

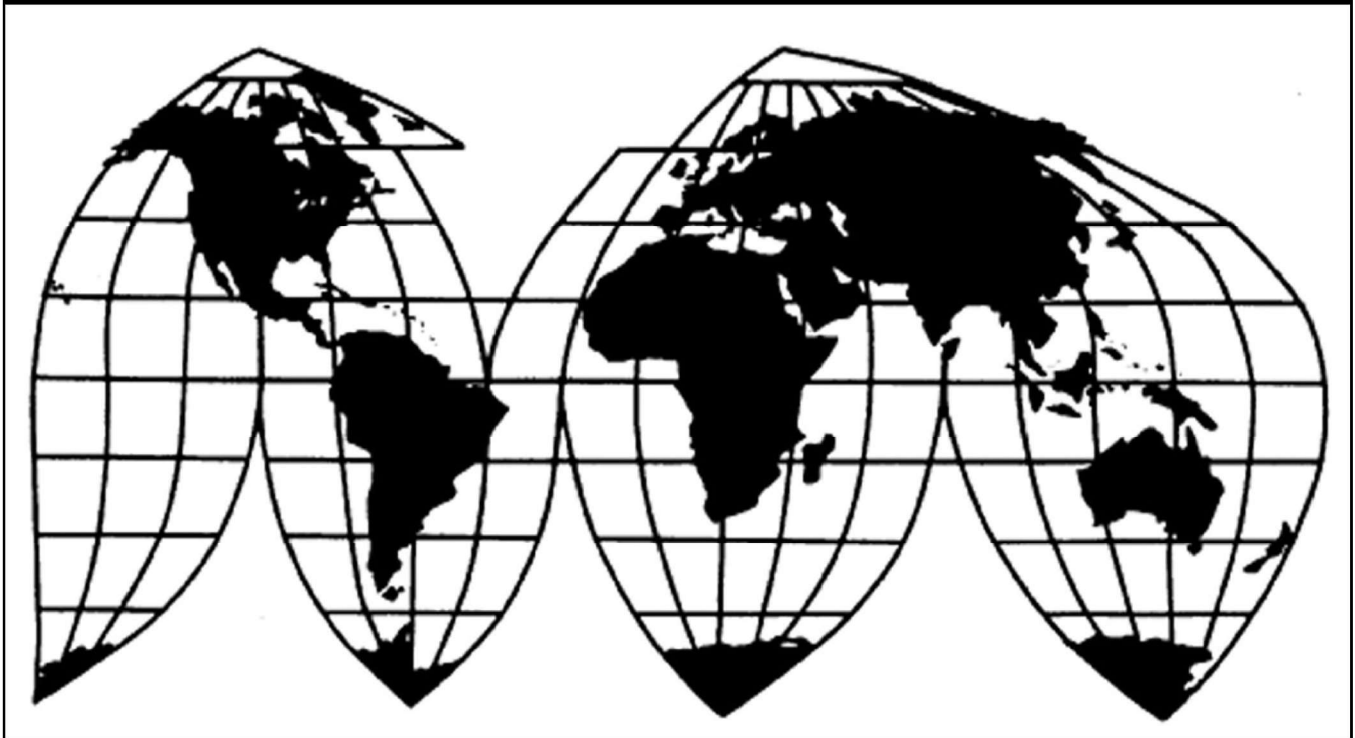
Hot-Rolled Steel from Australia, Brazil, Japan, Netherlands, Russia, South Korea, Turkey, and the United Kingdom

Investigation Nos. 701-TA-545-546 and 731-TA-1291-1297 (Review),
and 731-TA-808 (Fourth Review)

Publication 5380

November 2022

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
Dissenting Views of Commissioners Rhonda K. Schmittlein and Randolph J. Stayin	108
Part I: Introduction	I-1
Background.....	I-1
The original Russia investigation	I-3
Suspension agreement	I-3
The first five-year review of the suspended Russia investigation.....	I-4
The second five-year review of the suspended Russia investigation.....	I-5
Termination of suspension agreement	I-5
The third five-year review of the Russia antidumping duty order	I-5
The original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and United Kingdom investigations.....	I-6
Previous and related investigations	I-7
Summary data	I-11
Statutory criteria	I-18
Organization of report.....	I-20
Commerce’s reviews	I-23
Administrative reviews and other proceedings	I-23
Changed circumstances reviews	I-30
Five-year reviews.....	I-31
The subject merchandise	I-35
Commerce’s scope	I-35
Tariff treatment	I-37
The product	I-45
Description and applications	I-45
Manufacturing processes	I-47
Domestic like product issues.....	I-51

CONTENTS

	Page
Part I: Introduction	
U.S. market participants.....	I-52
U.S. producers	I-52
U.S. importers.....	I-57
U.S. purchasers	I-60
Apparent U.S. consumption and market shares	I-61
Quantity.....	I-61
Value.....	I-66
Part II: Conditions of competition in the U.S. market	II-1
U.S. market characteristics.....	II-1
Impact of section 232 tariffs	II-2
Channels of distribution	II-3
Distributor shipments by end-use markets.....	II-6
Geographic distribution	II-7
Supply and demand considerations	II-8
U.S. supply	II-8
U.S. demand	II-14
Substitutability issues.....	II-21
Factors affecting purchasing decisions.....	II-21
Purchase factor comparisons of domestic products, subject imports, and nonsubject imports	II-28
Comparison of U.S.-produced and imported hot-rolled steel	II-38
Elasticity estimates.....	II-51
U.S. supply elasticity.....	II-51
U.S. demand elasticity	II-51
Substitution elasticity.....	II-51

CONTENTS

	Page
Part III: Condition of the U.S. industry	III-1
Overview	III-1
Changes experienced by the industry	III-2
Anticipated changes in operations.....	III-8
U.S. production, capacity, and capacity utilization.....	III-9
Alternative products.....	III-15
Constraints on capacity	III-16
U.S. producers' U.S. shipments and exports.....	III-16
U.S. producers' inventories.....	III-18
U.S. producers' imports from subject sources.....	III-19
U.S. producers' purchases of imports from subject sources	III-23
U.S. employment, wages, and productivity	III-26
Financial experience of U.S. producers.....	III-27
Background.....	III-27
Operations on hot-rolled steel flat products	III-29
Net sales	III-36
Quantity.....	III-37
Value.....	III-37
Cost of goods sold	III-38
Raw material cost	III-38
Direct labor cost and other factory costs.....	III-41
Gross profit or loss	III-43
SG&A expenses and operating income or loss.....	III-45
Interest expense, other expenses and income, and net income or loss.....	III-46
Capital expenditures and research and development expenses	III-47
Assets and return on assets.....	III-52

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 countries.....	IV-2
Cumulation considerations	IV-14
Fungibility	IV-14
Geographical markets	IV-18
Presence in the market	IV-20
U.S. inventories of imported merchandise	IV-28
U.S. importers' imports subsequent to March 2022	IV-34
The industry in Australia	IV-35
Overview.....	IV-35
Changes in operations.....	IV-36
Operations on hot-rolled steel.....	IV-37
Affiliation	IV-46
Alternative products.....	IV-46
Exports.....	IV-46
The industry in Brazil.....	IV-51
Overview.....	IV-51
Changes in operations.....	IV-53
Operations on hot-rolled steel.....	IV-55
Affiliation	IV-65
Alternative products.....	IV-65
Exports.....	IV-66

CONTENTS

	Page
Part IV: U.S. imports and the foreign industries.....	
The industry in Japan	IV-70
Overview.....	IV-70
Changes in operations.....	IV-72
Operations on hot-rolled steel	IV-74
Affiliation	IV-85
Alternative products.....	IV-86
Exports.....	IV-87
The industry in Netherlands.....	IV-92
Overview.....	IV-92
Changes in operations.....	IV-93
Operations on hot-rolled steel	IV-94
Affiliation	IV-104
Alternative products.....	IV-105
Exports.....	IV-105
The industry in Russia	IV-110
Overview.....	IV-110
Changes in operations.....	IV-112
Operations on hot-rolled steel	IV-113
Affiliation	IV-124
Alternative products.....	IV-124
Exports.....	IV-125
The industry in South Korea.....	IV-130
Overview.....	IV-130
Changes in operations.....	IV-132
Operations on hot-rolled steel	IV-133
Affiliation	IV-144
Alternative products.....	IV-145

CONTENTS

	Page
Part IV: U.S. imports and the foreign industries.....	
Exports.....	IV-145
The industry in Turkey.....	IV-150
Overview.....	IV-150
Changes in operations.....	IV-152
Operations on hot-rolled steel.....	IV-153
Affiliation.....	IV-164
Alternative products.....	IV-164
Exports.....	IV-165
The industry in the United Kingdom.....	IV-170
Overview.....	IV-170
Changes in operations.....	IV-172
Operations on hot-rolled steel.....	IV-173
Alternative products.....	IV-184
Affiliation.....	IV-184
Exports.....	IV-184
Subject countries combined.....	IV-189
Third-country trade actions.....	IV-197
Global market.....	IV-199
Global production and apparent consumption.....	IV-204
Global prices.....	IV-205
Part V: Pricing data.....	V-1
Factors affecting prices.....	V-1
Raw material costs.....	V-1
Energy costs.....	V-3
Transportation costs to the U.S. market.....	V-5

CONTENTS

	Page
Part V: Pricing data	
Pricing practices	V-5
Pricing methods.....	V-5
Sales terms and discounts	V-8
Price leadership	V-8
Price data.....	V-9
Price trends.....	V-36
Price comparisons	V-47

CONTENTS

Page

Appendixes

A. Federal Register notices.....	A-1
B. List of hearing witnesses.....	B-1
C. Summary data	C-1
D. Effects of orders and likley effects of revocation	D-1
E. Data accompanying figures in Parts II and V	E-1
F. U.S. imports subject to Chapter 99 provisions	F-1
G. Firm-specific financial data	G-1
H. U.S. producers' U.S. shipments and foreign producers' shipments by shipment type..	H-1
J. U.S. producers' U.S. shipments by shipment type.....	J-1
L. Scope of the order for Russia.....	L-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-545-546 and 731-TA-1291-1297 (Review),

and 731-TA-808 (Fourth Review)

Hot-Rolled Steel from Australia, Brazil, Japan, Netherlands,

Russia, South Korea, Turkey, and the United Kingdom

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 hot-rolled steel flat products (“hot-rolled steel”) from South Korea and the antidumping duty orders on hot-rolled steel from Australia, Japan, Netherlands, Russia, South Korea, Turkey, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. The Commission further determines that revocation of the countervailing duty and antidumping duty orders on hot-rolled steel from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²

BACKGROUND

The Commission instituted these reviews on September 1, 2021 (86 FR 49057) and determined on December 6, 2021 that it would conduct full reviews (87 FR 3123, January 20, 2022). 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 June 16, 2022 (87 FR 36343). The Commission conducted its hearing on September 15, 2022. 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)).

² Commissioners Rhonda K. Schmidlein and Randolph J. Stayin determine that revocation of the countervailing duty orders on hot-rolled steel from Brazil and South Korea and the antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, Netherlands, Russia, South Korea, Turkey, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

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 certain hot-rolled steel flat products (“hot-rolled steel”) from South Korea and the antidumping duty orders on hot-rolled steel from Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. We also determine that revocation of the antidumping and countervailing duty orders on hot-rolled steel from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹

I. Background

*Original Investigations of Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom:*² On August 11, 2015, six U.S. producers of hot-rolled steel filed petitions concerning imports of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea,³ Turkey, and the United Kingdom.⁴ In September 2016, the Commission determined that an industry in the United States was materially injured by reason of imports of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom that had been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and by imports of hot-rolled steel from Brazil and South Korea that had been found by Commerce to be subsidized by the

¹ Commissioners Rhonda K. Schmittlein and Randolph J. Stayin determine that revocation of the countervailing duty orders on hot-rolled steel from Brazil and South Korea and the antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. Except where noted, they join sections I-III.E.2 and IV of these views. See Dissenting Views of Commissioners Rhonda K. Schmittlein and Randolph J. Stayin.

² The “original investigations” or “2016 investigations” hereinafter refers to the investigations of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom in *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Pub. 4638 (Sep. 2016) (“*Original Determinations*”).

³ For consistency, we use the term “South Korea” throughout, including where in prior proceedings the term “Korea” was used.

⁴ The six petitioners were AK Steel Corporation (“AK Steel”); ArcelorMittal USA, LLC (“ArcelorMittal USA”); Nucor Corporation (“Nucor”); SSAB Enterprises, LLC (“SSAB”); Steel Dynamics Inc. (“SDI”); and United States Steel Corporation (“U.S. Steel”).

governments of Brazil and South Korea.⁵ On October 3, 2016, Commerce issued antidumping duty orders on imports of hot-rolled steel from Australia, Brazil, Japan, South Korea, Turkey, and the United Kingdom, and countervailing duty orders on imports of hot-rolled steel from Brazil and South Korea.⁶

Original Investigations of Imports from Russia: On September 30, 1998, petitions were filed with Commerce and the Commission on imports of hot-rolled steel from Brazil, Japan, and Russia. In June 1999, the Commission determined that an industry in the United States was materially injured by reason of LTFV imports of hot-rolled steel from Japan.⁷ Commerce issued an antidumping duty order on hot-rolled steel imports from Japan in June 1999.⁸ On July 6, 1999, Commerce signed suspension agreements with Brazil and Russia, and on the same date, petitioners requested continuation of the corresponding final investigations.⁹ In August 1999, the Commission determined that an industry in the United States was being materially injured by reason of subsidized and LTFV imports of hot-rolled steel from Brazil and LTFV imports of hot-rolled steel from Russia.¹⁰

First Reviews: On May 4, 2004, the Commission instituted the first five-year reviews of the antidumping duty orders on hot-rolled steel from Brazil and Japan,¹¹ the suspended

⁵ *Original Determinations*, USITC Pub. 4638 at 3. The Commission determined that imports of hot-rolled steel from Turkey that were subsidized by the government of Turkey were negligible. *Id.*

⁶ *Certain Hot-Rolled Steel Flat Products From Brazil and the Republic of Korea: Amended Final Affirmative Countervailing Duty Determinations and Countervailing Duty Orders*, 81 Fed. Reg. 67962, (Oct. 3, 2016); *Certain Hot-Rolled Steel Flat Products From Australia, Brazil, Japan, the Republic of Korea, the Netherlands, the Republic of Turkey, and the United Kingdom: Amended Final Affirmative Antidumping Determinations for Australia, the Republic of Korea, and the Republic of Turkey and Antidumping Duty Orders*, 81 Fed. Reg. 67960 (Oct. 3, 2016).

⁷ *Certain Hot-Rolled Steel Products from Japan*, Inv. No. 731-TA-807 (Final), USITC Pub. 3202 (June 1999) (“*Original Japan Determination*”). In making its determination on subject imports from Japan, the Commission cumulated subject imports from Brazil, Japan, and Russia. *Id.* at 6-9.

⁸ *Antidumping Duty Order; Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Japan*, 64 Fed. Reg. 34778 (June 29, 1999).

⁹ *Suspension of Antidumping Duty Investigation: Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From the Russian Federation*, 64 Fed. Reg. 38642 (July 19, 1999); *Suspension of Antidumping Duty Investigation: Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From Brazil*, 64 Fed. Reg. 38792 (July 19, 1999); *Suspension of Countervailing Duty Investigation: Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From Brazil*, 64 Fed. Reg. 38797 (July 19, 1999).

¹⁰ *Certain Hot-Rolled Steel Products from Brazil and Russia*, Inv. Nos. 701-TA-384, 731-TA-806, 808 (Final), USITC Pub. 3223 (Aug. 1999). In these determinations, the Commission adopted the substantive analysis for cumulated subject imports it made in the *Original Japan Determination*. *Id.* at 3-5.

¹¹ Commerce terminated the suspension agreement with respect to the antidumping duty investigation of hot-rolled steel from Brazil in February 2001 after finding that producers in Brazil violated the agreement. Commerce issued an antidumping duty order in its place in March 2001. *Certain Hot-Rolled Flat-Rolled Carbon Quality Steel Products From Brazil: Final Results of Antidumping* (Continued...)

countervailing duty investigation on hot-rolled steel from Brazil, and the suspended antidumping duty investigation on hot-rolled steel from Russia. The Commission conducted full reviews. In September 2004, at the request of the government of Brazil, Commerce terminated the suspension agreement on subject imports from Brazil and issued a countervailing duty order in its place.¹² In April 2005, the Commission made affirmative five-year review determinations,¹³ and in May 2005, Commerce issued notices continuing the countervailing duty order on hot-rolled steel from Brazil, the antidumping duty orders on hot-rolled steel from Brazil and Japan, and the suspension agreement on hot-rolled steel from Russia.¹⁴

Second Reviews: On April 1, 2010, the Commission instituted its second five-year reviews.¹⁵ The Commission conducted full reviews. On June 6, 2011, the Commission made an affirmative determination in its review of the suspended antidumping duty investigation on imports from Russia,¹⁶ and made negative determinations in its reviews concerning the countervailing duty order on imports from Brazil and the antidumping duty orders on imports from Brazil and Japan.¹⁷ Commerce continued the suspension agreement on hot-rolled steel imports from Russia and revoked the orders on imports from Brazil and Japan.¹⁸

Duty Administrative Review and Termination of the Suspension Agreement, 67 Fed. Reg. 6226 (Feb. 11, 2001); *Antidumping Duty Order: Certain Hot-Rolled Flat-Rolled Carbon Quality Steel Products from Brazil*, 67 Fed. Reg. 11093 (Mar. 12, 2001).

¹² *Agreement Suspending the Countervailing Duty Investigation on Hot-Rolled Flat-Rolled Carbon-Quality Steel From Brazil; Termination of Suspension Agreement and Notice of Countervailing Duty Order*, 69 Fed. Reg. 56040 (Sep. 17, 2004).

¹³ *Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384, 731-TA-806-808 (Review), USITC Pub. 3767 (Apr. 2005) (“*First Five-Year Review Determinations*”). In making its determinations, the Commission cumulated subject imports from Brazil, Japan, and Russia. *Id.* at 11-23.

¹⁴ *Continuation of Antidumping Duty Orders; Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Brazil and Japan*, 70 Fed. Reg. 30413 (May 26, 2005); *Continuation of Countervailing Duty Order; Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Brazil*, 70 Fed. Reg. 30417 (May 26, 2005); and *Continuation of Suspended Antidumping Duty Investigation: Certain Hot-Rolled Flat-Rolled Carbon Quality Steel Products from the Russian Federation*, 70 Fed. Reg. 32571 (June 3, 2005).

¹⁵ 75 Fed. Reg. 16504 (Apr. 1, 2010).

¹⁶ *Hot-Rolled Flat Rolled Carbon-Quality Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Second Review), USITC Pub. 4237 (June 2011) (“*Second Five-Year Review Determinations*”).

¹⁷ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 1. In these determinations, the Commission exercised its discretion not to cumulate any of the subject imports. *Id.* at 18.

¹⁸ *Continuation of Suspended Antidumping Duty Investigation on Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from the Russian Federation*, 76 Fed. Reg. 35400 (June 17, 2011); *Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Brazil and Japan: Revocation of the Antidumping Duty Orders on Brazil and Japan and the Countervailing Duty Order on Brazil*, 76 Fed. Reg. 36081 (June 21, 2011).

In December 2014, Commerce terminated the suspension agreement on imports from Russia and issued an antidumping duty order in its place.¹⁹

Third Review: The Commission instituted the third five-year review of the antidumping duty order on hot-rolled steel from Russia on May 2, 2016.²⁰ It conducted an expedited review and determined that revocation of the antidumping duty order on hot-rolled steel from Russia would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²¹ Commerce subsequently published a continuation of the antidumping duty order.²²

Current Reviews: On September 1, 2021, the Commission instituted these first five-year reviews of the countervailing duty orders on hot-rolled steel from Brazil and South Korea and antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom, and the fourth review²³ of the antidumping duty order on hot-rolled steel from Russia.²⁴ Nucor, SSAB, SDI, U.S. Steel (collectively, “Four Domestic Producers”), Cleveland-Cliffs Inc. (“Cleveland-Cliffs”), and North Star BlueScope Steel (“North Star”), U.S. producers of hot-rolled steel, responded to the notice of institution.²⁵ Nine respondent foreign producers/exporters or governments also responded to the notice of institution: Australian producer BlueScope Steel Ltd. (“BlueScope Limited”); Brazilian producers Companhia Siderúrgica Nacional S.A. (“CSN”) and Usinas Siderúrgicas de Minas Gerais S.A. – USIMINAS (“USIMINAS”) (collectively, “Brazilian Respondents” or “CSN and USIMINAS”), and the Government of Brazil; Japanese producers Nippon Steel Corporation (“NSC”) and JFE Steel

¹⁹ *Termination of the Suspension Agreement on Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From the Russian Federation, Rescission of 2013-2014 Administrative Review, and Issuance of Antidumping Duty Order*, 79 Fed. Reg. 77455 (Dec. 24, 2014) (“Russia AD Order”).

²⁰ *Hot-Rolled Flat-Rolled Carbon Quality Steel Products from Russia; Institution of a Five-Year Review*, 81 Fed. Reg. 26256 (May 2, 2016).

²¹ *Hot-Rolled Flat Rolled Carbon-Quality Steel Products from Russia*, Inv. No. 731-TA-808 (Third Review), USITC Pub. 4639 (Sep. 2016) (“Third Review Determination”).

²² *Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From the Russian Federation: Continuation of Antidumping Duty Order*, 81 Fed. Reg. 72569 (Oct. 20, 2016).

²³ The Commission in consultation with Commerce may group reviews when appropriate to promote administrative efficiency. See 19 U.S.C. § 1675(c)(5)(D) and Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act, H.R. Rep. No. 103-316, Vol. I at 881 (1994).

²⁴ *Hot-Rolled Steel Flat Products From Australia, Brazil, Japan, Korea, the Netherlands, Russia, Turkey, and the United Kingdom; Institution of Five-Year Reviews*, 86 Fed. Reg. 49057 (Sep. 1, 2021).

²⁵ Nucor/SDI/SSAB/U.S. Steel Response to the Commission’s Notice of Institution, (Sep. 30, 2021); Cleveland-Cliffs Response to the Commission’s Notice of Institution, (Sep. 30, 2021). Domestic producer North Star and its parent company, BlueScope Limited, an Australian producer/exporter of subject merchandise, filed a combined response opposing continuation of the antidumping duty order on imports from Australia, as well as comments on adequacy requesting that the Commission conduct a full review of the order. BlueScope Response to the Commission’s Notice of Institution, (Oct. 1, 2021) (“BlueScope Response”); BlueScope Comments on Adequacy, (Nov. 16, 2021) at 2.

Corporation (“JFE Steel”); a producer in the Netherlands, Tata Steel IJmuiden BV (“TSIJ”); Turkish producer Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (“Erdemir”); and a producer in the United Kingdom, Tata Steel UK, Ltd. (“TSUK”).²⁶

On December 6, 2021, the Commission found that the domestic interested party group response was adequate for all reviews and that the respondent interested party group response was adequate for the reviews of the orders concerning hot-rolled steel from Australia, Brazil, Japan, the Netherlands, Turkey, and the United Kingdom.²⁷ Therefore, the Commission decided to conduct full reviews with respect to the orders concerning hot-rolled steel imports from Australia, Brazil, Japan, the Netherlands, Turkey, and the United Kingdom.²⁸

The Commission further found that the respondent interested party group responses with respect to Russia and South Korea were inadequate.²⁹ The Commission determined to conduct full reviews concerning the antidumping and countervailing duty orders on hot-rolled steel from South Korea and the antidumping duty order on hot-rolled steel from Russia to promote administrative efficiency in light of its decision to conduct full reviews with respect to the orders concerning hot-rolled steel from Australia, Brazil, Japan, the Netherlands, Turkey, and the United Kingdom.³⁰

The Commission received a joint prehearing brief filed on behalf of the Four Domestic Producers.³¹ Domestic producers California Steel Industries (“CSI”), Nucor, SSAB, and SDI filed a joint posthearing brief, and U.S. Steel individually filed a posthearing brief.³² Domestic producer Cleveland-Cliffs individually filed prehearing and posthearing briefs and final

²⁶ BlueScope Response; USIMINAS Response to the Commission’s Notice of Institution (Oct. 1, 2021) at 11; CSN Response to the Commission’s Notice of Institution, (Oct. 1, 2021); GOB Response to the Commission’s Notice of Institution, (Sep. 30, 2021); NSC Response to the Commission’s Notice of Institution, (Oct. 1, 2021) at 14; JFE Response to the Commission’s Notice of Institution, (Oct. 1, 2021); Tokyo Steel Response to the Commission’s Notice of Institution, (Oct. 1, 2021); TSIJ Steel Response to the Commission’s Notice of Institution, (Oct. 1, 2021) at 7; Erdemir Steel Response to the Commission’s Notice of Institution, (Sep. 30, 2021); Tata Steel UK, Ltd. Response to the Commission’s Notice of Institution, (Oct. 1, 2021). The Commission did not receive any response to the notice of institution from producers, exporters, or importers of hot-rolled steel from Russia or South Korea.

²⁷ *Notice of Commission Determination To Conduct Full Five-Year Reviews; Hot-Rolled Steel Flat Products From Australia, Brazil, Japan, Korea, the Netherlands, Russia, Turkey, and the United Kingdom*, 87 Fed. Reg. 31323 (Jan. 20, 2022) (“*Full Review Notice*”); *Hot-Rolled Steel Flat Products From Australia, Brazil, Japan, Korea, Netherlands, Russia, Turkey, and the United Kingdom; Scheduling of Full Five-Year Reviews*, 87 Fed. Reg. 36343 (June 16, 2022) (“*Scheduling Notice*”).

²⁸ *Full Review Notice*, 87 Fed. Reg. 31323, 3124.

²⁹ *Full Review Notice*, 86 Fed. Reg. 31323, 3124.

³⁰ *Full Review Notice*, 86 Fed. Reg. 31323, 3124.

³¹ Four Domestic Producers’ Prehearing Brief, EDIS Doc. 779759 (Sep. 8, 2022).

³² Nucor, SCI, SSAB, and SDI Posthearing Brief, EDIS Doc. 781024 (Sep. 26, 2022); United States Steel Corporation Posthearing Brief, EDIS Doc. 781007 (Sep. 26, 2022) (“U.S. Steel’s Posthearing Brief”). These five domestic producers also filed joint final comments.

comments,³³ and domestic producer ArcelorMittal North America filed posthearing comments.³⁴

Prehearing and posthearing briefs were received from foreign producers in Australia, Brazil, Japan, the Netherlands, South Korea, and Turkey and from importers of the subject merchandise from Australia and South Korea. The following respondents or groups of respondents filed briefs and final comments:

- BlueScope Limited, a foreign producer and exporter in Australia, BlueScope Steel America, an affiliated U.S. importer of the subject merchandise, North Star, an affiliated U.S. producer, and Steelscape, LLC (“Steelscape”), an affiliated U.S. purchaser (collectively “BlueScope”);
- Two producers of hot-rolled steel in Brazil, CSN and USIMINAS;
- Three producers of hot-rolled steel in Japan, NSC, JFE Steel, and Kobe Steel, Ltd. (“Kobe Steel”) (collectively, “Japanese Respondents”);
- POSCO and POSCO International Corporation, foreign producers and exporters of the subject merchandise in South Korea, and POSCO America Corporation, a U.S. importer of subject merchandise (collectively, “POSCO”);
- TSIJ, a producer and exporter of hot-rolled steel in the Netherlands;
- Two producers of hot-rolled steel in Turkey, Erdemir and Habaş Sinai ve Tibbi Gazlar Istihsal Endüstrisi A.Ş. (“Habaş”) (collectively, “Erdemir”).³⁵

³³ Posthearing Brief of Cleveland-Cliffs, EDIS Doc. 781014 (Sep. 26, 2022) (“Cleveland-Cliffs’ Posthearing Brief”); Prehearing Brief of Cleveland-Cliffs, EDIS Doc. 779719 (Sep. 8, 2022) (“Cleveland-Cliffs’ Prehearing Brief”). Nucor, SSAB, SDI, U.S. Steel, and Cleveland-Cliffs are collectively referred to as the “Domestic Producers.”

³⁴ Comments of ArcelorMittal North America, EDIS Doc. 781019 (Sep. 26, 2022).

³⁵ BlueScope's Prehearing Brief, EDIS Doc. 779740 (Sep. 8, 2022); BlueScope's Posthearing Brief, EDIS Doc. 781018 (Sep. 26, 2022); Prehearing Brief of CSN and USIMINAS, EDIS Doc. 779734 (Sep. 8, 2022); Posthearing Brief of CSN and USIMINAS, EDIS Doc. 781023 (Sep. 26, 2022); Prehearing Brief of Nippon Steel Corporation, JFE Steel Corporation, and Kobe Steel, Ltd., EDIS Doc. 779712 (Sep. 8, 2022) (“Japanese Respondents’ Prehearing Brief”); Posthearing Brief of Nippon Steel Corporation, JFE Steel Corporation, and Kobe Steel, Ltd., EDIS Doc. 781010 (Sep. 26, 2022) (“Japanese Respondents’ Posthearing Brief”); POSCO’s Prehearing Brief, EDIS Doc. 779720 (Sep. 8, 2022); POSCO’s Posthearing Brief, EDIS Doc. 780997 (Sep. 26, 2022); TSIJ Prehearing Brief, EDIS Doc. 779763 (Sep. 8, 2022); TSIJ Posthearing Brief, EDIS Doc. 781052 (Sep. 26, 2022).

The governments of Brazil and South Korea also filed prehearing briefs.³⁶ The Commission did not receive briefs from any producers, exporters, or importers of hot-rolled steel from Russia or the United Kingdom.

Representatives from the Four Domestic Producers, Cleveland-Cliffs, BlueScope, the Brazilian Respondents, Erdemir, the Japanese Respondents, POSCO, TSIJ and importers of its products (Thomas Steel Strip Corp. and Steel Warehouse Company LLC), as well as representatives from the governments of Brazil, South Korea, and the Netherlands, also appeared at the Commission's hearing. A representative from the United Steel, Paper and Forestry, Rubber Manufacturing, Energy, Allied Industrial and Service Workers International Union ("USW") also appeared at the Commission's hearing.³⁷

U.S. industry data are based on questionnaire responses from 11 U.S. producers that are believed to account for *** percent of U.S. production of hot-rolled steel during 2021.³⁸ U.S. import data are based on official Commerce import statistics and the responses of 34 U.S. importers of hot-rolled steel that are believed to have accounted for *** subject imports and 96.6 percent of all imports of hot-rolled steel in 2021.³⁹

Data and related information concerning the hot-rolled steel industries in subject countries are based on industry research data, public export data, and foreign producer questionnaire responses.⁴⁰

³⁶ Government of Brazil's Prehearing Brief, EDIS Doc. 779545 (Sep. 8, 2022); "Government of South Korea's Prehearing Brief", EDIS Doc. 779714 (Sep. 8, 2022).

³⁷ In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing through written witness testimony and videoconference held on September 15, 2022, as set forth in procedures provided to the parties. *Scheduling Notice*, 87 Fed. Reg. 36343.

³⁸ Confidential Report, Memorandum INV-UU-098 (Oct. 11, 2022) ("CR"); *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, Netherlands, Russia, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-546 and 731-TA-1291-1297 (Review) and 731-TA-808 (Fourth Review), USITC Pub. 5380 (Oct. 2022) ("PR") at I-20, I-52, and III-1.

³⁹ CR/PR at I-21, IV-1.

⁴⁰ The Commission received a questionnaire response from one firm that accounted for *** of hot-rolled steel production in Australia in 2021. CR/PR at I-21-22, IV-35. It received responses from three Brazilian firms, which accounted for *** percent of hot-rolled steel production in Brazil in 2021. CR/PR at I-21-22, IV-51-52. It received questionnaire responses from four Japanese firms, which accounted for *** production of hot-rolled steel in Japan in 2021. CR/PR at I-21-22, IV-70-71. The Commission received a questionnaire response of one firm that accounted for all known production of hot-rolled steel production in the Netherlands in 2021. CR/PR at I-21-22, IV-92-93. It received responses from two Russian firms, which accounted for approximately *** percent of hot-rolled steel production in Russia in 2021. CR/PR at I-21-22, IV-110-111. The Commission received responses from three firms that accounted for *** percent of hot-rolled steel production in South Korea in 2021. CR/PR at I-21-22, IV-130-131. It also received questionnaire responses from two Turkish firms which accounted for *** percent of hot-rolled steel production in Turkey in 2021. CR/PR at I-21-22, IV-150-151 (coverage (Continued...))

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.”⁴¹ 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.”⁴² 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.⁴³

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

{C}ertain hot-rolled, flat-rolled steel products, with or without patterns in relief, and whether or not annealed, painted, varnished, or coated with plastics or other non-metallic substances. The products covered do not include those that are clad, plated, or coated with metal. The products covered include coils that have a width or other lateral measurement (“width”) of 12.7 mm or greater, regardless of thickness, and regardless of form of coil (e.g., in successively superimposed layers, spirally oscillating, etc.). The products covered also include products not in coils (e.g., in straight lengths) of a thickness of less than 4.75 mm and a width that is 12.7 mm or greater and that measures at least 10 times the thickness. The products described above may be rectangular, square, circular, or other shape and include products of either rectangular or non-rectangular cross-section where such cross-section is achieved

figure is calculated from *** gross production data which includes nonsubject producer Colakoglu from which the Commission did not receive a questionnaire). Finally, the Commission received a questionnaire response from one firm that accounted for *** production of hot-rolled steel in the United Kingdom in 2021. CR/PR at I-21-22, IV-170-171.

⁴¹ 19 U.S.C. § 1677(4)(A).

⁴² 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. Dep’t 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).

⁴³ 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).

subsequent to the rolling process, i.e., products which have been “worked after rolling” (e.g., products which have been beveled or rounded at the edges).

For purposes of the width and thickness requirements referenced above:

(1) Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above unless the resulting measurement makes the product covered by the existing antidumping or countervailing duty orders on Certain Cut-To-Length Carbon-Quality Steel Plate Products From the Republic of Korea (A-580-836; C-580-837), and

(2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross-section, the width of certain products with non-rectangular shape, etc.), the measurement at its greatest width or thickness applies.

Steel products included in the scope of these investigations are products in which: (1) Iron predominates, by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

- 2.50 percent of manganese, or
- 3.30 percent of silicon, or
- 1.50 percent of copper, or
- 1.50 percent of aluminum, or
- 1.25 percent of chromium, or
- 0.30 percent of cobalt, or
- 0.40 percent of lead, or
- 2.00 percent of nickel, or
- 0.30 percent of tungsten, or
- 0.80 percent of molybdenum, or
- 0.10 percent of niobium, or
- 0.30 percent of vanadium, or
- 0.30 percent of zirconium.

Unless specifically excluded, products are included in this scope regardless of levels of boron and titanium.

For example, specifically included in this scope are vacuum degassed, fully stabilized (commonly referred to as interstitial-free (IF)) steels, high strength low alloy (HSLA) steels, the substrate for motor lamination steels, Advanced High Strength Steels (AHSS), and Ultra High Strength Steels (UHSS). IF steels are recognized as low carbon steels with micro-alloying levels of elements such as titanium and/or niobium added to stabilize carbon and nitrogen elements. HSLA steels are recognized as steels with micro-alloying levels of elements such as chromium, copper, niobium, titanium, vanadium, and molybdenum. The substrate for motor lamination steels contains micro-alloying levels of elements such as silicon and aluminum. AHSS and UHSS are considered high tensile strength and high elongation steels, although AHSS and UHSS are covered whether or not they are high tensile strength or high elongation steels.

Subject merchandise includes hot-rolled steel that has been further processed in a third country, including but not limited to pickling, oiling, levelling, annealing, tempering, temper rolling, skin passing, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the hot-rolled steel.

All products that meet the written physical description, and in which the chemistry quantities do not exceed any one of the noted element levels listed above, are within the scope of these investigations unless specifically excluded. The following products are outside of and/or specifically excluded from the scope of these investigations:

- Universal mill plates (i.e., hot-rolled, flat-rolled products not in coils that have been rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, of a thickness not less than 4.0 mm, and without patterns in relief);
- Products that have been cold-rolled (cold-reduced) after hot-rolling;
- Ball bearing steels;

- Tool steels; and
- Silico-manganese steels.⁴⁴

The scope definition set out above for the orders covering hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom, as well as the scope definition for the order covering Russia, have not substantively changed since the original investigations⁴⁵ and are substantially the same in all reviews.⁴⁶ Commerce has issued no scope rulings since the original investigations.⁴⁷

Hot-rolled steel is steel sheet, either in coils or not in coils, that is an input used in a variety of downstream steel products such as cold-rolled and corrosion-resistant steel, pipes and tubes, construction materials, automobiles, and appliances.⁴⁸ A large share of hot-rolled steel is internally consumed or sold to related firms to produce downstream products.⁴⁹

In the prior proceedings, the Commission defined a single domestic like product, consisting of hot-rolled steel, coextensive with Commerce's scope definitions, and no party argued for a different definition in the final phase of the original investigations or prior reviews.⁵⁰

⁴⁴ *Certain Hot-Rolled Steel Flat Products From Australia, Brazil, Japan, the Republic of Korea, the Netherlands, the Republic of Turkey, and the United Kingdom: Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders*, 87 Fed. Reg. 751, 753 (Jan. 6, 2022); *Issues and Decision Memorandum for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Hot Rolled Steel Flat Products from Australia, Brazil, Japan, the Republic of Korea, the Netherlands, the Republic of Turkey, and the United Kingdom*, (Dec. 29, 2021) at 4-6 (footnotes omitted); *Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from the Russian Federation: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 86 Fed. Reg. 72577 (Dec. 16, 2021); *Issues and Decision Memorandum for the Expedited Sunset Review of the Antidumping Duty Order on Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from the Russian Federation* (Dec. 15, 2021) at 3; CR/PR at I-35-36.

⁴⁵ See CR/PR at I-35-37 and Appendix L.

⁴⁶ CR/PR at I-35 n.51.

⁴⁷ CR/PR at I-23.

⁴⁸ CR/PR at I-44-45.

⁴⁹ CR/PR at I-44, I-49.

⁵⁰ In the prior proceedings regarding imports of hot-rolled steel from Russia, the Commission defined a single domestic like product coextensive with Commerce's scope. *Original Japan Determination*, USITC Pub. 3202 at 5; *First Five-Year Review Determinations*, USITC Pub. 3767 at 8-9; *Second Review Determination*, USITC Pub. 4237 at 6; *Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Russia*, Inv. No. 731-TA-808 (Third Review), USITC Pub. 4639 (Sep. 2016) ("*Third Five-Year Review Determinations*") at 6.

In the preliminary phase of the original investigations regarding imports from Australia, Brazil, Japan, South Korea, the Netherlands, Turkey, and the United Kingdom, the Commission rejected respondents' argument that thicker American Petroleum Institute grade X-70 hot-rolled steel coil should (Continued...)

The record in these reviews does not indicate that the characteristics and uses of domestically produced hot-rolled steel have changed since the prior proceedings that would warrant revisiting the definition of the domestic like product.⁵¹ No party argues for a different definition.⁵² Based on the foregoing, we define a single domestic like product, consisting of hot-rolled steel that is coextensive with Commerce's scope definitions.

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 the product."⁵³ 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.

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.⁵⁴ 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.⁵⁵ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.⁵⁶

be defined as a separate domestic like product. In the final phase of the investigations, there was no new information or argument and the Commission again defined the domestic like product coextensive with Commerce's scope definition. *Original Determinations*, USITC Pub. 4638 at 8-9.

⁵¹ See generally CR/PR at I-45 to I-50.

⁵² Four Domestic Producers' Prehearing Brief at 7; Cleveland-Cliff's Prehearing Brief at 11-13; CR/PR at I-50-51.

⁵³ 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.

⁵⁴ See 19 U.S.C. § 1677(4)(B).

⁵⁵ 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).

⁵⁶ 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);

(Continued...)

Original Investigations: In the original investigations regarding imports from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom, the Commission found that *** were either importers or were affiliated with foreign exporters and/or U.S. importers of hot-rolled steel.⁵⁷ However, the Commission found that appropriate circumstances did not exist to exclude any of the firms from the domestic industry under the related parties provision.⁵⁸ The Commission therefore defined the domestic industry as all U.S. producers of hot-rolled steel.⁵⁹

Russia Investigations and Reviews: In the original investigations and prior reviews concerning imports from Russia, the Commission found a single domestic industry consisting of all U.S. producers of hot-rolled steel. While multiple U.S. producers were found to have been, or may have been related parties, the Commission found that appropriate circumstances did not exist to exclude any producers from the domestic industry as related parties under 19 U.S.C. § 1677(4)(B).⁶⁰

Current Reviews. In these reviews, the Domestic Producers argue that the Commission should define the domestic industry as all U.S. producers of hot-rolled steel and that no domestic producer subject to the related parties provision be excluded from the domestic industry.⁶¹ Respondents presented no arguments concerning the definition of the domestic industry or the issue of related parties.

In these reviews, four U.S. producers shared a corporate affiliation with subject producers or U.S. importers of subject merchandise during the January 2016 through March 2022 period of review (“POR”).⁶² Below, we consider whether any of these producers are

(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.

⁵⁷ Confidential *Original Determinations*, EDIS Doc. 756007 at 13-14. The Commission indicated that two of these U.S. producers, ***, imported subject merchandise while one producer, ***, was related to a foreign exporter and an importer of subject merchandise. *Id.*

⁵⁸ *Original Determinations*, USITC Pub. 4638 at 11-12; Confidential *Original Determinations*, EDIS Doc. 756007 at 13-16.

⁵⁹ *Original Determinations*, USITC Pub. 4620 at 10.

⁶⁰ *Original Japan Determination*, USITC Pub. 3202 at 5-6; *First Five-Year Review Determinations*, USITC Pub. 3767 at 9-11; *Second Five-Year Review Determinations*, USITC Pub. 4237 at 7-9; *Third Five-Year Review Determinations*, USITC Pub. 4639 at 8.

⁶¹ Four Domestic Producers’ Prehearing Brief at 7-8, and n.6; Cleveland-Cliff’s Prehearing Brief at 13-14 n.33.

⁶² CR/PR at Table I-24. The Commission collected questionnaire data for the POR, but the record also contains information pertaining to years outside of the POR.

related parties and, if so, whether appropriate circumstances exist to exclude any domestic producers under the related parties provision in these reviews.

***. *** is subject to possible exclusion under the related parties provision because one of its corporate parents, ***, is a producer and exporter of hot-rolled steel in *** and also the parent corporation of an importer of subject merchandise, ***.⁶³ *** is also related to a producer and exporter of subject merchandise in ***, ***.⁶⁴

*** accounted for *** percent of domestic production during 2021 and supports continuation of the orders.⁶⁵ The ratio of *** subject imports to *** domestic production was consistently at low levels during the POR, ranging from *** percent in 2016 to *** percent in 2018.⁶⁶ *** only reported exporting subject merchandise to the United States *** and the volume equated to *** domestic production.⁶⁷ *** did not directly import or purchase subject merchandise during the POR and its affiliate's imports and/or exports to the United States were small relative to *** domestic production.⁶⁸ Further, there is no indication that *** ownership by *** or affiliation with *** caused it to perform differently during the POR than other domestic producers. In view of this information, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. One of *** corporate parents, ***, owns *** percent of *** and is a producer and exporter of hot-rolled steel in ***.⁶⁹ ***, a U.S. importer of subject merchandise from ***.⁷⁰ To the extent *** exercises "control" of ***,⁷¹ it is subject to possible exclusion under the

⁶³ CR/PR at Table I-24. *** is a 50 percent owner of ***. *Id.* 19 U.S.C. § 1677(4)(B)(ii)(II) ("the exporter or importer directly or indirectly controls the producer"). However, the record does not contain information to determine whether *** ownership interest in *** amounts to "control."

⁶⁴ CR/PR at Table I-24, IV-51. *** is a 50 percent owner of *** and owner of ***. *Id.* 19 U.S.C. § 1677(4)(B)(ii)(II) ("the exporter or importer directly or indirectly controls the producer"). However, the record does not contain information to determine whether *** ownership interest in *** amounts to "control."

⁶⁵ CR/PR at Tables I-24 and III-5.

⁶⁶ CR/PR at Table III-9.

⁶⁷ ***, EDIS Doc. 777389 at II.14.

⁶⁸ CR/PR at I-53 and III-22.

⁶⁹ CR/PR at Table I-24.

⁷⁰ CR/PR at Tables I-23-24. *** may also be related to ***, through ***. The relationship between *** and *** does not suggest that one controls the other. Specifically, the record does not contain information as to the extent of *** control of *** and vice versa through this joint venture with *** or whether this relationship has caused *** to act differently than they otherwise would. *See* 19 USC § 1677(4)(B)(ii)(IV) ("the producer and the exporter or importer directly or indirectly control a third party and there is reason to believe that the relationship causes the producer to act differently than a nonrelated producer").

⁷¹ *** ownership interest in *** at *** does not appear, based on the record in this review, to amount to "control." *See* 19 U.S.C. § 1677(4)(B)(ii)(II) (the exporter or importer directly or indirectly controls the producer); *id.* 1677(4)(B)(ii)(III) (a third party directly or indirectly controls the producer and the exporter or importer).

related parties provision. *** accounted for *** percent of domestic production during 2021 and supports continuation of the orders.⁷² The ratio of *** subject imports from *** to *** domestic production increased from *** percent in 2016 to *** percent in 2017, before steadily decreasing each remaining year of the POR to *** percent in 2021.⁷³ *** reported that it did not directly import or purchase subject merchandise, and its affiliate's imports and/or exports to the United States were small relative to *** domestic production.⁷⁴ Further, there is no indication that *** ownership by *** or affiliation with *** caused it to perform differently during the POR than other domestic producers. In view of this information, we find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision.

***. *** is a related party because it ***. Furthermore, *** wholly owns ***, a U.S. importer of subject merchandise from ***.⁷⁵ *** accounted for *** percent of domestic production during 2021 and ***.⁷⁶ *** imported subject merchandise from *** in 2016 and did not import subject merchandise from these two countries for the remainder of the POR.⁷⁷ *** also imported hot-rolled steel from *** during the POR, with such imports decreasing from *** short tons in 2016 to *** short tons in 2019 to *** in 2020 and 2021.⁷⁸ The ratio of *** subject imports to *** domestic production decreased from *** percent in 2016 to *** percent in 2019 and was *** percent in 2020 and 2021.⁷⁹ *** reported that it did not directly import or purchase subject merchandise, and its affiliate's imports and exports to the United States were small relative to *** domestic production.⁸⁰ In view of this information, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

⁷² CR/PR at Table III-5.

⁷³ ***, EDIS Doc. 778208 at II.7a; CR/PR at Table III-5. The ratio of *** exports of subject merchandise to *** domestic production in 2021 was minimal at *** percent. *Calculated from* CR/PR at Tables III-5 and IV-25.

⁷⁴ CR/PR at I-53.

⁷⁵ CR/PR at Table I-24.

⁷⁶ CR/PR at Table III-5.

⁷⁷ In 2016, *** imported *** short tons from *** (**% percent of *** total production) and *** short tons from *** (**% percent of *** total production). CR/PR at Table III-10.

⁷⁸ CR/PR at III-10.

⁷⁹ CR/PR at Table III-10. The ratio of *** exports of subject merchandise to the United States to *** domestic production was minimal, decreasing throughout the POR from *** percent in 2016 to *** in 2021. CR/PR at Tables III-5, IV-14.

⁸⁰ CR/PR at III-19, Table I-25. Additionally, *** reported that it did not export any subject merchandise to the United States that was destined to affiliated firms for further processing into in-scope product. CR/PR at IV-46. *** CR/PR at D-10.

***. *** is a related party because it shares common ownership with a U.S. importer of subject merchandise, ***.⁸¹ *** accounted for *** percent of domestic production during 2021, and it ***.⁸² *** only reported imports from *** in ***, and the ratio of those imports to *** production was less than *** percent.⁸³ *** did not directly import or purchase subject merchandise during the POR, and its affiliate's imports were small relative to *** domestic production. Further, there is no indication that *** affiliation with *** caused it to perform differently during the POR than other domestic producers. In view of this information, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

We therefore find that appropriate circumstances do not exist to exclude any domestic producers as related parties, and we define the domestic industry as all U.S. producers of hot-rolled steel.⁸⁴

⁸¹ CR/PR at III-19 n.8. *** also shares common ownership with a producer of hot-rolled steel in Russia, ***. However, there is no evidence in the record that *** exported subject merchandise to the U.S. market during the POR, and thus that *** is related to an exporter of subject merchandise from Russia. CR/PR at Table III-11.

⁸² CR/PR at Table III-5.

⁸³ CR/PR at III-19, Table III-11.

⁸⁴ While domestic producers *** and *** do not directly import subject merchandise, they may be subject to the related parties provision because they purchased subject merchandise from *** during the POR. CR/PR at Tables III-13 and III-14. A domestic producer shall be considered to be a related party if it directly or indirectly controls an exporter, importer, or third party. 19 U.S.C. § 1677(4)(B). A domestic producer that does not itself import subject merchandise or does not share a corporate affiliation with an importer may nonetheless be deemed a related party if it controls large volumes of imports. See SAA at 858. The Commission has found such control to exist where the domestic producer's purchases were responsible for a predominant proportion of an importer's subject imports and the importer's subject imports were substantial. See, e.g., *Iron Construction Castings from Brazil, Canada, and China*, Inv. Nos. 701-TA-248, 731-TA-262-263, 265 (Fourth Review), USITC Pub. 4655 at 11 (Dec. 2016); *Chlorinated Isocyanurates from China and Spain*, Inv. Nos. 731-TA-1082-1083 (Second Review), USITC Pub. 4646 at 12 (Nov. 2016).

*** purchases of subject imports from *** totaled *** short tons in 2021 and *** short tons in January-March ("interim") 2022. CR/PR at Table III-13. The purchases were small relative to the importer of record's total imports from ***. CR/PR at Table III-13 (*** percent and *** percent, respectively). Information concerning the volume of imports from *** imported by the importer is not available, but *** purchased volumes were small relative to total subject imports from *** during the relevant periods. See CR/PR at Table III-13. We find that *** purchases were insufficient for it to qualify as a related party.

*** also reported purchasing imports of subject merchandise from *** during the POR. Its reported purchases were *** short tons in 2016, *** short tons in 2018, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. CR/PR at Table III-14. Information concerning the volume of imports from *** imported by the importers of record is not available, but *** purchased volumes were small relative to total subject imports from *** during (Continued...)

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.⁸⁵

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁸⁶ The Commission may exercise its 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.

B. Original Investigations

In its final determinations, the Commission found a reasonable overlap of competition between and among the domestic like product and subject imports from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom and cumulated subject

the relevant periods of the POR. See CR/PR at Table III-14. We find that *** purchases were insufficient for it to qualify as a related party.

We note that both firms' purchases of subject imports were very modest compared to their domestic production, never exceeding *** percent in any period. See CR/PR at Table III-5.

⁸⁵ 19 U.S.C. § 1675a(a)(7).

⁸⁶ 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 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).

imports from each of these seven sources for its material injury determinations.⁸⁷ The Commission found that there was sufficient commonality in end uses and substitutability between the domestic like product and imports from each of these seven subject countries to support a finding of fungibility,⁸⁸ and also found a sufficient geographic overlap in shipments.⁸⁹ Regarding channels of distribution, the Commission observed that substantial portions of shipments of the domestic like product and imports from each subject country were directed to end users and distributors with an appreciable portion being sold to service centers/distributors.⁹⁰ The domestic like product and imports from all seven subject countries were also either present in the U.S. market throughout the period of investigation (“POI”) or in a majority of months during the POI.⁹¹

C. Russia Investigations and Reviews

In the original investigations involving imports from Russia, the Commission cumulated subject imports from the three subject countries after finding a reasonable overlap of competition. The Commission found that subject imports from all three subject countries were fungible with both the domestic like product and with each other. This finding relied on market participants’ reports that hot-rolled steel from the various sources was interchangeable. It also relied on the fact that, although some quality and product differences limited the Russian product’s suitability for certain end uses, significant portions of the subject imports from all three countries and the domestic like product were fairly standardized, commodity grade products, generally manufactured to industry standards and suitable for a wide range of applications.⁹²

The Commission found a geographic overlap based on sales of the domestic like product and subject imports from all three subject countries throughout the United States and the presence of subject imports from each of the three countries to some degree in each of the

⁸⁷ *Original Determinations*, USITC Pub. 4638 at 20-21. In the final phase of the original investigations, BlueScope and Japanese Producers argued that subject imports from Australia and Japan, respectively, were sold in unique channels of distribution because the majority of imports from each country was shipped to U.S. affiliates or to long-term customers and the imports were mostly limited to the West Coast and the Gulf regions. The Commission rejected respondents’ arguments because a substantial and increasing share of these firms’ total subject imports from Australia and Japan from 2013 to 2015 were not exclusively shipped to their U.S. affiliates. *Id.* It also found that the record did not support Japanese Producers’ argument that there was limited fungibility between the domestic like product and subject imports from Japan because U.S. producers were unable to satisfy customers’ strict quality requirements or because customers sought alternatives to U.S. supply. *Id.* at 16.

⁸⁸ *Original Determinations*, USITC Pub. 4638 at 17-18.

⁸⁹ *Original Determinations*, USITC Pub. 4638 at 20.

⁹⁰ *Original Determinations*, USITC Pub. 4638 at 18.

⁹¹ *Original Determinations*, USITC Pub. 4638 at 20.

⁹² *Original Japan Determination*, USITC Pub. 3202 at 7-9.

four geographic regions during the period examined. It also found a simultaneous presence in the U.S. market because subject imports from each country were present in all months of the period examined.⁹³

In the first and second reviews with respect to hot-rolled steel from Brazil, Japan, and Russia, the Commission did not find that subject imports from Brazil, Japan, or Russia would have no discernible adverse impact on the domestic industry if the orders were to be revoked, and found that there would likely be a reasonable overlap of competition between the domestic like product and imports from each subject country as well as between imports from each subject country.⁹⁴

In the first reviews of the orders on hot-rolled steel from Brazil, Japan, and Russia, the Commission did not find any likely differences in the conditions of competition that would warrant declining to exercise its discretion to cumulate.⁹⁵ However, in the second reviews, the Commission found likely differences in conditions of competition and exercised its discretion to decline to cumulate subject imports from any of the subject countries.⁹⁶

D. Arguments of the Parties

1. Domestic Producers' Arguments

The Domestic Producers argue that the Commission should cumulate subject imports from all eight countries for the purposes of its analysis in these reviews. They contend that imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry upon revocation,⁹⁷ that there would likely be a reasonable overlap of competition among subject imports and the domestic like product,⁹⁸ and that the subject imports are likely to compete with each other and the domestic like product in the U.S. market

⁹³ *Original Japan Determination*, USITC Pub. 3202 at 7-9.

⁹⁴ *First Five-Year Review Determinations*, USITC Pub. 3767 at 13-21; *Second Five-Year Review Determinations*, USITC Pub. 4237 at 12-15.

⁹⁵ *First Five-Year Review Determinations*, USITC Pub. 3767 at 23.

⁹⁶ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 16-18.

⁹⁷ In particular, they argue that the orders on imports from Brazil had a significant restraining effect on import volumes after the orders came into effect, that Brazilian producers have increased their capacity, production, and unused capacity throughout the POR, and that Brazilian capacity is expected to increase due to significant investments and acquisitions. They contend that hot-rolled steel producers in Brazil are export oriented, have been able to shift significant volumes to specific export markets in response to changes in demand, which they contend are expected in Brazil, neighboring South American countries and the European Union, and are subject to trade remedy and safeguard actions in third-countries. Cleveland-Cliffs' Prehearing Brief at 15-74; Four Domestic Producers' Prehearing Brief at 8-89, Exhibits 13, 27; *see also* CR/PR at Table IV-23.

⁹⁸ Cleveland-Cliffs' Producers' Prehearing Brief at 66-68; Four Domestic Producers' Prehearing Brief at 84-89.

if the orders are revoked. They urge the Commission to exercise its discretion to cumulate subject imports from all eight countries because the record does not indicate that disaggregating them is appropriate.⁹⁹

The Domestic Producers also argue that neither the differing Section 232 measures in subject countries nor the Commission's approach in *Cold-Rolled Steel*¹⁰⁰ indicate that subject producers in each country will compete under different conditions of competition in a manner that would justify not cumulating subject imports.¹⁰¹ Specifically, they argue that the Section 232 absolute quotas on hot-rolled steel from Brazil will not prevent those imports from competing with other subject imports and the domestic like product.¹⁰² They argue that, notwithstanding the purportedly finite likely volume of imports from Brazil, subject imports from Brazil will still adversely affect prices in the U.S. market as offers are referred to in price negotiations and affect spot indices used to set variable prices in many sales contracts.¹⁰³ Finally, the Four Domestic Producers argue that the annual Section 232 quota on hot-rolled steel imports from Brazil is discretionary, can be removed or modified at any time,¹⁰⁴ and is not

⁹⁹ Cleveland-Cliffs' Prehearing Brief at 15-74; Four Domestic Producers' Prehearing Brief at 8-89.

¹⁰⁰ *Cold-Rolled Steel Flat Products from Brazil, China, India, Japan, South Korea, and the United Kingdom*, Inv. Nos. 701-TA-540-543 and 731-TA-1283-1287 and 1290 (Review), USITC Pub. 5339 (Aug. 2022) ("*Cold-Rolled Steel*"). In *Cold-Rolled Steel*, a majority of the Commission exercised its discretion to not cumulate subject imports from Brazil, finding that subject imports from Brazil would likely compete under different conditions of competition from the other subject countries if the orders were revoked.

¹⁰¹ The Domestic Producers assert that the quota for hot-rolled steel from Brazil allows for larger orders, which will allow Brazilian producers to compete for more sales and drive down prices. They also contend that hot-rolled steel is more of a commodity product than cold-rolled steel and imports will have a greater effect on the spot market and price indices. See, e.g., Cleveland-Cliffs' Prehearing Brief at 70-73; Four Domestic Producers' Prehearing Brief at 90-98; Hearing Tr. at 356-358 (Vaughn).

¹⁰² Specifically, they contend that the quota of 143,416 short tons would represent *** percent of apparent domestic consumption in the U.S. merchant market for hot-rolled steel—greater than the share held by imports from Brazil in the market in 2013, the first year of the POI. They also argue that the quota will increase price competition because Brazilian producers will compete on price to fill the quota. Four Domestic Producers' Prehearing Brief at 34-38. Finally, they argue that conditions of competition between hot-rolled steel imported from Brazil and South Korea are similar because Brazilian producers could increase shipments by the full amount of the quota, an amount exceeding that available to South Korean producers. Four Domestic Producers' Prehearing Brief at 93; Nucor, SCI, SSAB, and SDI Posthearing Brief at 14.

¹⁰³ Four Domestic Producers' Prehearing Brief at 37-38 and 94; Cleveland-Cliffs' Prehearing Brief at 73-74. As support for their contention that a small volume of offers and sales would have an outsized effect on CRU and Platts price indices, the Domestic producers cite to hearing testimony and declarations from company officials from U.S. Steel and Nucor. Nucor, SCI, SSAB, and SDI Posthearing Brief at Exhibit 1 at 58-61; Cleveland-Cliffs' Posthearing Brief at 11, Exhibit 1 pgs. 20-21, Exhibit 4; U.S. Steel's Posthearing Brief at I-14, Attachment A.

¹⁰⁴ They also assert that the government of Brazil has asked the United States to reconsider the quotas and that a Brazilian trade organization for steel producers has indicated that it expects revisions to Brazil's quotas this year. Four Domestic Producers' Prehearing Brief at 32-38, Exhibits 39-40.

an actual ceiling as parties can be granted product exclusions and General Approved Exclusions (“GAEs”).¹⁰⁵

2. Respondents’ Arguments

Respondent foreign producers argue that the Commission should not cumulate subject imports from each of their respective countries because subject imports from each individual country would not likely have a discernible adverse impact on the domestic industry if the order is revoked.¹⁰⁶ The Brazilian Respondents, the Japanese Respondents, POSCO, and TSIJ argue there is likely to be no reasonable overlap of competition between and among subject imports from each of their respective countries and the domestic like product.¹⁰⁷ BlueScope, the Brazilian Respondents, the Japanese Respondents, POSCO, and TSIJ argue that the Commission should not exercise its discretion to cumulate subject imports from each of their respective countries because they would likely compete under different conditions of competition upon revocation.¹⁰⁸

Australia. BlueScope contends that it has maintained a very small share of the U.S. market throughout the original investigations and the current reviews.¹⁰⁹ It also maintains that its capacity is limited, that it is not export oriented, and that it operates at a high capacity utilization rate.¹¹⁰ BlueScope argues that it will have no incentive to export to the U.S. merchant market (*i.e.*, sell to non-affiliated parties) because since the underlying case was initiated, it has made substantial investments in the U.S. market, including \$770 million during the POR in its wholly-owned subsidiary, North Star, a U.S. producer of hot-rolled steel, and additional investments during the POR to support its North Star investments.¹¹¹ According to BlueScope, it has no incentive to undermine the success of the broader hot-rolled steel industry, and its affiliation with U.S. producer North Star and purchaser Steelscape are unique conditions of competition that make it compete differently in the U.S. market than any other

¹⁰⁵ They also emphasize that imports from Brazil for other steel products that are not covered by antidumping or countervailing duty orders have exceeded quota limits since the quotas took effect. Four Domestic Producers’ Prehearing Brief at 33.

¹⁰⁶ BlueScope’s Prehearing Brief at 14; Prehearing Brief of CSN and USIMINAS at 4-22; Japanese Respondents’ Prehearing Brief at 4-21; POSCO’s Prehearing Brief at 4; TSIJ’s Posthearing Brief at 4-7; Erdemir’s Prehearing Brief at 18-19. The Government of Brazil echoes the same arguments as Brazilian Respondents. See Government of Brazil’s Prehearing Brief at 1-2. The Government of South Korea echoes the same arguments as POSCO. See Government of South Korea’s Prehearing Brief at 2-6.

¹⁰⁷ Prehearing Brief of CSN and USIMINAS at 4-22; Japanese Respondents’ Prehearing Brief at 22-26; POSCO’s Prehearing Brief at 9-10; and TSIJ’s Prehearing Brief at 10-14.

¹⁰⁸ BlueScope’s Prehearing Brief at 6-31; Prehearing Brief of CSN and USIMINAS at 6-17; POSCO’s Prehearing Brief at 11-12; and TSIJ’s Posthearing Brief at 10-15.

¹⁰⁹ BlueScope’s Prehearing Brief at 30.

¹¹⁰ BlueScope’s Prehearing Brief at 29, 32, 33, 35.

¹¹¹ BlueScope’s Prehearing Brief at 5, 15-16, 21.

subject producer.¹¹² BlueScope emphasizes it does not have an existing customer base outside of Steelscape and that it only plans to export a relatively small amount of subject merchandise to its affiliate on the West Coast, Steelscape, that would not displace sales by the domestic industry because the domestic industry is unwilling and/or unable to supply Steelscape with an adequate supply of hot-rolled steel.¹¹³ It asserts that BlueScope would be merely replacing its sales of cold-rolled steel to Steelscape if the order on hot-rolled steel from Australia were revoked.¹¹⁴

Brazil. CSN and USIMINAS assert that subject imports from Brazil will likely not have a discernible impact on U.S. prices because the quota incentivizes Brazilian producers to seek the highest possible prices to maximize profits on limited sales to the U.S. market.¹¹⁵ They maintain that the Brazilian hot-rolled steel industry has very high capacity utilization, is not export oriented,¹¹⁶ and focuses any exports to the Latin American market.¹¹⁷

They argue that the Commission should exercise its discretion not to cumulate subject imports from Brazil because they would likely compete under different conditions of competition upon revocation since it is subject to an annual absolute Section 232 quota with the lowest quantity limit of any subject country,¹¹⁸ representing approximately 0.25 percent of apparent consumption.¹¹⁹ They add that there are currently no Section 232 product-specific

¹¹² BlueScope's Prehearing Brief at 22-23, 27. It argues that in past cases, the Commission has found that foreign producers' affiliations with, and/or investments in, U.S. producers as a reason for exercising its discretion to not cumulate, and in many of those cases, foreign producers made considerably less investments in the U.S. market than BlueScope has done in this case. BlueScope's Prehearing Brief at 9-14 (citing *Certain Large Residential Washers from Korea and Mexico*, Inv. Nos. 701-TA-488 and 731-TA-1199-1200, USITC Pub. 4882 (Review) (Apr. 2019) at 19-20; *Stainless Steel Plate from Belgium, Italy, Korea, South Africa, and Taiwan*, Inv. Nos. 701-TA-379 and 731-TA-788, 790-793, USITC Pub. 4248 (Second Review) (Aug. 2011) at 17; *Hot-Rolled Steel Products From Argentina, China, India, Indonesia, Kazakhstan, Romania, South Africa, Taiwan, Thailand, and Ukraine*, Inv. Nos. 701-TA-404-408 and 731-TA-898-902 and 904-908, USITC Pub. 3956 (Review) (Oct. 2007) at 17-18, n. 88).

¹¹³ BlueScope's Prehearing Brief at 18.

¹¹⁴ BlueScope's Prehearing Brief at 29-31; Hearing Tr. at 350-351, 361 (Deukmejian, Porter); BlueScope's Posthearing Brief at 38-41.

¹¹⁵ Prehearing Brief of CSN and USIMINAS at 3, 22.

¹¹⁶ Prehearing Brief of CSN and USIMINAS at 12-14. CSN and USIMINAS assert that Brazil's ratio of export shipments to total shipments is ***. *Id.* at 13.

¹¹⁷ Prehearing Brief of CSN and USIMINAS at 17, 19-20. The Government of Brazil echoes the same arguments as Brazilian Respondents. See Government of Brazil's Prehearing Brief at 1-2.

¹¹⁸ They also contend that the relatively "small" quantities of the quota cannot negatively affect price indices as the Domestic Producers contend because such indices are calculated based on weighted averages of actual sales and separate prices between domestic and imported sales as stated in a declaration from a CSN official. Posthearing Brief of CSN and USIMINAS at 5, Attachment 1 at 15, Exhibit 2. They also assert that the prevailing index used in contracts is CRU, not Platts, and CRU bases its indices on actual sales. *Id.* at Attachment 1 pg. 15, Exhibit 2.

¹¹⁹ Prehearing Brief of CSN and USIMINAS at 6-7, 10-11.

exclusions on subject imports from Brazil. While South Korea also is subject to an absolute quota, they note its annual quota of 584,544 short tons is much higher than the quota on subject imports from Brazil.¹²⁰

Japan. The Japanese Respondents assert that subject imports from Japan have been limited throughout the POR and will remain limited because of the Section 232 TRQ and because Japanese hot-rolled steel producers will continue to focus their limited capacity on supplying their joint ventures and affiliates in other export markets, particularly in Asia.¹²¹ The Japanese Respondents contend that NSC's affiliate, Steelscape, and other purchasers on the West Coast cannot obtain hot-rolled steel from U.S. producers in adequate quantities or at reasonable shipping rates, and that regardless of whether the order is revoked, NSC expects to continue supplying Steelscape with a limited quantity of hot-rolled steel.¹²² They argue that NSC competes differently in the U.S. market because ***.¹²³ They also argue that subject imports from Japan have displayed different pricing patterns than other subject imports, especially because of their overselling.¹²⁴

The Netherlands. TSIJ emphasizes that subject imports from the Netherlands were consistently low during the POR and will continue to be low in the event of revocation because TSIJ has limited capacity and divertible excess capacity, is not export oriented, and has no incentive to increase exports to the United States as it focuses its sales on internal consumption and exports to other markets.¹²⁵ It argues that any sales to the United States will be concentrated on a limited portion of the U.S. market consisting of *** that ***.¹²⁶

TSIJ additionally claims that there is limited fungibility between subject imports from the Netherlands and hot-rolled steel produced in the United States because it exports specialized products with unique end uses that U.S. firms have been unwilling or unable to supply. TSIJ asserts that it also competes differently in the U.S. market as shown by its low antidumping duty margin and sales to only two customers.¹²⁷

South Korea. POSCO maintains that the subject industry in South Korea is not export oriented, will continue to focus on regional markets in Asia and has limited capacity and excess capacity.¹²⁸ It observes that the Section 232 absolute quota on subject imports from South

¹²⁰ Prehearing Brief of CSN and USIMINAS at 10.

¹²¹ Japanese Respondents' Prehearing Brief at 4-10, 25-26; Japanese Respondents' Posthearing Brief at 9-10, 12-14.

¹²² Japanese Respondents' Prehearing Brief at 11, 25; Japanese Respondents' Posthearing Brief at 9-10.

¹²³ Japanese Respondents' Posthearing Brief at 7-8, 14.

¹²⁴ Japanese Respondents' Prehearing Brief at 20-22, 27-28; Japanese Respondents' Posthearing Brief at 14-15.

¹²⁵ TSIJ's Prehearing Brief at 5-9; TSIJ's Posthearing Brief at 7-9.

¹²⁶ TSIJ's Prehearing Brief at 6-10.

¹²⁷ TSIJ's Prehearing Brief at 11-14, 22.

¹²⁸ POSCO's Prehearing Brief at 18-21; POSCO's Posthearing Brief at 4-5.

Korea is considerably less than the volume of subject imports from South Korea in 2016. It asserts that there was predominant overselling during the POR, the antidumping and countervailing duty margins for South Korean producers are low, and that there was no evidence of price effects.¹²⁹

POSCO additionally argues there will not be an overlap of competition between subject imports from South Korea and hot-rolled steel from other sources. It argues that subject imports from South Korea and hot-rolled steel produced in the United States are not fungible because subject imports from South Korea are concentrated in different end uses.¹³⁰ POSCO additionally argues that competition is limited because subject imports from South Korea are concentrated on the Pacific Coast and in the Southeast and were sold primarily to ***. POSCO notes that while South Korea's Section 232 quota level is higher than Brazil's, subject imports from South Korea have *** the quota limit for 2021, and therefore will not be able to significantly increase beyond their current level.¹³¹

Turkey. Erdemir argues that since imports of hot-rolled steel from Colakoglu are not subject merchandise in these reviews, subject imports from Turkey will not have a discernible adverse impact.¹³² Erdemir asserts that subject imports from Turkey were consistently low during the POR and that Turkish subject producers have high and increasing capacity utilization and focus their sales primarily on their growing home market and non-U.S. export markets such as the European Union.¹³³

E. Analysis

In these reviews, the statutory threshold for cumulation is satisfied because all reviews were initiated on the same day: September 1, 2021.¹³⁴ In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether

¹²⁹ POSCO's Prehearing Brief at 6-11.

¹³⁰ POSCO's Prehearing Brief at 9-11.

¹³¹ POSCO's Prehearing Brief at 11-12.

¹³² Erdemir also argues that based on Commerce's recalculation on remand of the dumping margin for Colakoglu in the original investigations that rendered Colakoglu *de minimis*, subject imports from Turkey in the original antidumping investigation should be found negligible as they were in the original countervailing duty investigation for Turkey. It asks that the Commission either: 1) reconsider and reverse the Commission's negligibility finding in the original antidumping duty investigation in a separate reconsideration proceeding; 2) reverse the Commission's original negligibility finding in the original antidumping duty investigation in a separate changed circumstances proceeding; or 3) reverse the Commission's original negligibility finding in the original antidumping duty investigation in these reviews. Erdemir's Prehearing Brief at 10-18.

¹³³ Erdemir's Prehearing Brief at 11-12, 19-22; Erdemir's Posthearing Brief at 9-10, 13-14.

¹³⁴ CR/PR at Table I-1.

there is a likelihood of a reasonable overlap of competition among subject imports from the subject countries and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.

1. 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.¹³⁵ 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.¹³⁶ 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. We consider the data pertinent to each subject country below.

Australia. In the original investigations, subject imports from Australia increased throughout the POI, from *** short tons in 2013 (or *** percent of apparent U.S. consumption) to *** short tons in 2014 (or *** percent of apparent U.S. consumption), and to *** short tons in 2015 (or *** percent of apparent U.S. consumption). They were higher in January 2016-March 2016 (“interim 2016”) (*** short tons or *** percent of apparent U.S. consumption) than in interim 2015 (*** short tons or *** percent of apparent U.S. consumption).¹³⁷

In the final phase of the original investigations, the Commission received a questionnaire response from BlueScope, which accounted for *** percent of hot-rolled steel production in Australia and *** percent of exports of subject merchandise from Australia to the United States in 2015.¹³⁸ BlueScope reported that its capacity was *** short tons during 2013-2015 and *** short tons in interim 2015 and interim 2016.¹³⁹ Its reported production was *** short tons in 2013 and 2014, *** short tons in 2015, *** short tons in interim 2015, and ***

¹³⁵ 19 U.S.C. § 1675a(a)(7).

¹³⁶ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

¹³⁷ *Original Determinations*, USITC Pub. 4638 at Table C-2; Confidential Report INV-00-075, (Aug. 23, 2016) (EDIS Doc. No. 755997) (“Confidential Report from the Original Investigations”) at Table C-2.

¹³⁸ CR/PR at IV-35. Based on *** data on record in these reviews, it appears BlueScope may have been the only Australian producer during the original investigations. See Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at VII-3 (noting that ***).

¹³⁹ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-3.

short tons in interim 2016.¹⁴⁰ From 2013 through 2015, its reported exports as a share of its total shipments of hot-rolled steel ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent.¹⁴¹

In the current reviews, the volume of subject imports from Australia decreased throughout the POR, from 107,843 short tons in 2016 to 10,210 short tons in 2017, 2,993 short tons in 2018, 2,241 short tons in 2019, 25 short tons in 2020, and then zero in 2021 and interim 2022.¹⁴² The order appears to have had a restraining effect on the volume of subject imports from Australia. Subject imports from Australia accounted for 0.2 percent of apparent U.S. consumption in 2016 and then less than 0.05 percent of apparent U.S. consumption throughout the remainder of the POR.¹⁴³ Subject imports from Australia are not subject to Section 232 measures.¹⁴⁴

In these reviews, the Commission received a questionnaire response from BlueScope, which accounted for *** hot-rolled steel production in Australia in 2021.¹⁴⁵ BlueScope reported that its production capacity remained the same throughout the POR at *** short tons from 2016 through 2021 and *** short tons in interim 2021 and interim 2022.¹⁴⁶ Its reported production increased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017 and 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022.¹⁴⁷ Its reported capacity utilization increased irregularly throughout the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** in interim 2022.¹⁴⁸ BlueScope reported *** production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.¹⁴⁹ Its exports as a share of total shipments of hot-rolled steel decreased from *** percent in 2016 to *** percent in 2021 with exports to the United States as a share of shipments decreasing from *** percent to *** percent during this same period.¹⁵⁰ Thus, BlueScope's

¹⁴⁰ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-3. According to *** data in the original investigations, gross production of hot-rolled steel in Australia was *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015, while apparent gross consumption was *** short tons in 2013, 2014, and 2015. *Id.* at VII-3.

¹⁴¹ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-3.

¹⁴² CR/PR at Tables I-26 & C-1.

¹⁴³ CR/PR at Tables I-26 & C-1.

¹⁴⁴ CR/PR at Table I-22.

¹⁴⁵ CR/PR at IV-35.

¹⁴⁶ CR/PR at Table IV-13.

¹⁴⁷ CR/PR at Table IV-13.

¹⁴⁸ CR/PR at Table IV-13.

¹⁴⁹ CR/PR at IV-63.

¹⁵⁰ CR/PR at Tables IV-13-14.

exports were limited at the end of the POR.¹⁵¹ The average unit value (“AUV”) of the Australian industry’s export shipments to the United States was often higher than the AUV of its export shipments to other destination markets and its home market shipments.¹⁵²

In the original investigations, subject imports from Australia undersold the domestic like product in 22 of 47 comparisons (45 percent), with *** short tons in the comparisons with underselling (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent.¹⁵³ There were no pricing data available between imports of subject merchandise from Australia and the domestic like product in these reviews.¹⁵⁴

The record indicates that BlueScope had excess capacity of *** short tons in 2021 and had limited exports that year.¹⁵⁵ Significantly, BlueScope has indicated that it intends to ***.¹⁵⁶ Moreover, BlueScope specifically plans to supply Steelscape up to *** short tons of hot-rolled steel if the antidumping duty order is revoked.¹⁵⁷ Steelscape purchased *** short tons of hot-rolled steel in 2021, and it has indicated it would prefer to purchase additional hot-rolled steel, rather than using cold-rolled steel, if the order is revoked.¹⁵⁸ Thus, we find it likely that, as BlueScope has indicated, subject imports from Australia would increase to supply Steelscape.

Further, we are unpersuaded by BlueScope’s argument that its full ownership of and additional investments in North Star mean that BlueScope no longer has an economic interest to sell into the broader merchant market beyond Steelscape. North Star is a relatively small U.S. producer and produces less hot-rolled steel than BlueScope in Australia.¹⁵⁹ By its own admission BlueScope can export to the West Coast of the United States, where it contends North Star does not have an interest in competing because freight is too costly from its location

¹⁵¹ CR/PR at Tables IV-13-14.

¹⁵² CR/PR at Table IV-14.

¹⁵³ CR/PR at V-45 n.12; Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-13a.

¹⁵⁴ CR/PR at V-10, Table V-18.

¹⁵⁵ CR/PR at Table IV-13.

¹⁵⁶ CR/PR at IV-41 n.20.

¹⁵⁷ BlueScope’s Posthearing Brief, Exhibit 1 at 16-17.

¹⁵⁸ See Steelscape’s Purchaser Questionnaire at II-1; Hearing Tr. at 264 (Deukmejian).

¹⁵⁹ See CR/PR at Tables I-23, III-5, IV-13. The situation was similar in the original investigation compared to this review. In 2015, North Star reported *** short tons of production, while BlueScope reported *** short tons of production. Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Tables III-11 and IV-13. In 2021, North Star reported *** short tons of production in 2021 while BlueScope reported *** short tons of production. CR/PR at Tables III-5; IV-13.

North Star has indicated that it plans to expand its capacity to *** and BlueScope states that North Star should reduce the need to import from Australia in 2023 and 2024. North Star’s Questionnaire Response at III-13b; CR/PR at IV-41 n.21.

in the Midwest.¹⁶⁰ Thus, upon revocation of the order, at a minimum there would be an opportunity for BlueScope to compete for sales to the West Coast that are not of interest to its affiliate North Star. North Star's shares of domestic production (***) percent) and commercial sales (***) percent) also suggest opportunities for BlueScope to compete for sales in the U.S. market without jeopardizing sales by North Star.¹⁶¹

Further, in the original investigations, BlueScope owned North Star, acquiring 100 percent ownership of North Star in the last year of the POI¹⁶² and having a *** percent ownership interest in North Star prior to that,¹⁶³ yet BlueScope exported to unaffiliated purchasers in the United States during the POI. Approximately *** of subject imports from Australia were sold to Steelscope during the original investigation period with an increasing share of imports from Australia going to unaffiliated purchasers during the POI.¹⁶⁴

Thus, based on the foregoing, including the increasing volume of subject imports from Australia during the original investigation and the ability and incentive for BlueScope to increase its exports to the United States, we find that imports of hot-rolled steel from Australia would not likely have no discernible adverse impact in the event of revocation of the order.

¹⁶⁰ BlueScope argues that there is insufficient supply of hot-rolled steel on the West Coast and freight is too expensive from Midwest hot-rolled steel mills to supply Steelscope economically. BlueScope's Prehearing Brief at 38-39 and Exhibit 4. Hearing Tr. at 306 (freight too high to economically supply Steelscope from North Star) (Finan). We note that *** percent of Steelscope's purchases were from ***. Steelscope Purchaser Questionnaire at II-5. Moreover, all responding U.S. producers reported sales to the West Coast region during the POR. CR/PR at Table II-3. The record also does not indicate that freight is more expensive from the Midwest to the West Coast than ocean freight from Australia. See Domestic Interested Parties' Posthearing Brief, Exhibit 1 at 29-30 and Exhibits 14-15 (citing Original Determinations, USITC Pub. 4638 at 44-45 (Commission finding on relative transportation costs in original investigations and West Coast shipment freight costs for hot-rolled, cold-rolled, and corrosion-resistant steel)).

¹⁶¹ CR/PR at Tables III-5 and G-1.

¹⁶² CR/PR at Table III-4.

¹⁶³ *Original Determinations*, USITC Pub. 4638 at 29 n.138.

¹⁶⁴ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at VII-5; *Original Determinations*, USITC Pub. 4638 at 18-19.

BlueScope also argues that the head of BlueScope's North American operations has veto power over BlueScope's exports of hot-rolled steel to the United States and will not jeopardize its investment in North Star. See, e.g., BlueScope's Final Comments at 4. Although the head of BlueScope's North American operations may now have veto power over BlueScope's exports of hot-rolled steel to the United States, it does not follow that BlueScope's exports of hot-rolled steel to the United States necessarily would jeopardize BlueScope's investment in North Star. As discussed above, BlueScope itself contends that North Star is uninterested or unable to compete effectively for West Coast sales, and given North Star's relatively small share of U.S. production, even with North Star's ***, there does not appear to be an incentive for BlueScope to decline to compete for sales in the U.S. market, or for the head of BlueScope's North American operations to veto such sales, that North Star is unable or unwilling to serve.

Brazil. In the original investigations, subject imports from Brazil increased throughout the POI, from *** short tons in 2013 (or *** percent of apparent U.S. consumption) to *** short tons in 2014 (or *** percent of apparent U.S. consumption), and to *** short tons in 2015 (or *** percent of apparent U.S. consumption). They were lower in interim 2016 (*** short tons or *** percent of apparent U.S. consumption) than in interim 2015 (*** short tons or *** percent of apparent U.S. consumption).¹⁶⁵

In the final phase of the original investigations, the Commission received questionnaire responses from three producers/exporters of hot-rolled steel in Brazil, which accounted for *** percent of production in Brazil and *** percent of exports of subject merchandise from Brazil to the United States in 2015.¹⁶⁶ These producers reported that their capacity was 15.0 million short tons in 2013, 15.1 million short tons in 2014, 14.8 million short tons in 2015, 3.8 million short tons in interim 2015, and 3.2 million short tons in interim 2016.¹⁶⁷ Their reported production was 13.9 million short tons in 2013, 12.7 million short tons in 2014, 12.0 million short tons in 2015, 3.4 million short tons in interim 2015, and 2.7 million short tons in interim 2016.¹⁶⁸ From 2013 through 2015, their reported exports as a share of their total shipments of hot-rolled steel ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.¹⁶⁹

In the current reviews, the volume of subject imports from Brazil decreased from 13,441 short tons in 2016 to 36 short tons in 2017, and then remained at minimal levels during the remainder of the POR at 11 short tons in 2018, 336 short tons in 2019, 0 short tons in 2020 and 2021, and 8 short tons in interim 2022.¹⁷⁰ Subject imports from Brazil accounted for less than 0.05 percent of apparent U.S. consumption throughout the POR.¹⁷¹ Instead of duties, subject imports from Brazil are subject to an annual absolute import quota of 143,416 short tons under Section 232.¹⁷²

In these reviews, the Commission received questionnaire responses from three producers of hot-rolled steel in Brazil accounting for *** percent of hot-rolled steel production

¹⁶⁵ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-2.

¹⁶⁶ CR/PR at IV-51.

¹⁶⁷ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-7.

¹⁶⁸ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-7.

According to *** data in the original investigations, gross production of hot-rolled steel in Brazil was *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015, while apparent gross consumption was *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015. *Id.* at VII-9.

¹⁶⁹ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-7.

¹⁷⁰ CR/PR at Tables I-26 & C-1.

¹⁷¹ CR/PR at Tables I-26 & C-1.

¹⁷² CR/PR at I-39. The annual quota usage rates for relevant HTS subheadings that include hot-rolled steel suggest that the quota was mostly not filled in 2021 and were as follows: HTS 9903.80.05—0 percent of 108,453,546 kg filled; HTS 9903.80.06—0 percent of 5,730 kg filled; and HTS 9903.80.07—0 percent of 21,656,653 kg filled. CR/PR at I-33, 38 nn.49 and 53.

in Brazil in 2021.¹⁷³ Those producers reported their combined production capacity increased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017 and 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, while it was *** short tons in interim 2021 and interim 2022.¹⁷⁴ Their reported production increased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was lower in interim 2022 at *** short tons than it was in interim 2021 at *** short tons.¹⁷⁵ Their reported capacity utilization fluctuated throughout the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** in interim 2022.¹⁷⁶ These producers reported *** production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.¹⁷⁷ Their exports as a share of total shipments of hot-rolled steel from 2016 to 2021 ranged from *** percent to *** percent, with exports to the United States as a share of total shipments at *** percent during this same period.¹⁷⁸

In the original investigations, subject imports from Brazil undersold the domestic like product in 37 of 82 comparisons (45.1 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent.¹⁷⁹ During these reviews, in the ***, subject imports from Brazil oversold the domestic like product with ***.¹⁸⁰

The record indicates that subject imports from Brazil exited the U.S market early in the POR following imposition of the orders. The industry in Brazil has almost *** short tons of excess capacity, and the volume of subject imports from Brazil has not been close to the quota limit during the POR.¹⁸¹ In light of the increasing volume of subject imports from Brazil during the original investigations and the Brazilian industry's ability to increase exports to the United States should the orders be revoked, we find that revocation of the antidumping and countervailing duty orders on subject imports from Brazil would not likely have no discernible adverse impact on the domestic industry. We note that the volume under the Section 232 quota (143,416 short tons) is equivalent to approximately 0.25 percent of apparent U.S.

¹⁷³ CR/PR at IV-51-52.

¹⁷⁴ CR/PR at Table IV-20.

¹⁷⁵ CR/PR at Table IV-20.

¹⁷⁶ CR/PR at Table IV-20.

¹⁷⁷ CR/PR at IV-63.

¹⁷⁸ CR/PR at Tables I-26, IV-20-21.

¹⁷⁹ CR/PR at V-45 n.12; Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-13a.

¹⁸⁰ CR/PR at Table V-18.

¹⁸¹ CR/PR at I-39 n.57.

consumption in 2021.¹⁸² This potential loss in sales volume and revenue that might otherwise be available to the domestic industry would not likely have no discernible adverse impact on the domestic industry.

Japan. In the original investigations, subject imports from Japan decreased irregularly throughout the POI, from *** short tons in 2013 (or *** percent of apparent U.S. consumption), to *** short tons in 2014 (or *** percent of apparent U.S. consumption), and to *** short tons in 2015 (or *** percent of apparent U.S. consumption). They were lower in interim 2016 (*** short tons or *** percent of apparent U.S. consumption) than in interim 2015 (*** short tons or *** percent of apparent U.S. consumption).¹⁸³

In the final phase of the original investigations, the Commission received questionnaire responses from five producers/exporters of hot-rolled steel in Japan, which accounted for an estimated *** percent of production of hot-rolled steel in Japan and *** percent of exports of subject merchandise from Japan to the United States in 2015.¹⁸⁴ These producers reported that their capacity was 61.4 million short tons in 2013, 60.4 million short tons in 2014, 58.5 million short tons in 2015, 15.1 million short tons in interim 2015, and 14.6 million short tons in interim 2016.¹⁸⁵ Their reported production was 56.9 million short tons in 2013, 57.2 million short tons in 2014, 56.1 million short tons in 2015, 14.2 million short tons in interim 2015, and 14.1 million short tons in interim 2016.¹⁸⁶ From 2013 through 2015, their reported exports as a share of their total shipments of hot-rolled steel ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.¹⁸⁷

In the current reviews, the volume of subject imports from Japan increased irregularly. They were *** short tons in 2016 (or *** percent of apparent U.S. consumption), *** short tons in 2017 (or *** percent of apparent U.S. consumption), *** short tons in 2018 (or *** percent of apparent U.S. consumption), *** short tons in 2019 (or *** percent of apparent U.S. consumption), *** short tons in 2020 (or *** percent of apparent U.S. consumption), *** short tons in 2021 (or *** percent of apparent U.S. consumption), *** short tons in interim 2021 (or *** percent of apparent U.S. consumption), and *** short tons in interim 2022 (or *** percent of apparent U.S. consumption).¹⁸⁸ Effective April 1, 2022, hot-rolled steel products originating

¹⁸² *Calculated from CR/PR at I-33 & Table C-1.*

¹⁸³ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-2.

¹⁸⁴ CR/PR at IV-71. The percentages exceeded *** percent for Japan and several other subject industries because production reported in questionnaires was greater than that reported by ***. CR/PR at Table I-1.

¹⁸⁵ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-12.

¹⁸⁶ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-12.

¹⁸⁷ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-7.

¹⁸⁸ CR/PR at Tables I-26 & C-1.

in Japan have been exempt from additional Section 232 duties when within an annual tariff rate quota (“TRQ”) limit and subject to 25 percent duties when above the limit.¹⁸⁹

In these reviews, the Commission received questionnaire responses from four producers of hot-rolled steel in Japan accounting for *** hot-rolled steel production in Japan in 2021.¹⁹⁰ Those producers reported their combined production capacity decreased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, while it was *** short tons in interim 2021 and *** short tons in interim 2022.¹⁹¹ Their reported production decreased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was lower in interim 2022 at *** short tons than it was in interim 2021 at *** short tons.¹⁹² Their reported capacity utilization increased irregularly during the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022.¹⁹³ While ***, reported *** production and capacity of out-of-scope merchandise on shared equipment, the production of hot-rolled steel accounted for *** reported production in each year of the POR.¹⁹⁴ Japanese producers reported exports as a share of total shipments of hot-rolled steel from 2016 to 2021 ranging from *** percent to *** percent, with exports to the United States as a share of total shipments ranging from *** percent to *** percent during this same period.¹⁹⁵ The AUV of the Japanese industry’s export shipments to the United States over the POR was generally higher than the AUV of its export shipments to other destination markets and its home market shipments.¹⁹⁶

Japan was the largest global exporter of hot-rolled steel in 2021.¹⁹⁷ The largest export markets for hot-rolled steel from Japan in 2021 were in Asia.¹⁹⁸ During the POR, certain hot-

¹⁸⁹ CR/PR at I-39, Table I-22. The TRQ is 250,150 short tons for 2022. *Id.* The majority of subject imports from Japan were subject to Section 232 duties from 2019 to 2021 prior to the TRQ. Prior to the TRQ, all subject imports from Japan were subject to Section 232 duties of 25 percent *ad valorem*. See CR/PR at Table F-3.

¹⁹⁰ CR/PR at IV-70-71.

¹⁹¹ CR/PR at Table IV-29.

¹⁹² CR/PR at Table IV-29.

¹⁹³ CR/PR at Table IV-29.

¹⁹⁴ CR/PR at IV-86. Japanese respondents reported that hot-rolled steel accounted for *** percent in 2016 and 2017, and *** percent from 2018 through 2021 of the total production on shared equipment with out-of-scope merchandise. CR/PR at Table IV-32.

¹⁹⁵ CR/PR at Tables IV-29-30.

¹⁹⁶ CR/PR at Table IV-30.

¹⁹⁷ CR/PR at Table IV-73 (based on GTA data). The GTA data for hot-rolled flat products of iron or nonalloy steel may include some out-of-scope products.

¹⁹⁸ CR/PR at Table IV-30.

rolled steel products from Japan were subject to antidumping duty orders in India and Thailand and safeguard measures in Armenia, the European Union, the Gulf Cooperation Council, Mexico, Morocco, South Africa, and the United Kingdom.¹⁹⁹

In the original 2016 investigations, subject imports from Japan undersold the domestic like product in 15 of 33 comparisons (45.5 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and margins of underselling ranging from *** to *** percent.²⁰⁰ During these reviews, subject imports from Japan undersold the domestic like product in 19 of 100 comparisons (19.0 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent.²⁰¹

The record shows that subject imports from Japan increased their presence in the U.S. market during the POR, notwithstanding the antidumping duty order and Section 232 measures; subject imports from Japan more than doubled in 2021 compared to 2020.²⁰² The hot-rolled steel industry in Japan reported substantial excess capacity of *** short tons in 2021, and it remains the world's largest exporter of hot-rolled steel.²⁰³ The Japanese industry faces import restrictions on its exports of hot-rolled steel in several markets, including the European Union. Its exports to the United States were at higher values than its exports to other major markets in 2021, such as the European Union.²⁰⁴ In light of the foregoing, we find that revocation of the antidumping duty order on subject imports from Japan would not likely have no discernible adverse impact on the domestic industry.²⁰⁵

¹⁹⁹ CR/PR at Table IV-72.

²⁰⁰ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-13a.

²⁰¹ CR/PR at Table V-18. Pricing data reported by importers accounted for *** percent of commercial shipments of subject imports from Japan in 2021. *Id.* at V-9.

²⁰² CR/PR at Table C-1

²⁰³ CR/PR at Table IV-29.

²⁰⁴ CR/PR at Table IV-30.

²⁰⁵ The Japanese Respondents argue that subject imports from Japan will not have a discernible adverse impact if the order were to be revoked. They claim their exports will continue to be focused on Asian markets, be limited to the West Coast of the United States, and primarily supply Steelscape because Nippon Steel wants to avoid competing with its affiliated domestic producer, AM/NS Calvert. They also maintain that subject imports from Japan will be restrained by the Section 232 TRQ. Japanese Respondents' Prehearing Brief at 4-10; Japanese Respondents' Posthearing Brief at 9-10, 12-14. We are not persuaded by these arguments. Subject imports from Japan continued to be present in the U.S. market in substantial quantities throughout the POR, including when they were subject to additional Section 232 duties prior to the establishment of the TRQ in April 2022; they also increased in 2021. Thus, Japanese producers have demonstrated a continued interest in supplying the U.S. market and Section 232 measures have not deterred their participation. In addition, the Japanese industry exported *** short tons of hot-rolled steel to North American markets other than the United States in 2021, suggesting it is not only focused on Asian markets as the Japanese respondents claim. CR/PR at Table IV-30.

(Continued...)

The Netherlands. In the original investigations, subject imports from the Netherlands increased irregularly throughout the POI, from *** short tons in 2013 (or *** percent of apparent U.S. consumption) to *** short tons in 2014 (or *** percent of apparent U.S. consumption), and to *** short tons in 2015 (or *** percent of apparent U.S. consumption). They were lower in interim 2016 (*** short tons or *** percent of apparent U.S. consumption) than in interim 2015 (*** short tons or *** percent of apparent U.S. consumption).²⁰⁶

In the final phase of the original investigations, the Commission received a questionnaire response from one producer/exporter of hot-rolled steel in the Netherlands, TSIJ, which accounted for approximately *** percent of production of hot-rolled steel in the Netherlands and *** percent of exports of subject merchandise from the Netherlands to the United States in 2015.²⁰⁷ It reported that its capacity was *** short tons in 2013 and 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.²⁰⁸ Its reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, and *** short tons in interim 2015 and interim 2016.²⁰⁹ TSIJ reported exports as a share of its total shipments of hot-rolled steel from 2013 through 2015 ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent during this same period.²¹⁰

In the current reviews, the volume of subject imports from the Netherlands decreased irregularly, and was *** short tons in 2016 (or *** percent of apparent U.S. consumption), *** short tons in 2017 (or *** percent of apparent U.S. consumption), *** short tons in 2018 (or *** percent of apparent U.S. consumption), *** short tons in 2019 (or *** percent of apparent U.S. consumption), *** short tons in 2020 (or *** percent of apparent U.S. consumption), *** short tons in 2021 (or *** percent of apparent U.S. consumption), *** short tons in interim 2021 (or *** percent of apparent U.S. consumption), and *** short tons in interim 2022 (or *** percent of apparent U.S. consumption).²¹¹ Effective April 1, 2022, hot-rolled steel products originating in European Union countries, including the Netherlands, have been exempt from

Subject imports from Japan were sold to several U.S. regions during the POR and even more regions during the original investigations. See CR/PR at II-3 (sales in all regions except the Northeast and Mountains) and Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table II-4 (all regions except Northeast and “Other” (*i.e.*, AK, HI, PR, and VI.)). Further, there are three other producers in Japan in addition to Nippon Steel, so the industry as a whole will not necessarily focus its exports on a limited region in the United States in order to avoid competing with AM/NS Calvert. See CR/PR at Table IV-25.

²⁰⁶ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-2.

²⁰⁷ CR/PR at IV-92.

²⁰⁸ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-22.

²⁰⁹ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-22.

²¹⁰ Confidential Report from Original Investigations, EDIS Doc. No. 755997 at Table VII-22.

²¹¹ CR/PR at Tables I-26 & C-1.

additional Section 232 duties when within an annual TRQ limit and subject to 25 percent duties when above the limit.²¹²

In these reviews, the Commission received a questionnaire response from one producer of hot-rolled steel in the Netherlands, TSIJ, accounting for *** production of hot-rolled steel in the Netherlands in 2021.²¹³ TSIJ reported that its production capacity increased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, while it was *** short tons in interim 2021 and *** short tons in interim 2022.²¹⁴ Its reported production decreased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and in interim 2022.²¹⁵ Its reported capacity utilization increased irregularly during the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022.²¹⁶ TSIJ reported *** production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.²¹⁷ Its exports as a share of total shipments of hot-rolled steel from 2016 through 2021 ranged from *** percent to *** percent, with exports to the United States as a share of total shipments ranging from *** percent to *** percent during this same period.²¹⁸ The AUV of the Dutch industry's export shipments to the United States over the POR was generally higher than the AUV of its export shipments to other destination markets and its home market shipments.²¹⁹

In the original investigations, subject imports from the Netherlands undersold the domestic like product in 31 of 62 comparisons (50.0 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent. During these reviews, subject imports from the Netherlands undersold the domestic like product in 10 of 85 comparisons (11.8

²¹² CR/PR at I-39, Table I-22. The Netherlands' share of the European Union's TRQ is 215,087 short tons. *Id.* The majority of subject imports from the Netherlands was not subject to Section 232 duties from 2019 to 2021. See CR/PR at Table F-4.

²¹³ CR/PR at IV-92-93.

²¹⁴ CR/PR at Table IV-36.

²¹⁵ CR/PR at Table IV-36.

²¹⁶ CR/PR at Table IV-36.

²¹⁷ CR/PR at IV-105.

²¹⁸ CR/PR at Tables IV-36-37.

²¹⁹ CR/PR at Table IV-37.

percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent.²²⁰

The record shows that subject imports from the Netherlands have maintained a presence in the U.S. market during the POR notwithstanding the antidumping duty order and Section 232 measures.²²¹ The industry in the Netherlands reported excess capacity of *** short tons in 2021, and its exports are substantial, exporting approximately *** percent of its shipments.²²² In light of the foregoing, we find that revocation of the antidumping order on subject imports from the Netherlands would not likely have no discernible adverse impact on the domestic industry.²²³

²²⁰ CR/PR at Table V-18. Pricing data reported by importers accounted for *** percent of commercial shipments of subject imports from the Netherlands in 2021. *Id.* at V-9. During the original investigations, four purchasers reported that price was a primary reason for buying *** short tons of lower-priced subject imports from the Netherlands instead of the domestic like product. *Id.* at Table V-16.

²²¹ The TRQ was established in 2022. CR/PR at I-38.

²²² CR/PR at Table IV-36.

²²³ TSIJ claims that imports from the Netherlands will remain minimal in the event of revocation of the order and not have a discernible adverse impact. TSIJ argues it has limited capacity and excess capacity, is not export oriented, and has no incentive to increase shipments to the U.S. as it focuses on internal consumption and exports of specialty products to the United States that domestic producers are unable to produce. TSIJ's Prehearing Brief at 7-9; TSIJ's Posthearing Brief at 7-9.

Notwithstanding TSIJ's claims, importers and purchasers perceive subject imports from the Netherlands to be generally interchangeable with the domestic product. *See* CR/PR at Tables II-16 and II-17. Further, given the usage of subject imports from the Netherlands in a variety of applications during the original investigations, we disagree that in the event of revocation subject imports from the Netherlands are likely to consist of only of specialty products for sale to very few customers in the United States as it has claimed. *See* Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table II-3 (***). To the extent that TSIJ is supplying specialty products, the record shows that several purchasers reported buying lower-priced subject imports from the Netherlands instead of domestic hot-rolled steel during the original investigations, which demonstrates there was competition between the domestic product and subject imports from the Netherlands prior to the imposition of the orders, regardless of any specialized nature of the imports. *See* Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-16. Moreover, domestic producers provided information regarding their production of specialty steel types during these reviews, suggesting competition among all types of products if the orders were to be revoked. *See* Nucor, SSAB, and SDI's Posthearing Brief, Exhibit 1 at 74-75 and Exhibit 21; Cleveland-Cliffs' Posthearing Brief at Exhibit 4. We also disagree that the industry in the Netherlands is not export oriented. The industry has consistently exported approximately *** percent of its shipments during the POR, and the *** of its commercial shipments are exports. CR/PR at Table IV-36. TSIJ's exports to the United States were often at higher unit values relative to its exports to other markets from 2019 to 2021, indicating that the United States will likely be an attractive market for its exports. CR/PR at Table IV-37. Accordingly, we do not find that subject imports from the Netherlands will not likely have no discernible adverse impact on the domestic industry.

Russia. In the original investigations, the volume of subject imports from Russia increased from 847,764 short tons in 1996 to 2.0 million short tons in 1997, and then to 3.8 million short tons in 1998, when market penetration reached a peak of 5.1 percent.²²⁴ During the first five-year reviews, subject imports from Russia fell to 14,612 short tons in 1999 and then fluctuated for the succeeding five years, ranging from a low of 5,845 short tons in 2001 to a high of 904,101 short tons in 2004.²²⁵ In the second five-year reviews, subject imports declined to 299,275 short tons in 2005, increased to 789,288 short tons in 2006, and then declined the next three years, reaching a period low of 1,708 short tons in 2009. Subject imports increased to 125,079 short tons in 2010, accounting for 0.2 percent of apparent U.S. consumption.²²⁶

During the Commission's third five-year review, subject imports rose from 181,689 short tons in 2011 to 288,873 short tons in 2012, declined to 34,814 short tons in 2013, and then increased to 939,489 short tons in 2014. Due to the 25-fold increase in subject imports from Russia between 2013 and 2014, domestic producers requested that Commerce terminate the suspension agreement on hot-rolled steel imports from Russia. After Commerce terminated the agreement in December 2014 and imposed an antidumping duty order, the volume of subject imports from Russia dropped to 18,079 short tons in 2015, and was zero in 2016, 6,777 short tons in 2017, zero from 2018 to 2020, and 4 short tons in 2021.²²⁷

During the original investigations, three producers/exporters from Russia reportedly accounted for *** percent of Russian production of hot-rolled steel.²²⁸ Their capacity increased from 19.5 million short tons in 1996 to 21.2 million short tons in 1998. Their production increased from 14.7 million short tons in 1996 to 17.3 million short tons in 1998. Their capacity utilization rate increased from 77.5 percent in 1996 to 81.3 percent in 1998. These producers' exports as a share of total shipments decreased from 30.3 percent in 1996 to 20.0 percent in 1998.²²⁹

During the first five-year review, three producers/exporters from Russia reportedly accounted for nearly all Russian production of hot-rolled steel. Their capacity increased from 20.9 million short tons in 1999 to 22.8 million short tons in 2004. Their production increased from 16.1 million short tons in 1999 to 20.3 million short tons in 2004. Their capacity utilization increased from 77.4 percent in 1999 to 89.0 percent in 2004 which resulted in 2.5 million short tons of excess capacity in 2004. These producers' exports as a share of total shipments decreased from 38.5 percent in 1999 to 30.8 percent in 2004.²³⁰

²²⁴ *First Review Determinations*, USITC Pub. 3767 at 19.

²²⁵ *First Review Determinations*, USITC Pub. 3767 at 19-20.

²²⁶ *Second Review Determinations*, USITC Pub. 4237 at 13.

²²⁷ *Third Review Determinations*, USITC Pub. 4639 at 17; CR/PR at Table C-1.

²²⁸ CR/PR at IV-110.

²²⁹ *First Review Determinations*, USITC Pub. 3767 at 20.

²³⁰ *First Review Determinations*, USITC Pub. 3767 at 20.

During the second five-year review, three companies, believed to account for a “substantial portion” of Russian production of hot-rolled steel, responded to the Commission’s questionnaire. Their capacity fluctuated, decreasing overall from 23.6 million short tons in 2005 to 23.3 million short tons in 2010. Their production also fluctuated, decreasing overall from 20.9 million short tons in 2005 to 20.3 million short tons in 2010. Their annual capacity utilization rates ranged from 80.6 to 92.6 percent from 2005 through 2010 and was 87.2 percent in 2010. These producers’ exports constituted between 24.3 and 37.4 percent of their annual total shipments from 2005 through 2010.²³¹

In the current reviews, subject imports from Russia were only present in appreciable volumes during 2017 (6,777 short tons) and they accounted for less than 0.05 percent of apparent U.S. consumption throughout the POR.²³² Subject imports from Russia are currently subject to 25 percent ad valorem duties under Section 232.²³³

In these reviews, the Commission received questionnaire responses from two producers of hot-rolled steel in Russia accounting for approximately *** percent hot-rolled steel production in Russia in 2021.²³⁴ These producers reported their combined production capacity fluctuated during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018 and 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.²³⁵ Their reported production increased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was lower in interim 2022 at *** short tons than it was in interim 2021 at *** short tons.²³⁶ Their reported capacity utilization increased irregularly during the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020 and 2021, *** percent in interim 2021, and *** percent in interim 2022.²³⁷ Russian producers reported production of out-of-scope merchandise on shared equipment; production of hot-rolled steel accounted for *** percent of reported production on shared equipment in 2021.²³⁸ Their

²³¹ *Second Review Determination*, USITC Pub. 4237 at 13-14, Table IV-15. No respondent interested party participated in the Commission’s expedited third five-year review. The record, therefore, contained limited new information with respect to the hot-rolled steel industry in Russia. *Third Review Determinations*, USITC Pub. 4639 at 11.

²³² CR/PR at Tables I-26 & C-1.

²³³ CR/PR at I-39, Table I-22.

²³⁴ CR/PR at IV-111.

²³⁵ CR/PR at Table IV-43.

²³⁶ CR/PR at Table IV-43.

²³⁷ CR/PR at Table IV-43.

²³⁸ CR/PR at Table IV-45. Russian respondents reported that their overall production capacity on shared equipment with hot-rolled steel was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. *Id.*

exports as a share of total shipments of hot-rolled steel from 2016 to 2021 ranged from *** percent to *** percent, with exports to the United States as a share of total shipments being *** percent during this same period.²³⁹

According to *** data, gross production of hot-rolled steel in Russia increased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; apparent gross consumption also increased irregularly and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021.²⁴⁰ Gross production of hot-rolled steel in Russia is projected to be *** short tons while apparent gross consumption is projected to be *** short tons in 2022.²⁴¹

Russia was the second largest global exporter of hot-rolled steel in 2021,²⁴² with its leading export markets consisting of Turkey, Poland, Vietnam, and Italy.²⁴³ Exports of hot-rolled steel from Russia decreased irregularly during the POR and were 7.0 million short tons in 2016, 6.1 million short tons in 2017, 6.0 million short tons in 2018, 4.9 million short tons in 2019, 5.6 million short tons in 2020, and 6.6 million short tons in 2021.²⁴⁴ During the POR, certain hot-rolled steel products from Russia were subject to antidumping duty orders in the European Union, India, Indonesia, Mexico, Thailand, and the United Kingdom and safeguard measures in Armenia, the European Union, the Gulf Cooperation Council, Mexico, Morocco, South Africa, and the United Kingdom.²⁴⁵

In the original investigations, subject imports from Russia undersold the domestic like product in 63 of 72 comparisons (87.5 percent) with an average underselling margin of 12.8 percent.²⁴⁶ In the first five-year reviews, subject imports from Russia undersold the domestic like product in 42 of 78 comparisons (53.8 percent) with underselling margins ranging from near zero percent to 82.1 percent.²⁴⁷ In the second five-year reviews, subject imports from Russia undersold the domestic like product in 27 of 40 comparisons (53.8 percent) with

²³⁹ CR/PR at Tables I-26, IV-43-44.

²⁴⁰ CR/PR at Table IV-40.

²⁴¹ CR/PR at Table IV-40.

²⁴² CR/PR at Table IV-73 (GTA data based on official export statistics). The GTA data for hot-rolled flat products of iron or nonalloy steel may include some out-of-scope products.

²⁴³ CR/R at Table IV-46.

²⁴⁴ CR/PR at Tables IV-46, IV-73 (GTA data based on official export statistics).

²⁴⁵ CR/PR at Table IV-72.

²⁴⁶ *Original Japan Determination*, USITC Pub. 3202 at V-15.

²⁴⁷ *First Review Determination*, USITC Pub. 6767 at 21, V-15.

underselling margins ranging from 0.1 percent to 52.2 percent.²⁴⁸ In these reviews, there were no pricing data reported for subject imports from Russia.²⁴⁹

Subject imports from Russia increased significantly during the original investigations and have not been present in the United States during the POR in appreciable quantities since 2017, demonstrating the restraining effect of the order. The two reporting members of the industry in Russia reported limited excess capacity;²⁵⁰ however, according to ***, the Russian industry as a whole has excess capacity of *** short tons, and the industry was the second-largest exporter of hot-rolled steel in 2021.²⁵¹ The Russian industry faces import restrictions on its exports of hot-rolled steel in several markets, including the European Union. Subject imports from Russia also mostly undersold the domestic like product in the U.S. market during the original investigation and first two reviews. In light of the foregoing, we find that revocation of the antidumping order on hot-rolled steel from Russia would not likely have no discernible adverse impact on the domestic industry.²⁵²

South Korea. In the original investigations, subject imports from South Korea increased throughout the POI, from *** short tons in 2013 (or *** percent of apparent U.S. consumption) to *** short tons in 2014 (or *** percent of apparent U.S. consumption), and to *** short tons in 2015 (or 2.1 percent of apparent U.S. consumption). They were lower in interim 2016 (*** short tons or *** percent of apparent U.S. consumption) than in interim 2015 (*** short tons or *** percent of apparent U.S. consumption).²⁵³

In the final phase of the original investigations, the Commission received questionnaire responses from three producers/exporters of hot-rolled steel in South Korea, which together accounted for approximately *** percent of production of hot-rolled steel in South Korea and *** percent of exports of subject merchandise from South Korea to the United States in 2015.²⁵⁴ These producers reported that their capacity was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, and 10.4 million short tons in interim 2015 and in interim

²⁴⁸ *Second Review Determination*, USITC Pub. 4237 at Table V-6. The third five-year review was expedited and there were no pricing data comparisons. *Third Review Determinations*, USITC Pub. 4639 at 20.

²⁴⁹ CR/PR at V-10, Table V-18.

²⁵⁰ CR/PR at Table IV-43.

²⁵¹ CR/PR at IV-111 n.77 and Tables IV-40 and IV-73 (based on *** estimates of *** short tons of capacity and *** short tons of production in 2021).

²⁵² Following Russia's invasion of Ukraine, the United States revoked normal trade relations status for imports from Russia, thereby increasing the generally applicable tariff rates applicable to imports of HRS from Russia. CR/PR at Table I-21. The EU, a significant export market for Russia over the POR, has instituted a ban on imports from Russia. See Four Producers Prehearing Brief at 62 & n.259. CR/PR at Table IV-44.

²⁵³ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-2.

²⁵⁴ CR/PR at IV-130.

2016.²⁵⁵ Their reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.²⁵⁶ Their reported exports as a share of their total shipments of hot-rolled steel increased from *** percent in 2013 to *** percent in 2015, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent during this same period.²⁵⁷

In the current reviews, the volume of subject imports from South Korea decreased irregularly, and were *** short tons in 2016 (or *** percent of apparent U.S. consumption), *** short tons in 2017 (or *** percent of apparent U.S. consumption), *** short tons in 2018 (or *** percent of apparent U.S. consumption), *** short tons in 2019 (or *** percent of apparent U.S. consumption), *** short tons in 2020 (or *** percent of apparent U.S. consumption), *** short tons in 2021 (or *** percent of apparent U.S. consumption), *** short tons in interim 2021 (or *** percent of apparent U.S. consumption), and *** short tons in interim 2022 (or *** percent of apparent U.S. consumption).²⁵⁸ Instead of duties, subject imports from South Korea are subject to annual absolute import quotas under Section 232.²⁵⁹ The annual absolute quota is 584,544 short tons and became effective April 1, 2018.²⁶⁰

In these reviews, the Commission received questionnaire responses from three producers of hot-rolled steel in South Korea accounting for *** percent of hot-rolled steel production in South Korea in 2021.²⁶¹ Those producers reported their combined production capacity decreased throughout the POR from *** short tons for 2016 through 2019, to *** short tons in 2020, and *** short tons in 2021; their capacity was *** short tons in interim 2021 and interim 2022.²⁶² Their reported production decreased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and in interim 2022.²⁶³ Their reported capacity utilization decreased irregularly during the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022.²⁶⁴ South Korean producers reported *** production of out-of-scope merchandise

²⁵⁵ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-17.

²⁵⁶ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-17.

²⁵⁷ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-17.

²⁵⁸ CR/PR at Tables I-26 & C-1.

²⁵⁹ CR/PR at I-38-39.

²⁶⁰ CR/PR at I-38-39. The annual quota usage rates for relevant HTS subheadings that include hot-rolled steel in 2021 were as follows: HTS 9903.80.05—71 percent of 404,694,045 kg filled; HTS 9903.80.06—4 percent of 249,173 kg filled; HTS 9903.80.07—99 percent of 125,346,920 kg filled. CR/PR at I-38-39 n.55

²⁶¹ CR/PR at IV-130-131.

²⁶² CR/PR at Table IV-52.

²⁶³ CR/PR at Table IV-52.

²⁶⁴ CR/PR at Table IV-52.

on the same equipment and machinery used to produce hot-rolled steel.²⁶⁵ Their exports as a share of total shipments of hot-rolled steel ranged from *** percent in 2016 to *** percent in 2021, with exports to the United States as a share of total shipments ranging from *** percent to *** percent during this same period.²⁶⁶ The AUV of the South Korean industry's export shipments to the United States over the POR was generally higher than the AUV of its export shipments to other destination markets and its home market shipments.²⁶⁷

South Korea was the fourth largest global exporter of hot-rolled steel in 2021,²⁶⁸ with its leading export markets including India, Japan, Vietnam, and the United States.²⁶⁹ During the POR, certain hot-rolled steel products from South Korea were subject to antidumping duty orders in Indonesia, Taiwan, and Thailand and safeguard measures in Armenia, the European Union, the Gulf Cooperation Council, Mexico, Morocco, South Africa, and the United Kingdom.²⁷⁰

In the original investigations, subject imports from South Korea undersold the domestic like product in 35 of 84 comparisons (41.7 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent. During these reviews, subject imports from South Korea undersold the domestic like product in 36 of 103 comparisons (35.0 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent.²⁷¹

The South Korean industry is the fourth largest exporter of hot-rolled steel in the world, and subject producers in South Korea reported *** short tons of excess capacity in 2021.²⁷² Subject imports from South Korea peaked at *** short tons in 2015, and they have maintained a substantial presence in the U.S. market during the POR.²⁷³ Subject imports from South Korea were *** percent higher in 2021, at *** short tons, than in 2020. Moreover, they can increase up to the absolute quota of 584,544 short tons in 2022, which is equivalent to 1.0 percent of apparent U.S. consumption in 2021. In light of the foregoing, we find that revocation of the

²⁶⁵ CR/PR at IV-145.

²⁶⁶ CR/PR at Tables IV-52-53.

²⁶⁷ CR/PR at Table IV-53.

²⁶⁸ CR/PR at Table IV-73 (GTA data based on official export statistics). The GTA data for hot-rolled flat products of iron or nonalloy steel may include some out-of-scope products.

²⁶⁹ CR/PR at Table IV-55.

²⁷⁰ CR/PR at Table IV-72.

²⁷¹ CR/PR at Table V-18. Pricing data reported by importers accounted for *** percent of commercial shipments of subject imports from South Korea in 2021. *Id.* at V-9.

²⁷² CR/PR at Table IV-52.

²⁷³ See Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-1.

antidumping order on hot-rolled steel from South Korea would not likely have no discernible adverse impact on the domestic industry.²⁷⁴

Turkey. In the original investigations, subject imports from Turkey increased from *** short tons in 2013 (or *** percent of apparent U.S. consumption) to *** short tons in 2014 (or *** percent of apparent U.S. consumption), and were *** short tons in 2015 (or *** percent of apparent U.S. consumption). They were lower in interim 2016 (*** short tons or *** percent of apparent U.S. consumption) than in interim 2015 (*** short tons or *** percent of apparent U.S. consumption).²⁷⁵

In the final phase of the original investigations, the Commission received questionnaire responses from two producers/exporters of hot-rolled steel in Turkey, which accounted for *** percent of production of hot-rolled steel in Turkey and *** percent of exports of subject merchandise from Turkey to the United States in 2015.²⁷⁶ They reported that their capacity was *** short tons from 2013 to 2015, *** short tons in interim 2015 and interim 2016.²⁷⁷ Their

²⁷⁴ POSCO maintains that the hot-rolled steel industry in South Korea is not export oriented, will continue to focus on other regional markets in Asia (especially Japan and China), and has limited capacity and low excess capacity, such that subject imports from South Korea will not have a discernible adverse impact. POSCO's Prehearing Brief at 18-21; POSCO's Posthearing Brief at 4-5.

Despite the alleged focus on regional Asian markets, subject imports from South Korea have remained in the U.S. market throughout the POR. Indeed, while the majority of the industry's exports were to Asian markets in 2021, a substantial portion (*** percent) were to other markets, such as those in North America and Europe. CR/PR at Table IV-53. Further, as noted above, the South Korean industry's exports to the United States were often at higher unit values than its exports to other markets in 2021, suggesting that the U.S. market remains attractive relative to the industry's other export markets. CR/PR at Table IV-53. Notwithstanding that subject producers in South Korea exported a lower percentage of their shipments than some other hot-rolled steel industries, the South Korean industry was nonetheless the fourth largest exporter of hot-rolled steel in the world. CR/PR at Table IV-73. Moreover, producers in South Korea reported over *** short tons of excess capacity in 2021, which is *** to fill the entire Section 232 quota volume. See CR/PR at Table IV-52. We find therefore that subject imports from South Korea are not likely to have no discernible adverse impact upon revocation of the orders.

²⁷⁵ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-2.

²⁷⁶ CR/PR at IV-150. Data regarding the industry in Turkey in the original investigations consisted of questionnaire responses from Colakoglu Metalurji Anonim Şirketi ("Colakoglu") and Erdemir. Based on a remand from the CIT regarding Commerce's original determination, Commerce found a zero antidumping duty margin for Colakoglu and subsequently excluded Colakoglu from the antidumping duty order. Therefore, it is no longer a producer of subject merchandise and data for it is not included in the data for subject imports from Turkey during the current review. *Certain Hot-Rolled Steel Flat Products From Turkey: Notice of Court Decision Not in Harmony With the Amended Final Determination in the Less-Than-Fair-Value Investigation; Notice of Amended Final Determination, Amended Antidumping Duty Order; Notice of Revocation of Antidumping Duty Order in Part; and Discontinuation of the 2017-18 and 2018-19 Antidumping Duty Administrative Reviews, in Part*, 85 Fed. Reg. 29399 (Apr. 23, 2020).

²⁷⁷ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-25.

reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons interim 2016.²⁷⁸ Their reported exports as a share of their total shipments of hot-rolled steel from 2013 through 2015 ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent during this same period.²⁷⁹ Although Erdemir accounted for *** percent of reported production in Turkey in 2015, it only accounted for *** percent of the exports to the United States in 2015; currently nonsubject producer Colakoglu was responsible for *** of reported exports from Turkey to the United States.²⁸⁰

In the current reviews, the volume of subject imports from Turkey decreased irregularly, and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019 and 2020, and *** short tons in 2021; it was *** tons in interim 2021 and interim 2022.²⁸¹ Subject imports from Turkey accounted for ***.²⁸² Subject imports from Turkey are currently subject to 25 percent *ad valorem* duties under Section 232.²⁸³

In these reviews, the Commission received questionnaire responses from two subject producers/exporters of hot-rolled steel in Turkey, accounting for approximately *** percent of production of hot-rolled steel in the Turkey in 2021.²⁸⁴ These producers reported that their combined production capacity decreased irregularly during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, while it was *** short tons in interim 2021 and *** short tons in interim 2022.²⁸⁵ Their reported production increased during the POR and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.²⁸⁶ Their reported capacity utilization increased during the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in

²⁷⁸ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-25. According to *** data in the original investigations, gross production of hot-rolled steel in Turkey was *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015, while apparent gross consumption was *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015. *Id.* at VII-36.

²⁷⁹ Confidential Report from Original Investigations, EDIS Doc. No. 755997 at Table VII-25.

²⁸⁰ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Tables VII-24 and H-1 (showing subject imports from Turkey minus Colakoglu's imports).

²⁸¹ CR/PR at Tables I-26 & C-1.

²⁸² CR/PR at Tables I-26 & C-1.

²⁸³ CR/PR at I-39, Table I-22.

²⁸⁴ CR/PR at IV-150-151. The two responding Turkish producers were Erdemir and Habas Sinai Ve Tibbi Gazlar Istihsal Endustrisi A.S. ("Habas"). This coverage estimate includes Colakoglu's production in the estimate of total hot-rolled steel production in Turkey. Colakoglu accounted for approximately *** percent of hot-rolled steel capacity in Turkey in 2021. CR/PR at IV-150 nn.103, 105.

²⁸⁵ CR/PR at Table IV-59.

²⁸⁶ CR/PR at Table IV-59.

2020, and *** percent in 2021. Their capacity utilization rate was lower in interim 2022 (*** percent) than in interim 2021 (*** percent).²⁸⁷ Turkish producers reported production of out-of-scope merchandise on shared equipment; the production of hot-rolled steel accounted for *** percent of reported production on shared equipment in 2021.²⁸⁸ Their exports as a share of total shipments of hot-rolled steel from 2016 through 2021 ranged from *** percent to *** percent, with exports to the United States as a share of total shipments ranging from *** percent to *** percent during this same period.²⁸⁹ During the POR, certain hot-rolled steel products from Turkey were subject to antidumping duty orders in the European Union and Thailand and were subject to safeguard measures in Armenia, the European Union, the Gulf Cooperation Council, Mexico, Morocco, South Africa, and the United Kingdom.²⁹⁰

In the original investigations, subject imports from Turkey undersold the domestic like product in 31 of 59 comparisons (52.3 percent), with *** short tons in the underselling comparisons (*** percent of the total volume of quarterly comparisons) and underselling margins ranging from *** to *** percent.²⁹¹ During these reviews, subject imports from the Turkey undersold the domestic like product in 1 of 4 comparisons (25.0 percent), with *** short tons in the underselling comparison (*** percent of the total volume of quarterly comparisons) and an underselling margin of *** percent.²⁹²

Subject imports from Turkey were absent from the U.S. market during 2019-2020, but totaled *** short tons in 2021.²⁹³ Subject producers in Turkey reported *** short tons of excess capacity in 2021, and subject producer Habas is adding 2.0 million metric tons of capacity in 2023.²⁹⁴ The United States remains an attractive export market for subject producers in Turkey. The average unit value of their shipments to the United States in 2021 was higher than alternative markets such as the European Union or markets in Asia.²⁹⁵ *** acknowledges that the United States is a higher-priced market.²⁹⁶ During the original investigations, Erdemir's exports to the United States *** from *** short ton in 2013 to ***

²⁸⁷ CR/PR at Table IV-59.

²⁸⁸ CR/PR at Table IV-61. The two Turkish respondents reported that their overall production capacity on shared equipment with hot-rolled steel was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018-2021, and *** short tons in interim 2021 and interim 2022. CR/PR at Table IV-61.

²⁸⁹ CR/PR at Tables IV-59-60.

²⁹⁰ CR/PR at Table IV-72.

²⁹¹ Confidential Report from Original Investigations, EDIS Doc. No. 755997 at Table V-13a. Most of these comparisons were likely from nonsubject producer Colakoglu.

²⁹² CR/PR at Table V-18. Pricing data reported by importers accounted for *** percent of commercial shipments of subject imports from Turkey in 2021. *Id.* at V-9.

²⁹³ CR/PR at Table IV-1.

²⁹⁴ CR/PR at Tables IV-58 and IV-59. See also CR/PR at Table IV-59 (capacity utilization *** percent in three of the six full years of the POR).

²⁹⁵ CR/PR at Table IV-60.

²⁹⁶ See *** Foreign Producer Questionnaire at III-16 ***.

short tons in 2014 and *** short tons in 2015.²⁹⁷ Turkey also faces an antidumping order in the European Union, which may foreclose an important export market for the subject industry. Based on the foregoing, we find that it is not likely that there will be no discernible adverse impact if the antidumping duty order on hot-rolled steel from Turkey is revoked.²⁹⁸

The United Kingdom. In the original investigations, subject imports from the United Kingdom decreased irregularly and were *** short tons in 2013 (or *** percent of apparent U.S. consumption), *** short tons in 2014 (or *** percent of apparent U.S. consumption), *** short tons in 2015 (or *** percent of apparent U.S. consumption), *** short tons in interim 2015 (or *** percent of apparent U.S. consumption), and *** short tons in interim 2016 (or *** percent of apparent U.S. consumption).²⁹⁹

In the final phase of the original investigations, the Commission received a questionnaire response from one producer/exporter of hot-rolled steel in the United Kingdom, Tata Steel U.K., Ltd. (“TSUK”), which accounted for approximately *** percent of production of hot-rolled steel in the United Kingdom and approximately *** percent of exports of subject merchandise from the United Kingdom to the United States in 2015.³⁰⁰ TSUK reported that its capacity was *** short tons in 2013, *** short tons in 2014 and 2015, and *** short tons in interim 2015 and interim 2016.³⁰¹ Its reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.³⁰² TSUK’s reported exports as a share of its total shipments of hot-rolled steel from 2013 through 2015 ranged from *** percent to *** percent, while its exports to the

²⁹⁷ Confidential Report from Original Investigations, EDIS Doc. No. 755997 at Table H-3.

²⁹⁸ Regarding Erdemir’s argument that, since imports of hot-rolled steel from Colakoglu are not subject merchandise in these reviews, subject imports from Turkey will not have a discernible adverse impact, we disagree. Given the relative attractiveness of the U.S. market and the Turkish industry’s excess capacity, we find that it is not likely that there will be no discernible adverse impact if the antidumping duty order on hot-rolled steel from Turkey is revoked even if exports from Colakoglu are no longer subject merchandise.

We note that in asserting that subject imports from Turkey would likely have no discernible adverse impact in the event of revocation, Erdemir has raised several arguments concerning the Commission’s negligibility determination in the original antidumping duty investigation with respect to subject imports from Turkey. It contends that the Commission should revisit that determination either in these reviews, in a changed circumstance review, or in a reconsideration proceeding. Erdemir’s Prehearing Brief at 10-18; Erdemir’s Posthearing Brief at 1-6. These arguments have also been raised in proceedings outside of these reviews and the Commission has addressed them there. Five-year reviews are prospective in nature and therefore do not accommodate reconsideration of an original determination. *See generally* 19 U.S.C. § 1675(c)(1)(C).

²⁹⁹ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table C-2.

³⁰⁰ CR/PR at IV-170.

³⁰¹ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-29.

³⁰² Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-29.

United States as a share of total shipments ranged from *** percent to *** percent during this same period.³⁰³

In the current reviews, the volume of subject imports from the United Kingdom decreased from *** short tons in 2016 to *** short tons in 2017, and then remained at minimal levels during the remainder of the POR at *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons 2021, *** short tons in interim 2021, and *** short tons in interim 2022.³⁰⁴ Subject imports from the United Kingdom accounted for ***.³⁰⁵ Effective April 1, 2022, hot-rolled steel products originating in the United Kingdom have been subject to a TRQ under Section 232, with imports exempt from additional duties when within the annual TRQ limit and subject to 25 percent duties when above the limits.³⁰⁶

In these reviews, the Commission received a questionnaire response from one producer of hot-rolled steel in the United Kingdom, TSUK, accounting for *** production of hot-rolled steel in the United Kingdom in 2021.³⁰⁷ TSUK reported that its combined production capacity decreased during the POR and was *** short tons in 2016 and *** short tons from 2017 through 2021, while it was *** short tons in interim 2021 and *** short tons in interim 2022.³⁰⁸ Its reported production increased during the POR and was *** short tons in 2016 and 2017, *** short tons in 2018 and 2019, and *** short tons in 2020 and *** short tons 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.³⁰⁹ Its reported capacity utilization increased irregularly during the POR and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, and *** percent in interim 2021 and in interim 2022.³¹⁰ TSUK reported *** production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.³¹¹ Its exports as a share of total shipments of hot-rolled steel from 2016 through 2021 ranged from *** percent to *** percent, with exports to the United States as a share of total shipments *** percent throughout this same period.³¹² During the POR, certain hot-rolled steel products from the United Kingdom were subject to safeguard measures in Armenia, the European Union, the Gulf Cooperation Council, Mexico, Morocco, and South Africa.³¹³

³⁰³ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table VII-29.

³⁰⁴ CR/PR at Tables I-26, C-1.

³⁰⁵ CR/PR at Tables I-26, C-1.

³⁰⁶ CR/PR at I-39, Table I-22. The TRQ for imports of hot-rolled steel articles from the United Kingdom is 54 short tons. *Id.* Subject imports from the United Kingdom were not subject to Section 232 duties until 2022. *See* CR/PR at I-38-I-39.

³⁰⁷ CR/PR at IV-170-171.

³⁰⁸ CR/PR at Table IV-67.

³⁰⁹ CR/PR at Table IV-67.

³¹⁰ CR/PR at Table IV-67.

³¹¹ CR/PR at IV-183-184.

³¹² CR/PR at Tables IV-67-68.

³¹³ CR/PR at Table IV-72.

In the original investigations, subject imports from the United Kingdom undersold the domestic like product in 25 of 29 comparisons (86.2 percent) involving *** short tons (*** percent of the total volume of quarterly comparisons) with underselling margins ranging from *** to *** percent. During these reviews, subject imports from the United Kingdom oversold the domestic like product in *** short tons, with overselling margins ranging from *** percent to *** percent.³¹⁴

Subject imports from the United Kingdom have been largely absent from the U.S. market during the POR, demonstrating the restraining effect of the order.³¹⁵ TSUK reported excess capacity of *** short tons and it exported a total of *** short tons in 2021.³¹⁶ Recently, TSUK rapidly increased its ***, demonstrating an ability and interest in supplying this region.³¹⁷ Another hot-rolled steel producer in the United Kingdom, Liberty Steel, also has announced plans to increase its production capacity by 2 million tons.³¹⁸ Based on this record, we find that it is not likely that there will be no discernible adverse impact if the antidumping duty order on hot-rolled steel from the United Kingdom is revoked.

2. 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.³¹⁹ Only a “reasonable overlap” of competition is required.³²⁰ In five-year reviews, the

³¹⁴ CR/PR at V-18. Pricing data reported by importers accounted for *** percent of subject imports from the United Kingdom in 2016. *Id.* at V-15, IV-63.

³¹⁵ See CR/PR at Table IV-1.

³¹⁶ CR/PR at Table IV-67.

³¹⁷ CR/PR at Table IV-68. Its *** markets were *** short tons in 2020 and *** short tons in 2021. *Id.*

³¹⁸ CR/PR at Table IV-66.

³¹⁹ 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).

³²⁰ 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* (Continued...)

relevant inquiry is whether there likely would be competition if the orders are revoked, even if none currently exists because the subject imports are absent from the U.S. market.³²¹

Fungibility. In the original investigations, the Commission found that there was sufficient commonality in end uses and substitutability between the domestic like product and imports from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom to support a finding of fungibility between and among hot-rolled steel from each of these seven subject sources and domestically produced hot-rolled steel.³²² The Commission found that substantial proportions of both the domestic like product and imports from Australia, Brazil, Japan, South Korea, and the United Kingdom were sold for automotive/transportation end uses, and that the domestic like product and imports from each subject country were also used in the construction/structural and tubular goods sectors.³²³

In finding a sufficient degree of fungibility in the original investigations involving hot-rolled steel from Russia, the Commission relied on market participants' reports that hot-rolled steel from the various sources was interchangeable. It also relied on the fact that, although some quality and product differences limited the Russian product's suitability for certain end uses, significant proportions of the subject imports from all three countries and the like product were fairly standardized, commodity grade products, generally manufactured to industry standards, and suitable for a wide range of applications.³²⁴

In these reviews, market participants reported a relatively high degree of interchangeability between hot-rolled steel from different sources. All U.S. producers reported that hot-rolled steel from each subject source and the domestic product are always interchangeable.³²⁵ A majority of responding purchasers reported that hot-rolled steel from each subject source is always or frequently interchangeable with other subject sources and with the domestic like product.³²⁶ A majority of responding importers reported that hot-rolled steel from each subject source is always or frequently interchangeable with other subject sources and with the domestic like product except when comparing the domestic like product to

and Mexico, Inv. Nos. 701-TA-386 and 731-TA-812-813 (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).

³²¹ See generally, *Cheflin Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

³²² *Original Determinations*, USITC Pub. 4638 at 17-18. The Commission observed that there was a high degree of substitutability between domestically produced hot-rolled steel and hot-rolled steel imported from each subject source, with the possible exception of some particular products for which U.S. or subject-country producers are specialized suppliers. *Id.*

³²³ *Original Determinations*, USITC Pub. 4638 at 17-18 (citing Table II-3).

³²⁴ *Original Japan Determination*, USITC Pub. 3202 at 6-9.

³²⁵ CR/PR at Table II-15.

³²⁶ CR/PR at Table II-17.

subject imports from Japan and when comparing subject imports from Japan with subject imports from Australia.³²⁷

Most purchasers rated hot-rolled steel from the United States as either superior or comparable to hot-rolled steel from subject countries on all factors other than price.³²⁸ Most U.S. producers reported that factors other than price were never significant when comparing hot-rolled steel from different sources.³²⁹ Additionally, most importers and a majority of purchasers reported that factors other than price were either sometimes or never significant when comparing hot-rolled steel from different sources except when comparing hot-rolled steel from the United States to hot-rolled steel from Australia.³³⁰

U.S. producers accounted for a large majority of total U.S. shipments (***) for all five reported end-use product types: 1) tubular goods; 2) auto/transportation; 3) construction/structural; 4) appliances/machinery; 5) other end-uses/sectors.³³¹ “Other end-uses/sectors,” such as internal consumption for cold-rolled steel and corrosion resistant production, accounted for *** percent of domestic producers’ U.S. shipments.³³²

U.S. importers’ shipment data suggest that imports from subject countries were concentrated in specific sectors during 2021, particularly in the “construction/structural,” “other end-uses/sectors,” and “tubular goods” categories.³³³ Foreign producers’ shipment data indicate more of a focus on “other end-uses/sectors” products, though

³²⁷ CR/PR at Table II-16. While a plurality of importers reported that hot-rolled steel from Japan is sometimes interchangeable with the domestic like product and with hot-rolled steel from Australia, an equal amount of importers reported that hot-rolled steel from Japan is always or frequently interchangeable with the domestic like product and hot-rolled steel from Australia. *Id.* No importer reported that hot-rolled steel from any subject source is never interchangeable with hot-rolled steel from another subject source or with the domestic like product. *Id.*

³²⁸ CR/PR at Table II-14. A majority of purchasers rated U.S. hot-rolled steel as comparable to hot-rolled steel from the subject countries on all non-price factors except availability (in comparisons with Australia, Brazil, Russia, and South Korea), delivery terms (in comparisons with Brazil), delivery time (in comparisons with Brazil, Japan, South Korea, and Turkey) reliability of supply (in comparisons with Brazil), technical support/service (in comparison with Brazil), and U.S. transportation costs (in comparisons with Brazil and South Korea). *Id.* A majority of purchasers reported that U.S. and nonsubject hot-rolled steel were comparable on most non-price factors except delivery time in which a plurality of purchasers reported that U.S. hot-rolled steel was superior to nonsubject sources. *Id.*

³²⁹ CR/PR at Table II-18.

³³⁰ CR/PR at Tables II-18 through II-20. A plurality of purchasers reported that factors other than price were never significant when comparing hot-rolled steel from Australia with the domestic product. *Id.* at Table II-20.

³³¹ CR/PR at Table IV-3.

³³² CR/PR at Table IV-3.

³³³ In 2021, the majority of imports from Japan and South Korea was concentrated in the “construction/structural” sector (***) and (***) percent, respectively), (***) imports from Russia were concentrated in the “tubular goods” sector, and (***) imports from the Netherlands were concentrated in “other end-uses/sectors.” CR/PR at Table IV-3.

producers in all subject countries reported shipments to all end-user segments.³³⁴ Further, U.S. distributor/service center purchasers reported that shipments to “other end-uses/sectors” comprised a substantial portion of their total purchases from domestic producers (50.7 percent) and imported sources (28.0 percent), as well as an overlap in other product categories in 2021.³³⁵

TSIJ maintains that subject imports from the Netherlands are likely to lack fungibility with the domestic product and other subject imports upon revocation of the orders. It argues that TSIJ exports specialized products that subject producers from other countries and domestic producers have been unwilling or unable to supply, such as battery quality hot band and ultra-high strength steel.³³⁶ However, the record shows that a majority of purchasers during the POR reported that the availability of specialized or proprietary grade steel and the quality of subject merchandise from the Netherlands was comparable to U.S. produced hot-rolled steel.³³⁷ Moreover, SDI indicated that it ***, and representatives from U.S. Steel testified and attested to its capability to produce and its attempts to sell many of the purported specialty grades to TSIJ’s U.S. affiliate Thomas Steel.³³⁸ A plurality (half) of purchasers and a plurality of importers reported that subject imports from the Netherlands were always interchangeable with domestically produced hot-rolled steel.³³⁹ Furthermore, in 2021 *** from the Netherlands and *** of U.S. shipments by the domestic industry were made to the “other end-uses/sector” category.³⁴⁰ Similarly, during the original investigations, absent the discipline of the orders, subject imports from the Netherlands competed for sales with the domestic like product in the “other” and “automotive/transportation” categories.³⁴¹ Accordingly, the record does not

³³⁴ CR/PR at Table H-1 and Fig. H-1.

³³⁵ See CR/PR at Table II-2.

³³⁶ TSIJ’s Prehearing Brief at 12-14; TSIJ’s Posthearing Brief at 2-6. TSIJ reiterates that over 95 percent of its exports to the United States were to two purchasers which rely on imports from the Netherlands for specialized products that cannot be supplied by U.S. producers. TSIJ’s Posthearing Brief at 2.

³³⁷ CR/PR at Table II-14.

³³⁸ Nucor, SSAB, and SDI’s Posthearing Brief at Exhibit 21; U.S. Steel’s Posthearing Brief at Attachment A; Hearing Tr. at 200-201 (Kopf).

³³⁹ CR/PR at Table II-16.

³⁴⁰ CR/PR at Table IV-3.

³⁴¹ Original Investigations, USITC Pub. 4619 at 16-17. In addition, TSIJ has acknowledged selling automotive steel to markets other than the U.S. market during the POR. Hearing Tr. at 334 (de Haan) (“The product we’re selling to other markets mainly relate to the automotive market to be honest.”).

TSIJ asserts that the proportion of Section 232 exclusion requests granted indicates that it will limit its exports to specialty products that do not compete with the domestic like product. TSIJ’S Posthearing Brief at 5. However, Commerce has denied 186 exclusion requests for hot-rolled steel produced in the Netherlands suggesting that there has been overlap in hot-rolled steel products between subject imports from the Netherlands and the domestic like product during the POR. Nucor, (Continued...)

support TSIJ's claim that subject imports from the Netherlands are likely to lack fungibility with the domestic product and other subject imports upon revocation of the orders.

POSCO similarly maintains that subject imports from South Korea are likely to lack fungibility with the domestic like product and other subject imports upon revocation of the orders.³⁴² It argues that subject imports from South Korea are concentrated in the construction/structural and tubular goods sectors while domestic producers are focused primarily on the "other end uses/sectors" and that "many companies prefer Korean steel products because of the increasing focus on green technology."³⁴³ However, as noted above, the domestic industry was the largest supplier of hot-rolled steel to both the "construction/structural" and "tubular goods sectors," accounting for *** and *** percent of shipments to each category in 2021, respectively.³⁴⁴ Furthermore, during the original investigations, absent the discipline of the orders, *** percent of shipments of subject imports from South Korea were for "other end uses," which indicates that upon revocation, subject imports from South Korea would not be as focused on the construction/structural and tubular goods sectors as they have been with the orders in place.³⁴⁵ In addition, as described above, market participants reported that subject imports from South Korea were generally interchangeable with hot-rolled steel from other sources.³⁴⁶ Accordingly, we disagree with POSCO's claim that subject imports from South Korea are likely to lack fungibility with the domestic product and other subject imports upon revocation of the orders.

Thus, we find that record indicates that there is a substantial degree of fungibility between and among subject imports from each source and the domestic like product.

Geographic Overlap. In the original investigations, the Commission found that domestically produced hot-rolled steel was shipped nationwide and that while hot-rolled steel from different sources may have different regional concentrations, subject imports from

SSAB, and SDI's Posthearing Brief at 15 (citing regulations.gov, <https://www.regulations.gov/docket/BIS-2018-0006>; BIS, "Section 232 Steel and Aluminum, Published Exclusion Requests," web portal, <https://232app.azurewebsites.net/steelalum>). Moreover, domestic producers contend that the lack of objection to exclusion requests does not necessarily mean there is no domestic production of the specific product, and provided multiple examples where domestic producers chose not to object to exclusion requests for various reasons. See U.S. Steel's Posthearing Brief at Attachment A; Nucor, SSAB, and SDI's Posthearing Brief at Exhibit 21.

³⁴² POSCO's Prehearing Brief at 10-11.

³⁴³ See POSCO's Posthearing Brief at 10.

³⁴⁴ CR/PR at Table IV-3.

³⁴⁵ Confidential *Original Determinations*, EDIS Doc. 756007 at 25 n.75.

³⁴⁶ See CR/PR at Tables II-15 to II-17.

Australia, Brazil, Japan, South Korea, Turkey, and the United Kingdom were also sold mostly throughout the continental United States.³⁴⁷

In the original investigations involving hot-rolled steel from Russia, the Commission found geographic overlap based on sales of the domestic like product and subject imports from all three subject countries throughout the United States, and the presence of subject imports from each of the three countries to some degree in each of the four geographic regions during the period of investigation.³⁴⁸

In these reviews, domestic producers and importers of subject merchandise from all subject countries in aggregate reported selling hot-rolled steel to all regions in the contiguous United States.³⁴⁹ There were no responding importers of subject merchandise from Russia or Brazil and only one or two reporting importers for subject imports from Australia, the Netherlands, and the United Kingdom.³⁵⁰ Given the limited reporting in these reviews and the geographic distribution of sales in the original investigations, there is likely to be a greater geographic overlap in sales of the domestic product and imports from each subject source upon revocation of the orders than that observed during the POR.

POSCO's argument that there would likely be limited geographic overlap between subject imports from South Korea, imports from other subject sources, and U.S. producers is not supported by the record. Specifically, it maintains that whereas domestic producers sell hot-rolled steel throughout all U.S. geographic regions, subject imports from South Korea are concentrated in the Pacific Coast and Southeast regions, while imports from other sources are concentrated in the Central, Southwest, and Midwest regions.³⁵¹ However, as previously

³⁴⁷ *Original Determinations*, USITC Pub. 4638 at 20. Specifically, the Commission found that imports from all subject sources were sold in all six regions of the continental United States, except that subject imports from Brazil were not sold in the West Coast region and subject imports from the United Kingdom were not sold in the Mountain and West Coast regions. *Id.* The Commission rejected Australian and Japanese Producers' arguments that subject imports from Australia and Japan lacked geographic overlap because they were "uniquely present in the West Coast" by noting that imports from these countries also entered into the South/Gulf Coast and that although imports from certain countries may have been concentrated in a particular region, importers reported selling subject imports throughout the United States. *Id.*

³⁴⁸ *Original Japan Determination*, USITC Pub. 3202 at 7 n.29.

³⁴⁹ CR/PR at Table II-3. Imports of subject merchandise from Japan and the majority of U.S. imports from South Korea entered at Western borders of entry, the majority of U.S. imports from Turkey entered at Southern borders of entry, while most U.S. imports from Netherlands and the United Kingdom entered at Northern borders of entry. CR/PR at Table IV-4. The *** Australia reported selling hot-rolled steel to the ***; importers of hot-rolled steel from Japan reported selling to ***; importers of hot-rolled steel from the Netherlands reported selling to ***; importers of hot-rolled steel from South Korea reported selling to ***; importers of hot-rolled steel from Turkey reported selling to ***; and *** of hot-rolled steel from the United Kingdom *** reported selling to ***. CR/PR at Table II-3.

³⁵⁰ CR/PR at Table II-3.

³⁵¹ POSCO's Posthearing Brief at 11.

noted, importers of subject merchandise from South Korea reported selling subject imports ***.³⁵² Likewise, domestic producers reported selling hot-rolled steel throughout the continental United States, while importers of subject imports from all other subject countries in aggregate reporting selling hot-rolled steel ***.³⁵³ Furthermore, in the original investigations, absent the discipline of the orders, U.S. imports from South Korea were sold in all six regions of the continental United States.³⁵⁴ Accordingly, we disagree with POSCO's claim that subject imports from South Korea likely would be limited in geographic overlap with the domestic like product and subject imports from other subject sources in the event of revocation of the orders.

Japanese Respondents argue that subject imports from Japan are focused on the West Coast, where the U.S. producers have a smaller presence.³⁵⁵ They observe that only *** percent of sales by the U.S. mills, which are nearly all located over 1,000 miles from the West Coast, were made to customers over 1,000 miles away, while *** percent of imports of hot-rolled steel from Japan entered at Western borders of entry.³⁵⁶ However, importers of subject merchandise from Japan reported selling hot-rolled steel in various other regions in the United States (*i.e.*, the Midwest, Southeast, and Central Southwest), while domestic producers reported selling hot-rolled steel throughout the continental United States, including in the Pacific region.³⁵⁷ Furthermore, in the original investigations, absent the discipline of the orders, U.S. imports from Japan were sold in all six regions of the continental United States.³⁵⁸ Accordingly, we disagree with Japanese Respondents' claim that subject imports from Japan likely would be limited in geographic overlap with the domestic like product and subject imports from other subject sources in the event of revocation of the orders.

Consistent with the Commission's finding in the original investigations, although hot-rolled steel from different sources may have different regional concentrations, the record as a whole does not indicate that in the event of revocation importers would not sell the subject

³⁵² CR/PR at Table II-3. The only region in which importers did not report sales of subject merchandise from South Korea was the "other" region, which consists of Alaska, Hawaii, Puerto Rico, and the Virgin Islands. *Id.*

³⁵³ CR/PR at Table II-3.

³⁵⁴ *Original Determinations*, USITC Pub. 4638 at 20.

³⁵⁵ Japanese Respondents assert that domestically produced hot-rolled steel is unavailable to its affiliate Steelscape (who purchased (***) percent) of all Japanese exports to the United States in 2021), (***) Steelscape. Japanese Respondents contend that U.S. producers are unwilling and/or unable to provide Steelscape with sufficient quantities of hot-rolled steel to meet its needs, (***) Japanese Respondents' Prehearing Brief at 25-26. Domestic Producers assert that domestic producers are "willing and able" to fully supply Steelscape if requested, have (***) , and regularly supply the West Coast with hot-rolled steel. Nucor, SCI, SSAB, and SDI, Posthearing Brief at 6-9.

³⁵⁶ Japanese Respondents' Prehearing Brief at 26 (citing CR/PR at Table IV-4).

³⁵⁷ CR/PR at Table II-3.

³⁵⁸ *Original Determinations*, USITC Pub. 4638 at 20.

imports throughout the United States.³⁵⁹ Consequently, we find that, in the event of revocation, there would be geographic overlap among the subject imports and between imports from each subject source and the domestic like product.

Channels of Distribution. In the original investigations, the Commission found that an appreciable proportion of shipments of the domestic like product and imports from Australia, Brazil, Japan, South Korea, Turkey and the United Kingdom were directed to both end users and distributors/service centers.³⁶⁰

In the original investigations involving hot-rolled steel from Russia, the Commission found that subject imports and the domestic like product were generally sold in the same channels of distribution. The Commission noted that the domestic producers and subject importers sold hot-rolled steel to distributors, processors, or service centers, manufacturers of tubular products and other end users, although domestic producers also internally transferred significant amounts to make downstream products.³⁶¹

In these reviews, a majority of shipments by U.S. producers were directed to end users, and significant quantities (31.1 percent of shipments in 2021) were also sold to distributors.³⁶² While most subject imports from the Netherlands and South Korea were sold to distributors, substantial and increasing quantities (***) and (***) percent of shipments in 2021, respectively compared to (***) and (***) percent in 2016, respectively) were also sold to end users.³⁶³ While a majority of subject imports from the Japan were sold to end users, increasing quantities (***) percent of shipments in 2021 compared to (***) percent in 2016) were also sold to distributors. Subject imports from Brazil and Turkey were sold (***) to distributors, while subject imports from Australia and Russia were sold (***) to end users.³⁶⁴

POSCO's argument that there would likely be differentiated channels of distribution between subject imports from South Korea, imports other subject sources, and U.S. producers

³⁵⁹ *Original Determinations*, USITC Pub. 4638 at 20.

³⁶⁰ *Original Determinations*, USITC Pub. 4638 at 18-19. The Commission observed that in 2015, the majority of U.S. producers' commercial shipments (54.5 percent) were sold directly to service centers/distributors, as were imports of hot-rolled steel from Australia (***) percent), Brazil (***) percent), Korea (***) percent), the Netherlands (***) percent), Turkey (***) percent), and the United Kingdom (***) percent), whereas the majority of hot-rolled steel imports from Japan (***) were sold directly to end users. Confidential *Original Determinations*, EDIS Doc. 756007 at 26-27. The Commission also rejected BlueScope and Japanese respondents' arguments that subject imports from Australia and Japan flowed through distinct channels of distribution because the majority of these imports were shipped to U.S. affiliates or to long-term customers. Specifically, the Commission found that there was a substantial overlap in the channels of distribution because a substantial and increasing share of subject imports from Australia and Japan from 2013 to 2015 were not shipped to these companies' U.S. affiliates. *Original Determinations*, USITC Pub. 4638 at 19.

³⁶¹ *Original Japan Determination*, USITC Pub. 3202 at 7-8 and n.28.

³⁶² CR/PR at Table II-1.

³⁶³ CR/PR at Table II-1.

³⁶⁴ CR/PR at Table II-1.

is not supported by the record. Specifically, it maintains that subject imports from South Korea were sold *** to distributors during most of the POR while domestic producers' sales and sales of *** on end users.³⁶⁵ As indicated above, an increasing share of subject imports from South Korea during the POR were made to end users.³⁶⁶ Furthermore, during the original investigations, *** of imported hot-rolled steel from South Korea was sold to end users.³⁶⁷ As such, the record does not indicate that upon revocation, significant quantities of subject merchandise from South Korea would not be sold directly to end users as they were during the original investigations.³⁶⁸ Consequently, we reject POSCO's claim and find that in the event of revocation, there would be sufficient overlap in channels of distribution among the subject imports and between imports from each subject source and the domestic like product.

Simultaneous Presence in Market. In the original investigations, the domestic like product and imports of hot-rolled steel from Japan, Korea, the Netherlands, Turkey, and the United Kingdom were present in the U.S. market in every month during the POI, while imports from Australia and Brazil were present in the U.S. market for a majority of the POI.³⁶⁹ In the original investigations involving hot-rolled steel from Russia the Commission found simultaneous presence in the market.³⁷⁰

In these reviews, the domestic like product and imports of hot-rolled steel from the Netherlands and South Korea were present in the U.S. market every month of the POR, while imports of hot-rolled steel from Turkey and Japan were present in the majority of months of the POR.³⁷¹ Subject imports from Australia, Brazil, Russia, and the United Kingdom had a limited presence during the POR.³⁷² However, upon revocation of the orders, nothing in the record indicates that subject imports will not increase their presence in the U.S. market; consequently, imports from each subject source would likely be simultaneously present in the U.S. market along with the domestic like product as they were during the original investigations.

Conclusion. We find a likely reasonable overlap of competition among subject imports from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United

³⁶⁵ POSCO's Prehearing Brief at 10-11.

³⁶⁶ CR/PR at Table II-1.

³⁶⁷ Confidential *Original Determinations*, EDIS Doc. 756007 at 26.

³⁶⁸ Confidential *Original Determinations*, EDIS Doc. 756007 at 26.

³⁶⁹ *Original Determinations*, USITC Pub. 4638 at 20-21. Specifically, imports from Japan, Korea, the Netherlands, Turkey, and the United Kingdom were present in every month of the POI, imports from Australia were present in 27 of 42 months, and imports from Brazil were present in 37 of 42 months. *Id.*

³⁷⁰ *Original Japan Determination*, USITC Pub. 3202 at 7.

³⁷¹ CR/PR at Table IV-5. Specifically, imports of hot-rolled steel from Japan were present in 70 of 78 months, imports from Turkey were present in 56 of 78 months, imports from the United Kingdom were present in 31 of 78 months, imports from Brazil were present in 13 of 78 months, imports from Australia were present in 12 of 78 months, and imports from Russia were present in 4 of 78 months. *Id.*

³⁷² CR/PR at Table IV-5.

Kingdom and between the domestic like product and subject imports from each source. Notwithstanding TSII's and POSCO's arguments to the contrary, there is likely to be a reasonable degree of fungibility upon revocation of the orders. There were sales of hot-rolled steel for the same end-use categories purchased from domestic producers and subject sources. Further, as described above, market participants reported a high degree of fungibility between and among subject imports from each source and the domestic like product. This is reflected in the responses regarding interchangeability, the reports of limited differences other than price between hot-rolled steel from different sources, and most purchasers reporting that domestically produced hot-rolled steel is comparable with subject imports from all eight subject countries with respect to most factors.

Japanese Respondents and POSCO have highlighted different U.S. sales regions and channels of distribution for subject imports from Japan and South Korea during the POR. However, the record does not indicate that subject imports upon revocation of the orders would not resume the distribution and geographic patterns reflected in the original investigations. During the original investigations, subject imports from South Korea and Japan were sold to both distributors and end users.³⁷³

Accordingly, we find that there would likely be a reasonable overlap of competition among subject imports from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom and between the domestic like product and subject imports from each source.

3. Likely Conditions of Competition³⁷⁴

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom would likely compete under similar or different conditions of competition. Based on our review of the record, we find that subject imports from Brazil would not be likely to compete under similar conditions of competition with subject imports from other subject countries – Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom. We consequently exercise our discretion not to cumulate subject imports from Brazil with the other subject countries for purposes of our analysis of the likely volume and effects of subject imports in these reviews.³⁷⁵ As discussed below, we

³⁷³ Confidential *Original Determinations*, EDIS Doc. 756007 at 26.

³⁷⁴ Commissioners Schmidlein and Stayin do not join this section. See Dissenting Views of Commissioners Rhonda K. Schmidlein and Randolph J. Stayin.

³⁷⁵ In determining whether to exercise our discretion, the Commission has historically looked at a number of different likely conditions of competition. As discussed above in the Legal Standard for Cumulation, the Federal Circuit in *Nucor* affirmed that the Commission has wide latitude in selecting the (Continued...)

exercise our discretion to cumulate subject imports from Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom.

a. Brazil

We find that subject imports from Brazil would not be likely to compete under similar conditions of competition with subject imports from other subject countries in the event of revocation given the effects of the Section 232 quota with respect to hot-rolled steel from Brazil. Unlike all but one of the other subject countries, hot-rolled steel from Brazil is subject to an absolute quota limit imposed under Section 232. The Section 232 quota took effect in June of 2018 and is an absolute cap on the annual volume of subject imports from Brazil. The quota is set at 143,416 short tons per year for 2022, equivalent to 0.25 percent of apparent U.S. consumption in 2021.³⁷⁶ Even prior to the establishment of the quota in June of 2018, subject imports from Brazil were limited during the POR.³⁷⁷

By comparison, subject imports from Australia are not subject to any Section 232 measures and subject imports from Russia and Turkey have no quota limits but are subject instead to 25 percent *ad valorem* tariffs.³⁷⁸ Further, while hot-rolled steel from Japan, the Netherlands, and the United Kingdom are subject to TRQs,³⁷⁹ the TRQs are not an absolute cap on the volume of imports. The TRQs for Japan, the Netherlands, and the United Kingdom permit unlimited volumes of subject imports from each of these subject countries to enter the United States with 25 percent Section 232 duty rates applied for any volumes in excess of the

types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews. *Nucor*, 601 F.3d at 1292; *see also, e.g., Nucor Corp. v. United States*, 605 F. Supp. 2d 1361, 1371, n. 13 (Ct. Int'l Trade 2009) (*citing Nucor Corp. v. United States*, 569 F. Supp.2d 1328, 1338 n.5 (Ct. Int'l Trade 2008)); *Cut-to-Length Carbon Steel Plate from China, Russia, South Africa, and Ukraine*, Inv. Nos. 731-TA-753-756 (Review), USITC Pub. 3626 (September 2003) at 16-17 (Commission declining to exercise its discretion to cumulate subject imports from South Africa with other subject imports based, in part, on South Africa's exemption from safeguard measures); *Cotton Shop Towels from Bangladesh, China, and Pakistan*, Inv. Nos. 701-TA-202 (Review) and 731-TA-103 and 514 (Review), USITC Pub. 3267 (January 2000) at 9-11 (citing differing textile quota conditions for China than for Bangladesh/Pakistan as basis for exercising discretion not to cumulate subject imports from China with subject imports from those other two countries). Consistent with this latitude and prior Commission decisions in five-year reviews identifying trade restricting measures as a relevant condition of competition, we find that the absolute quota on imports from Brazil is a relevant likely condition of competition affecting their ability to supply and compete in the U.S. market.

³⁷⁶ CR/PR at I-39. Subject imports from Brazil were 11 short tons in 2018, 336 short tons in 2019, 0 short tons in 2020 and 2021, and 8 short tons in interim 2022. *Id.* The information available thus indicates that the quota for Brazil was mostly not utilized during the POR. CR/PR at I-39 n.57

³⁷⁷ CR/PR at Table IV-1. The volume of subject imports from Brazil decreased from 13,441 short tons in 2016 to 36 short tons in 2017.

³⁷⁸ CR/PR at Table I-21.

³⁷⁹ CR/PR at I-39 to I-40.

TRQ limits.³⁸⁰ Prior to the institution of the TRQ in 2022, subject imports from the Netherlands and Japan maintained a presence in the United States market despite the Section 232 measures.³⁸¹

Further, although imports of hot-rolled steel from South Korea also are currently subject to an absolute quota, there are important differences between the level of South Korea's quota and presence of subject imports from South Korea compared to subject imports from Brazil. The annual absolute quota on subject imports from South Korea is 584,544 short tons (equivalent to 1.0 percent of apparent U.S. consumption in 2021), whereas the annual absolute quota on subject imports from Brazil is only 143,416 short tons (equivalent to 0.25 percent of apparent U.S. consumption in 2021).³⁸² In other words, the absolute quota on subject imports from South Korea is approximately four times larger than the absolute quota for subject imports from Brazil. Further, while subject imports from South Korea approached their quota limit (and were higher than volume associated with the quota limit for Brazil) and maintained a substantial presence in the U.S. market throughout the POR,³⁸³ subject imports from Brazil remained well below their much smaller quota limit, having essentially exited the U.S. market earlier in the POR.³⁸⁴ Given the absolute quota applicable to subject imports from Brazil, even if imports from Brazil reached the quota level, the substantially larger quota for South Korea and the absence of an absolute quota on imports from other subject countries means that, unlike subject imports from Brazil, imports from the other subject countries would be in a position to compete for a greater number of sales at larger volumes than subject producers in

³⁸⁰ CR/PR at I-39 to I-40 and Table I-21. Currently, the TRQs are 250,115 short tons for hot-rolled steel from Japan, 215,087 short tons for hot-rolled steel from the Netherlands, and 54 short tons for hot-rolled steel from the United Kingdom. *Id.*

³⁸¹ See CR/PR at Tables F-3 and F-4. Most subject imports from the Netherlands were not subject to the Section 232 duties.

³⁸² See CR/PR at Tables I-21 and C-1.

³⁸³ During the POR, the volume of subject imports from South Korea were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021 and *** short tons in interim 2022. CR/PR at Tables IV-1 and C-1. As discussed above, available information indicates that the quota for South Korea was mostly filled in 2021. South Korea's annual quota usage rates for HTS statistical reporting numbers containing hot-rolled steel products were the following in 2021: HTS 9903.80.05 (71 percent of 404,694,045 kg filled), HTS 9903.80.06 (4 percent of 249,173 kg filled), HTS 9903.80.07 (99 percent of 125,346,920 kg filled). CR/PR at I-39 n.57.

³⁸⁴ The Brazilian industry also produces and exports far less hot-rolled steel than the industry in South Korea. Compare CR/PR at Table IV-20 (Brazilian production of *** short tons in 2021) with Table IV-52 (South Korean production of *** short tons in 2021 and exports of *** short tons in 2021). Brazilian subject producers' exports as a share of total shipments have fallen steadily over the POR, from *** percent in 2016 to *** percent in 2021. CR/PR at Table IV-20. These numbers suggest that the Brazilian industry will likely not as aggressively seek sales in the United States compared to the more export oriented subject industries in Japan, South Korea, and Russia.

Brazil which must share the smaller quota.³⁸⁵ As a result, the small absolute quota applicable to subject imports from Brazil is likely to prevent Brazilian exporters from competing under similar conditions of competition as producers in other subject countries.

The absolute quota on imports from Brazil also is administered quarterly, and imports count against the quota as they arrive, up to 30 percent of the already small annual quota.³⁸⁶ This administration of the quota coupled with the small quarterly limit (at most 43,025 short tons) is likely to introduce some uncertainty into the market as to whether an importer's arriving shipment of subject imports from Brazil will be permitted entry in a particular quarter. This is an added complication, making planning to take advantage of even the small quota amounts more difficult for importers of hot-rolled steel from Brazil.

Therefore, in light of the foregoing, in particular the absolute annual quota, we find that subject imports from Brazil would likely compete under different conditions of competition than hot-rolled steel imports from the other subject countries if the orders were revoked.³⁸⁷

³⁸⁵ See Hearing Tr. at 67 (Kopf).

³⁸⁶ Hearing Tr. at 217, 258-259 (Richardson); Hearing Tr. at 67 (Kopf). See also Posthearing Brief of CSN and USIMINAS at Exhibit 3 (***) (***) ; Domestic Parties' Posthearing Brief at 14 (arguing that Brazilian producers will race to fill up the quarterly quota); Hearing Tr. at 258 (Richardson) ("But the way it works is you line up like you're at a red light."); Cleveland-Cliffs' Posthearing Brief at Exhibit 1 at 19 (arguing Brazilians can nonetheless compete for larger transaction volumes of 20,000 to 40,000 tons despite quarterly administration of quota).

³⁸⁷ The Domestic Producers claim that the Commission erred in *Cold-Rolled Steel* by exercising its discretion not to cumulate subject imports from Brazil that were under an absolute quota. They argue that the Commission in these reviews should focus its analysis on the merchant market, as it did in the original investigations, that subject producers in Brazil can compete for larger sales because the quota is larger than in *Cold-Rolled Steel*, that the Commission cannot exercise its discretion based upon the absolute quota on subject imports from Brazil, and that importers have already begun offering cold-rolled steel for sale after the orders were revoked on cold-rolled steel from Brazil. Nucor, SSAB, and SDI's Posthearing Brief, Exhibit 1 at 54; Exhibit 20 (***) Affidavit; Cleveland-Cliffs' Posthearing Brief at 10-11, Exhibit 1 at 18-23.

We note that the statutory direction for the Commission to focus primarily on the merchant market in certain circumstances does not apply to five-year reviews. We do, however, consider the significant quantity of captive production as a condition of competition. We also do not find that the slightly larger quota in these reviews compared to the quota in *Cold-Rolled Steel* is a meaningful distinction. The quota for cold-rolled steel was equivalent to 0.20 percent of total market apparent U.S. consumption (or 0.50 percent of the merchant market), whereas the quota for hot-rolled steel is 0.25 percent of total market apparent U.S. consumption (or 0.57 percent of the merchant market). *Cold-Rolled Steel*, USITC Pub. 5339 at 71 n.486; *Calculated* from CR/PR at I-39 and Table K-1. Both are administered quarterly. As mentioned, subject imports from Brazil will likely compete under different conditions of competition than subject imports from other sources because of the quota. Further, the fact that importers have offered cold-rolled steel for sale after the orders were revoked on cold-rolled steel is not inconsistent with our conclusion that subject imports from Brazil will likely compete under different conditions of competition with the small absolute quota in place.

(Continued...)

b. Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom

We also find that the record in these reviews does not indicate that there likely would be significant differences in the conditions of competition between subject imports from Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom if the orders were revoked. As discussed above, each of these subject countries has shown a demonstrated interest and incentive to compete in the U.S. market, an ability to compete in the U.S. market in large volumes given their production capacity and nature of Section 232 measures, and with the exception of Australia, each subject industry exports substantial volumes of hot-rolled steel.³⁸⁸ We have also explained that, contrary to respondents' arguments, there is likely to be a reasonable overlap of competition if the antidumping and countervailing duty orders are revoked. Accordingly, we do not find different conditions of competition sufficient to warrant exercising our discretion to not cumulate subject imports

As discussed further below, we also disagree with Domestic Producers' contention that the Section 232 action as it relates to imports of hot-rolled steel from Brazil will likely be terminated in the reasonably foreseeable future, as well as their claim that the Brazilian industry will likely increase its export volumes above the absolute quota via exclusions. *See infra* section p. 103.

³⁸⁸ CR/PR at Tables IV-13, IV-29, IV-36, IV-43, IV-52, IV-59, IV-67.

from Australia, Japan,³⁸⁹ the Netherlands,³⁹⁰ Russia, South Korea,³⁹¹ Turkey, and the United Kingdom with each other.

BlueScope argues that subject imports from Australia are likely to compete under different conditions of competition than imports from other subject countries. Specifically, BlueScope argues that its ownership and investment in U.S. producer North Star and purchaser Steelscape, as well as its plans to supply Steelscape with hot-rolled steel, are a unique condition

³⁸⁹ The Japanese Respondents argue, similar to BlueScope, that most of the Japanese producers' sales are to Steelscape and that such sales do not compete with the domestic industry, so there is not likely to be a reasonable overlap of competition. They contend that such sales are a unique condition of competition, and therefore, subject imports from Japan will compete differently in the U.S. market and should not be cumulated. Japanese Respondents' Prehearing Brief at 11; Japanese Respondents' Final Comments at 2-6. We reject these arguments. As noted above, domestic producers regularly supply West Coast purchasers and have offered to sell hot-rolled steel to Steelscape. Moreover, Japanese Respondents have acknowledged that a substantial portion of subject imports from Japan were not destined for Steelscape during the POR. Given the size of the Japanese industry, its export orientation, and the continued presence of subject imports from Japan in the U.S. market, we are not persuaded that subject imports from Japan will compete under different conditions of competition if the antidumping duty order is revoked.

³⁹⁰ TSIJ argues that subject imports from the Netherlands are not likely to have reasonable overlap of competition with the domestic product and subject imports from other subject countries and therefore will compete differently in the U.S. market. It argues that it sells specialty products to only two longstanding customers in the United States and that it currently is subject to a low antidumping margin, so the Commission should exercise its discretion and decline to cumulate subject imports from the Netherlands. TSIJ's Prehearing Brief at 10-11. We have explained above that if the antidumping duty order on subject imports from the Netherlands is revoked, it is likely that subject imports from the Netherlands will compete with subject imports from other subject countries and the domestic like product as they did in the original investigations, so that there will likely be a reasonable overlap of competition. Thus, regardless of the distinctions emphasized by TSIJ concerning subject imports from the Netherlands during the POR, given the Dutch industry's continued export orientation and its aggressive pricing during the original investigations, we find it likely that subject imports from the Netherlands will compete with imports from other subject countries (except Brazil) under similar conditions of competition if the order is revoked. CR/PR at Table IV-36 (exports' share of shipments); Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-16 (purchasers' reports of price reductions and shift to subject imports from the Netherlands).

³⁹¹ POSCO argues that the absolute quota on subject imports from South Korea is a unique condition of competition and that they are not likely to compete with the domestic like product and imports from other subject countries. POSCO's Prehearing Brief at 9-10; POSCO's Posthearing Brief at 3-9; POSCO's Final Comments at 2-4. We have explained why there is likely to be a reasonable overlap of competition if the orders are revoked as subject imports from South Korea are not likely to be limited geographically or used for only limited categories of end uses as POSCO argues. We have also explained why the continued presence of subject imports from South Korea in the U.S. market and the larger absolute quota on imports of hot-rolled steel from South Korea distinguish these subject imports from subject imports from Brazil despite imports from both countries facing an absolute quota. We therefore find that it is likely that subject imports from South Korea will compete under conditions of competition similar to imports from other subject countries with the exception of Brazil.

of competition. We find, however, that the distinctions BlueScope emphasizes do not indicate that subject imports from Australia are likely to compete differently from imports from other subject countries (except Brazil).

As we have explained above, if the antidumping duty order on hot-rolled steel from Australia is revoked, BlueScope's sales of hot-rolled steel into the U.S. market are not likely to be limited to *** short tons per year supplied only to Steelscape.³⁹² As an initial matter, we reject BlueScope's claim that its likely sales to Steelscape would not be sales in the merchant market and thus would not compete with domestic producers.³⁹³ Although BlueScope is affiliated with Steelscape and thus maintains an interest in its operations, any sales from BlueScope (Australia) to Steelscape would not constitute internal consumption/transfers to related firms with respect to the U.S. market.³⁹⁴ We thus reject the notion that BlueScope's intended sales to Steelscape upon revocation would exist outside of the U.S. merchant market and indicate a difference in likely conditions of competition.³⁹⁵

Further, as discussed above, we are unpersuaded that BlueScope's likely sales upon revocation would be limited to its affiliate Steelscape by virtue of BlueScope's investments in its other U.S. affiliate North Star since imposition of the orders. Notably, although BlueScope has made significant investments in North Star and related entities since the imposition of the orders,³⁹⁶ BlueScope nonetheless maintained ownership of North Star during the original POI while approximately *** of its U.S. sales were to U.S. purchasers other than Steelscape,³⁹⁷ suggesting that BlueScope is able to sell into the U.S. market without harming North Star's sales or pricing. North Star's relatively limited position in the U.S. market is consistent with an incentive to increase sales of imports from Australia. North Star accounts for only *** percent

³⁹² BlueScope's Posthearing Brief, Exhibit 1 at 16-18.

³⁹³ BlueScope's Prehearing Brief at 22-23; BlueScope's Final Comments at 2-10. *See also* Hearing Tr. at 279 (Finan, Porter).

³⁹⁴ *See* Foreign Producer Questionnaire at II-11. ***. *See* BlueScope's Prehearing Br. at Exhibit 2. *** *Id.*

³⁹⁵ As discussed above, we also disagree with BlueScope that domestic producers are unable or unwilling to compete for West Coast sales. *See* BlueScope's Prehearing Brief at Exhibit 4. *** *See* BlueScope's Prehearing Brief at Exhibit 4. *** *See* Domestic Interested Parties Posthearing Br. at Exhibits 10, 11, 12. *** *See* BlueScope's Posthearing Br. *** *See, e.g.,* Domestic Interested Parties Posthearing Br. at Exhibit 10, para. 8 ("In my experience, ***"); *id.* at Exhibit 12, para. 5 ("Over the years, ***. These negotiations have not been successful. For example, ***.").

³⁹⁶ We note also that BlueScope is not the only subject producer to have substantial investments in hot-rolled steel production in the United States. Japanese producer NSC and ArcelorMittal SA, since acquiring the ThyssenKrupp Steel USA facility in Calvert, Alabama in 2014 for \$1.55 billion as a joint venture, invested in a \$775 million expansion of that facility, which began in 2021. Japanese Respondents' Prehearing Brief at Exhibit 10.

³⁹⁷ Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at VII-5; *Original Determinations*, USITC Pub. 4638 at 18-19.

of U.S. production and is located in Delta, Ohio.³⁹⁸ North Star's relatively small share of U.S. production, even with the ***, implies that it need not be in competition for sales across the entirety of the U.S. market to maintain and even expand on its position. Indeed, BlueScope itself maintains that North Star does not compete for sales to the West Coast of the United States because North Star considers freight and logistics to be too high.³⁹⁹ Thus, we are unpersuaded that BlueScope's investments in North Star would substantially limit its sales activity in the U.S. market such that BlueScope would likely compete under different conditions of competition upon revocation.⁴⁰⁰ ⁴⁰¹

In sum, for the reasons discussed above, we exercise our discretion not to cumulate subject imports from Brazil and therefore consider subject imports from Brazil separately from

³⁹⁸ CR/PR at Table III-5.

³⁹⁹ BlueScope's Prehearing Brief at 38-39 and Exhibit 4. Hearing Tr. at 306 (Finan) (freight too high to economically supply Steelscape from North Star).

⁴⁰⁰ Nor does the fact of the head of BlueScope's North American operations recently gaining expanded authority, to include veto power over BlueScope's exports of hot-rolled steel to the United States, persuade us otherwise. See, e.g., BlueScope's Final Comments at 4. Although the head of BlueScope's North American operations may now have veto power over BlueScope's exports of hot-rolled steel to the United States, it does not follow that BlueScope's exports of hot-rolled steel to the United States necessarily would jeopardize BlueScope's investment in North Star, as discussed above.

⁴⁰¹ BlueScope also cites several previous investigations in which a subject producer invested in U.S. production and the Commission declined to cumulate subject imports. BlueScope's Prehearing Brief at 9-14 (citing *Certain Large Residential Washers from Korea and Mexico*, Inv. Nos. 701-TA-488 and 731-TA-1199-1200, USITC Pub. 4882 (Review) (Apr. 2019) at 19-20; *Stainless Steel Plate from Belgium, Italy, Korea, South Africa, and Taiwan*, Inv. Nos. 701-TA-379 and 731-TA-788, 790-793, USITC Pub. 4248 (Second Review) (Aug. 2011) at 17. As an initial matter, we note that Commission determinations are not precedent, and the Commission is not bound by prior determinations because each investigation is *sui generis*. *Nucor Corp. v. United States*, 414 F.3d 1331, 1340 (Fed. Cir. 2005), *International Imaging Materials, Inc. v. United States*, 30 C.I.T. 1181, 1185-86 (2006) ("the ITC's prior factual determinations . . . do not constitute precedent"). In addition, the cited investigations involved instances where subject imports were replaced by domestic production, where foreign ownership of the domestic producer at issue was a new condition of competition during the review period, and/or where the domestic producer at issue held a substantial share of domestic production. By contrast, BlueScope has held at least a 50-percent ownership interest in North Star since the beginning of the original investigations and actually purchased the remaining 50 percent of North Star in 2015, during the final year of the original POI. Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Tables III-2 and III-3. Further, North Star accounted for a relatively small *** percent of domestic production of hot-rolled steel both in the original investigations in 2015 and in the current reviews. Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table III-1; CR/PR at I-23. As we have explained, BlueScope was selling to unaffiliated purchasers in the U.S. market during the original POI while it had a substantial ownership interest in North Star, and the record does not indicate there has been such a change in the conditions of competition since the original investigations that BlueScope will no longer likely sell to unaffiliated customers in the United States.

all other subject imports. We also exercise our discretion to cumulate subject imports from Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom.

F. Conclusion

We determine that if the orders were revoked, subject imports from Australia, Brazil, Japan, the Netherlands, South Korea, Russia, Turkey, and the United Kingdom would not be likely to have no discernible adverse impact on the domestic industry. We further find that there would likely be a reasonable overlap of competition between the subject imports from each of these countries and the domestic like product and among the subject imports from these countries. In addition, we find that imports from each subject country except Brazil are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from Australia, Japan, the Netherlands, South Korea, Russia, Turkey, and the United Kingdom. As discussed above, however, we find that subject imports from Brazil are likely to compete under different conditions of competition from the other subject countries if the orders were revoked, and therefore, we exercise our discretion not to cumulate imports from Brazil with imports from any of the other subject countries.⁴⁰²

IV. Revocation of the Antidumping and Countervailing Duty Orders On Cumulated Subject Imports 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.”⁴⁰³ 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

⁴⁰² Commissioners Schmidlein and Stayin determine that imports from each subject country would likely compete under similar conditions of competition upon revocation of the orders and exercise their discretion to cumulate imports from all subject countries for their analysis in these reviews.

⁴⁰³ 19 U.S.C. § 1675a(a).

elimination of its restraining effects on volumes and prices of imports.”⁴⁰⁴ Thus, the likelihood standard is prospective in nature.⁴⁰⁵ 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.⁴⁰⁶

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.”⁴⁰⁷ 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.”⁴⁰⁸

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.”⁴⁰⁹ 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

⁴⁰⁴ 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.

⁴⁰⁵ 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.

⁴⁰⁶ 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’”).

⁴⁰⁷ 19 U.S.C. § 1675a(a)(5).

⁴⁰⁸ 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.*

⁴⁰⁹ 19 U.S.C. § 1675a(a)(1).

an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁴¹⁰ 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.⁴¹¹

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.⁴¹² 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.⁴¹³

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.⁴¹⁴

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

⁴¹⁰ 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings since imposition of the orders. CR/PR at I-23.

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

⁴¹² 19 U.S.C. § 1675a(a)(2).

⁴¹³ 19 U.S.C. § 1675a(a)(2)(A-D).

⁴¹⁴ 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.

more advanced version of the domestic like product.⁴¹⁵ 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 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.⁴¹⁶

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.”⁴¹⁷ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. In its original determinations, the Commission found that demand for hot-rolled steel was driven by demand in the automotive, construction, and energy sectors.⁴¹⁸ The Commission found that hot-rolled steel was used in the manufacture of downstream products for automotive applications, pipe and tube goods, transportation equipment (such as rail cars, ships, and barges), nonresidential construction, appliances, heavy machinery, and machine parts. The domestic industry’s 2015 commercial shipments of hot-rolled steel were ***, followed by shipments to the ***; other end uses accounted for the remaining shipments.

The Commission additionally observed that a majority of U.S. hot-rolled steel production was internally consumed and primarily used to produce coated steel and cold-rolled sheet and strip, and to a lesser extent tin mill and tubular products. Accordingly, the Commission found that demand for hot-rolled steel was also driven by demand in the market sectors for these finished downstream products.⁴¹⁹

Apparent U.S. consumption of hot-rolled steel in the merchant market increased by 10.1 percent from 2013 to 2014, but then decreased by 15.7 percent from 2014 to 2015, for an

⁴¹⁵ 19 U.S.C. § 1675a(a)(4).

⁴¹⁶ 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.

⁴¹⁷ 19 U.S.C. § 1675a(a)(4).

⁴¹⁸ *Original Determinations*, USITC Pub. 4638 at 27.

⁴¹⁹ *Original Determinations*, USITC Pub. 4638 at 28.

overall decrease of 7.2 percent from 2013 to 2015.⁴²⁰ Similarly, apparent U.S. consumption of hot-rolled steel in the overall U.S. market increased by 5.1 percent from 2013 to 2014, then decreased by 11.5 percent from 2014 to 2015, for an overall decline of 7.0 percent from 2013 to 2015.⁴²¹

U.S. producers, importers, and purchasers generally described increased demand from the automotive, appliance, and construction industries, while they generally described demand from the oil country tubular goods sector and other energy-related sectors as having declined substantially during the original investigations.⁴²²

The Russia Investigation and Reviews. In the original investigations concerning hot-rolled steel from Brazil, Japan, and Russia, the Commission characterized apparent U.S. consumption of hot-rolled steel as strong.⁴²³ In both the first and second reviews, the Commission found that demand for hot-rolled steel in the United States was largely tied to overall economic activity.⁴²⁴ During the first reviews, apparent U.S. consumption dropped sharply in 2001 as a result of a recession, but subsequently rebounded.⁴²⁵ During the second reviews, demand was impacted by a recession that caused gross domestic product to decline during the latter portion of 2008 and 2009.⁴²⁶ In the expedited third review, the domestic producers reported that demand grew from 2012 to 2014, but was lower during the first six months of 2015 than the comparable period in 2014.⁴²⁷

Current Reviews. In the current reviews, the main drivers of demand for hot-rolled steel remain the same as in the original investigations (*i.e.*, demand in the automotive, construction,

⁴²⁰ *Original Determinations*, USITC Pub. 4638 at 25-27. In the *Original Determinations*, the Commission found that the criteria for application of the captive production of the statute was satisfied. *Id.* Accordingly, it focused its analysis on the merchant market in analyzing the market share and financial performance of the domestic industry. *Id.* at 24. It also considered the market as a whole and the captive portion of the market for hot-rolled steel in its analysis. *Id.* The Commission has stated that the captive production provision does not apply to five-year reviews. *See, e.g., Hot-Rolled Steel Products from Argentina, China, India, Indonesia, Kazakhstan, Romania, South Africa, Taiwan, Thailand, and Ukraine*, Inv. Nos. 701-TA-404-408 & 731-TA-898-902 & 904-908 (Review), USITC Pub. 3956 at 25 n.129 (Oct. 2007). However, we find it appropriate to consider the significant share of domestic production that is captively consumed as a relevant condition of competition.

⁴²¹ *Original Determinations*, USITC Pub. 4638 at 28.

⁴²² *Original Determinations*, USITC Pub. 4638 at 28.

⁴²³ *Original Japan Determination* at 9-10. Finding the terms of the captive production provision satisfied, the Commission majority focused its analysis primarily on the merchant market when assessing market share and the factors affecting the financial performance of the domestic industry. *Original Japan Determination* at 9-10; *Certain Hot-Rolled Steel Products from Brazil and Russia*, Inv. Nos. 701-TA-384, 731-TA-806, 808 (Final), USITC Pub. 3223 (Aug. 1999).

⁴²⁴ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 26-27; *First Five-Year Review Determinations*, USITC Pub. 3767 at 28-29.

⁴²⁵ *First Five-Year Review Determinations*, USITC Pub. 3767 at 27.

⁴²⁶ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 26-27.

⁴²⁷ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 12.

and energy sectors), which generally reflect overall economic conditions.⁴²⁸ The domestic industry's 2021 shipments of hot-rolled steel were *** percent of their total U.S. shipments followed by tubular goods, which accounted for *** percent of their total U.S. shipments.⁴²⁹

Apparent U.S. consumption increased irregularly during 2016-2021, ending 0.3 percent higher in 2021 than in 2016; it was lower in interim 2022 compared to interim 2021.⁴³⁰ Apparent U.S. consumption measured in short tons was 57.6 million in 2016, 59.3 million in 2017, 61.2 million in 2018, 58.1 million in 2019, 50.4 million in 2020, 57.8 million in 2021, 14.5 million in interim 2021, and 12.5 million in interim 2022.⁴³¹ Overall, seasonally adjusted automotive and light truck sales declined by 28.8 percent from January 2016 to December 2021.⁴³² Construction spending fluctuated, but was 43.5 percent higher in December 2021 than it was in January 2016, with the largest decline occurring from April 2020 to June 2021, which also coincided with the COVID-19 pandemic.⁴³³ The COVID-19 pandemic reduced U.S. demand for hot-rolled steel in 2020, as production shutdowns, particularly in the automotive industry, led to a sharp decline in demand.⁴³⁴ Demand then recovered rapidly in 2021.⁴³⁵ While a large majority U.S. producers, U.S. importers, and purchasers reported in their questionnaire responses that U.S. demand increased or fluctuated during the POR,⁴³⁶ the Four Domestic Producers assert that demand remained lower in 2021 than during the POI of the original investigations.⁴³⁷

⁴²⁸ CR/PR at II-16.

⁴²⁹ CR/PR at IV-14, Table IV-3 "Distributors/service centers'" shipments of domestically produced hot-rolled steel were *** shipped to the "other" end uses, accounting for *** percent of distributors/service centers' U.S. shipments of domestically produced hot-rolled steel, while tubular goods accounted for *** percent. *Id.* at Table II-2. The domestic industry's 2021 shipments to end users were largely shipped to the "other" end uses, accounting for *** percent of U.S. shipments to distributors/service centers while tubular goods accounted for *** percent. *Id.* at Table H-1.

⁴³⁰ CR/PR at Tables I-26 and C-1.

⁴³¹ CR/PR at Tables I-26 and C-1.

⁴³² CR/PR at II-16, Fig. II-1.

⁴³³ CR/PR at II-16, Fig. II-2.

⁴³⁴ CR/PR at II- 15, III-37 n.22, III-46 n.50; *see also* CR/PR at Figs. II-1 (auto sales), II-2 (construction spending), II-3 (real U.S. GDP).

⁴³⁵ CR/PR at II- 15, III-37 n.22, III-46 n.50; *see also* CR/PR at Figs. II-1 (auto sales), II-2 (construction spending), II-3 (real U.S. GDP). Hearing Tr. at 110 (Kopf), 109, 121 (Moskaluk). Apparent U.S. consumption decreased by 13.2 percent from 2019 to 2020 before increasing by 14.6 percent from 2020 to 2021. CR/PR at Tables I-26 and C-1. Likewise, U.S. real GDP increased in each full year of the POR except from 2020 to 2021 and ended higher in the last quarter of 2021 than the first quarter of 2016. CR/PR at II-16, Fig. II-3.

⁴³⁶ CR/PR at Table II-5. In their prehearing brief Brazilian Respondents argue that demand is currently "strong" and is projected to remain strong. Prehearing Brief of CSN and USIMINAS at 44-46.

⁴³⁷ Four Domestic Producers' Prehearing Brief at 107; Hearing Tr. at 110 (Kopf), 109, 121 (Moskaluk), 166-67 (Catterlin) (asserting that U.S. consumption for hot-rolled steel in the United States (Continued...))

A large majority U.S. producers, U.S. importers, and purchasers reported in their questionnaire responses that they anticipate U.S. demand will either increase or fluctuate.⁴³⁸ However, in their prehearing briefs and at the hearing, the Domestic Producers argue that demand is decreasing and expect it to decrease in the foreseeable future because of general economic headwinds, including supply chain issues, inflation, rising interest rates, and the war in Ukraine.⁴³⁹

2. Supply Conditions

Original Investigations. In the original investigations, the domestic industry was the largest supplier of hot-rolled steel to the U.S. market; its market share declined overall from 2013 to 2015 with respect to both the merchant market and total market and was higher in interim 2016 than interim 2015.⁴⁴⁰ During the POI, the four largest domestic producers, ***, accounted for over *** of domestic production.⁴⁴¹

Most domestic producers were located in the midwestern and eastern United States, with some domestic production on the West Coast. Individual domestic producers of hot-rolled steel engaged in different types of production activity, with some using blast furnace/oxygen furnace steelmaking and some utilizing electric-arc furnace steelmaking; others produced hot-rolled steel starting with slabs produced by a different firm. Domestic producers made several acquisitions during the POI.⁴⁴²

Five domestic producers reported shutdowns or curtailments in their hot-rolled steel production operations, mostly during 2014 and 2015. The domestic industry's production

was lower in 2021 than during the original investigation and was lower in interim 2022 than interim 2021).

⁴³⁸ See CR/PR at Table II-6.

⁴³⁹ Cleveland-Cliffs' Prehearing Brief at 78-79; Four Domestic Producers' Prehearing Brief at 107, 171-172; Hearing Tr. at 58 (Query), 79-80 (Gerrish), 123 (Price).

There were positive trends in seasonally adjusted auto and light truck sales and construction spending in 2022 compared to 2021 while real GDP decreased in the first quarter of 2022 compared to the fourth quarter of 2021. CR/PR at II-16 to II-18.

⁴⁴⁰ *Original Determinations*, USITC Pub. 4638 at 28. The domestic industry's share of apparent U.S. consumption in the merchant market decreased from 86.5 percent in 2013 to 79.8 percent in 2014 and to 78.6 percent in 2015; the U.S. industry's share of apparent U.S. consumption in the merchant market was 74.6 percent in interim 2015 and 83.1 percent in interim 2016. The domestic industry supplied 93.9 percent of apparent U.S. consumption in the total U.S. market in 2013, 90.4 percent in 2014, and 90.3 percent in 2015; the U.S. industry's share of apparent U.S. consumption in the total U.S. market was 88.1 percent in interim 2015 and 92.7 percent in interim 2016. *Id.*

⁴⁴¹ *Original Determinations*, USITC Pub. 4638 at 28-29.

⁴⁴² *Original Determinations*, USITC Pub. 4638 at 29.

capacity, however, remained largely unchanged over the POI, and the Commission noted that it had ample unused capacity throughout the POI.⁴⁴³

The Commission found that cumulated subject imports were the third largest source of supply to the U.S. market after the domestic industry and nonsubject imports in 2013 and 2014, but surpassed nonsubject imports in 2015 to become the second largest source of supply to the U.S. market. Cumulated subject imports' share of apparent U.S. consumption in the merchant market increased from 6.0 percent in 2013 to 9.9 percent in 2014 and 13.2 percent in 2015; their share was 17.0 percent in interim 2015 and 8.5 percent in interim 2016.⁴⁴⁴

The Commission observed that nonsubject imports' share of apparent U.S. consumption in the merchant market increased from 7.5 percent in 2013 to 10.4 percent in 2014, and then decreased to 8.2 percent in 2015; their share of the merchant market was 8.4 percent in both interim 2015 and interim 2016.⁴⁴⁵ The Commission attributed the increase in imports from nonsubject countries to imports from Russia, which had entered the U.S. market under the terms of a revised suspension agreement that was subsequently terminated and replaced with an antidumping duty order at the end of 2014.⁴⁴⁶

The Russia Investigation and Reviews. During the original investigations in 1999, 24 firms accounted for 95 percent of domestic production of hot-rolled steel, but by the time of the first reviews in 2005, the Commission observed that industry consolidation reduced the number of domestic producers to 18.⁴⁴⁷ In the second reviews in 2011, the Commission found that the domestic industry satisfied the bulk of domestic demand for hot-rolled steel, while imports from the subject sources held a very small presence in the U.S. market, nearly all involving subject imports from Russia.⁴⁴⁸ In the third review, the Commission found that the domestic industry had further consolidated and six domestic producers accounted for most of U.S. production in 2015.⁴⁴⁹

⁴⁴³ *Original Determinations*, USITC Pub. 4638 at 29.

⁴⁴⁴ *Original Determinations*, USITC Pub. 4638 at 30. In the total U.S. market, cumulated subject imports' share of apparent U.S. consumption was 2.7 percent in 2013, 4.7 percent in 2014, and 6.0 percent in 2015; their share was 8.0 percent in interim 2015 and 3.7 percent in interim 2016. *Id.* at 30 n.146.

⁴⁴⁵ *Original Determinations*, USITC Pub. 4638 at 30. In the total U.S. market, nonsubject imports' share of apparent U.S. consumption was 3.4 percent in 2013, 4.9 percent in 2014, and 3.7 percent in 2015; their share was 3.9 percent in interim 2015 and 3.6 percent in interim 2016. *Id.* at 30 n.148.

⁴⁴⁶ *Original Determinations*, USITC Pub. 4638 at 30.

⁴⁴⁷ *First Five-Year Review Determinations*, USITC Pub. 3767 at 27.

⁴⁴⁸ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 27-28. Imports from subject sources combined accounted for between less than 0.05 and 1.1 percent of total apparent U.S. consumption, and between 0.1 and 2.5 percent of merchant market consumption, on an annual basis during the second review period. *Id.* at 28.

⁴⁴⁹ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 13.

In the third review, the Commission also observed that in December 2014, Commerce terminated the suspension agreement on hot-rolled steel from Russia and issued an antidumping duty order in its place.⁴⁵⁰ Subject imports from Russia were present in the U.S. market throughout the period of 2011 to 2014, while the suspension agreement was in effect and remained present, but at much smaller levels, in 2015 under the antidumping duty order.⁴⁵¹

Current Reviews. During the current review period, the domestic industry continued to be the largest supplier to the U.S. market.⁴⁵² U.S. producers' market share by quantity fluctuated during the POR but was generally steady overall, at 93.1 percent of apparent U.S. consumption in 2016 and 93.0 percent in 2021; it was lower in interim 2022 (92.4 percent) than in interim 2021 (94.6 percent).⁴⁵³

While AK Steel, Cleveland-Cliffs, and *** closed several production lines and/or facilities, there were also several plant openings, expansions, and acquisitions during the POR—notably, Cleveland-Cliffs acquired AK Steel Corporation in March 2020 and ArcelorMittal USA in December 2020, and U.S. Steel fully acquired Big River Steel in January 2021 (including its electric arc furnace facility in Osceola, Arkansas that began producing in early 2017).⁴⁵⁴ Nucor acquired a majority ownership position in CSI in February, 2022.⁴⁵⁵ AM/NS Calvert began constructing a new EAF facility to be completed in 2023, while ***.⁴⁵⁶ In May 2022, North Star completed an expansion of its EAF facility in Delta, Ohio that will increase annual production by over 930,000 short tons.⁴⁵⁷

⁴⁵⁰ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 13 (citing *Russia AD Order*, 79 Fed. Reg. 77455).

⁴⁵¹ *Third Five-Year Review Determinations*, USITC Pub.4639 at 13-14.

⁴⁵² CR/PR at Tables I-26 and C-1.

⁴⁵³ CR/PR at Tables I-26 and C-1. The domestic industry's share of apparent consumption in the total U.S. market was 93.1 percent in 2016, 94.3 percent in 2017, 93.5 percent in 2018, 95.2 percent in 2019, 95.3 percent in 2020, and 93.0 percent in 2021. *Id.* For the U.S. merchant market, the domestic industry's market share, by quantity, fluctuated but decreased overall by 0.6 percentage points from 2016 to 2021: it was 84.4 percent in 2016, 87.7 percent in 2017, 86.1 percent in 2018, 89.4 percent in 2019, 89.2 percent in 2020, 83.8 percent in 2021, 86.9 percent in interim 2021, and 82.1 percent in interim 2022. *Id.* at Table K-1.

⁴⁵⁴ CR/PR at Tables III-2 and III-3; Hearing Tr. at 149; Hearing Tr. at 52 (Jaycox).

⁴⁵⁵ CR/PR at Table III-3; Hearing Tr. at 56 (Query).

⁴⁵⁶ CR/PR at Tables III-2 and III-3. As during the original investigations, domestic producers remain largely concentrated in the midwestern and eastern United States, with some domestic production on the West Coast. Individual domestic producers of hot-rolled steel continue to be engaged in different types of production activity, with some using blast furnace/oxygen furnace steelmaking and some utilizing electric-arc furnace steelmaking, while others produced hot-rolled steel starting with slabs produced by different firms. CR/PR at Tables I-23, III-1.

⁴⁵⁷ CR/PR at Table III-2.

The result of the plant and line closings, openings, and expansions was that the domestic industry's capacity increased from 2016 to 2018, then fluctuated, for an overall increase from 72.6 million short tons in 2016 to 75.9 million short tons in 2021.⁴⁵⁸ The domestic industry's reported capacity utilization decreased irregularly from 75.1 percent in 2016 to 72.5 percent in 2021; it was lower in interim 2022 (64.4 percent) than in interim 2021 (73.8 percent).⁴⁵⁹

Imports from nonsubject countries were the second largest source of supply to the U.S. market throughout the POR.⁴⁶⁰ Nonsubject imports' market share by quantity increased irregularly during the POR from 4.3 percent of apparent U.S. consumption in 2016 to 5.3 percent in 2021.⁴⁶¹ They accounted for 75.0 percent of total U.S. imports of hot-rolled steel in 2021.⁴⁶² The largest sources of nonsubject imports during the POR were Canada and Mexico.⁴⁶³

Cumulated subject imports were the smallest source of supply to the U.S. market throughout the POR.⁴⁶⁴ Cumulated subject imports' market share, by quantity, declined from 2.6 percent of apparent U.S. consumption in 2016 to 1.8 percent in 2021; it was higher in interim 2022 (1.8 percent) than in interim 2021 (1.7 percent).⁴⁶⁵

Six of 11 U.S producers and 18 of 27 importers reported that they had not experienced supply constraints, while 20 of 32 responding purchasers reported experiencing supply

⁴⁵⁸ CR/PR at Tables III-5 and C-1. The increase in capacity during 2016-18 largely reflects Big River Steel's entrance into the market. The decrease in capacity during 2019-20 correlated with reported decreases in demand due to the COVID-19 pandemic and associated plant shutdowns. *Id.* at III-9 n.4. The decline in capacity in interim 2022 was primarily driven by *** permanent shut-down of ***. *Id.* at III-9 n.3.

⁴⁵⁹ CR/PR at Tables III-5 and C-1.

⁴⁶⁰ CR/PR at Table I-26.

⁴⁶¹ CR/PR at Table I-26. Nonsubject imports' share of apparent U.S. consumption was 4.3 percent in 2016, 4.4 percent in 2017, 4.8 percent in 2018, 3.5 percent in 2019, 3.3 percent 2020, and 5.3 percent in 2021. *Id.* For the U.S. merchant market, nonsubject import's market share, by quantity, fluctuated but increased overall by 2.6 percentage points from 2016 to 2021: it was 9.7 percent in 2016, 9.6 percent in 2017, 10.2 percent in 2018, 7.6 percent in 2019, 7.7 percent in 2020, 12.1 percent in 2021, 9.1 percent in interim 2021, and 13.7 percent in interim 2022. *Id.* at Table K-1.

⁴⁶² CR/PR at Table IV-1.

⁴⁶³ CR/PR at Table IV-2. Imports of hot-rolled steel from Canada and Mexico, by quantity, made up 75.6 percent of all nonsubject imports in 2021. *Id.* at Tables IV-1, IV-2.

⁴⁶⁴ CR/PR at Table I-26.

⁴⁶⁵ CR/PR at Table I-26. Cumulated subject imports' share of apparent U.S. consumption was 2.6 percent in 2016, 1.3 percent in 2017, 1.7 percent in 2018, 1.3 percent in 2019 and 2020, 1.8 percent in 2021, 1.7 percent in interim 2021, and 1.8 percent in interim 2022. *Id.* For the U.S. merchant market, cumulated subject imports' market share, by quantity, fluctuated but decreased overall by 2 percentage points from 2016 to 2021: it was 6.0 percent in 2016, 2.8 percent in 2017, 3.7 percent in 2018, 3.0 percent in 2019, 3.1 percent in 2020, 4.0 percent in 2021, 4.0 percent in interim 2021, and 4.3 percent in interim 2022. *Id.* at Table K-1

constraints, since January 1, 2016.⁴⁶⁶ Several domestic producers, including *** reported ***.⁴⁶⁷ The Four Domestic Producers assert that there was a temporary “supply-demand imbalance” in 2021 that resulted from an unexpectedly quick rebound in demand following declines in demand in 2020 combined with supply chain difficulties, all partially caused by the COVID-19 pandemic.⁴⁶⁸ Certain foreign producers, importers, and purchasers assert that there was a supply “shock” and/or a shortage of hot-rolled steel in the U.S. market in 2020 and 2021 in which U.S. producers did not have sufficient capacity to meet U.S. demand and contend that U.S. producers will continue to not have sufficient capacity to meet U.S. demand.⁴⁶⁹

3. Substitutability and Other Conditions

Original Investigations. In the original investigations, the Commission found that there was a high degree of substitutability between the domestic like product and cumulated subject imports and that price was an important factor for purchasers. It observed that most responding U.S. producers, importers, and purchasers reported that hot-rolled steel from all sources was always or frequently interchangeable.⁴⁷⁰

The Commission found that price was an important consideration in purchasing decisions. It observed that most producers and importers indicated that differences other than price were only sometimes or never significant in their sales of hot-rolled steel. Purchasers cited quality and price as the two most important factors in purchasing decisions and over 85 percent of purchasers rated price, along with availability, quality and reliability of supply, as very important factors in purchasing decisions.⁴⁷¹

The Commission observed that prices for the primary raw materials used to produce hot-rolled steel (iron ore, coal, and iron steel scrap) fell by 10.7 percent, 9.1 percent, and 46.7 percent over the POI, respectively, with much of the decrease in these input costs occurring during 2015. It found that raw material costs for hot-rolled steel accounted for a relatively large share of the cost of goods sold (“COGS”); they were 60.1 percent of total COGS in 2015, down from 69.6 percent in 2013.⁴⁷²

The Commission observed that a majority of responding U.S. producers and importers reported that their contracts do not allow price renegotiation during the contract period and do

⁴⁶⁶ CR/PR at II-14. U.S. producers reporting supply constraints reported that they were short-term and caused by issues related to the COVID-19 pandemic. *Id.*

⁴⁶⁷ CR/PR at Table III-3.

⁴⁶⁸ CR/PR at I-61; Four Domestic Producers’ Prehearing Brief at 167-169.

⁴⁶⁹ Hearing Tr. at 267-268 (Richardson, Parker); POSCO’s Prehearing Brief at 13-14. Steelscape asserts that the domestic industry does not have sufficient capacity to meet demand on the U.S. West Coast. Hearing Tr. at 267 (Deukmejian).

⁴⁷⁰ *Original Determinations*, USITC Pub. 4638 at 31.

⁴⁷¹ *Original Determinations*, USITC Pub. 4638 at 31.

⁴⁷² *Original Determinations*, USITC Pub. 4638 at 31.

not contain meet-or-release provisions. Contract prices were often based on a discount from published price indices for hot-rolled steel and the majority of purchasers indicated that raw material prices affected their firm's negotiations with suppliers of hot-rolled steel.⁴⁷³

The Russia Investigation and Reviews. In the original investigations concerning Brazil, Japan, and Russia, the Commission indicated that the subject imports and the domestic like product were "broadly substitutable,"⁴⁷⁴ and it observed in the first reviews that substitutability was even higher because subject imports from Russia had improved in quality.⁴⁷⁵ In the second reviews, the Commission found a high degree of substitutability between hot-rolled steel from the United States and hot-rolled steel from Brazil, Japan, and Russia.⁴⁷⁶ In the third review, the Commission again found there was a high degree of substitutability between the domestic like product and subject imports from Russia.⁴⁷⁷ The Commission also noted that U.S. purchasers indicated that price was a "very important" factor in purchasing decisions.⁴⁷⁸

Current Reviews. In these reviews, we find a moderate-to-high degree of substitutability between domestically produced hot-rolled steel and cumulated subject imports.⁴⁷⁹ All U.S. producers reported that hot-rolled steel from all country pairs were always interchangeable.⁴⁸⁰ A majority of purchasers reported that hot-rolled steel from all country pairs were always or frequently interchangeable.⁴⁸¹ A majority of importers reported that hot-rolled steel from all country pairs were always or frequently interchangeable, except when comparing the domestic like product to subject imports from Japan and when comparing subject imports from Japan with subject imports from Australia.⁴⁸² At the same time, a majority of responding importers and purchasers reported that there were either sometimes or never significant differences in factors other than price between hot-rolled steel in all but one country pair.⁴⁸³ In general, a

⁴⁷³ *Original Determinations*, USITC Pub. 4638 at 31-32.

⁴⁷⁴ *Original Japan Determination*, USITC Pub. 3202 at 14.

⁴⁷⁵ *First Five-Year Review Determinations*, USITC Pub. 3767 at 37.

⁴⁷⁶ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 28, II-17, and Table II-8.

⁴⁷⁷ *Third Five-Year Review Determinations*, USITC Pub. at 14.

⁴⁷⁸ *Third Five-Year Review Determinations*, USITC Pub. at 14.

⁴⁷⁹ CR/PR at II-21.

⁴⁸⁰ CR/PR at Table II-15.

⁴⁸¹ CR/PR at Table II-17.

⁴⁸² CR/PR at Table II-16. While a plurality of importers reported that hot-rolled steel from Japan is sometimes interchangeable with the domestic like product and with hot-rolled steel from Australia, an equal amount of importers reported that hot-rolled steel from Japan is always or frequently interchangeable with the domestic like product and hot-rolled steel from Australia as those that reported that they are sometimes interchangeable. *Id.* No importer reported that hot-rolled steel from any subject source is never interchangeable with hot-rolled steel from another subject source or with the domestic like product. *Id.*

⁴⁸³ CR/PR at Tables II-18 through II-20. A plurality of purchasers reported that factors other than price were never significant when comparing hot-rolled steel from Australia with the domestic product. *Id.* at Table II-20.

majority of purchasers also rated domestically produced hot-rolled steel and hot-rolled steel from subject countries as either superior or comparable on all non-price factors.⁴⁸⁴

We also find that price is an important factor in purchasing decisions.⁴⁸⁵ Responding purchasers most frequently cited price, quality, and availability as the top three factors influencing their purchasing decisions. Price was most frequently reported as the most important factor (17 firms), followed by quality (12 firms).⁴⁸⁶ Responding purchasers most frequently reported price (31 firms), quality meets industry standards (31 firms), reliability of supply (30 firms), delivery time (26 firms), product consistency (25 firms), and quality exceeds industry standards (18 firms) as very important to their purchasing decisions.⁴⁸⁷ A plurality of purchasers (16 of 33) reported that they usually purchase the lowest priced product.⁴⁸⁸

The primary raw materials for hot-rolled steel are iron ore, coal, and iron and steel scrap.⁴⁸⁹ Raw material costs represent the largest component of total COGS; as a percentage of total COGS, raw material costs increased irregularly from 66.0 percent in 2016 to 73.0 percent in 2021 and was lower in interim 2022 (70.8 percent) than in interim 2021 (72.3 percent).⁴⁹⁰ On a per-short ton basis, U.S. producers' raw material costs increased irregularly from \$296 per short ton in 2016 to \$518 per short ton in 2021, and were higher in interim 2022 (\$590 per short ton) than in interim 2021 (\$445 per short ton).⁴⁹¹ Rising raw material costs during the POR reflected increasing prices for iron ore, coal, and iron and steel scrap, which increased by 67.4 percent, 3.0 percent, and 189.0 percent, respectively, between January 2016 and December 2021; between December 2021 and March 2022, they increased by 1.7 percent, 25.3

⁴⁸⁴ CR/PR at Table II-14. Most purchasers rated U.S. hot-rolled steel as comparable to hot-rolled steel from the subject countries on all non-price factors except availability (in comparisons with Australia, Brazil, Russia, and South Korea), delivery terms (in comparisons with Brazil), delivery time (in comparisons with Brazil, Japan, South Korea, and Turkey), reliability of supply (in comparisons with Brazil), technical support/service (in comparison with Brazil), and U.S. transportation costs (in comparisons with Brazil and South Korea). *Id.* Most purchasers reported that U.S. and nonsubject hot-rolled steel were comparable on most non-price factors except delivery time, for which a plurality of purchasers reported that U.S. hot-rolled steel was superior to nonsubject sources. *Id.*

⁴⁸⁵ See CR/PR at II-23.

⁴⁸⁶ CR/PR at Table II-9.

⁴⁸⁷ CR/PR Table II-10.

⁴⁸⁸ CR/PR at II-23. Most purchasers (29 of 33) reported that they usually or sometimes purchase the lowest priced product. *Id.*

⁴⁸⁹ CR/PR at III-39-40, V-1. The extent to which domestic producers produced the steel slab used for hot-rolled steel varied. Most domestic hot-rolled steel production is done by domestic producers that manufacture steel slabs or purchase it from related firms and further process the steel, while a smaller share reflects the operations of several U.S. producers that purchase slab from unrelated sources. CR/PR at III-38-39, Table III-1.

⁴⁹⁰ CR/PR at III-38, Table III-17.

⁴⁹¹ CR/PR at III-38 and Table III-17. Most purchasers (22 of 32) indicated that information on raw material prices affected their negotiations or contracts to purchase hot-rolled steel since 2016. CR/PR at V-4.

percent, and 16.2 percent, respectively.⁴⁹² Industrial electric power costs increased by 22.9 percent from January 2016 to December 2021 and by 5.4 percent from December 2021 to March 2022.⁴⁹³

Domestic producers sold a majority of their hot-rolled steel to end users, with significant quantities going to distributors (31.1 percent in 2021), while importers of subject merchandise sold a decreasing majority of their hot-rolled steel to distributors (59.1 percent in 2021 compared to 73.0 percent in 2016).⁴⁹⁴

A majority of U.S. producers' commercial shipments in 2021 were under annual contracts (51.4 percent) with spot sales accounting for the next largest share of shipments (25.7 percent); most subject imports were sold through spot sales (***) followed by short-term contracts (***)⁴⁹⁵ A vast majority of purchasers (30 of 32) reported that they negotiate prices with their suppliers.⁴⁹⁶ While four of these 30 purchasers mentioned price indices as a factor in these negotiations, certain Domestic Producers assert that a "high prevalence" of hot-rolled steel is not sold using fixed-priced contracts, and instead, is sold using variable prices that are adjusted using external price indices such as Platts or CRU.⁴⁹⁷ Platts considers confirmed transactions, firm bids, and offers for orders exceeding 100 short tons in its prices while CRU sets prices using weekly spot market transaction data and each price submitted by a data provider is compared with a price range set by reference to the arithmetic mean of all prices received during the weekly collection window—a price that falls outside this range is not included in the initial price index calculation.⁴⁹⁸

⁴⁹² CR/PR at Table E-3.

⁴⁹³ CR/PR at Fig. V-3, Table E-4. Industrial electric power costs were highest in 2022. The summer of 2021 (June, July, and August) had the second highest industrial electric power costs. *Id.*

⁴⁹⁴ CR/PR at Table II-1.

⁴⁹⁵ CR/PR at Table V-2.

⁴⁹⁶ CR/PR at Table V-7.

⁴⁹⁷ U.S. Steel's Posthearing Brief at Attachment A pg. 3; CR/PR at V-7; Hearing Tr. at 66 (Kopf), 195 (Scruggs). Cleveland-Cliffs indicated that ***. Cleveland-Cliffs' Posthearing Brief at Exhibit 4 pg. 2. The Domestic Producers argue that even a small volume of low-priced subject imports would have a "reverberating effect" on these price indices. Nucor, SSAB, SCI and SDI Posthearing Brief at Exhibit 1 at 58-61; Cleveland-Cliffs' Posthearing Brief at 11, Exhibit 1 pgs. 20-21. The Brazilian Respondents argue that the domestic industry primarily uses CRU in its contracts and the relatively small volume of subject imports from Brazil would have a very small, if any, effect on CRU prices because such prices are based on the weighted average price of actual transactions. Posthearing Brief of CSN and USIMINAS at 5-6. Brazilian Respondents also argue that CRU has separate indices for U.S.-produced hot-rolled steel and imported hot-rolled steel. Posthearing Brief of CSN and USIMINAS at Attachment 1 pg. 15.

⁴⁹⁸ CR/PR at V-7 n.6. For CRU, individual price and volume submissions are compared to the previous submission made by that provider and if they deviate more than a specific percentage range, they are flagged and may be excluded from the initial price index calculation. *Id.*

U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days.⁴⁹⁹ Importers reported that *** percent of commercial shipments were produced-to-order, with lead times averaging *** days.⁵⁰⁰

Effective March 23, 2018, hot-rolled steel from Turkey and Russia became subject to 25 percent *ad valorem* duties under Section 232, and remain subject to these duties.⁵⁰¹ Hot-rolled steel from South Korea and Brazil has been subject to annual absolute quotas under Section 232 since March 23, 2018.⁵⁰² Hot-rolled steel imports from the Netherlands, Japan, and the United Kingdom also became subject to Section 232 duties in March 2018 but as of January 1, 2022, April 1, 2022, and June 1, 2022, respectively, are subject to TRQs under which hot-rolled steel imports are subject to Section 232 duties only after TRQ amounts are reached.⁵⁰³ These Section 232 measures are subject to requestor- and importer-specific individual product exclusions that are generally applied to more narrow product categories than 10-digit HS subheadings.⁵⁰⁴ They are also subject to certain general approved exclusions (“GAEs”), which are available to all importers.⁵⁰⁵

All U.S. producers and a majority of importers (20 of 27) and purchasers (30 of 33) reported that the Section 232 duties affected the U.S. market for hot-rolled steel since January 2016. Certain firms reported that the U.S. market price for hot-rolled steel increased, the supply of imports decreased, and the supply of domestic hot-rolled steel increased.⁵⁰⁶

⁴⁹⁹ CR/PR at II-24. The remaining *** percent of U.S. producers’ commercial shipments came from inventories, with lead times averaging *** days. *Id.*

⁵⁰⁰ CR/PR at II-24, II-24 n.16.

⁵⁰¹ 19 U.S.C. § 1862; *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, 83 Fed. Reg. 11625 (Mar. 8, 2018); CR/PR at I-39. Turkey’s *ad valorem* rate was increased to 50 percent in August 2018, but subsequently reduced back to 25 percent in May 2019. CR/PR at Table I-21.

⁵⁰² CR/PR at I-39. The annual quotas for imports of hot-rolled steel from Brazil and South Korea for 2022 are 143,416 short tons and 584,544 short tons, respectively. *Id.* Imports of hot-rolled steel originating from Australia and certain nonsubject countries (Canada and Mexico) are exempt from Section 232 measures entirely and imports from certain other nonsubject countries are subject to annual absolute quotas (Argentina) or annual TRQs (other European Union Countries). CR/PR at I-39.

⁵⁰³ CR/PR at I-39-40, Table I-21.

⁵⁰⁴ *See* at I-39-40, Table I-21. Brazilian Respondents indicated that no individual product exclusions were granted and no GAEs were utilized for subject imports Brazil. CSN and USIMINAS Posthearing Brief at Attachment 1, pgs. 21-22. TSIJ indicated that Commerce has granted 338 individual product exclusions for imports of hot-rolled steel from the Netherlands out of the 564 individual product exclusions that were granted on imports of hot-rolled steel from subject countries. TSIJ’s Prehearing Brief at 13; CR/PR at I-22. Five purchasers reported that they requested and were granted individual product exclusions for certain hot-rolled steel products from ***. CR/PR at II-2 n.4.

⁵⁰⁵ CR/PR at I-42. Hot-rolled steel products imported under HTS reporting number 7208.10.1500 are eligible for exclusions based on this rule. *Id.*

⁵⁰⁶ *See* CR/PR at II-2.

C. Likely Volume of Cumulated Subject Imports

Original Investigations. In the original investigations, the Commission found that the volume and increase in volume of cumulated subject imports were significant, both in absolute terms and relative to consumption in the United States.⁵⁰⁷ It found that cumulated subject imports increased from 1.75 million short tons in 2013 to 3.18 million short tons in 2014 and 3.59 million short tons in 2015. Cumulated subject imports were 1.19 million short tons in interim 2015 and 0.57 million short tons in interim 2016. The volume of cumulated subject imports had risen at a much faster rate than apparent U.S. consumption in 2014, increasing by 81.9 percent, and continued to increase by 12.9 percent between 2014 and 2015, for an overall increase of 105.4 percent between 2013 and 2015.⁵⁰⁸

Cumulated subject imports increased their share of apparent U.S. consumption in the merchant market from 6.0 percent in 2013 to 9.9 percent in 2014 and 13.2 percent in 2015.⁵⁰⁹ The Commission found that cumulated subject imports' 7.2 percentage-point gain in merchant market share from 2013 to 2015 came at the expense of the domestic industry, which lost 7.9 percentage points of market share in the merchant market during the same period. The Commission therefore concluded that the volume and increase in volume of cumulated subject imports were significant, both in absolute terms and relative to consumption in the United States.⁵¹⁰

Russia Investigation and Reviews. During the original investigations, the Commission observed that the quantity of cumulated subject imports increased, more than doubling from 1996 to 1997 and more than doubling again from 1997 to 1998, to reach a volume of 7.0 million short tons in 1998. Cumulated subject import merchant market share increased from 5.0 percent in 1996 to 21.0 percent in 1998. The Commission found that both the volume and increase in the volume of subject imports were significant.⁵¹¹

⁵⁰⁷ *Original Determinations*, USITC Pub. 4638 at 35.

⁵⁰⁸ *Original Determinations*, USITC Pub. 4638 at 33.

⁵⁰⁹ *Original Determinations*, USITC Pub. 4638 at 33. The Commission found that cumulated subject imports' share of apparent U.S. consumption in the merchant market was 17.0 percent in interim 2015 and 8.5 percent in interim 2016. Cumulated subject imports also increased as a share of apparent U.S. consumption in the total U.S. market during the period, increasing from 2.7 percent in 2013 to 4.7 percent in 2014 and 6.0 percent in 2015. Cumulated subject imports' share of apparent U.S. consumption in the total U.S. market was 8.0 percent in interim 2015 and 3.7 percent in interim 2016. *Id.* at 33 n.174.

⁵¹⁰ *Original Determinations*, USITC Pub. 4638 at 33. The Commission rejected respondents' arguments that supply constraints, attenuated competition, or weakened demand for downstream products led to reduced domestic shipments of hot-rolled steel and increased subject imports. *Original Determinations*, USITC Pub. 4638 at 33 n.172, 34 n.176

⁵¹¹ *Original Japan Determination*, USITC Pub. 3202 at 12-13. Subject imports from Russia increased from 847,764 short tons in 1996 to 2.0 million short tons in 1997 and to 3.8 million short tons (Continued...)

In the first five-year reviews, the Commission found that cumulated subject import volume declined the year the orders were imposed and the suspension agreement went into effect, fluctuated for the next four years, and increased to a period peak in 2004, largely because of an increase in subject imports from Russia. It cited several factors in support of the proposition that subject producers would likely increase exports to significant levels upon revocation.⁵¹²

Capacity in each of the subject countries had increased significantly, further capacity or production increases were likely, and unused capacity was significant in terms of both the U.S. merchant and overall markets. Moreover, the capital-intensive nature of hot-rolled steel production provided strong incentives to the subject producers to make full use of available capacity.⁵¹³ The Commission further found that the industries in the subject countries were export oriented to a significant degree and had demonstrated the ability to shift shipments quickly from their home markets to export markets and among export markets.⁵¹⁴

In the second five-year reviews, the Commission found there was likely to be a significant quantity of subject imports from Russia upon termination of the suspension agreement based primarily on two observations that also were the basis for its findings in the first reviews.⁵¹⁵ First, the industry in Russia had excess capacity and had reportedly completed or planned to increase capacity in the reasonably foreseeable future.⁵¹⁶ Second, producers in Russia had a significant export orientation and a tendency to shift exports rapidly between

in 1998. Subject imports from Russia market share in the total market was 1.2 percent in 1996, 2.8 percent in 1997 and 5.1 percent in 1998. In the merchant market, the market share of subject imports from Russia was 3.2 percent in 1996, 6.9 percent in 1997, and 11.6 percent in 1998. *Id.* at Tables C-1 and C-2.

⁵¹² *First Five-Year Review Determinations*, USITC Pub. 3767 at 31. The volume of subject imports from Russia fluctuated widely during the first review period. From 1999 to 2003, the annual volume of subject imports from Russia ranged from 5,845 to 183,236 short tons. The volume of subject imports from Russia reached a period peak of 904,101 short tons in 2004. *Id.* at Table I-1.

⁵¹³ *First Five-Year Review Determinations*, USITC Pub. 3767 at 31. The Commission also observed that there was the capability of product shifting in the subject countries, although it did not rely on this consideration in finding likely significant subject import volumes. *Id.* at 33.

⁵¹⁴ *First Five-Year Review Determinations*, USITC Pub. 3767 at 33-35. The Commission found several reasons why the subject producers were likely to shift exports to the United States upon revocation. First, the United States was an attractive market because of its size, openness, and high prices. Second, increased production in China, and the development of China as a net exporter of hot-rolled steel, would likely necessitate that the subject producers find other markets for exports that had previously been directed to China. Third, there were impediments to the importation of hot-rolled steel from each subject country into certain third-country markets. *Id.* at 35-36.

⁵¹⁵ *Second Five-Year Review Determinations*, USITC Pub. at 4237 at 29-31. During the second review period, the annual volume of subject imports from Russia ranged from 1,708 short tons in 2009 to 789,788 short tons in 2006. *Id.* at Table IV-1.

⁵¹⁶ *Second Five-Year Review Determinations*, USITC Pub. at 4237 at 30.

different markets.⁵¹⁷ The Commission found that producers in Russia had the ability to supply significant additional quantities of subject imports to the United States both by utilizing excess capacity and by shifting exports between sources, as they had done in the past.

Additionally, the Commission observed that termination of the suspension agreement would likely serve to make the U.S. market a considerably more favorable environment for subject imports from Russia. The Commission found that prices in the U.S. market were consistently attractive even when not necessarily higher than all other world market prices.⁵¹⁸ Furthermore, antidumping duty orders and quantitative restrictions on hot-rolled steel from Russia in other countries contributed to the relative attractiveness of the U.S. market.⁵¹⁹

In the third five-year reviews, the Commission found that subject imports from Russia rose from 181,689 short tons in 2011 to 288,873 short tons in 2012, declined to 34,814 short tons in 2013, and then markedly increased to 939,489 short tons in 2014. After Commerce terminated the agreement in December 2014 and imposed an antidumping duty order on these imports in its place, the volume of subject imports from Russia dropped to 18,079 short tons in 2015.⁵²⁰

The limited available information in the third five-year reviews indicated that the industry in Russia had substantial capacity, had available excess capacity, was export oriented, and had the ability to export a significant volume of hot-rolled steel to the United States in the event of revocation of the antidumping duty order. In 2015, the industry in Russia was the world's third-largest exporter of hot-rolled steel, and was subject to third-country antidumping duty orders and safeguard duties. The Commission found that upon revocation, the volume of subject imports would likely be significant in light of the behavior of subject imports during the original investigations and prior reviews and the marked increase in subject imports from Russia in 2014 during the pendency of the suspension agreement.⁵²¹

Current Reviews. Cumulated subject imports have maintained a presence in the U.S. market under the disciplining effects of the orders throughout the POR, though at much lower levels than during the original investigations. Cumulated subject import volumes were 1.5 million short tons in 2016, 761,414 short tons in 2017, 1.1 million short tons in 2018, 782,886

⁵¹⁷ *Second Five-Year Review Determinations*, USITC Pub. at 4237 at 30. Reporting Russian producers' exports constituted between 24.3 percent and 37.4 percent of their annual shipments, and between 53.0 and 70.5 percent of annual commercial shipments, during the second review period. *Id.*

⁵¹⁸ In 2011, even with the suspension agreement in effect, producers in Russia made repeated offers to sell hot-rolled steel in the United States when U.S. market prices were higher than those in other major export markets. *Second Five-Year Review Determinations*, USITC Pub. 4237 at 31.

⁵¹⁹ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 31.

⁵²⁰ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 17. Due to the increase between 2013 and 2014, the domestic industry requested that Commerce terminate the suspension agreement on hot-rolled steel imports from Russia.

⁵²¹ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 17-18.

short tons in 2019, 677,379 short tons in 2020, and 1.0 million short tons in 2021.⁵²² Cumulated subject import market share was 2.6 percent in 2016, 1.3 percent in 2017, 1.7 percent in 2018, 1.3 percent in 2019, 1.3 percent in 2020 and 1.8 percent in 2021.⁵²³ We find that the reduced volume and market share of cumulated subject imports during the POR reflect the discipline of the orders.

The subject industries have the ability to export significant volumes of subject merchandise to the United States in the event of revocation of the orders. The subject industries have significant production capacity, and although it declined over the POR,⁵²⁴ it exceeded both apparent U.S. consumption and the domestic industry's capacity during the POR by a wide margin.⁵²⁵ Further, on a cumulated basis, subject producers have significant unused production capacity.⁵²⁶ The reporting subject producers maintain substantial end-of-period

⁵²² *Calculated from* CR/PR at Table C-1 (subtracting subject imports from Brazil). Cumulated subject imports were *** short tons in interim 2021 and *** short tons in interim 2022. *Id.* Commissioners Schmidlein and Stayin note that including Brazil, cumulated subject import volumes (in short tons) were 1,523,225 in 2016, 761,450 in 2017, 1,056,388 in 2018, 783,222 in 2019, 677,379 in 2020, and 1,014,193 in 2021. *Id.* Including Brazil, cumulated subject imports were 240,104 short tons in interim 2021 and 226,477 short tons in interim 2022. *Id.*

⁵²³ *Calculated from* CR/PR at Tables I-23 & C-1. Cumulated subject imports' market share was *** percent in interim 2021 and *** percent in interim 2022. *Id.*

⁵²⁴ Cumulated subject producers reported hot-rolled steel production capacity of *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021. *Calculated from* CR/PR at Tables IV-20 and IV-70 (subtracting Brazilian industry data). Their production capacity was *** short tons in interim 2021 and *** short tons in interim 2022. *Id.*

Commissioners Schmidlein and Stayin note that, including Brazil, cumulated subject producers reported hot-rolled steel production capacity of *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021. CR/PR at Table IV-70. Their production capacity was *** short tons in interim 2021 and *** short tons in interim 2022. *Id.*

⁵²⁵ Apparent U.S. consumption was 57.8 million short tons in 2021, and the domestic producers' capacity was 75.9 million short tons in 2021. CR/PR at Table C-1.

⁵²⁶ Reporting cumulated subject producers reported available production capacity throughout the POR. Their capacity utilization rates ranged from 84.9 percent to 92.5 percent during the POR and was 92.5 percent in 2021. *Calculated from* CR/PR at Tables IV-20 and IV-70 (subtracting Brazilian industry data). Based on an estimated *** short tons of capacity and production of *** short tons in 2021, excess capacity was *** short tons in 2021, equivalent to *** percent of apparent U.S. consumption in 2021. *Calculated from* CR/PR at Tables IV-20, IV-70, and C-1.

The two reporting firms in Russia reported a minimal excess capacity of *** short tons. However, the two firms only accounted for approximately *** percent of total hot-rolled steel production in Russia in 2021. CR/PR at IV-111 and Table IV-43. Information from *** indicates that there is likely an additional *** short tons of excess capacity in Russia unaccounted for in the combined industry data cited above. See CR/PR at IV-111 n.77 and Table IV-40 (production capacity of *** short tons). (Continued...)

inventories.⁵²⁷ The combined subject industries exported *** short tons of hot-rolled steel in 2021.⁵²⁸

The U.S. remains an attractive export market for cumulated subject producers, providing them with the incentive to export significant volumes of subject merchandise to the United States in the event of revocation. The United States has been one of the largest markets for hot-rolled steel,⁵²⁹ and prices for hot-rolled steel are generally higher in the United States than other national or regional markets.⁵³⁰ The average unit values (“AUVs”) of exports from the subject countries generally were higher for exports to the U.S. market than for exports to

tons and production of *** short tons). For all other subject countries, the firms reporting accounted for virtually all of subject production.

Commissioners Schmidlein and Stayin note that, including Brazil, subject producers’ capacity utilization rates ranged from 83.8 percent to 92.5 percent during the POR and was 92.5 percent in 2021. CR/PR at Table IV-70. Based on an estimated *** short tons of capacity and production of *** short tons in 2021, excess capacity was *** short tons in 2021, equivalent to *** percent of apparent U.S. consumption in 2021. *Id.* and CR/PR at Table C-1.

⁵²⁷ Total end-of-period inventories of responding producers in the cumulated subject countries increased overall during the POR. They were *** short tons in 2016 and 2017, *** short tons in 2018, *** short tons in 2019 and 2020, and *** short tons in 2021. Reporting foreign producers’ inventories at the end of 2021 were equivalent to *** percent of apparent U.S. consumption in 2021. *Calculated from* CR/PR at Tables IV-20, IV-70, and C-1.

U.S. importers’ end-of-period inventories of subject merchandise declined overall during the POR. They were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018,

*** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021 and *** short tons in interim 2022. CR/PR at Table IV-7. Arranged cumulated subject imports for 2022 totaled *** short tons for the period April 2022 to March 2023. CR/PR at Table IV-8.

Commissioners Schmidlein and Stayin note that, including Brazil, total end-of-period inventories of responding producers in the combined subject countries increased overall during the POR. They were *** short tons in 2016 and 2017, *** short tons in 2018 and 2019, *** short tons in 2020, and *** short tons in 2021. Reporting foreign producers’ inventories at the end of 2021 were equivalent to *** percent of apparent U.S. consumption in 2021. CR/PR at Tables IV-70 and C-1.

⁵²⁸ *Calculated from* CR/PR at Tables IV-20 and IV-70. Japan, Russia, and South Korea were three of the top-five exporters of hot-rolled steel products in 2021, accounting for over one-third of global exports. CR/PR at Table IV-73 (based on GTA data which may include some out-of-scope hot-rolled steel products). Exports of hot-rolled steel by reporting cumulated subject producers accounted for *** percent of their total shipments in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021, *** percent in interim 2021 and *** percent in interim 2022. *Calculated from* CR/PR at Tables IV-20 and IV-70.

Commissioners Schmidlein and Stayin note that, including Brazil, the cumulated subject industries exported *** short tons of hot-rolled steel in 2021. CR/PR at Table IV-70. Exports of hot-rolled steel by reporting cumulated subject producers, including Brazil, accounted for *** percent of total shipments in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021, *** percent in interim 2021 and *** percent in interim 2022. *Id.*

⁵²⁹ Cleveland-Cliffs’ Prehearing Brief at 86.

⁵³⁰ See CR/PR at Table IV-74 (showing prices in the United States, European Union, Latin America, and China from January 2016 to June 2022).

other markets.⁵³¹ Moreover, the existence of third-country trade barriers to subject imports from China, India, Japan, South Korea, and the United Kingdom would increase the relative attractiveness of the U.S. market to subject exporters in those countries in the event of revocation.⁵³²

Accordingly, based on the subject producers' behavior during the original investigations, the continued presence of cumulated subject imports in the U.S. market during the POR while under the discipline of the orders, and cumulated subject producers' substantial production capacity, available unused capacity, inventories, and exports, as well as the relative attractiveness of the U.S. market, we find that the likely volume of cumulated subject imports would be significant in the event of revocation.⁵³³

D. Likely Price Effects of Cumulated Subject Imports

Original Investigations. In the original investigations, the Commission found that cumulated subject imports and the domestic like product were highly substitutable and that price was an important factor in purchasing decisions. It found predominant underselling of the domestic like product by cumulated subject imports over the POI,⁵³⁴ and particularly during 2014 and into 2015, when cumulated subject imports gained substantial U.S. market share and the volume and market share of cumulated subject imports were at their peak. Given these

⁵³¹ The AUVs for subject producers' exports to the United States of hot-rolled steel were often higher than those of other export markets during 2021 and interim 2022. See CR/PR at Table IV-30 (Japan), Table IV-37 (Netherlands), Table IV-53 (South Korea), and Table IV-60 (Turkey).

⁵³² Some or all of the subject producers face trade remedy actions in several third-country markets on hot-rolled steel. CR/PR at Table IV-72. These include measures in markets such as the European Union, Gulf Cooperation Council and India.

⁵³³ We have also considered the potential for product shifting in our analysis of likely subject import volume. Producers in Russia and Turkey reported production of *** short tons of out-of-scope products on the same equipment and machinery used to produce in-scope hot-rolled steel. See CR/PR at Tables IV-45 and IV-61. Producers in Japan also reported very limited production of out-of-scope products (*** short tons) on the same equipment and machinery used to produce hot-rolled steel. See CR/PR at Table IV-32. Reporting producers in Australia, the Netherlands, South Korea, and the United Kingdom reported no production of other products on the same equipment and machinery used to produce hot-rolled steel. CR/PR at IV-46, IV-105, IV-145, and IV-184.

⁵³⁴ *Original Determinations*, USITC Pub. 4638 at 36-37. Cumulated subject imports undersold the domestic like product in 196 of 396 quarterly comparisons, or 49.5 percent of the comparisons, at margins ranging from 0.1 percent to 19.6 percent from January 2013 to March 2016. There were 1,309,163 short tons of cumulated subject import shipments involved in underselling comparisons and 636,073 short tons of cumulated subject import shipments involved in overselling comparisons; thus, on a volume basis, 67.3 percent of cumulated subject imports were involved in quarters of underselling. *Id.* at 36.

facts, and the numerous reports that purchasers shifted their purchases to cumulated subject imports due to price, the Commission found the underselling significant.⁵³⁵

In considering price effects, the Commission observed that prices for individual domestically produced hot-rolled steel pricing products fell between 31.3 percent and 38.6 percent from January 2013 to March 2016. However, raw material prices also fell during 2015, and apparent U.S. consumption in the merchant market that year decreased by 15.7 percent. In light of this, the Commission did not find that the lower-priced subject imports depressed prices for domestically produced hot-rolled steel to a significant degree.⁵³⁶

The Commission also did not find that cumulated subject imports prevented price increases which otherwise would have occurred to a significant degree. It observed that from 2013 to 2014, the domestic industry's unit cost COGS increased, but net sales values increased by a greater amount in both the merchant and total U.S. markets. Consequently, since prices increased by more than costs from 2013 to 2014, it found that price increases would have been unlikely in 2015 while unit COGS and apparent U.S. consumption were declining.⁵³⁷

In sum, the Commission found that significant underselling of the domestic like product by cumulated subject imports enabled cumulated subject imports to gain market share at the expense of the domestic industry. It therefore concluded that low-priced cumulated subject imports had significant effects on the domestic industry.⁵³⁸

The Russia Investigation and Reviews. In the original Brazil, Japan, and Russia investigations, the Commission found that price was an important factor in purchasing decisions and that the subject imports were broadly substitutable, notwithstanding some quality differences with respect to hot-rolled steel from Russia. The Commission observed that the most precipitous declines in the price of the domestic like product and subject imports occurred in the third and fourth quarters of 1998, when the subject imports were peaking. The Commission found a mixed pattern of underselling, with overselling predominating in 1996, but underselling predominating in 1997 (underselling in 48 of 64 instances) and 1998 (45 of 67 instances). The Commission also found that prices declined at a greater rate than cost of goods sold, and concluded that the subject imports had significant price-depressing effects.⁵³⁹

In the first five-year reviews, the Commission found that price was a key factor in purchasing decisions for hot-rolled steel, and because of the improved quality of subject imports from Russia, there was even broader interchangeability among the subject imports and the domestic like product than in the original investigations.⁵⁴⁰ While prices for the domestic

⁵³⁵ *Original Determinations*, USITC Pub. 4638 at 36-37.

⁵³⁶ *Original Determinations*, USITC Pub. 4638 at 37-38.

⁵³⁷ *Original Determinations*, USITC Pub. 4638 at 39.

⁵³⁸ *Original Determinations*, USITC Pub. 4638 at 39.

⁵³⁹ *Original Japan Determinations*, USITC Pub. 3202 at 13-16. Subject imports from Russia undersold the domestic like product in 63 of 72 quarterly comparisons. *Id.* at V-15.

⁵⁴⁰ *First Five-Year Review Determinations*, USITC Pub. 3767 at 37.

like product rose sharply in 2004, prices were trending lower in late 2004 and early 2005 as producers' orders had declined, and increased subject imports from Russia played a role in this price decline.⁵⁴¹

The Commission found that significant underselling upon revocation by the cumulated subject imports would be likely based on the pricing behavior in the original investigations, the importance of price in purchasing decisions, and the substitutability of the subject imports and the domestic like product. It concluded that upon revocation cumulated subject imports would likely have significant price-depressing or -suppressing effects.⁵⁴²

In the second five-year reviews, the Commission once again found price to be an important factor in purchasing decisions and that there was no substantial quality distinction between the domestic like product and subject imports from Russia.⁵⁴³ While subject imports from Russia undersold the domestic like product in 27 of 67 quarterly comparisons, in 2006, when subject imports from Russia had peaked in the U.S. market, subject imports undersold the domestic like product in 10 of 11 quarterly comparisons.⁵⁴⁴ The Commission found that upon revocation, significant underselling by subject imports from Russia was likely, and that subject imports would likely have significant price-suppressing or -depressing effects given the importance of price in purchasing decisions and that domestic producers would likely need to cut prices to meet subject import competition.⁵⁴⁵

In the third five-year review of the antidumping duty order on Russia, there were no new pricing comparisons. The Commission found that the likely significant volume of subject imports from Russia would likely undersell domestic prices in an attempt to regain market share, as demonstrated by their pricing behavior in the original investigations and prior reviews. It found the likely significant volume of subject imports that would likely undersell the domestic like product would force the domestic industry either to lower sales prices or lose sales and cede market share. Accordingly, the Commission concluded that, absent the disciplining effect of the order, subject imports from Russia would likely have significant depressing or suppressing effects on prices for the domestic like product.⁵⁴⁶

⁵⁴¹ Subject imports from Russia undersold the domestic like product in 42 of 78 quarterly comparisons. *First Five-Year Review Determinations*, USITC Pub. 3767 at Table V-7. The Commission also noted that inventory buildups by U.S. service centers that occurred towards the end of the period would likely be drawn down in the reasonably foreseeable future, adding to downward price pressure in the U.S. market. *Id.* at 37-38.

⁵⁴² *First Five-Year Review Determinations*, USITC Pub. 3767 at 38.

⁵⁴³ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 32-33.

⁵⁴⁴ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 32. The Commission collected information on four pricing products accounting for approximately 47.5 percent of reported U.S. producers' commercial shipments of hot-rolled steel, and 79.3 percent of reported U.S. shipments of subject imports from Russia. *Id.*

⁵⁴⁵ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 33.

⁵⁴⁶ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 20.

Current Reviews. As discussed above, the record in these reviews indicates that there is a moderate-to-high degree of substitutability between domestically produced hot-rolled steel and hot-rolled steel from subject sources, and that price is an important factor in purchasing decisions.

The Commission requested pricing data for four pricing products in these reviews.⁵⁴⁷ Eleven U.S. producers and 12 importers provided usable data for sales of the requested products, although not all firms reported data for all products for all quarters.⁵⁴⁸ Data reported by these firms accounted for approximately *** percent of U.S. producers' commercial shipments of hot-rolled steel to distributors and *** percent of commercial shipments to end users in 2021.⁵⁴⁹ Pricing data reported by subject importers accounted for approximately *** percent of commercial shipments sold to distributors in 2021 and *** percent of commercial shipments to end users in 2021.⁵⁵⁰ No pricing data were reported for subject imports from Australia or Russia.⁵⁵¹

The pricing data indicate that cumulated subject imports undersold the domestic like product in 66 of 294 (or 22.4 percent of) quarterly comparisons, while prices for cumulated subject imports oversold the domestic like product in 228 of 294 (or 77.6 percent of) quarterly comparisons.⁵⁵² There were *** short tons of cumulated subject imports in quarterly comparisons in which cumulated subject imports undersold the domestic like product (20.2 percent of the total) and *** short tons of cumulated subject imports in quarterly comparisons in which cumulated subject imports oversold the domestic like product (79.8 percent of the

⁵⁴⁷ The Commission requested pricing data on the following products:

Product 1.-- Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36 and/or conversion to ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width.;

Product 2.-- Hot-rolled carbon steel sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width;

Product 3.-- Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width; and

Product 4.-- Ultra High Strength Steel (UHSS) or Advanced High Strength Steel, DRY, not tempered, 40-72" in width, and 0.071-0.250" in thickness.

CR/PR at V-9.

⁵⁴⁸ CR/PR at V-9.

⁵⁴⁹ CR/PR at V-9.

⁵⁵⁰ CR/PR at V-9.

⁵⁵¹ CR/PR at Table V-18 (revised by Memorandum INV-UU-101 (Oct. 14, 2022)).

⁵⁵² *Calculated from* CR/PR at Table V-18. Commissioners Schmidlein and Stayin note that cumulated subject imports including Brazil undersold the domestic like product in 66 of 295 (or 22.4 percent of) quarterly comparisons, while prices for cumulated subject imports oversold the domestic like product in 229 of 295 (or 77.6 percent of) quarterly comparisons. *Id.*

total).⁵⁵³ Thus, notwithstanding the discipline of the orders, cumulated subject imports undersold the domestic like product in an appreciable number of comparisons, which encompassed *** of the total volume of reported shipments of cumulated subject imports during the POR. Moreover, for sales to end users, just over half of the volume of importers' commercial shipments of cumulated subject imports undersold the domestic like product.⁵⁵⁴

The margins of underselling ranged up to *** percent, while the margins of overselling ranged up to *** percent.⁵⁵⁵ Over the POR, prices of U.S.-produced hot-rolled steel for all four pricing products increased between *** percent and *** percent.⁵⁵⁶ The domestic industry's ratio of COGS to net sales declined overall from 2016 to 2021.⁵⁵⁷

In light of the underselling observed during the original POI,⁵⁵⁸ during the Russia investigation and reviews,⁵⁵⁹ and during the POR with the orders in place, as well as the significance of price in purchasing decisions and the moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports, we find that significant underselling by cumulated subject imports is likely in the event of revocation.⁵⁶⁰ Additionally, because price is an important factor in purchasing decisions and the domestic like product and cumulated subject imports are substitutable, the significant quantities of cumulated subject imports that would likely enter the United States and that would likely undersell the domestic like product would likely force the domestic industry to lower prices, forego price increases, or

⁵⁵³ *Calculated from* CR/PR at Table V-18. Commissioners Schmidlein and Stayin note that when Brazil is included there were *** short tons of cumulated subject imports in the quarterly comparisons in which the imports undersold the domestic like product (20.2 percent of the total) and *** short tons of cumulated subject imports in the quarterly comparisons in which the imports oversold the domestic like product (79.8 percent of the total). *Id.*

⁵⁵⁴ For sales to end users, there were *** short tons of cumulated subject imports in quarterly comparisons in which cumulated subject imports undersold the domestic like product (51 percent of the total) and *** short tons of cumulated subject imports in quarterly comparisons in which cumulated subject imports oversold the domestic like product (49.0 percent of the total). CR/PR at Table V-17.

⁵⁵⁵ CR/PR at Tables V-18.

⁵⁵⁶ CR Table V-8. As we have discussed, these increases primarily resulted from the supply and demand mismatch in 2021 and 2022.

⁵⁵⁷ The domestic industry's COGS to net sales ratio was 89.3 percent in 2016, 89.0 percent in 2017, 77.2 percent in 2018, 89.2 percent in 2019, 97.1 percent in 2020, and 58.7 percent in 2021. CR/PR at Table III-17. It was 74.5 percent in interim 2021 and 66.7 percent in interim 2022. *Id.*

⁵⁵⁸ *See, e.g.,* Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-13a. We recognize that the majority of the subject imports from Turkey in these comparisons were from nonsubject producer Colakoglu. *See id.* at Table VII-24

⁵⁵⁹ *See Original Japan Determination*, USITC Pub. 3202 at V-15. *First Review Determination*, USITC Pub. 6767 at 21, V-15; *Second Review Determination*, USITC Pub. 4237 at Table V-6.

⁵⁶⁰ In its expedited reviews, Commerce determined that revocation of the subject orders would be likely to lead to continuation or recurrence of dumping and/or subsidization at margins that, in some instances, are substantial. CR/PR at Tables I-11, I-14 to I-20.

lose market share.⁵⁶¹ Consequently, we find that cumulated subject imports would likely have significant price effects in the event of revocation within a reasonably foreseeable time.

E. Likely Impact of Cumulated Subject Imports

Original Investigations. In the original investigations, the Commission found that despite a 10.0 percent increase in apparent U.S. consumption in the merchant market from 2013 to 2014, the domestic industry reported only a slight increase in commercial shipments in 2014, when the subject imports captured significant market share. The Commission found that as a result of subject imports, the domestic industry did not perform as well as would have been expected during the 2013-2014 period of growing demand. The Commission further found that although the industry's capacity was essentially unchanged during the period and the industry increased its employment, many other indicators plummeted in 2015 as subject imports continued to increase their volume and share of the U.S. market. The Commission noted that the domestic industry's production, utilization rate, shipments, revenues, capital expenditures, and financial performance all declined.⁵⁶²

The Commission rejected arguments that a large portion of subject imports did not meaningfully compete with the domestic like product, either because of geographic attenuation or their dedicated sales to U.S. affiliates. The Commission also was not persuaded that there was a lack of correlation between the increase in subject imports in 2014 and

⁵⁶¹ POSCO argues that the Commission should give dispositive weight to the overselling that occurred during the POR and find that significant underselling is unlikely if the orders are revoked. It also argues that the Section 232 duties will support domestic hot-rolled steel prices. POSCO's Prehearing Brief at 36-39; POSCO's Posthearing Brief at 10-11. We do not place as much weight on overselling with the antidumping and countervailing duty orders in place but note that some underselling still occurred over the POR. We find the pattern of underselling prior to the orders to be more indicative of pricing behavior if the orders are revoked. See SAA at 884 ("{t}his period is the most recent time during which imports of subject merchandise competed in the U.S. market free of the discipline of an order or agreement."). We also disagree with the contention that the Section 232 measures will support hot-rolled steel prices and prevent adverse price effects from the cumulated subject imports. We have already found that the reduced volume and market share of cumulated subject imports reflect the discipline of the orders, and that absent these orders, the likely volume of subject imports would be significant in the event of revocation. Moreover, while hot-rolled steel prices rose after Section 232 duties were imposed in March 2018, prices began declining shortly thereafter, falling below 2018 price levels in 2019. See CR/PR at Figs. V-12 and V-13. Further, while Section 232 duties impose additional duties on imports, these measures operate differently than antidumping and countervailing duty orders, which have distinct restraining effects. See, e.g., *Certain Corrosion-Resistant Steel Products from China, India, Italy, South Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278 (Review), USITC Pub. 5337 (Aug. 2022) at 51. Based on the record, we find that Section 232 duties are unlikely to prevent significant underselling or price effects upon revocation of the orders.

⁵⁶² *Original Determinations*, USITC Pub. 4638 at 40-42.

deterioration in the domestic industry's condition in 2015, as subject imports had continued their increase in 2015.⁵⁶³

In its non-attribution analysis, the Commission found that nonsubject imports increased modestly but could not explain the industry's loss of market share. Moreover, while demand for downstream OCTG declined late in the POI, the increases in subject imports preceded declines in the OCTG market and demand in other downstream sectors increased. Accordingly, the Commission found that neither nonsubject imports nor trends in demand explained the magnitude of the domestic industry's loss of market share and revenues due to underselling by cumulated subject imports.⁵⁶⁴

The Russia Investigation and Reviews. In the original investigation, the Commission found that cumulated subject imports gained market share at the expense of the domestic industry, at a time when the domestic industry was adding capacity commensurate with increased apparent U.S. consumption. Domestic producers' production and shipments declined from 1997 to 1998, and operating income declined by more than half in that time frame. While recognizing that other factors, especially increased intra-industry competition, contributed to the industry's poorer performance in 1998, the Commission concluded that the substantially increased volume of subject imports at declining prices had materially contributed to the industry's deteriorating performance, as reflected in nearly all indicators of the industry's condition. It therefore concluded that the industry was materially injured by reason of the subject imports.⁵⁶⁵

In the first reviews, the Commission characterized the domestic industry's vulnerability as "mixed" because even though the industry had improved its efficiency and productivity, it had experienced five years of poor financial performance before attaining substantial profitability in 2004. Recognizing global demand associated with a sharp upsurge in Chinese demand for hot-rolled steel permitted the improved performance, the Commission found these conditions were temporary and unlikely to continue into the foreseeable future in light of China's becoming a net exporter of hot-rolled steel by the fourth quarter of 2004.⁵⁶⁶ In the environment of deteriorating prices and increasing raw materials costs, the Commission found that upon revocation, the likely increase in subject import volume and consequent price effects would have a significant adverse impact on the domestic industry.⁵⁶⁷

In the second reviews, the Commission found that the domestic industry's capacity, production, and shipments followed similar trends, increasing from 2005 to 2006, declining to

⁵⁶³ *Original Determinations*, USITC Pub. 4638 at 44.

⁵⁶⁴ *Original Determinations*, USITC Pub. 4638 at 45-46.

⁵⁶⁵ *Original Japan Determination*, USITC Pub. 3202 at 16-21.

⁵⁶⁶ *First Five-Year Review Determinations*, USITC Pub. 3767 at 39-41.

⁵⁶⁷ *First Five-Year Review Determinations*, USITC Pub. 3767 at 41-42.

period lows in 2009, and rising slightly in 2010.⁵⁶⁸ The Commission acknowledged the domestic industry's lackluster 2010 financial performance, but concluded that it reflected demand conditions and observed that U.S. demand was projected to improve in 2011 and 2012. In the context of the business cycle, the Commission found that the industry was not vulnerable, although the Commission stated that the domestic industry was still not in a position to withstand significantly increased low-priced subject imports from Russia without likely sustaining significant adverse effects. In this respect, it rejected the contention that any additional subject imports from Russia would simply be at the expense of nonsubject imports rather than at the domestic industry's expense.⁵⁶⁹

In the expedited third five-year review, the limited information was insufficient to make a finding as to whether the domestic industry was vulnerable to continuation or recurrence of material injury in the event of revocation of the order.⁵⁷⁰ The domestic industry's capacity, capacity utilization, U.S. commercial shipments, market share, production, and financial performance were lower in 2015 than in 2010.⁵⁷¹

The Commission found that revocation of the order would be likely to lead to a significant volume of subject imports that would undersell the domestic like product and have significant adverse effects on the domestic industry's prices. Consequently, it found the likely significant volume of subject imports would place pressure on domestic producers to cut prices or lose market share to subject imports. The likely significant volume of subject imports and their price effects would negatively affect the domestic industry's production capacity, production, capacity utilization, shipments, and market share, directly impacting the domestic industry's profitability and employment.⁵⁷²

⁵⁶⁸ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 34.

⁵⁶⁹ *Second Five-Year Review Determinations*, USITC Pub. 4237 at 36.

⁵⁷⁰ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 22. Vice Chairman Johanson and Commissioner Pinkert found that the domestic industry was vulnerable based on its condition in 2015, including its operating loss of \$1.3 billion and its income to net sales ratio of negative 5.2 percent. *Id.* at 22 n.125.

⁵⁷¹ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 22. In 2015, the domestic industry's capacity was 68 million short tons while production was 49 million short tons, with a capacity utilization rate of 72.4 percent, whereas in 2010, the domestic industry's capacity was 79.7 million short tons and its production was 54 million short tons, with a capacity utilization rate of 68.9 percent. The domestic industry's U.S. commercial shipments were 18 million short tons and 20 million short tons in 2015 and 2010, respectively. The domestic industry's market share was 89.9 percent and 94.5 percent in 2015 and 2010, respectively. The domestic industry reported an operating loss of \$1.3 billion and an operating income to net sales ratio of negative 5.2 percent in 2015. In 2010, the domestic industry reported an operating income of \$758.6 million and an operating margin of 2.3 percent. *Third Five-Year Review Determinations*, USITC Pub. 4639 at 22 n.126.

⁵⁷² *Third Five-Year Review Determinations*, USITC Pub. 4639 at 22.

In its non-attribution analysis, the Commission found that the existing and forthcoming orders on nonsubject imports⁵⁷³ would likely serve to discipline their volume and price effects in the U.S. market in the reasonably foreseeable future. In addition, the record provided no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities upon revocation of the orders. Accordingly, the Commission concluded that, if the antidumping duty order were revoked, subject imports from Russia would likely have a significant impact on the domestic industry within a reasonably foreseeable time.⁵⁷⁴

Current Reviews. The domestic industry reported modest improvements in its trade indicators during the POR. The domestic industry increased its production capacity by 4.6 percent from 2016 to 2021,⁵⁷⁵ and its production increased by 1.0 percent.⁵⁷⁶ The smaller increase in production resulted in the domestic industry's capacity utilization rate declining by 2.6 percentage points from 2016 to 2021.⁵⁷⁷ The quantity of the domestic industry's total U.S. shipments⁵⁷⁸ and net sales⁵⁷⁹ increased slightly between 2016 and 2021. The domestic

⁵⁷³ The antidumping and countervailing duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom were issued in August 2016. See CR/PR at Table I-1.

⁵⁷⁴ *Third Five-Year Review Determinations*, USITC Pub. 4639 at 22-23.

⁵⁷⁵ The domestic industry's production capacity was 72.6 million short tons in 2016, 74.4 million short tons in 2017, 75.0 million short tons in 2018, 74.8 million short tons in 2019, 73.7 million short tons in 2020, and 75.9 million short tons in 2021. CR/PR at Table C-1. It was 19.1 million short tons in interim 2021 and 18.1 million short tons in interim 2022. *Id.*

⁵⁷⁶ The domestic industry's production was 54.5 million short tons in 2016, 57.3 million short tons in 2017, 58.5 million short tons in 2018, 56.3 million short tons in 2019, 49.1 million short tons in 2020, and 55.0 million short tons in 2021. CR/PR at Table C-1. It was 14.1 million short tons in interim 2021 and 11.7 million short tons in interim 2022. *Id.*

⁵⁷⁷ The domestic industry's capacity utilization rate was 75.1 percent in 2016, 77.0 percent in 2017, 78.0 percent in 2018, 75.3 percent in 2019, 66.6 percent in 2020, and 72.5 percent in 2021. CR/PR at Table C-1. It was 73.8 percent in interim 2021 and 64.4 percent in interim 2022. *Id.*

⁵⁷⁸ U.S. producers' total U.S. shipments were 53.6 million short tons in 2016, 55.9 million short tons in 2017, 57.3 million short tons in 2018, 55.3 million short tons in 2019, 48.0 million short tons in 2020, and 53.7 million short tons in 2021. CR/PR at Table C-1. They were 13.7 million short tons in interim 2021 and 11.9 million short tons in interim 2022. *Id.*

The domestic industry's U.S. commercial shipments declined by 2.5 percent between 2016 and 2021. U.S. commercial shipments were 21.5 million short tons in 2016, 24.1 million short tons in 2017, 24.6 million short tons in 2018, 23.6 million short tons in 2019, 19.5 million short tons in 2020, and 21.0 million short tons in 2021. CR/PR at Table K-1. They were 5.2 million short tons in interim 2021 and 4.4 million short tons in interim 2022. *Id.*

⁵⁷⁹ The domestic industry's net sales, by quantity, were 54.5 million short tons in 2016, 57.3 million short tons in 2017, 58.4 million short tons in 2018, 56.5 million short tons in 2019, 49.2 million short tons in 2020, and 54.9 million short tons in 2021. CR/PR at Table C-1. They were 14.0 million short tons in interim 2021 and 11.8 million short tons in interim 2022. *Id.*

industry's share of the U.S. market fluctuated during the period, ending slightly lower.⁵⁸⁰ Ending inventory quantities increased overall by 1.0 percent from 2016 to 2021.⁵⁸¹

The domestic industry's employment-related indicators were mixed. The number of production related workers ("PRWs") and hours worked both declined overall from 2016 to 2021.⁵⁸² However, wages paid, hourly wages, and productivity all increased between 2016 and 2021.⁵⁸³

The domestic industry's financial performance indicia fluctuated but improved overall from 2016 to 2019, declined sharply in 2020, and then rebounded strongly in 2021. As a result, the domestic industry's financial indicators were substantially higher in 2021 than in 2016. The domestic industry's net sales revenues,⁵⁸⁴ gross profits,⁵⁸⁵ operating income,⁵⁸⁶ and net income⁵⁸⁷ all increased between 2016 and 2021 and were also higher in interim 2022 than in

⁵⁸⁰ The domestic industry's share of the U.S. market was 93.1 percent in 2016, 94.3 percent in 2017, 93.5 percent in 2018, 95.2 percent in 2019, 95.3 percent in 2020, and 95.3 percent in 2021. It was 94.6 percent in interim 2021 and 92.4 percent in interim 2022. *Id.*

⁵⁸¹ The domestic industry's ending inventory quantities were 1.6 million short tons in 2016 and 2017, 1.7 million short tons in 2018, 1.5 million short tons in 2019, 1.4 million short tons in 2020, and 1.6 million short tons in 2021. CR/PR at Table C-1. They were 1.5 million short tons in interim 2021 and 1.4 million short tons in interim 2022. *Id.*

⁵⁸² The number of PRWs was 14,379 in 2016, 14,490 in 2017, 15,280 in 2018, 15,449 in 2019, 14,164 in 2020, and 13,769 in 2021. CR/PR at Table C-1. PRWs totaled 13,393 in interim 2021 and 13,849 in interim 2022. *Id.*

Hours worked were 30.1 million in 2016, 31.3 million in 2017, 33.1 million in 2018, 32.6 million in 2019, 28.5 million in 2020, and 29.2 million in 2021. *Id.* They were 7.1 million in interim 2021 and 7.4 million in interim 2022. *Id.*

⁵⁸³ Wages paid were \$1.2 billion in 2016 and 2017, \$1.3 billion in 2018 and 2019, \$1.2 billion in 2020, and \$1.4 billion in 2021. CR/PR at Table C-1. They were \$303.8 million in interim 2021 and \$347.9 million in interim 2022. *Id.*

Hourly wages were \$38.22 in 2016, \$39.77 in 2017, \$40.74 in 2018, \$41.29 in 2019, \$41.40 in 2020, and \$47.41 in 2021. CR/PR at Table C-1. They were \$43.07 in interim 2021 and \$47.33 in interim 2022. *Id.* Productivity measured in short tons per 1,000 hours was 1,810 in 2016, 1,832 in 2017, 1,766 in 2018, 1,724 in 2019, 1,721 in 2020, and 1,882 in 2021. Productivity was 2,002 in interim 2021 and 1,589 in interim 2022. *Id.*

⁵⁸⁴ Net sales revenues were \$27.4 billion in 2016, \$34.0 billion in 2017, \$44.1 billion in 2018, \$35.9 billion in 2019, \$26.3 billion in 2020, and \$66.3 billion in 2021. *Id.* They were \$11.6 billion in interim 2021 and \$14.8 billion in interim 2022. *Id.*

⁵⁸⁵ CR/PR at Table C-1. Gross profits were \$2.9 billion in 2016, \$3.7 billion in 2017, \$10.1 billion in 2018, \$3.9 billion in 2019, \$773.4 million in 2020, and \$27.4 billion in 2021. *Id.* They were \$3.0 billion in interim 2021 and \$4.9 billion in interim 2022. *Id.*

⁵⁸⁶ Operating income was \$2.0 billion in 2016, \$2.6 billion in 2017, \$8.7 billion in 2018, \$2.7 billion in 2019, negative \$258.7 million in 2020, and \$25.9 billion in 2021. *Id.* It was \$2.6 billion in interim 2021 and \$4.6 billion in interim 2022. *Id.*

⁵⁸⁷ CR/PR at Table C-1. Net income was \$1.8 billion in 2016, \$2.4 billion in 2017, \$8.4 billion in 2018, \$2.5 billion in 2019, negative \$420.3 million in 2020, and \$25.6 billion in 2021. *Id.* It was \$2.5 billion in interim 2021 and \$4.5 billion in interim 2022. *Id.*

interim 2021. Likewise, the domestic industry's operating and net income margins increased overall and ended the period much higher than at the beginning.⁵⁸⁸ The industry tripled its capital expenditures from 2016 to 2021; its research and development expenses declined by over 50 percent during the same period.⁵⁸⁹

In assessing the vulnerability of the domestic industry, we observe that certain performance indicators showed mixed trends, with capacity, production, sales, and shipments improving overall during the POR, and the industry's capacity utilization, market share, and employment declining. Financial indicators such as net sales revenue, gross profit, operating and net income, and operating and net income margins fluctuated and improved markedly, demonstrating strong performance toward the end of the period.⁵⁹⁰ On the basis of the record as a whole, we do not find that the domestic industry is currently vulnerable.⁵⁹¹

As discussed above, we have found that the volume of cumulated subject imports would likely be significant in the reasonably foreseeable future if the orders under review were revoked, and subject imports would likely undersell the domestic like product to a significant degree, forcing the domestic industry to either cut prices or forego price increases, or else lose sales and market share to subject imports. The likely volume of cumulated subject imports,

⁵⁸⁸ CR/PR at Table C-1. The domestic industry's operating margin was 7.2 percent in 2016, 7.5 percent in 2017, 19.7 percent in 2018, 7.4 percent in 2019, negative 1.0 percent in 2020, and 39.1 percent in 2021. *Id.* It was 22.7 percent in interim 2021 and 30.8 percent in interim 2022. *Id.*

The domestic industry's net margin was 6.5 percent in 2016, 7.0 percent in 2017, 19.1 percent in 2018, 6.8 percent in 2019, negative 1.6 percent in 2020, and 38.6 percent in 2021. *Id.* It was 21.9 percent in interim 2021 and 30.5 percent in interim 2022. *Id.*

⁵⁸⁹ CR/PR at Table C-1. Capital expenditures were \$929.3 million in 2016, \$1.7 billion in 2017, \$1.3 billion in 2018, \$1.8 billion in 2019, \$2.6 billion in 2020, and \$2.8 billion in 2021. *Id.* They were \$489.5 million in interim 2021 and \$282.1 million in interim 2022. *Id.* The industry's assets and return on assets both increased substantially from 2016 to 2021. *See* CR/PR at Tables III-24 and III-25.

Research and development expenses were \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, and \$*** in 2021. CR/PR at Table C-1. They were \$*** in interim 2021 and \$*** in interim 2022. *Id.*

⁵⁹⁰ We note, for example, that the industry's operating profit as a ratio to net sales was 39.1 percent in 2021 as compared to negative 7.0 percent in 2015, the final year of the POI. CR/PR at Table I-3.

⁵⁹¹ We find that the domestic industry's improved condition during the POR compared to its condition during the original investigations is due at least in part to the antidumping and countervailing duty orders under review. The domestic industry generally reported higher productivity, profits, income, assets, return on assets and greater yearly capital expenditures during the POR than in the original investigations when the industry was reporting losses by the end of the period of investigation. The industry's condition improved when the orders were imposed in 2016 as evidenced by its 7.2 percent operating margin that year compared to 2015 when domestic industry reported a negative 7.0 percent operating margin. *See* CR/PR at Appendix C. The improvements in the domestic industry's condition also were evident in 2016 and 2017, prior to the implementation of the Section 232 duties in 2018. *Id.*

coupled with their adverse price effects, would have a direct adverse impact on the industry's production, shipments, profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Therefore, we find that revocation of the orders under review would likely have a significant impact on the domestic industry.

Respondents highlight the domestic industry's increased capital expenditures, investments, productivity, and profitability during the POR and claim that the domestic industry is not vulnerable to material injury and that the Section 232 duties will protect the domestic industry from material injury.⁵⁹² As we have noted, the domestic industry's condition rapidly improved in 2016 when the orders under review were imposed and prior to the Section 232 duties.⁵⁹³ The domestic industry's capital expenditures decreased from 2013 to 2015, but in 2016, they began increasing when the antidumping and countervailing duty orders were imposed.⁵⁹⁴ As discussed above, we disagree that the Section 232 duties would prevent the likely significant volume of cumulated subject imports from causing adverse price effects in the event of revocation of the orders, and therefore also disagree that Section 232 duties would prevent recurrence of material injury by cumulated subject imports if the antidumping and countervailing duty orders are revoked.

Further, the domestic industry's reported elevated profits in 2021 into 2022 likely reflected in part a temporary supply/demand imbalance as the U.S. economy rapidly recovered from the effects of the COVID-19 pandemic. Domestic hot-rolled steel prices are already receding from the elevated prices that resulted in the domestic industry's increased profits at the end of the POR.⁵⁹⁵

We have also considered the role of factors other than subject imports so as not to attribute likely injury from other factors to the subject imports. Nonsubject imports increased overall during the POR both in terms of volume and market share. Nonsubject import volume increased from 2.5 million short tons in 2016 to 3.0 million short tons in 2021.⁵⁹⁶ Nonsubject imports as a share of apparent U.S. consumption increased by 1.0 percentage point from 2016 to 2021, from 4.3 percent in 2016 to 5.3 percent in 2021.⁵⁹⁷ Although nonsubject imports would be likely to remain in the U.S. market after revocation of the orders, their market share remains relatively modest compared to the domestic industry's market share of 93.0 percent in

⁵⁹² See, e.g., POSCO's Prehearing Brief at 44-51.

⁵⁹³ See CR/PR at Appendix C.

⁵⁹⁴ See CR/PR at Appendix C.

⁵⁹⁵ See CR/PR at Figs. V-12 and V-13 (showing price declines in interim 2022) and Table IV-74 (hot-rolled steel prices for January 2016-June 2022). See also Four Domestic Producers' Prehearing Brief at 171-172 and Exhibit 12 (***) data showing domestic prices falling from a peak of \$*** per short ton in September 2021 to \$*** per short ton in August 2022).

⁵⁹⁶ CR/PR at Table C-1. Nonsubject imports also were higher in interim 2022 at 725,554 short tons compared to 542,167 short tons in interim 2021. *Id.*

⁵⁹⁷ CR/PR at Table C-1.

2021. The likely significant volume of cumulated subject imports would thus likely take market share from the domestic industry or force the domestic industry to reduce prices or forego price increases that otherwise would occur, given the domestic industry's large share of the U.S. market, the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, the importance of price, and cumulated subject imports' likely significant underselling. We find that the continued presence of nonsubject imports in the U.S. market would not preclude cumulated subject imports from taking market share from the domestic industry or forcing the domestic industry to lower prices in order to retain sales and market share.

We have also considered the likely effects of demand trends on the domestic industry. Apparent U.S. consumption of hot-rolled steel increased by 0.3 percent from 2016 to 2021, increasing from 57.6 million short tons in 2016 to 57.8 million short tons in 2021.⁵⁹⁸ Although apparent U.S. consumption recovered more quickly in 2021 than expected, such strong demand may not persist in the reasonably foreseeable future, as evidenced by recently falling prices. Most responding U.S. producers, importers, and purchasers reported in their questionnaires that they expect U.S. demand for hot-rolled steel to fluctuate or increase within the reasonably foreseeable future.⁵⁹⁹ However, additional information in the record indicates that future demand for hot-rolled steel is uncertain due to global supply chain issues, the COVID-19 pandemic, rising inflation and interest rates, the war in Ukraine, and a possible global recession.⁶⁰⁰ Further, apparent U.S. consumption for hot-rolled steel was 13.6 percent lower in interim 2022 than in interim 2021.⁶⁰¹ The significant volume of low-priced cumulated subject imports that is likely after revocation would exacerbate any injury caused by stagnant or weak demand and negatively impact the domestic industry, by further reducing the domestic industry's sales and placing additional downward pressure on domestic hot-rolled steel prices. Given these considerations, we find that the likely effects attributable to the cumulated subject imports are distinguishable from any likely effects of demand if the orders were revoked.

In sum, we conclude that if the antidumping and countervailing duty orders were revoked, cumulated subject imports from Australia, Japan, the Netherlands, Russia, South

⁵⁹⁸ CR/PR at Table C-1.

⁵⁹⁹ See CR/PR at Table II-6.

⁶⁰⁰ Four Domestic Producers' Prehearing Brief at 3, 102 (deteriorating global conditions due to interest rate increases); Nucor, SSAB, and SDI Posthearing Brief a 2-3 (deteriorating global conditions); Cleveland-Cliffs' Prehearing Brief at 114 (noting effects of pandemic, supply chain issues and war in Ukraine).

⁶⁰¹ CR/PR at Table C-1.

Korea, Turkey, and the United Kingdom would likely have a significant impact on the domestic industry within a reasonably foreseeable time.⁶⁰²

V. Revocation of the Antidumping and Countervailing Duty Orders On Subject Imports from Brazil Would Not Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

1. Likely Volume of Subject Imports from Brazil⁶⁰³

During the original investigations, subject imports from Brazil were *** short tons in 2013 (or *** percent of apparent U.S. consumption in the merchant market), *** short tons in 2014 (or *** percent of apparent U.S. consumption in the merchant market), *** short tons in 2015 (or *** percent of apparent U.S. consumption in the merchant market), *** short tons in interim 2015 (or *** percent of apparent U.S. consumption in the merchant market), and *** short tons in interim 2016 (or *** percent of apparent U.S. consumption in the merchant market).⁶⁰⁴

During the POR, subject imports from Brazil had a minimal presence in the U.S. market; they were 13,441 short tons in 2016, 36 short tons in 2017, 11 short tons in 2018, 336 short tons in 2019, 0 short tons in 2020 and 2021, and 8 short tons in interim 2022.⁶⁰⁵ Their share of apparent U.S. consumption, by quantity, was less than 0.05 percent throughout the POR.⁶⁰⁶

The Brazilian hot-rolled steel industry is focused on serving its domestic market.⁶⁰⁷ An overwhelming and increasing share of the Brazilian industry's total shipments during the POR were shipped to its home market, increasing each full year from *** percent in 2016 to ***

⁶⁰² Commissioners Schmidlein and Stayin find that if the antidumping and countervailing duty orders were revoked, cumulated subject imports from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom would likely have a significant impact on the domestic industry within a reasonably foreseeable time. They do not join the remainder of the Commission's Views.

⁶⁰³ We have discussed above in section IV.B the conditions of competition that are distinctive to the domestic industry that also inform our determinations with respect to subject imports from Brazil.

⁶⁰⁴ *Original Determinations*, USITC Pub. 4638 at Table C-2; Confidential Report from the Original Investigations, EDIS Doc. 755997 at Table C-2. The volume of subject imports from Brazil as a share of apparent U.S. consumption in the total U.S. market was *** percent in 2013, *** percent in 2014, *** percent in 2015, *** percent in interim 2015, and *** percent in interim 2016. *Id.*

⁶⁰⁵ CR/PR at Tables I-26 and C-1.

⁶⁰⁶ CR/PR at Tables I-26 and C-1.

⁶⁰⁷ In these reviews, the Commission received questionnaire responses from three producers of hot-rolled steel in Brazil accounting for approximately *** percent of hot-rolled steel production in Brazil in 2021. CR/PR at IV-52.

percent in 2021.⁶⁰⁸ Conversely, the share of total shipments that were exported by Brazilian hot-rolled steel producers declined each full year of the POR, from *** percent in 2016 to *** percent in 2021.⁶⁰⁹ Information available indicates that the Brazilian industry's limited exports have been focused largely on customers located in nearby Latin American markets with regional trade promotion programs or to customers in European markets.⁶¹⁰ The Brazilian industry's exports to the U.S. market as a share of total shipments never exceeded *** percent throughout the POR.⁶¹¹

In addition to being focused on its home market and other markets outside the United States for its relatively limited exports, the Brazilian industry has an increasing capacity utilization rate as well as limited and decreasing excess capacity. Its capacity utilization rate increased irregularly during the POR, increasing overall by *** percentage points from 2016 to 2021.⁶¹² The Brazilian industry's excess capacity of hot-rolled steel by volume declined overall by *** percent during the 2016 to 2021 period.⁶¹³ Despite the existence of some available capacity, albeit in decreasing amounts, during the POR,⁶¹⁴ the Brazilian industry did not

⁶⁰⁸ CR/PR at Table IV-20. Home market shipments as a share of total shipments by the Brazilian industry was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020 and 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id.*

⁶⁰⁹ CR/PR at Table IV-20. Export shipments as a share of total shipments by the Brazilian industry was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020 and 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id.*

⁶¹⁰ *See, e.g.*, CR/PR at Table IV-21 and IV-39; CSN and USIMINAS Prehearing Br. at 17, Exhibit 17; USIMINAS Posthearing Br. at 9, Attachment 1 pg. 12; Hearing Tr. at 216 (Richardson), 222 (Delgado). GTA data show that the leading markets for Brazilian exports of hot-rolled flat products of iron or nonalloy steel (a category that includes hot-rolled steel and out-of-scope merchandise) in 2021 were Chile, Columbia, Turkey, Portugal, Ecuador, Peru, and Bolivia. CR/PR at Table IV-23. Despite being subject to antidumping duty orders in Canada, the European Union, India, Taiwan, Thailand, and the United Kingdom and safeguard measures in Armenia, the European Union, the Gulf Cooperation Council, Mexico, Morocco, South Africa, and the United Kingdom, CR/PR at Table IV-72, the European Union remained one of the leading export markets for the Brazilian hot-rolled steel industry. *See, e.g.*, CR/PR at Tables IV-21 and IV-23.

⁶¹¹ CR/PR at Table IV-21. The Brazilian industry's reported export shipments to the United States were *** short tons in 2016, *** short tons in 2017 and 2018, *** short tons in 2019, and *** short tons for the remainder of the POR. *Id.*

⁶¹² The Brazilian industry's production and capacity utilization both fluctuated but increased irregularly between 2016 and 2021. CR/PR at Table IV-20. Its production was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. *Id.* Its capacity utilization rate was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id.*

⁶¹³ CR/PR at Table IV-20.

⁶¹⁴ CR/PR at Table IV-20.

significantly increase shipments outside of its home market;⁶¹⁵ in fact, the Brazilian industry's reported total export shipments declined overall by *** percent during the 2016 to 2021 period.⁶¹⁶ This also supports the conclusion that hot-rolled steel producers in Brazil are not globally export oriented.

Data in the record of these reviews show that the AUVs for the Brazilian industry's domestic shipments are higher than for their export shipments, further demonstrating the attractiveness of its home market.⁶¹⁷ In the ***, the AUVs for the Brazilian subject industry's exports to the United States were generally higher than for its exports to other markets;⁶¹⁸ these exports accounted for less than *** percent of its total shipments in each year.⁶¹⁹ Information in the record indicates that the U.S. market is not a particularly attractive market for Brazilian subject producers compared to other export markets, especially those in Latin America due to regional tariff preferences and proximity.⁶²⁰ The record indicates that Brazilian producers are focused on their home market and other export markets, constituting the vast majority of the Brazilian industry's total shipments, a trend likely to continue in light of projected demand growth, particularly for automotive and construction uses in those markets.⁶²¹

Subject imports from Brazil are subject to an absolute quota, administered on a quarterly basis, imposed under Section 232 of 143,416 short tons per year as of April 1, 2018.⁶²² Subject imports from Brazil have been far below the quota limit during the POR as none of the

⁶¹⁵ CR/PR at Table IV-20. The Brazilian industry's home market shipments were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019 and 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. *Id.*

⁶¹⁶ CR/PR at Table IV-20. The Brazilian industry's total exports were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. *Id.* Likewise, GTA data indicate exports of hot-rolled steel from Brazil declined irregularly, but overall, by *** percent during the 2016 to 2021 period and were 1.7 million short tons in 2016, 1.8 million short tons in 2017, 1.5 million short tons in 2018, 1.3 million short tons in 2019, 743,542 short tons in 2020, and 736,961 short tons in 2021. CR/PR at Tables IV-23, IV-73 (GTA data based on official Brazilian statistics). The GTA data for hot-rolled flat products of iron or nonalloy steel may include some out-of-scope products.

⁶¹⁷ CR/PR at Table IV-20. The AUVs per short ton for the Brazilian industry's home market shipments were \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, \$*** in 2021, \$*** in interim 2021, and \$*** in interim 2022. The AUVs per short ton for the Brazilian industry's total export shipments were \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, \$*** in 2021, \$*** in interim 2021, and \$*** in interim 2022. *Id.*

⁶¹⁸ See, e.g., CR/PR at Tables IV-20 & IV-21.

⁶¹⁹ CR/PR at Table IV-21.

⁶²⁰ See, e.g., Prehearing Brief of CSN and USIMINAS at 15, 20, 50, 53, Exhibits 17-18; Posthearing Brief of CSN and USIMINAS at Exhibit Attachment 1, pg. 26.

⁶²¹ See, e.g., Prehearing Brief of CSN and USIMINAS at 13-14; Posthearing Brief of CSN and USIMINAS at Attachment 1 pgs. 23-24, Exhibits 3, 6-10.

⁶²² CR/PR at I-39 & Tables I-21.

quota level in 2020 or 2021 was filled.⁶²³ Among the subject countries with absolute quotas, Brazil's annual absolute quota has the lowest quantity limit, equivalent to only 0.25 percent of apparent U.S. consumption in 2021.⁶²⁴ Additionally, given the Brazilian industry's overwhelming focus on the home market and to a much lesser degree export markets in Latin America and Europe, the Brazilian industry's limited excess capacity, and the limited volume of U.S. exports available to the Brazilian industry under the absolute quota limit, we see no incentive for Brazilian producers to price aggressively to win sales and market share; on the contrary, they would likely seek to maximize profits on this limited quota amount.⁶²⁵

Although the parties disagree,⁶²⁶ the record of these reviews does not indicate that the Section 232 trade action as it relates to imports of hot-rolled steel from Brazil, an absolute quota, will likely be terminated in the reasonably foreseeable future. The President stated in the May 2018 Proclamation his "determination to exclude, on a long-term basis," these imports of hot-rolled steel products from Brazil from the tariffs originally imposed in March 2018 and instead impose the quota.⁶²⁷ The quota has been in place since that time, and there has been no announcement by the Administration that it is considering revising or removing the quota on Brazil in the reasonably foreseeable future. Therefore, based on the record, we conclude that the Section 232 trade action, as currently structured and enforced, likely will continue through the reasonably foreseeable future.

We are also not persuaded by the Domestic Producers' argument that the Brazilian industry will likely be able to increase export volumes above the 143,416 short ton quota limit

⁶²³ CR/PR at I-39 n.57; *calculated from* CR/PR at I-26 & Table C-1. There are *** arranged subject imports from Brazil for 2022 and in addition to the 3 short tons of subject imports from Brazil in interim 2022, *** percent of the 143,416 total annual quota for Brazil would likely have been filled in 2022. *Calculated from* CR/PR at Tables I-26, IV-8, and C-1.

⁶²⁴ *Calculated from* CR/PR at I-39 & Table C-1. Even if the quota is filled, annual subject imports from Brazil would be equivalent to only 0.6 percent of apparent U.S. consumption in the merchant market in 2021. *Calculated from* CR/PR at I-39 & Table K-1. This quota quantity is less than one-quarter the quantity of subject imports from Brazil in 2015, the last year of the POI. CR/PR at Table I-3.

⁶²⁵ *See, e.g.*, Posthearing Brief of CSN and USIMINAS at Exhibit 3.

⁶²⁶ *See, e.g.*, Cleveland-Cliffs' Prehearing Brief at 95, Four Domestic Producers' Prehearing Brief at 34; Prehearing Brief of CSN and USIMINAS at 48. The Domestic Producers assert that the Government of Brazil has been "urging the Administration to weaken Section 232 relief," has pursued renegotiation of the quota, and reportedly obtained promises to reconsider the quota. Cleveland-Cliffs' Prehearing Brief at 95; Four Domestic Producers' Prehearing Brief at 34. However, the Government of Brazil has indicated that there are "no negotiations pending on altering the Section 232 quotas" between it and the United States. Government of Brazil's Prehearing Brief at 2.

⁶²⁷ *Proclamation 9759 of May 31, 2018 Adjusting Imports of Steel Into the United States*, 83 Fed. Reg. 25857, 25858 (June 5, 2018); *see also Proclamation 9705 of March 8, 2018 (Adjusting Imports of Steel Into the United States)*, 83 Fed. Reg. 11625 (March 15, 2018).

through obtaining broad product exclusions from the Commerce Department.⁶²⁸ Commerce’s exclusion process provides that an exclusion request will only be granted after determining the hot-rolled steel article “not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality” or when warranted based upon specific national security considerations.⁶²⁹ Commerce may take months to review a request, and generally denies the request whenever a domestic interested party makes a valid objection.⁶³⁰ Moreover, according to Brazilian Respondents, there have been no individual product exclusion requests granted for Brazilian hot-rolled steel during the POR, and there have been no U.S. imports of hot-rolled steel from Brazil under the tariff codes covered by the GAE.⁶³¹

In sum, given the Section 232 quota limit volume, amounting to 0.25 percent of apparent U.S. consumption in 2021, to act as an absolute cap on the volume of subject imports from Brazil,⁶³² the Brazilian industry’s dedicated focus on its home market, the minimal level of Brazilian exports outside of Latin America and Europe, its growing home market, and its limited excess capacity, the Brazilian industry has little incentive or ability to export significant volumes of hot-rolled steel to the U.S. market if the order was revoked. Accordingly, we find that the likely volume of subject imports from Brazil, in absolute terms and relative to U.S. consumption, would not be significant in the event of revocation.⁶³³

⁶²⁸ See, e.g., Cleveland-Cliffs’ Prehearing Br. at 61-63; Four Domestic Producers’ Prehearing Brief at 33-34; Nucor, SCI, SSAB, and SDI’s Posthearing Brief at Exhibit 1 pg. 68.

⁶²⁹ See, e.g., CR/PR at I-41-42.

⁶³⁰ See, e.g., Posthearing Brief of CSN and USIMINAS at Attachment 1 pg. 22.

⁶³¹ Posthearing Brief of CSN and USIMIAS at 8, Attachment 1 pgs. 21-22. Moreover, no purchaser reported requesting and/or receiving individual product exclusions for certain hot-rolled steel products from Brazil. See CR/PR at II-2 n.4.

⁶³² Likewise, because of this cap, we are unpersuaded by Domestic Producers’ argument that if the order were revoked, a similar scenario would occur as when subject producers in Brazil subsequently “flooded” the U.S. market with hot-rolled steel after the orders on hot-rolled steel from Brazil were revoked in 2011 in the *Second Five-Year Review Determinations*, USITC Pub. 4237. See Four Domestic Producers’ Prehearing Brief at 1.

⁶³³ We have also considered the potential for product shifting and inventories in our analysis of likely subject import volume. Subject producers in Brazil reported no production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel. CR/PR at IV-65. The Brazilian industry’s end-of-period inventories were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. *Id.* at IV-20. Its ratio of inventories to production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id.* Its ratio of inventories to total shipments was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id.* U.S. importers’ inventories of subject merchandise from Brazil were *** throughout the POR. CR/PR at Table IV-7.

2. Likely Price Effects of Subject Imports from Brazil

In considering the likely price effects of subject imports from Brazil if the order were revoked, we acknowledge, as discussed above, that subject imports from Brazil and the domestic like product generally are interchangeable and that price is important in purchasing decisions. In these reviews, there is only limited pricing data specific to hot-rolled steel from Brazil that we do not find to be particularly useful to our analysis.⁶³⁴

Given our finding that the volume of subject imports from Brazil upon revocation is not likely to be significant, given the low absolute quota volume, any likely volume of subject imports from Brazil would be too small to have a significant effect on prices for the domestic like product.⁶³⁵ As discussed above, the Brazilian industry is focused on supplying its home market, and its limited exports are almost exclusively destined for regional Latin American markets or Europe, with less than *** percent of Brazilian producers' shipments of hot-rolled

⁶³⁴ CR/PR at Tables V-14 to V-18. In the original investigations, subject imports from Brazil undersold the domestic like product in 37 of 82 comparisons (45 percent) involving *** short tons (*** percent of the total volume of quarterly comparisons) with underselling margins ranging from *** to *** percent. CR/PR at V-45 n.12; Confidential Report from the Original Investigations, EDIS Doc. No. 755997 at Table V-13a. In the current reviews, the pricing data show that prices for hot-rolled steel from Brazil were above those for U.S.-produced product in *** with ***. CR/PR at V-18.

⁶³⁵ The likely volume of subject imports from Brazil would likely be too small to have a significant effect on prices for the domestic like product regardless of domestic producers' assertions that (1) they have been informed of low-priced offers of cold-rolled steel from Brazil in the U.S. market immediately following the revocation of the orders on cold-rolled steel from Brazil; and (2) the quota amount, which is larger than the quota for cold-rolled steel, would allow Brazilian imports to compete directly on price in a larger variety of sales types and shipment sizes. *See, e.g.,* Cleveland-Cliffs' Posthearing Brief at Exhibit 1 pg. 22, Exhibit 4; Hearing Tr. at 65 (Chronister), 57 (Query); Nucor, SSAB, and SDI's Posthearing Brief at Exhibit 1, Pgs. 63-64, 66. We are unpersuaded by the Domestic Producers' argument that even small volumes of low-priced imports and offers from Brazil would have an amplified effect on prices because they would be reflected in price indices such as CRU, Platts, and Argus that are regularly referenced in U.S. producers' sales contracts and in direct negotiations. Four Domestic Producers' Prehearing Brief at 34-38; Nucor, SCI, SSAB, and SDI's Posthearing Brief at 61; Cleveland-Cliffs' Posthearing Brief at Exhibit 1 pg. 53 Hearing Tr. at 66 (Kopf), 106-107 (Chronister). The record shows that the CRU price index is widely used by U.S. producers, takes into account the volume of actual sales, and excludes abnormally low (or high) prices. CR/PR at V-7-V-8 n.6; Platts and CRU Methodology, EDIS Doc. 782220 at 7-8 (indicating that CRU calculates prices using volume weighted-average prices of actual weekly spot market transactions and excludes prices that fall outside of a five percent range from the arithmetic mean of weekly transactions); Cleveland-Cliffs' Posthearing Brief at Exhibit 4, pg. 2 (indicating that *** of the *** listed by Cleveland-Cliffs ***); Posthearing Brief of CSN and USIMINAS at Exhibit 2 pg. 2 and Hearing Tr. at 218 (Richardson) (indicating that U.S. producers primarily use CRU when assessing U.S. market prices, and CRU compiles prices on a volume weighted average basis). Therefore, the likely small volume and limited availability of subject imports from Brazil due to the quota will likely lessen their effect on prices and limit the ability of purchasers to use low-priced subject imports from Brazil to extract price concessions from domestic producers.

steel destined for the U.S. market since 2016.⁶³⁶ Additionally, Brazilian producers explain that the quota will make them focus on more profitable, higher-value, niche hot-rolled steel products, particularly in their limited exports to the United States.⁶³⁷ Given these considerations, the Brazilian industry's limited and decreasing unused capacity, and the Section 232 quota limit to act as an absolute cap on the volume of subject imports from Brazil, the Brazilian industry lacks the incentive to lower prices to gain sales in the U.S. market.⁶³⁸ Instead, the Brazilian producers are likely to continue focusing on higher-value hot-rolled steel products in their limited exports to the United States to maximize profits.

Accordingly, we find that revocation of the antidumping and countervailing duty orders from Brazil would not be likely to lead to significant underselling or significant price depression or suppression within a reasonably foreseeable time.

3. Likely Impact of Subject Imports from Brazil

In evaluating the likely impact of subject imports from Brazil on the domestic industry, we reiterate our finding that the domestic industry is not in a vulnerable condition, as discussed in section IV.E above. Given that we do not find it likely that there would be a significant volume of subject imports from Brazil or that any such imports likely would have significant price effects, we find that revocation of the antidumping and countervailing duty orders on subject imports from Brazil would not likely lead to a significant impact on the domestic industry. For all of these reasons, we conclude that revocation of the antidumping and countervailing duty orders on subject imports of hot-rolled steel from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

⁶³⁶ CR/PR at Table IV-12.

⁶³⁷ Posthearing Brief of CSN and USIMINAS at Exhibit 3.

⁶³⁸ We are unpersuaded by the Domestic Producers' argument that Brazilian exporters will likely "rush in imports" and compete with each other aggressively on price to fill the quota as quickly as possible. Four Domestic Producers' Prehearing Brief at 34-37. Notwithstanding our finding that the likely low volumes from Brazil would be too small to have significant price effects, the absolute quota is divided on a quarterly basis wherein imports in each quarter cannot exceed 30 percent of the annual limit. Posthearing Brief of CSN and USIMINAS at Exhibit 3; Hearing Tr. at 218 (Richardson).

VI. Conclusion

For the above reasons, we determine that revocation of the countervailing duty order on hot-rolled steel from South Korea and the antidumping duty orders on hot-rolled steel from Australia, Japan, the Netherlands, South Korea, Russia, Turkey, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. We also determine that revocation of the antidumping and countervailing duty orders on hot-rolled steel from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Dissenting Views of Commissioners Rhonda K. Schmittlein and Randolph J. Stayin

Commissioners Schmittlein and Stayin disagree with the Majority's decision not to cumulate Brazil with the remaining subject countries for the purposes of analyzing the likely volume and effects of subject imports in these reviews.¹ Based on our review of the record, we find that there would not likely be significant differences between the conditions of competition under which imports from each subject country would likely compete if the orders were revoked. Consequently, we exercise our discretion to cumulate imports from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom.

Imports from each of the subject countries exhibited similar behavior during the original investigations, with subject imports from each country initially increasing during the investigation period and declining after the orders and suspension agreement (for Russia) were imposed.² Imports from each subject country also undersold the domestic like product, and purchasers reported shifting purchases from the domestic like product to imports from each subject country due to the lower price of the imports.³ As explained in the Majority views, the Commission has already determined that producers in each subject country have the ability to export hot-rolled steel ("HRS") to the United States in volumes that would have a discernible adverse impact on the domestic industry if the orders were revoked, and that imports from each subject country would compete with each other and with the domestic like product for sales in the U.S. market. Imports from each subject country would likely be competing for similar sales, in similar channels of distribution, to similar customers, and would likely use aggressive prices to gain sales as they did during the original investigations.

We are not persuaded by Brazilian Respondents' argument that subject imports from Brazil are likely to compete under different conditions of competition than other subject imports in the event of revocation due to the Brazilian industry's focus on its home market and differences in applicable Section 232 measures.⁴ Brazilian HRS producers have demonstrated a strong interest in exporting to the U.S. market, similar to producers in other subject countries.

¹ Except as noted, we join the Commission's Views in sections I–III.E.2 and IV.

² See CR/PR at Appendix C, Tables C-1 (2016-2021), C-1 (2013-2015), C-1 (1999-2004), and C-1 (1996-1998). Subject imports from Australia, Brazil, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom increased overall during their initial investigation periods, while subject imports from Japan initially increased between 2013 and 2014 but declined in 2015 for an overall decline of *** percent. CR/PR at Appendix C, Tables C-1 (2013-2015) and C-1 (1996-1998).

³ *Original Determinations*, USITC Pub. 4638 at Tables V-13a and V-16; *Certain Hot-Rolled Steel Products From Japan*, Inv. No. 731-TA-807 (Final), USITC Pub. 3202 (June 1999) ("*Russia Original Determination*, USITC Pub. 3202") at V-15.

⁴ Brazilian Respondents' Prehearing Br. at 7-15.

Before the orders were imposed, subject imports from Brazil increased rapidly, by *** percent, from *** short tons in 2013 to *** short tons in 2015, increasing as a share of the merchant market from *** percent in 2013 to *** percent in 2015.⁵ This occurred as subject imports from Brazil undersold the domestic like product in 37 of 82 quarterly comparisons, with 63.8 percent of the volume of subject imports from Brazil in the pricing comparisons associated with underselling.⁶ The orders subsequently had a significant restraining effect on the volumes of subject imports from Brazil, which significantly decreased to 13,441 short tons in 2016 and 36 short tons in 2017.⁷ Subject imports from Brazil remained at minimal or zero short tons throughout the remainder of the period of review (“POR”) and were significantly lower in each year of the POR than in each year of the original period of investigation (“POI”).⁸

Although responding Brazilian producers’ export shipments were substantially smaller than their home market shipments during the POR, this was also the case during the original investigation period and yet subject imports from Brazil increased by more than *** percent.⁹ Additionally, although the industry’s exports as a share of total shipments declined during the POR, responding Brazilian producers still exported nearly *** short tons of HRS to markets throughout the world in 2021.¹⁰ Moreover, the fact that the Brazilian industry had a higher concentration of sales to its home market does not make it unique among the subject countries,¹¹ nor does the fact that the Brazilian industry’s total exports declined during the POR.¹² Thus, we do not find that imports from Brazil are likely to compete under different conditions of competition due to any alleged difference in export orientation among the HRS industries in the subject countries.¹³

⁵ CR/PR at Table C-1 (2013-2015).

⁶ *Original Determinations*, USITC Pub. 4638 at Table V-13a.

⁷ CR/PR at Table C-1 (2016-2021).

⁸ CR/PR at Tables C-1 and C-2.

⁹ CR/PR at Table IV-20; Confidential Report from the Original Investigations at Tables VII-7 and C-1. Brazilian producers’ exports as a share of total shipments ranged between *** and *** percent during the POI. Confidential Report from the Original Investigations at Table VII-7. That subject imports from Brazil were able to significantly increase during the POI despite Brazilian producers shipping a large majority of their production to their home market suggests that comparable export-orientation during the POR and in 2021 will not prevent the Brazilian industry from increasing its exports to the United States upon revocation in the reasonably foreseeable future, along with imports from the other subject countries.

¹⁰ CR/PR at Tables IV-20 and IV-21. Brazilian producers’ exports as a share of total shipments declined from *** percent in 2016 to *** percent in 2021. CR/PR at Table IV-20.

¹¹ See, e.g., CR/PR at Tables IV-13 (Australia), IV-29 (Japan), IV-36 (Netherlands), IV-52 (South Korea), and IV-67 (United Kingdom).

¹² See, e.g., CR/PR at Tables IV-13 (Australia) and IV-52 (South Korea).

¹³ Foreign producer questionnaire responses indicate that the HRS industries in each subject country exported *** of their shipments of HRS. Responding Brazilian HRS producers, which accounted (Continued...)

for approximately *** percent of HRS production in Brazil in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-51-52 and Table IV-20. In the original investigations, responding Brazilian producers, which accounted for approximately *** percent of production in Brazil in 2015, exported between *** and *** percent of total HRS shipments during 2013-2015. CR/PR at IV-51; Confidential Report from the Original Investigations at VII-9 and Table VII-9.

Responding Australian HRS producers, which accounted for approximately *** percent of HRS production in Australia in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-35 and Table IV-13. In the original investigations, responding Australian producers, which accounted for approximately *** percent of production in Australia in 2015, exported between *** and *** percent of total HRS shipments during 2013-2015. CR/PR at IV-35; Confidential Report from the Original Investigations at VII-3 and Table VII-3.

Responding Japanese HRS producers, which accounted for approximately *** percent of HRS production in Japan in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-70 and Table IV-29. In the original investigations, responding Japanese producers, which accounted for approximately *** percent of production in Japan in 2015, exported between *** and *** percent of total HRS shipments during 2013-2015. CR/PR at IV-70; Confidential Report from the Original Investigations at VII-16 and Table VII-12.

Responding Dutch HRS producers, which accounted for approximately *** percent of HRS production in the Netherlands in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-92-93 and Table IV-36. In the original investigations, responding Dutch producers, which accounted for approximately *** percent of production in the Netherlands in 2015, exported between *** and *** percent of total HRS shipments during 2013-2015. CR/PR at IV-92; Confidential Report from the Original Investigations at VII-30 and Table VII-22.

The responding South Korean producers, which accounted for approximately *** percent of HRS production in South Korea in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-130-131 and Table IV-52. In the original investigations, responding South Korean producers, which accounted for approximately *** percent of production in South Korea in 2015, exported between *** and *** percent of total shipments of HRS during 2013-2015. CR/PR at IV-130; Confidential Report from the Original Investigations at Table VII-17.

Responding Turkish HRS producers, which accounted for approximately *** percent of HRS production in Turkey in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-150-151 and Table IV-59. In the original investigations, responding Turkish producers, which accounted for approximately *** percent of production in Turkey in 2015, exported between *** and *** percent of total HRS shipments during 2013-2015. CR/PR at IV-150; Confidential Report from the Original Investigations at VII-36 and Table VII-25.

Responding Russian HRS producers, which accounted for approximately *** percent of HRS production in Russia in 2021, exported between *** and *** percent of total HRS shipments during 2016-2021. CR/PR at IV-110 and Table IV-43. In the original investigations, responding Russian producers, which accounted for approximately *** percent of production in 1998, exported between *** and *** percent of HRS production in the United Kingdom in 2021, exported between *** and *** percent of total HRS shipments during 2016-2017. CR/PR at IV-170-171 and Table V-67. In the original investigations, responding producers of HRS in the United Kingdom, which accounted for approximately *** percent of production in the United Kingdom in 2015, exported between *** and *** percent of their total shipments of HRS during 2013-2015. CR/PR at IV-170; Confidential Report from the Original Investigations at VII-42 and Table VII-29.

We also do not find that any differences in the applicable Section 232 measures constitute different conditions of competition that warrant analyzing subject imports from Brazil on a decumulated basis. The fact that certain imports may be subject to quotas while others are subject to tariffs or tariff-rate quotas does not affect the conditions of competition facing these imports in the U.S. market, nor does it suggest that the imports would not compete with each other and with the domestic product if the orders were to be revoked.¹⁴ The differences in measures do not affect the types of products that may be sold in the U.S. market, nor do they affect the locations or channels of distribution through which the imports may be sold. Simply put, any differences in these Section 232 measures will not result in the imports from different subject countries competing differently in the marketplace.^{15 16}

We disagree with the Majority's view that the difference in the quota levels between Brazil and South Korea constitutes a different condition of competition that will result in imports from Brazil operating differently in the U.S. market. Subject imports from Brazil are subject to an annual absolute quota of 143,416 short tons under Section 232 while subject imports from South Korea are subject to a quota limit of 584,544 short tons.¹⁷ The quota volumes are equivalent to 0.25 percent of apparent U.S. consumption in 2021 for Brazil, and 1.0 percent for South Korea. Subject imports from both countries were below their quota levels throughout the POR, and South Korea filled more of its quota than did Brazil in 2021.¹⁸ Thus, we agree with the Majority that upon revocation of the orders, imports from every subject country are likely to increase, including subject imports from Brazil and South Korea.¹⁹ Indeed,

¹⁴ See 19 U.S.C. § 1675a(a)(7).

¹⁵ See *Certain Corrosion-Resistant Steel Products from China, India, Italy, South Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278 (Review), USITC Pub. 5337 (Aug. 2022) at 37. We note that the Commission cumulated imports from all five subject countries in its recent review of the orders in *Certain Corrosion-Resistant Steel Products*, including those from South Korea, which was the only subject country that was subject to an absolute quota limit under Section 232 in those reviews.

¹⁶ For these same reasons, we are unpersuaded by the Korean respondents' arguments that the Section 232 quota on imports from South Korea is a different condition of competition that warrants evaluation of subject imports from South Korea on a decumulated basis. See POSCO's Prehearing Br. at 11-12.

¹⁷ CR/PR at I-39 (quantities for 2022).

¹⁸ See CR/PR at I-39 and Table IV-1. South Korea's annual quota usage rates for HTS statistical reporting numbers containing hot-rolled steel products in 2021 were 71 percent of 404,694,045 kg filled for HTS 9903.80.05, 4 percent of 249,173 kg filled for HTS 9903.80.06, and 99 percent of 125,346,920 kg filled for HTS 9903.80.07. CR/PR at I-39 n.57. Brazil's annual quota usage rates for HTS statistical reporting numbers containing hot-rolled steel products in 2021 were 0 percent of 108,453,546 kg filled for HTS 9903.80.05, 0 percent of 5,730 kg filled for HTS 9903.80.06, and 0 percent of 21,656,653 kg filled for HTS 9903.80.07. *Id.*

¹⁹ Brazilian Respondents refer to *Stainless Steel Bar from Brazil, India, Japan, and Spain*, Inv. Nos. 731-TA-678, 679, 681, and 682 (Fourth Review), USITC Pub. 4820 (Sept. 2018), in which the Commission did not cumulate subject imports from Brazil from the other subject countries due to a Section 232 (Continued...)

even though South Korea has a larger quota volume than Brazil, upon revocation of the orders, subject imports from Brazil will likely increase by *more* than subject imports from South Korea: in 2021, subject imports from Brazil were 143,416 below their quota limit, while subject imports from South Korea were only *** short tons below their quota limit.²⁰

Although Brazil's quota limit is lower than South Korea's, the Brazilian HRS producers competing for 0.25 percent of apparent consumption in the U.S. market have the same incentive to price aggressively as the producers in South Korea who are competing for 1.0 percent of apparent consumption under their quota limit. In fact, during the original POI, subject imports from Brazil were priced just as aggressively, if not more, than subject imports from South Korea.²¹ Further, there are multiple HRS producers in both Brazil and South Korea that will be seeking to increase exports to the United States and maximize sales under their respective quotas.²²

We also disagree with the Majority that Brazil's smaller quota volume, administered on a quarterly basis, will significantly affect Brazilian HRS producers' ability to compete for sales in the U.S. market. As a preliminary matter, we note that when asked at the hearing why Brazil had not been filling the quota during the review period, a witness for respondents attributed the lack of imports to the dumping duty order, not the administration of the quota.²³ While Brazilian respondents' contend that the quarterly import quota volume (no more than 43,025 short tons) prohibits large shipments and creates uncertainty for potential customers,²⁴ the available information regarding quarterly sales of subject imports suggests that this volume

absolute quota. Brazilian Respondents' Prehearing Brief at 18 & n.63. However, while the Commission did rely on the Section 232 measures as a basis not to cumulate Brazil in the *Stainless Steel Bar* Review, this was due to a finding of no discernable adverse impact. In that review, the Commission found that subject imports from Brazil would have to decline from their volumes during the POR once the Section 232 absolute quota was imposed because the quota limit was smaller than the volumes of subject imports from Brazil during each year of the POR. *See Stainless Steel Bar*, USITC Pub. 4820 at 16. Once the Commission reached this finding of no discernible adverse impact it was precluded from cumulating imports from Brazil with imports from other subject countries. *See* 19 U.S.C. § 1675a(a)(7). Here, we agree with the Majority that subject imports from Brazil are likely to *increase* in the event of revocation of the orders and that such increase would not likely have no discernable adverse impact on the U.S. industry. *See* Commission Views at section III.E.1.

²⁰ *Derived from* CR/PR at I-39 and Table IV-1.

²¹ Pricing data from the original investigation show that 232,196 short tons of HRS from Brazil undersold the domestic like product, which equated to 63.8 percent of the total imports from Brazil in the pricing comparisons, while 188,385 short tons of subject imports from South Korea undersold the domestic like product, which equated to 45.5 percent of the total volume from South Korea in the pricing comparisons. *Original Determinations*, USITC Pub. 4638 at Table V-13a.

²² CR/PR at IV-50-51 and IV-130-131 (noting that the Commission received questionnaire responses in the current reviews from three firms in Brazil and three firms in South Korea that collectively accounted for the *** of production in their respective countries).

²³ *See* Hearing Transcript at 259-260.

²⁴ *See* Brazilian Producers' Posthearing Br. at 8.

would not significantly restrict Brazilian producers' ability to compete for sales. The Commission collects pricing data on a quarterly basis for different pricing products, and these data – from both the original investigations and current reviews – rarely show subject import sales from any source exceeding 43,025 tons in any given quarter.²⁵ In other words, we do not see evidence of purchasers frequently requiring large volumes of specific products from a single import source in a single quarter such that the quarterly quota volume would prohibit producers in Brazil from being able to compete for a significant portion of sales. Rather, the pricing data show a large number of fairly small-to-moderate quarterly sales of individual products, which seems consistent with subject imports predominantly being sold in the spot market.²⁶ Thus, despite the quota restricting imports from Brazil to a smaller volume than other subject countries, we do not find that this will meaningfully affect Brazilian producers' ability to compete for most sales in the market along with imports from the other subject countries.

In sum, while one may argue that the difference in quota levels between Brazil and South Korea may ultimately have a different impact on the domestic industry (and that is debatable), this is not a difference in the conditions of competition.²⁷ For all these reasons, we find that there are not likely to be differences in the conditions of competition between subject imports of HRS from Brazil and other subject countries upon revocation of the orders, and therefore cumulate imports from Brazil with the other subject countries for purposes of analyzing the likely effects of revoking the orders.

We generally concur with the Majority's analysis with respect to the lack of differences in the conditions of competition facing imports from the other subject countries and adopt that analysis herein, except as it pertains to Brazil.²⁸

²⁵ CR/PR at Tables V-3 to V-7; Confidential Report from the Original Investigations at Tables V-4 to V-11. We recognize that these quarterly sales volumes are for individual products and do not represent the total quarterly sales volumes from different sources, but we nonetheless find them to be probative of the individual sales volumes for which importers have historically been competing in the U.S. market.

²⁶ In 2021, *** percent of importers' shipments of subject imports were spot sales, with the remaining *** percent occurring under short-term contracts. CR/PR at Table V-2. In 2015, *** percent of importers' shipments of subject imports were spot sales, *** percent were under short-term contracts, *** percent were under annual contracts, and *** percent were under long-term contracts. Confidential Report from the Original Investigations at Table V-2.

²⁷ The Court of International Trade has held that it is an abuse of discretion to rely on circular reasoning that conflates the Commission's cumulation and injury analyses. *See Neenah Foundry Co. v. United States*, 155 F. Supp. 2d 766, 771-72 (Ct. Int'l Trade 2001). The problem with such reasoning is that it undermines the very purpose of the cumulation provision, which is to address the potential hammering effect of individually small volumes of unfair imports from multiple subject countries. *See id.*

²⁸ *See* Commission Views at section III.E.3.b.

We also join the Majority's analysis with respect to evaluating the likelihood of continuation or recurrence of material injury by reason of subject imports from Australia, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom, but we have also considered information regarding Brazil in the cumulated subject import data, as noted in the Majority views. Based on these data, and for the reasons explained in the Majority views, we determine that revocation of the countervailing duty orders on hot-rolled steel from Brazil and South Korea and the antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Part I: Introduction

Background

On September 1, 2021, 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 orders on hot-rolled steel flat products (“hot-rolled steel”) from Brazil and South Korea and revocation of the antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom would likely lead to the continuation or recurrence of material injury to a domestic industry.² ³ On December 6, 2021, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table I-1 presents information relating to the background and schedule of this proceeding.⁵

¹ 19 U.S.C. 1675(c).

² 86 FR 49057, September 1, 2021. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ 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. 86 FR 48983, September 1, 2021.

⁴ 87 FR 3123, January 20, 2022. The Commission found that the domestic interested party group responses and the respondent interested party group responses from Australia, Brazil, Japan, the Netherlands, Turkey, and the United Kingdom to its notice of institution were adequate and determined to conduct full reviews of the orders on hot-rolled steel from these countries. The Commission further found that the respondent interested party group responses from Russia and South Korea were inadequate but determined to conduct full reviews concerning the orders on hot-rolled steel from Russia and South Korea to promote administrative efficiency considering its determinations to conduct full reviews on the orders with respect to Australia, Brazil, Japan, the Netherlands, Turkey, and the United Kingdom.

⁵ 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 who appeared at the Commission’s hearing.

Table I-1**Hot-rolled steel: Information relating to the background and schedule of this proceeding**

Effective date	Action
July 12, 1999	Commerce's suspension of the antidumping duty investigation on hot-rolled steel from Russia (64 FR 38642, July 19, 1999)
May 12, 2005	Commerce's continuation of the suspended antidumping duty investigation on hot-rolled steel from Russia (70 FR 32571, June 3, 2005)
June 17, 2011	Commerce's continuation of the suspended antidumping duty investigation on hot-rolled steel from Russia (76 FR 35400)
December 19, 2014	Commerce's termination of the suspension agreement and issuance of the antidumping duty order on hot-rolled steel from Russia (79 FR 77455, December 24, 2014)
August 12, 2016	Commerce's countervailing duty orders on hot-rolled steel from Brazil, South Korea, and Turkey (81 FR 53416, 81 FR 53439, 81 FR 53433) and antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom (81 FR 53406, 81 FR 53424, 81 FR 53409, 81 FR 53421, 81 FR 53419, 81 FR 53428, and 81 FR 53436)
October 20, 2016	Commerce's continuation of the antidumping duty order on hot-rolled steel from Russia (81 FR 72569)
May 15, 2020	Commerce's notice of amended antidumping duty order for Turkey following third remand redetermination (85 FR 29399)
September 1, 2021	Commission's institution of five-year reviews (86 FR 49057)
September 1, 2021	Commerce's initiation of five-year reviews (86 FR 48983)
December 6, 2021	Commission's determinations to conduct full five-year reviews (87 FR 3123, January 20, 2022)
December 22, 2021	Commerce's final results of the expedited five-year review of the antidumping duty order on hot-rolled steel from Russia (86 FR 72577)
January 5, 2022	Commerce's final results of the expedited five-year review of the countervailing duty order on hot-rolled steel from South Korea (87 FR 428)
January 6, 2022	Commerce's final results of the expedited five-year reviews of the countervailing duty order on hot-rolled steel from Brazil (87 FR 750) and antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom (87 FR 751)
June 9, 2022	Commission's scheduling of the reviews (87 FR 36343, June 16, 2022)
September 15, 2022	Commission's hearing
October 21, 2022	Commission's vote
November 25, 2022	Commission's determinations and views

The original Russia investigation

The original investigation with respect to hot-rolled steel from Russia⁶ resulted from petitions filed on September 30, 1998 with Commerce and the Commission by Bethlehem Steel Corporation, Bethlehem, Pennsylvania; USX Corporation, Pittsburgh, Pennsylvania; Ispat Inland Incorporated (“Ispat Inland”), East Chicago, Indiana; LTV Corporation (“LTV”), Cleveland, Ohio; National Steel Corporation (“National”), Mishawaka, Indiana; California Steel Industries, Fontana, California; Gallatin Steel Company (“Gallatin”), Ghent, Kentucky; Geneva Steel Holdings (“Geneva”), Vineyard, Utah; Gulf States Steel (“Gulf States”), Gadsden, Alabama; IPSCO Incorporated, Muscatine, Iowa; SDI, Butler, Indiana; Weirton Steel Corporation (“Weirton”), Weirton, West Virginia; The Independent Steelworkers Union (“ISU”), Weirton, West Virginia; and the United Steelworkers of America (“USWA”), Pittsburgh, Pennsylvania.⁷ In July 1999, Commerce signed a suspension agreement with respect to Russia.⁸

Suspension agreement⁹

On July 19, 1999, Commerce made a final affirmative dumping determination with respect to Russia.¹⁰ The Commission made its final affirmative injury determination on August 24, 1999. Effective July 12, 1999, Commerce suspended the antidumping duty investigation on such imports from Russia. The suspension agreement implemented export quota levels and reference prices to restrict the volume of hot-rolled steel imports from Russia. The suspension agreement provided that no Russian shipments were permitted during a “moratorium period” from February 22, 1999 to December 31, 1999. The agreement specified export quota levels for the years 2000-03. Thereafter, the quota would be determined by a formula, taking into account the previous year’s export limit, apparent consumption in the United States, and the adoption of premium reference prices by the Ministry of Trade of the Russian Federation. The agreement set an initial reference price and stipulated that Commerce would issue reference

⁶ Petitions in these original investigations were also filed for Brazil and Japan.

⁷ Certain Hot-Rolled Steel Products from Brazil and Russia, Investigation Nos. 701-TA-384 and 731-TA-806 and 808 (Final), USITC Publication 3223, August 1999, (“Original Russia publication”), p. I-1.

⁸ 64 FR 38642, July 19, 1999.

⁹ Unless indicated otherwise, the following discussion regarding suspension agreements is based on information contained in Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Russia, Investigation No. 731-TA-808 (Third Review), USITC Publication 4639, September 2016, (“Russia third review publication”) pp. I-13-I-14.

¹⁰ The antidumping duty rates calculated by Commerce in the final phase of the original investigations was 73.59 percent for JSC Severstal and 184.56 percent for the Russia-Wide rate. 64 FR 38626, July 19, 1999.

prices for each quarter. In addition, the suspension agreement provided for up to 15 percent of the export limit (if not used) to be carried over to the subsequent export limit period and for up to 15 percent of the export limit for any period to be carried back to the last 60 days of the previous export limit period. The Russian government formally requested, and was granted on October 26, 2004, permission to carry back 15 percent of its 2005 export limit, or 122,192 metric tons, to 2004. Imports of hot-rolled steel from Russia to the United States filled 18.5 percent of the carry-back quantity; the remaining amount, or 99,637 metric tons, was carried forward to 2005. On July 22, 2004, and August 31, 2005, pursuant to requests from the Russian government, the Department agreed to add certain new grades of merchandise to its reference price calculation.

The first five-year review of the suspended Russia investigation

On August 6, 2004, the Commission determined that it would conduct a full review concerning the suspended antidumping duty investigation on hot-rolled steel from Russia.¹¹ On September 9, 2004, Commerce determined that termination of the suspended antidumping duty investigation on hot-rolled steel from Russia would likely lead to continuation or recurrence of dumping.¹² On April 28, 2005, the Commission determined that termination of the suspended antidumping duty investigation on imports of hot-rolled steel from Russia, would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹³ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective May 12, 2005, Commerce issued a continuation of the suspended antidumping duty investigation on imports of hot-rolled steel from Russia.¹⁴

¹¹ 69 FR 52525, August 26, 2004.

¹² 69 FR 54633, September 9, 2004.

¹³ 70 FR 23886, May 5, 2005.

¹⁴ 70 FR 32571, June 3, 2005.

The second five-year review of the suspended Russia investigation

On July 6, 2010, the Commission determined that it would conduct a full review of the suspended investigation on hot-rolled steel from Russia.¹⁵ On August 5, 2010, Commerce determined that termination of the antidumping duty suspended investigation on hot-rolled steel from Russia would likely lead to continuation or recurrence of dumping.¹⁶ On June 6, 2011, the Commission determined that termination of the suspension agreement on hot-rolled steel from Russia would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁷ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective June 17, 2011, Commerce issued a continuation of the suspended antidumping duty investigation on imports of hot-rolled steel from Russia.¹⁸

Termination of suspension agreement

Effective December 19, 2014, Commerce terminated the suspension agreement and issued an antidumping duty order on subject imports from Russia with weighted-average margins ranging from 73.59 to 184.56 percent.¹⁹

The third five-year review of the Russia antidumping duty order

On August 5, 2016, the Commission determined that it would conduct an expedited review of the antidumping duty order on hot-rolled steel from Russia.²⁰ On September 8, 2016, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from Russia would be likely to lead to continuation or recurrence of dumping.²¹ On September 29, 2016, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.²² Following affirmative determinations in the five-year

¹⁵ 75 FR 42782, July 22, 2010.

¹⁶ 75 FR 47263, August 5, 2010.

¹⁷ In addition, the Commission determined that revocation of the countervailing duty order on hot-rolled steel from Brazil and revocation of the antidumping duty orders on hot-rolled steel from Brazil and Japan would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. 76 FR 34101, June 10, 2011.

¹⁸ 76 FR 35400, June 17, 2011.

¹⁹ 79 FR 77455, December 24, 2014.

²⁰ 81 FR 58531, August 25, 2016.

²¹ 81 FR 62094, September 8, 2016.

²² 81 FR 69079, October 5, 2016.

reviews by Commerce and the Commission, effective October 20, 2016, Commerce issued a continuation of the antidumping duty order on imports of hot-rolled steel from Russia.²³

The original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and United Kingdom investigations

The original investigations with respect to hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom resulted from petitions filed on August 11, 2015 by AK Steel Corporation (“AK Steel”), West Chester, Ohio; ArcelorMittal USA, LLC (“ArcelorMittal USA”), Chicago, Illinois; Nucor Corporation (“Nucor”), Charlotte, North Carolina; SSAB Enterprises, LLC (“SSAB”), Lisle, Illinois; Steel Dynamics, Inc. (“SDI”), Fort Wayne, Indiana; and United States Steel Corporation (“U.S. Steel”), Pittsburgh, Pennsylvania, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of hot-rolled steel from Brazil, South Korea, and Turkey, and less-than-fair-value (“LTFV”) imports of hot-rolled steel from Australia, Brazil, Japan, South Korea, Turkey, and the United Kingdom.²⁴ On August 12, 2016, Commerce determined that imports of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom were being sold at LTFV and subsidized by the governments of Brazil, South Korea, and Turkey.²⁵ The Commission determined on September 26, 2016 that the domestic industry was materially injured by reason of imports of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom found by Commerce to be sold in the U.S. market at LTFV and subsidized by the governments of Brazil and South Korea.²⁶ On October 3, 2016, Commerce published the countervailing duty orders on imports of hot-rolled steel from Brazil and South Korea and the antidumping duty orders on imports of

²³ 81 FR 72569, October 20, 2016.

²⁴ Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Publication 4638, September 2016 (“Original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and United Kingdom publication”), p. I-1.

²⁵ 81 FR 53406, 81 FR 53409, 81 FR 53416, 81 FR 53419, 81 FR 53421, 81 FR 53424, 81 FR 53428, 81 FR 53433, 81 FR 53436, and 81 FR 53439, August 12, 2016. In Commerce’s final countervailing duty determination on hot-rolled steel from Turkey, exports produced by Colakoglu received a de minimis subsidy margin. 81 FR 53433, August 12, 2016.

²⁶ 81 FR 66996, September 29, 2016. In its determinations, the Commission found that subject imports of hot-rolled steel that have been found by Commerce to be subsidized by the government of Turkey (i.e., excluding exports produced by Colakoglu) were negligible.

hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom.^{27 28}

Turkish producers Çolakoğlu Metalurji A.S. and Çolakoğlu Dis Ticaret A.S. (collectively, “Colakoglu”) and Ereğli Demir ve Çelik Fabrikalari T.A.Ş. and Iskenderun Demir Ve Celik (collectively, “Erdemir”) appealed Commerce's final determination to the U.S. Court of International Trade (CIT). On March 22, 2018, the CIT remanded Commerce’s amended final determination. On December 27, 2018, the CIT issued a second remand order to Commerce. On April 13, 2020, the CIT sustained Commerce’s third remand redetermination pertaining to the LTFV investigation of hot-rolled steel from Turkey. Pursuant to the CIT's final judgment, Commerce amended the estimated weighted-average dumping margins for Erdemir and Colakoglu, resulting in Colakoglu’s exemption from the order.^{29 30}

Australian producer BlueScope also appealed Commerce’s final determination. On November 30, 2021, the CIT issued a remand order to Commerce. In its remand redetermination, issued in April 2022, Commerce recalculated the period of review weighted-average dumping margin for BlueScope in the administrative review of the antidumping duty order on HRS from Australia covering the period March 22, 2016, through September 30, 2017. On August 30, 2022, the CIT sustained Commerce’s remand redetermination. Pursuant to the CIT’s final judgement, Commerce amended the estimated weighted-average dumping margin for BlueScope from 99.2 percent to 4.95 percent.³¹

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on hot-rolled steel or similar merchandise. Table I-2 presents data on previous and related title VII investigations.

²⁷ 81 FR 67962, October 3, 2016.

²⁸ 81 FR 67960, October 3, 2016.

²⁹ 85 FR 29399, May 15, 2020.

³⁰ On September 10, 2021, the Commission received a request to review its affirmative determination in investigation No. 731-TA-1296 (Final) pursuant to section 751(b) of the Act (19 U.S.C. 1675(b)). The request, filed by Erdemir, alleged there have been significant changed circumstances since the issuance of the Commission’s 2016 determination. Specifically, Erdemir alleged that Commerce’s recalculation of Colakoglu’s antidumping duty margin to zero percent and its exclusion from the antidumping duty order as a result of judicial review constitute significantly changed circumstances from those in existence at the time of the original investigation because the facts underlying the Commission’s negligibility determination completely changed. On December 2, 2021, the Commission invited comments from the public on whether changed circumstances exist sufficient to warrant the institution of such a review. 86 FR 68512, December 2, 2021.

³¹ 87 FR 57178, September 19, 2022.

Table I-2**Hot-rolled steel: Previous and related Commission proceedings and status of orders**

Date	Number(s)	Countr(ies)	Determination	Current status of Order
1982	701-TA-94	Belgium	Affirmative (Preliminary)	Petition withdrawn 10/29/82
1982	701-TA-95	Brazil	Negative (Preliminary)	---
1982	701-TA-96	France	Affirmative (Preliminary)	Petition withdrawn 10/29/82
1982	701-TA-97	Italy	Affirmative (Preliminary)	Petition withdrawn 10/29/82
1982	701-TA-98	Luxembourg	Negative (Preliminary)	---
1982	701-TA-99	Netherlands	Negative	---
1982	701-TA-100	United Kingdom	Negative (Preliminary)	---
1982	701-TA-101	Germany	Affirmative (Preliminary)	Petition withdrawn 10/29/82
1982	701-TA-156	Spain	Negative (Preliminary)	---
1982	701-TA-171	South Korea	Affirmative	ITA revoked 10/10/85
1982	731-TA-61	Belgium	Affirmative (Preliminary)	Terminated 11/10/82
1982	731-TA-62	France	Affirmative (Preliminary)	Terminated 11/10/82
1982	731-TA-63	Italy	Affirmative (Preliminary)	Terminated 11/10/82
1982	731-TA-64	Luxembourg	Negative (Preliminary)	---
1982	731-TA-65	Netherlands	Negative	---
1982	731-TA-66	United Kingdom	NA	Petition withdrawn 1/30/82
1982	731-TA-67	Germany	Affirmative (Preliminary)	Terminated 11/10/82
1983	701-TA-206	Brazil	Affirmative	ITA revoked 9/5/85
1984	731-TA-153	Brazil	Affirmative	ITA revoked 8/21/85
1985	701-TA-227	Austria	Negative	---
1985	701-TA-228	Sweden	Negative	---

Date	Number(s)	Countr(ies)	Determination	Current status of Order
1985	701-TA-229	Venezuela	Affirmative (Preliminary)	Terminated 7/19/85
1985	731-TA-219	Austria	Negative	---
1985	731-TA-220	Finland	NA	Petition withdrawn 1/18/85
1985	731-TA-221	Hungary	Affirmative (Preliminary)	Petition withdrawn 6/4/85
1985	731-TA-222	Romania	Affirmative (Preliminary)	Terminated 7/19/85
1985	731-TA-223	Venezuela	Affirmative (Preliminary)	Terminated 7/19/85
1992	701-TA-329	Belgium	Negative	---
1992	701-TA-330	Brazil	Negative	---
1992	701-TA-331	France	Negative	---
1992	701-TA-332	Germany	Negative	---
1992	701-TA-333	Italy	Negative (Preliminary)	---
1992	701-TA-334	South Korea	Negative	---
1992	701-TA-335	New Zealand	Negative	---
1992	731-TA-588	Belgium	Negative	---
1992	731-TA-589	Brazil	Negative	---
1992	731-TA-590	Canada	Negative	---
1992	731-TA-591	France	Negative	---
1992	731-TA-592	Germany	Negative	---
1992	731-TA-593	Italy	Negative (Preliminary)	---
1992	731-TA-594	Japan	Negative	---
1992	731-TA-595	South Korea	Negative	---
1992	731-TA-596	Netherlands	Negative	---
1998	701-TA-384	Brazil	Affirmative	Order revoked after second review, 06/21/11
1998	731-TA-806	Brazil	Affirmative	Order revoked after second review, 06/21/11

Date	Number(s)	Countr(ies)	Determination	Current status of Order
1998	731-TA-807	Japan	Affirmative	Order revoked after second review, 06/21/11
2000	701-TA-404	Argentina	Affirmative	Order revoked after first review, 01/22/14
2000	701-TA-405	India	Affirmative	Order continued after third review, 08/19/19
2000	701-TA-406	Indonesia	Affirmative	Order continued after third review, 08/19/19
2000	701-TA-407	South Africa	Affirmative	Order revoked after first review, 11/20/07
2000	701-TA-408	Thailand	Affirmative	Order continued after third review, 08/19/19
2000	731-TA-898	Argentina	Affirmative	Order revoked after first review, 11/20/07
2000	731-TA-899	China	Affirmative	Order continued after third review, 08/19/19
2000	731-TA-900	India	Affirmative	Order continued after third review, 08/19/19
2000	731-TA-901	Indonesia	Affirmative	Order continued after third review, 08/19/19
2000	731-TA-902	Kazakhstan	Affirmative	Order revoked after first review, 11/20/07
2000	731-TA-903	Netherlands	Affirmative	Order revoked after first review, 6/27/07
2000	731-TA-904	Romania	Affirmative	Order revoked after first review, 11/20/07
2000	731-TA-905	South Africa	Affirmative	Order revoked after first review, 11/20/07
2000	731-TA-906	Taiwan	Affirmative	Order continued after third review, 08/19/19
2000	731-TA-907	Thailand	Affirmative	Order continued after third review, 08/19/19
2000	731-TA-908	Ukraine	Affirmative	Order continued after third review, 08/19/19

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

Note: "Date" refers to the year in which the investigation was instituted by the Commission.

Summary data

Table I-3 presents a summary of data from the original Russia investigations, the first and second full five-year Russia reviews, the original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and United Kingdom investigations, and the current full five-year reviews.³² The quantity of apparent U.S. consumption was 3.8 percent lower in 2021 than in 2015, however the value of apparent U.S. consumption was 130.3 percent higher. U.S. producers' market share, by quantity, increased from 90.3 percent in 2015 to 93.0 percent in 2021. The market share of subject source imports declined from 6.0 percent in 2015 to 1.8 percent in 2021, while the market share for imports from nonsubject sources increased from 3.7 percent to 5.3 percent. Overall imports from subject sources, by quantity, were 71.7 percent lower in 2021 than in 2015. Subject imports from Japan, the Netherlands, South Korea, and Turkey were *** percent, *** percent, *** percent, and *** percent lower, respectively, in 2021 than in 2015. There were no imports from Australia and Brazil in 2021, while imports from Russia and the United Kingdom were *** short tons or lower in 2021.

U.S. producers' capacity was 5.7 percent lower in 2021 than in 2015, while their production was 0.5 percent higher. U.S. producers' production-related workers declined from 18,408 in 2015 to 13,769 in 2021, while productivity increased from 1.3 short tons per hour to 1.9 short tons per hour. U.S. producers reported a gross loss of \$790.7 million in 2015 and a gross profit of \$27.4 billion in 2021. U.S. producers reported an operating loss of \$1.9 billion in 2015 and an operating income of \$25.9 billion in 2021.

³² Data from the third expedited Russia review are not included. The terminal year for the expedited Russia review is 2015. Russia third review publication, p. I-31.

Table I-3
Hot-rolled steel: Comparative data from the original investigations and subsequent reviews, by terminal years

Quantity in short tons; value in 1,000 dollars; shares in percent

Item	Measure	1998	2004	2010	2015	2021
Apparent consumption	Quantity	75,251,116	73,173,003	56,090,768	60,047,172	57,777,586
U.S. producers market share	Share of quantity	84.8	92.9	94.5	90.3	93.0
Australia market share	Share of quantity	NA	NA	NA	***	---
Brazil market share	Share of quantity	0.6	0.0	0.0	***	---
Japan market share	Share of quantity	3.6	0.0	0.0	***	***
Netherlands market share	Share of quantity	NA	NA	NA	***	***
Russia market share	Share of quantity	5.1	1.2	0.2	NA	0.0
South Korea market share	Share of quantity	NA	NA	NA	***	***
Turkey, subject market share	Share of quantity	NA	NA	NA	***	***
United Kingdom market share	Share of quantity	NA	NA	NA	***	***
Subject market share	Share of quantity	9.3	1.3	0.3	6.0	1.8
Turkey, nonsubject market share	Share of quantity	NA	NA	NA	NA	***
All other sources	Share of quantity	NA	NA	NA	NA	***
Nonsubject market share	Share of quantity	5.9	5.8	5.3	3.7	5.3
Import market share	Share of quantity	15.2	7.1	5.5	9.7	7.0
Apparent consumption	Value	22,245,254	38,586,924	33,801,040	30,461,111	70,151,721
U.S. producers market share	Share of value	85.3	93.1	94.3	90.1	93.5
Australia market share	Share of value	NA	NA	NA	***	0.0
Brazil market share	Share of value	0.6	0.0	0.0	***	0.0
Japan market share	Share of value	3.6	0.0	0.0	***	***
Netherlands market share	Share of value	NA	NA	NA	***	***
Russia market share	Share of value	4.2	1.2	0.2	NA	0.0
South Korea market share	Share of value	NA	NA	NA	***	***
Turkey, subject market share	Share of value	NA	NA	NA	***	***
United Kingdom market share	Share of value	NA	NA	NA	***	***
Subject market share	Share of value	8.4	1.3	0.3	5.8	1.5
Turkey, nonsubject market share	Share of value	NA	NA	NA	NA	***
All other sources	Share of value	NA	NA	NA	NA	***
Nonsubject market share	Share of value	6.3	5.6	5.4	4.1	5.0
Import market share	Share of value	14.7	6.9	5.7	9.9	6.5

Table continued.

Table I-3 Continued**Hot-rolled steel: Comparative data from the original investigations and subsequent reviews, by terminal years**

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Item	Measure	1998	2004	2010	2015	2021
Australia	Quantity	NA	NA	NA	***	---
Australia	Value	NA	NA	NA	***	---
Australia	Unit value	NA	NA	NA	***	---
Brazil	Quantity	451,462	2,978	512	***	---
Brazil	Value	133,442	1,393	402	***	---
Brazil	Unit value	\$296	\$468	\$785	***	---
Japan	Quantity	2,684,756	16,086	15,033	***	***
Japan	Value	801,295	16,451	14,636	***	***
Japan	Unit value	\$298	\$1,023	\$974	***	***
Netherlands	Quantity	NA	NA	NA	***	***
Netherlands	Value	NA	NA	NA	***	***
Netherlands	Unit value	NA	NA	NA	***	***
Russia	Quantity	3,843,641	904,101	125,079	NA	4
Russia	Value	923,303	477,902	69,708	NA	15
Russia	Unit value	\$240	\$529	\$557	NA	\$3,798
South Korea	Quantity	NA	NA	NA	***	***
South Korea	Value	NA	NA	NA	***	***
South Korea	Unit value	NA	NA	NA	***	***
Turkey, subject	Quantity	NA	NA	NA	***	***
Turkey, subject	Value	NA	NA	NA	***	***
Turkey, subject	Unit value	NA	NA	NA	***	***
United Kingdom	Quantity	NA	NA	NA	***	***
United Kingdom	Value	NA	NA	NA	***	***
United Kingdom	Unit value	NA	NA	NA	***	***
Subject sources	Quantity	6,979,859	923,164	140,624	3,587,950	1,014,193
Subject sources	Value	1,858,040	495,746	84,745	1,779,259	1,023,234
Subject sources	Unit value	\$266	\$537	\$603	\$496	\$1,009
Turkey, nonsubject	Quantity	NA	NA	NA	NA	***
Turkey, nonsubject	Value	NA	NA	NA	NA	***
Turkey, nonsubject	Unit value	NA	NA	NA	NA	***
All other sources	Quantity	NA	NA	NA	NA	***
All other sources	Value	NA	NA	NA	NA	***
All other sources	Unit value	NA	NA	NA	NA	***
Nonsubject sources	Quantity	4,428,038	4,270,579	2,955,493	2,228,196	3,043,078
Nonsubject sources	Value	1,411,701	2,178,142	1,828,647	1,234,892	3,523,603
Nonsubject sources	Unit value	\$319	\$510	\$619	\$554	\$1,158
All import sources	Quantity	11,407,896	5,193,743	3,096,118	5,816,146	4,057,272
All import sources	Value	3,269,741	2,673,888	1,913,392	3,014,150	4,546,837
All import sources	Unit value	\$287	\$515	\$618	\$518	\$1,121

Table continued.

Table I-3 Continued
Hot-rolled steel: Comparative data from the original investigations and subsequent reviews, by terminal years

Quantity in short tons; value in 1,000 dollars; ratio in percent

Item	Measure	1998	2004	2010	2015	2021
Capacity	Quantity	73,544,818	79,113,331	79,679,215	80,466,076	75,901,972
Production	Quantity	64,373,004	68,229,669	54,913,361	54,731,937	55,025,234
Capacity utilization	Ratio	87.5	86.2	68.9	68.0	72.5
Producer U.S. shipments	Quantity	63,843,220	67,979,260	52,994,650	54,231,026	53,720,314
Producer U.S. shipments	Value	18,975,513	35,913,036	31,887,648	27,446,961	65,604,884
Producer U.S. shipments	Unit value	\$297	\$528	\$602	\$506	\$1,221
Producer inventories	Quantity	2,771,350	1,846,384	1,617,837	1,588,277	1,579,054
Producer inventory ratio to total shipments	Ratio	4.3	2.7	3.0	2.9	2.9
Production workers (number)	Noted in label	32,885	21,480	21,682	18,408	13,769
Hours worked (in 1,000 hours)	Noted in label	68,574	48,143	47,358	41,372	29,241
Wages paid (1,000 dollars)	Value	1,677,417	1,456,957	1,540,481	1,606,038	1,386,314
Hourly wages (dollars per hour)	Value	\$24.46	\$30.26	\$32.53	\$38.82	\$47.41
Productivity (short tons per 1,000 hour)	Noted in label	938.7	1,378.2	1,159.5	1,300.0	1,881.8
Net sales	Quantity	63,717,428	66,638,302	53,701,466	52,999,285	54,853,499
Net sales	Value	21,341,169	34,823,477	32,440,446	27,261,339	66,329,880
Net sales	Unit value	\$335	\$523	\$604	\$514	\$1,209
Cost of goods sold	Value	19,794,103	25,428,123	30,772,148	28,052,084	38,910,236
Gross profit or (loss)	Value	1,547,066	9,395,354	1,668,298	(790,745)	27,419,644
SG&A expense	Value	986,607	1,886,866	909,717	1,128,437	1,512,272
Operating income or (loss)	Value	560,459	7,508,488	758,581	(1,919,182)	25,907,372
Unit COGS	Unit value	\$311	\$382	\$573	\$529	\$709
Unit operating income	Unit value	\$9	\$113	\$14	(\$36)	\$472
COGS/ Sales	Ratio	92.8	73.0	94.9	102.9	58.7
Operating income or (loss)/ Sales	Ratio	2.6	21.6	2.3	(7.0)	39.1

Source: Certain Hot-Rolled Steel Products from Japan, Inv. No. 731-TA-807 (Final), USITC Publication 3202, June 1999 ("Original Japan publication"), Certain Hot-Rolled Steel Flat Products from Brazil, Japan, and Russia, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Review), USITC Publication 3767, April 2005 ("Russia first review publication"), Certain Hot-Rolled Steel Flat Products from Brazil, Japan, and Russia, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Second Review), USITC Publication 4237, June 2011 ("Russia second review publication"), Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final): Hot-rolled steel flat products from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom, Confidential Report, INV-OO-075, August 23, 2016, as revised/supplemented in INV-OO-078, August 29, 2016 ("Original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and the United Kingdom confidential report"), and from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. (Continued).

Table I-3 Continued**Hot-rolled steel: Comparative data from the original investigations and subsequent reviews, by terminal years**

Source (Continued): U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported exports to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2015 are from the last year of the original investigations. The original investigation did not have Russia as a subject country and did not have a subject and nonsubject breakout for Turkey. Therefore the data for 2015 treats Russian imports as nonsubject sources and treats all Turkish imports as subject. According to official Commerce statistics, U.S. imports from Russia in 2015 were 18,079 short tons. Russia third review publication, p. I-31.

Table I-4 and figure I-1 present data on U.S. producers' U.S. shipments and U.S. importers' U.S. imports during the original investigations and these full reviews.

Table I-4**Hot-rolled steel: U.S. producers' U.S. shipments and U.S. importers' imports during 2013-21, by source and period**

Quantity in short tons

Source	Measure	2013	2014	2015
U.S. producers	Quantity	60,617,956	61,325,942	54,231,026
Subject sources	Quantity	1,747,157	3,178,238	3,587,950
Nonsubject sources	Quantity	2,203,485	3,336,994	2,228,196
All import sources	Quantity	3,950,642	6,515,232	5,816,146
All sources	Quantity	64,568,598	67,841,174	60,047,172

Table continued.

Table I-4 Continued**Hot-rolled steel: U.S. producers' U.S. shipments and U.S. importers' imports during 2013-21, by source and period**

Quantity in short tons

Source	Measure	2016	2017	2018
U.S. producers	Quantity	53,620,345	55,941,696	57,257,632
Subject sources	Quantity	1,523,225	761,450	1,056,388
Nonsubject sources	Quantity	2,467,284	2,623,784	2,917,675
All import sources	Quantity	3,990,509	3,385,235	3,974,062
All sources	Quantity	57,610,854	59,326,931	61,231,694

Table continued.

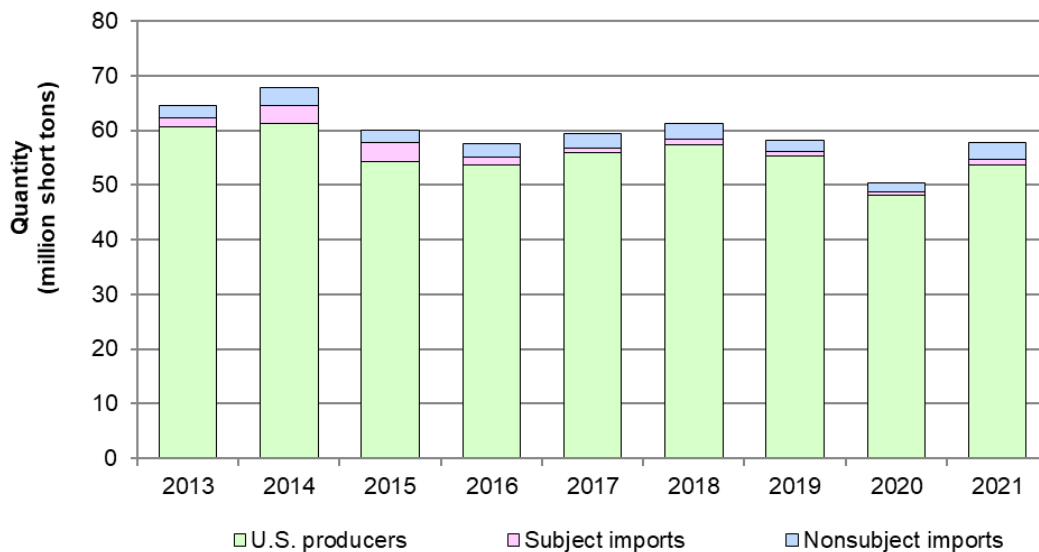
Table I-4 Continued
Hot-rolled steel: U.S. producers' U.S. shipments and U.S. importers' imports during 2013-21, by source and period

Quantity in short tons

Source	Measure	2019	2020	2021
U.S. producers	Quantity	55,288,896	48,043,711	53,720,314
Subject sources	Quantity	783,222	677,379	1,014,193
Nonsubject sources	Quantity	2,009,243	1,678,843	3,043,078
All import sources	Quantity	2,792,466	2,356,222	4,057,272
All sources	Quantity	58,081,362	50,399,933	57,777,586

Source: Data for 2013-15 are from the Original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and the United Kingdom confidential report. Data for 2016-21 are from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data for 2016-21 are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported exports to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Figure I-1
Hot-rolled steel: Apparent U.S. consumption, by source and by period



Source: Data for 2013-15 are from the Original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and the United Kingdom confidential report. Data for 2016-21 are from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported exports to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

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 hot-rolled steel as collected in the reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of eleven U.S. producers of hot-rolled steel that are believed to have accounted for *** percent of domestic production of hot-rolled steel in 2021.³³ U.S. import data and related information are based on Commerce’s official import statistics for non-alloy hot-rolled steel,³⁴ as adjusted to include alloy hot-rolled steel data collected separately in questionnaire responses,³⁵ and the questionnaire responses of 34 U.S. importers of hot-rolled

³³ The coverage estimate is based on *** production of *** short tons in the United States in 2021. Data include hot-rolled sheet and coiled plate. ***.

³⁴ Imports of non-alloy hot-rolled steel are classified under HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, and 7211.19.7590.

The following statistical reporting numbers are listed in Commerce’s scope definition but are not included in official import statistics in this report: 7210.70.3000, 7210.90.9000, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7214.99.0060, 7214.99.0075, 7214.99.0090, 7215.90.5000, 7226.99.0180, and 7228.60.6000. Staff excluded these numbers because they primarily include out-of-scope products.

³⁵ Micro-alloy flat-rolled hot-rolled steel, in which: (1) iron predominates by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) one or more of the elements listed below is present in the quantity, by weight, respectively indicated:

- 0.30 – 1.50 percent of aluminum
- 0.0008 – unlimited percent of boron
- 0.30 – 1.25 percent of chromium
- 0.3 percent of cobalt
- 0.40 – 1.50 percent of copper
- 0.4 percent of lead
- 1.65 – 2.50 percent of manganese
- 0.08 – 0.80 percent of molybdenum

(continued...)

steel that are believed to have accounted for 96.6 percent of total U.S. imports during 2021, including virtually all imports from subject sources during 2021.³⁶ Foreign industry data and related information are based on the questionnaire responses of 17 producers and/or exporters of hot-rolled steel. One producer accounted for all known³⁷ production in Australia; three producers accounting for *** percent³⁸ of production in Brazil; four producers accounting for ***³⁹ production in Japan; one producer accounting for all known⁴⁰ production in the Netherlands; two producers accounting for approximately *** percent⁴¹ of total production

-
- 0.30 – 2.00 percent of nickel
 - 0.06 – 0.10 percent of niobium (also called columbium)
 - 0.60 – 3.30 percent of silicon
 - 0.05 – unlimited percent of titanium
 - 0.3 percent of tungsten (wolfram)
 - 0.10 – 0.30 percent of vanadium
 - 0.05 – 0.30 percent of zirconium

³⁶ The coverage estimate is based on questionnaire data for U.S. imports of non-alloy hot-rolled steel and does not include questionnaire data for alloy and micro-alloy hot-rolled steel for all sources except Turkey. Imports for Turkey (subject) are based on export shipment data of non-alloy and micro alloy hot-rolled steel to the United States by Turkish responding firms. Therefore, a difference in timing may impact estimates of import quantity in 2021. These data are used for coverage in lieu of official stats for Turkey (subject). U.S. imports of hot-rolled steel were compared to official U.S import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, and 7211.19.7590.

³⁷ BlueScope's response to the notice of institution, October 1, 2021, p. 9.

³⁸ Based on *** gross production of *** short tons in Brazil in 2021. Data include hot-rolled sheet and coiled plate. ***. The three responding firms reported they collectively accounted for *** percent of hot-rolled steel production in Brazil in 2021. ArcelorMittal Brasil, CSN, and USIMINAS' foreign producer questionnaire responses, sections II-5.

³⁹ Based on *** gross production of *** short tons in Japan in 2021. Data include hot-rolled sheet and coiled plate. ***. The four responding firms reported they collectively account for *** percent of hot-rolled steel production in Japan and *** percent of exports to the United States from Japan in 2021. JFE, Kobe, NSC, and Tokyo Steel's foreign producer questionnaire responses, sections II-5 and II-6.

⁴⁰ TATA Netherland's response to the notice of institution, October 1, 2021, p. 7.

⁴¹ Based on *** gross production of *** short tons in Russia in 2021. Data include hot-rolled sheet and coiled plate. ***. The two responding firms reported they collectively accounted for *** percent of hot-rolled steel production in Russia in 2021. NLMK and Severstal's foreign producer questionnaire responses, sections II-5 and II-6.

in Russia; three producers and/or exporters accounting for *** percent⁴² of production in South Korea; two producers accounting for ***⁴³ of total production (subject and nonsubject) in Turkey; and one producer accounting for ***⁴⁴ production in the United Kingdom submitted questionnaire responses. Responses by U.S. producers, importers, purchasers, and foreign producers of hot-rolled steel 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.

⁴² Based on *** gross production of *** short tons in South Korea in 2021. Data include hot-rolled sheet and coiled plate. ***. The three responding firms reported they collectively accounted for *** percent of hot-rolled steel production in South Korea and *** percent of exports to the United States from South Korea in 2021. Hyundai, POSCO, and POSCO International's foreign producer questionnaire responses, sections II-5 and II-6.

⁴³ Based on *** gross production of *** short tons in Turkey in 2021, including production for Colakoglu which is exempt from the antidumping duty order. Data include hot-rolled sheet and coiled plate. ***. The two responding firms reported they collectively account for *** percent of hot-rolled steel production in Turkey and *** percent of exports to the United States from Turkey in 2021. Erdemir and Habas' foreign producer questionnaire responses, sections II-5 and II-6.

⁴⁴ Based on *** gross production of *** short tons in the United Kingdom in 2021. Data include hot-rolled sheet and coiled plate. ***. The responding firm reported they collectively account for approximately *** percent of hot-rolled steel production in the United Kingdom and *** percent of exports to the United States from the United Kingdom in 2021. TSUK's foreign producer questionnaire response, sections II-5 and II-6.

Commerce's reviews

Administrative reviews and other proceedings

Commerce has not conducted any scope rulings or circumvention findings since the completion of the original investigations. In addition, Commerce has not issued any duty absorption findings since the imposition of the orders.⁴⁵

Commerce has completed three administrative reviews of the outstanding antidumping duty order on hot-rolled steel from Australia, one administrative review of the outstanding antidumping duty order on hot-rolled steel from Brazil, four administrative reviews of the outstanding antidumping duty order on hot-rolled steel from Japan, four administrative reviews of the outstanding countervailing duty order on hot-rolled steel from South Korea, four administrative reviews of the outstanding antidumping duty order on hot-rolled steel from South Korea, and three administrative reviews of the outstanding antidumping duty order on hot-rolled steel from Turkey.⁴⁶

⁴⁵ Commerce Issues and Decision Memorandum for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, the Republic of Korea, the Netherlands, the Republic of Turkey, and the United Kingdom, December 29, 2021. Commerce Issues and Decision Memorandum for the Expedited Sunset Review of the Antidumping Duty Order on Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from the Russian Federation, December 15, 2021.

⁴⁶ 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.

Australia

Commerce has completed three antidumping duty administrative reviews with regard to subject imports of hot-rolled steel from Australia. The results of the administrative reviews are shown in table I-5.

Table I-5
Hot-rolled steel: Administrative reviews of the antidumping duty order for Australia

Date results published	Period of review	Producer or exporter	Margin (percent)
April 30, 2019, 84 FR 18241	March 22, 2016 – September 30, 2017	BlueScope Steel Ltd., BlueScope Steel (AIS) Pty Ltd., and BlueScope Steel Distribution Pty Ltd	99.20
October 7, 2020, 85 FR 63249	October 1, 2017 – September 30, 2018	BlueScope Steel Ltd./BlueScope Steel (AIS) Pty Ltd./BlueScope Steel Distribution Pty Ltd	2.72
August 23, 2021, 86 FR 47054	October 1, 2018 – September 30, 2019	BlueScope Steel (AIS) Pty Ltd, BlueScope Steel Ltd., and BlueScope Steel Distribution Pty Ltd	9.94

Source: Cited Federal Register notices.

Brazil

Commerce has completed one antidumping duty administrative review with regard to subject imports of hot-rolled steel from Brazil. The results of the administrative reviews are shown in table I-6.

Table I-6
Hot-rolled steel: Administrative reviews of the antidumping duty order for Brazil

Date results published	Period of review	Producer or exporter	Margin (percent)
September 26, 2018, 83 FR 48592	March 22, 2016 – September 30, 2017	Aperam South America	34.28
September 26, 2018, 83 FR 48592	March 22, 2016 – September 30, 2017	ArcelorMittal Brasil	34.28
September 26, 2018, 83 FR 48592	March 22, 2016 – September 30, 2017	Companhia Siderurgica Nacional	34.28
September 26, 2018, 83 FR 48592	March 22, 2016 – September 30, 2017	Companhia Siderurgica Suape	34.28
September 26, 2018, 83 FR 48592	March 22, 2016 – September 30, 2017	Marcegaglia do Brasil	34.28
September 26, 2018, 83 FR 48592	March 22, 2016 – September 30, 2017	Usinas Siderurgicas de Minas Gerais SA	34.28

Source: Cited Federal Register notices.

Japan

Commerce has completed four antidumping duty administrative reviews with regard to subject imports of hot-rolled steel from Japan. The results of the administrative reviews are shown in table I-7.

Table I-7
Hot-rolled steel: Administrative reviews of the antidumping duty order for Japan

Date results published	Period of review	Producer or exporter	Margin (percent)
June 28, 2019, 84 FR 31025	March 22, 2016 – September 30, 2017	Nippon Steel & Sumitomo Metal Corporation	7.64
June 28, 2019, 84 FR 31025	March 22, 2016 – September 30, 2017	Nisshin Steel Co., Ltd.	6.92 (March 22, 2016 – March 12, 2017)
June 28, 2019, 84 FR 31025	March 22, 2016 – September 30, 2017	Nisshin Steel Co., Ltd.	7.64 (March 13, 2017 – September 30, 2017)
June 28, 2019, 84 FR 31025	March 22, 2016 – September 30, 2017	Tokyo Steel Manufacturing Co., Ltd	2.06
June 28, 2019, 84 FR 31025	March 22, 2016 – September 30, 2017	Non-examined companies	6.92
September 16, 2020, 85 FR 57821	October 1, 2017 – September 30, 2018	Nippon Steel Corporation/Nippon Steel Nisshin Co., Ltd./Nippon Steel Trading Corporation	0.00
September 16, 2020, 85 FR 57821	October 1, 2017 – September 30, 2018	Tokyo Steel Manufacturing Co., Ltd	0.00
September 16, 2020, 85 FR 57821	October 1, 2017 – September 30, 2018	Review-Specific Average Rate	0.00

Table continued.

Table I-7 Continued**Hot-rolled steel: Administrative reviews of the antidumping duty order for Japan**

Date results published	Period of review	Producer or exporter	Margin (percent)
August 26, 2021, 86 FR 47615	October 1, 2018 – September 30, 2019	Nippon Steel Corporation/Nippon Steel Nisshin Co., Ltd./Nippon Steel Trading Corporation	11.70
August 26, 2021, 86 FR 47615	October 1, 2018 – September 30, 2019	Tokyo Steel Manufacturing Co., Ltd	6.80
August 26, 2021, 86 FR 47615	October 1, 2018 – September 30, 2019	Review-Specific Average Rate	10.95
May 24, 2022, 87 FR 31523	October 1, 2019 – September 30, 2020	See note	24.07

Source: Cited Federal Register notices.

Note: March 22, 2016 – September 30, 2017 review: Entries of subject merchandise produced/exported by Nisshin Steel Co., Ltd. made prior to March 13, 2017 are subject to the non-examined companies' rate calculated in this administrative review

Note: March 22, 2016 – September 30, 2017 review: Companies not individually examined include Hanwa Co., Ltd., JFE Steel Corporation, JFE Shoji Trade America, Kanematsu Corporation, Kobe Steel, Ltd., Mitsui & Co., Ltd., Miyama Industry Co., Ltd., Nippon Steel & Sumikin Logistics Co., Ltd., Okaya & Co. Ltd., Saint-Gobain KK, Shinsho Corporation, Sumitomo Corporation, Suzukaku Corporation, and Toyota Tsusho Corporation Nagoya.

Note: October 1, 2017 – September 30, 2018 review: Review-specific average rate applicable to the following companies: Hanwa Co., Ltd, Higuchi Manufacturing America, LLC, Higuchi Seisakusho Co., Ltd, Hitachi Metals, Ltd, JFE Steel Corporation/JFE Shoji Trade Corporation, JFE Shoji Trade America, Kanematsu Corporation, Kobe Steel, Ltd, Metal One Corporation, Mitsui & Co., Ltd, Miyama Industry Co., Ltd, Nakagawa Special Steel Inc, Nippon Steel & Sumikin Logistics Co., Ltd, Okaya & Co. Ltd, Panasonic Corporation, Saint-Gobain K.K, Shinsho Corporation, Sumitomo Corporation, Suzukaku Corporation, Toyota Tsusho Corporation Nagoya.

Note: October 1, 2018 – September 30, 2019 review: Review-specific average rate applicable to the following companies: Hanwa Co., Ltd, Higuchi Manufacturing America, LLC, Higuchi Seisakusho Co., Ltd, Hitachi Metals, Ltd, JFE Steel Corporation/JFE Shoji Trade Corporation, JFE Shoji Trade America, Kanematsu Corporation, Kobe Steel, Ltd, Metal One Corporation, Miyama Industry Co., Ltd, Nakagawa Special Steel Inc, Nippon Steel & Sumikin Logistics Co., Ltd, Okaya & Co. Ltd, Saint-Gobain K.K, Shinsho Corporation, Sumitomo Corporation, Suzukaku Corporation, Toyota Tsusho Corporation Nagoya

Note: October 1, 2019 – September 30, 2020 review: Commerce assigned the weighted-average dumping margin (24.07 percent) to the following firms: Nippon Steel Corporation/Nippon Steel Nisshin Co., Ltd./Nippon Steel Trading Corporation, Hanwa Co., Ltd, Higuchi Manufacturing America, LLC, Higuchi Seisakusho Co., Ltd, Hitachi Metals, Ltd, JFE Steel Corporation/JFE Shoji Trade Corporation, JFE Shoji Trade America, Kanematsu Corporation, Kobe Steel, Ltd, Metal One Corporation, Miyama Industry Co., Ltd, Nakagawa Special Steel Inc, Nippon Steel & Sumikin Logistics Co., Ltd, Okaya & Co. Ltd, Panasonic Corporation, Saint-Gobain K.K, Shinsho Corporation, Sumitomo Corporation, Suzukaku Co., Ltd, Suzukaku Corporation, Tokyo Steel Manufacturing Co., Ltd, Toyota Tsusho Corporation Nagoya.

Note: October 1, 2019 – September 30, 2020 review: Commerce has assigned to companies not individually examined a margin of 24.07 percent, which is NSC's calculated weighted-average dumping margin.

South Korea

Commerce has completed four countervailing duty administrative reviews and four antidumping duty reviews with regard to subject imports of hot-rolled steel from South Korea. The results of the administrative reviews are shown in table I-8 and table I-9.

Table I-8

Hot-rolled steel: Administrative reviews of the countervailing duty order for South Korea

Date results published	Period of review	Producer or exporter	Margin (percent)
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	POSCO	0.54
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Hyundai Steel Co., Ltd	0.58
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	DCE Inc	0.56
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Dong Chuel America Inc	0.56
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Dongbu Steel Co., Ltd	0.56
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Dongkuk Industries Co., Ltd	0.56
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Hyewon Sni Corporation (H.S.I.)	0.56
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Soon Hong Trading Co., Ltd	0.56
July 24, 2019, 84 FR 35604	August 12, 2016 – December 31, 2016	Sung-A Steel Co., Ltd	0.56
October 9, 2020, 85 FR 64122	January 1, 2017 – December 31, 2017	Hyundai Steel Co., Ltd	0.51
August 26, 2021, 86 FR 47621	January 1, 2018 – December 31, 2018	Hyundai Steel Co., Ltd	0.51
May 9, 2022, 87 FR 27570	January 1, 2019 – December 31, 2019	Hyundai Steel Company	0.56
May 9, 2022, 87 FR 27570	January 1, 2019 – December 31, 2019	POSCO	0.56

Source: Cited Federal Register notices.

Note: 84 FR 35604 presents amendments to the final results of the first administrative review of the countervailing duty order on hot-rolled steel from South Korea that was published on June 19, 2019 to correct a ministerial error in the calculation of POSCO's subsidy rate.

Table I-9**Hot-rolled steel: Administrative reviews of the antidumping duty order for South Korea**

Date results published	Period of review	Producer or exporter	Margin (percent)
August 5, 2019, 84 FR 37988	March 22, 2016 – September 30, 2017	POSCO/POSCO Daewoo Co., Ltd	11.10
August 5, 2019, 84 FR 37988	March 22, 2016 – September 30, 2017	Non-examined companies	8.27
October 6, 2020, 85 FR 63079	October 1, 2017 – September 30, 2018	Hyundai Steel Company	0.89
April 9, 2021, 86 FR 18500	October 1, 2018 – September 30, 2019	Hyundai Steel Company	0.00
March 7, 2022, 87 FR 12660	October 1, 2019 – September 30, 2020	Hyundai Steel Company	3.62
March 7, 2022, 87 FR 12660	October 1, 2019 – September 30, 2020	POSCO; POSCO International Corporation	1.57
March 7, 2022, 87 FR 12660	October 1, 2019 – September 30, 2020	Review-Specific Average Rate	2.95

Source: Cited Federal Register notices.

Note: 84 FR 37988 presents amendments to the final results of the first administrative review of the countervailing duty order on hot-rolled steel from South Korea that was published on July 9, 2019 to correct several ministerial errors in the calculation of POSCO's subsidy rate.

Note: October 1, 2017 – September 30, 2018 review: This review covered two producers and/or exporters of the subject merchandise. Commerce selected one mandatory respondent for individual examination: Hyundai Steel Company (Hyundai) and rescinded the review for the remaining producer/exporter which was not selected for individual examination, POSCO and POSCO Daewoo Corporation (collectively, POSCO).

Note: October 1, 2018 – September 30, 2019 review: Commerce determined that the sole producer/exporter subject to this review, Hyundai Steel Company, did not make sales of subject merchandise at less than normal value during the period of review.

Note: October 1, 2019 – September 30, 2020 review: Review-specific average rate applicable to the following companies: Dongkuk Industries Co., Ltd, Dongkuk Steel Mill Co., Ltd, KG Dongbu Steel Co., Ltd, Marubeni-Itochu Steel Korea, Ltd, Snp Ltd, Soon Hong Trading Co, and Sungjin Co., Ltd.

Turkey

Commerce has completed three antidumping duty reviews with regard to subject imports of hot-rolled steel from Turkey. The results of the administrative reviews are shown in table I-10.

Table I-10
Hot-rolled steel: Administrative reviews of the countervailing duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
June 27, 2019, 84 FR 30694	March 22, 2016 – September 30, 2017	Colakoglu Metalurji A.S. and Colakoglu Dis Ticaret A.S	0.00
June 27, 2019, 84 FR 30694	March 22, 2016 – September 30, 2017	Agir Haddecilik A.S	0.00
June 27, 2019, 84 FR 30694	March 22, 2016 – September 30, 2017	Habas Industrial and Medical Gases Production Industries Inc	0.00
June 27, 2019, 84 FR 30694	March 22, 2016 – September 30, 2017	Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi	0.00
June 27, 2019, 84 FR 30694	March 22, 2016 – September 30, 2017	MMK Atakas Metalurji	0.00
June 27, 2019, 84 FR 30694	March 22, 2016 – September 30, 2017	Ozkan Iron and Steel Ind	0.00
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Agir Haddecilik A.S	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Cag Celik Demir ve Celik	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Gazi Metal Mamulleri Sanayi Ve Ticaret A.S	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Habas Industrial and Medical Gases Production Industries Inc	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	MMK Atakas Metalurji	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Ozkan Iron and Steel Ind	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Seametal San ve Dis Tic	2.73
October 6, 2020, 85 FR 63098	October 1, 2017 – September 30, 2018	Tosyali Holding (Toscelik Profile and Sheet Ind. Co., Toscelik Profil ve Sac)	2.73

Table continued.

Table I-10 Continued

Hot-rolled steel: Administrative reviews of the countervailing duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
August 23, 2021, 86 FR 47058	October 1, 2018 – September 30, 2019	Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi A.S	24.32
August 23, 2021, 86 FR 47058	October 1, 2018 – September 30, 2019	Review-Specific Average Rate	24.32

Source: Cited Federal Register notices.

Note: March 22, 2016 – September 30, 2017 review: Commerce determined the weighted-average dumping margin for the non-examined companies to be zero.

Note: October 1, 2017 – September 30, 2018: Commerce assigned the 2.73 percent rate for Erdemir Group and all other producers and exporters as the weighted-average dumping margin for the non-examined companies in this administrative review.

Note: October 1, 2018 – September 30, 2019: Review-Specific Average Rate Applicable to the Following Companies: Cag Celik Demir ve Celik, Colakoglu Metalurji, A.S./Colakoglu Dis Ticaret A.S., Habas Industrial and Medical Gases Production Industries Inc, MMK Atakas Metalurji, Ozkan Iron and Steel Ind.

Changed circumstances reviews

On July 19, 2019, Commerce published its notice of initiation and preliminary results of the changed-circumstances review of the antidumping duty order on hot-rolled steel from Japan. In that notice, Commerce preliminarily determined that (1) Nippon Steel Corporation (“NSC”) is the successor-in-interest to Nippon Steel & Sumitomo Metal Corporation (“NSSMC”); (2) Nippon Steel Nisshin Co., Ltd. (“Nippon Nisshin”) is the successor in interest to Nisshin Steel Co., Ltd. (“Nisshin Steel”); and (3) Nippon Steel Trading Corporation (“NSTC”) is the successor in interest to Nippon Steel & Sumikin Bussan Corporation (“NSSBC”). Additionally, Commerce preliminarily determined that NSC, Nippon Nisshin, and NSTC should be treated as a single entity, and should receive the same antidumping cash deposit rate with respect to the subject merchandise as NSSMC, the predecessor company. No interested party submitted comments regarding the initiation and preliminary results. For the final results, Commerce continued to find that NSC is the successor-in-interest to NSSMC. Accordingly, Commerce determined that NSC, Nippon Nisshin, and NSTC should receive the antidumping duty cash deposit rate previously assigned to NSSMC under the Order.⁴⁷

⁴⁷ 84 FR 46713, September 5, 2019 and 84 FR 49093, September 18, 2019.

On July 13, 2022, Commerce published the notice of initiation and preliminary results of a changed circumstances review of the antidumping duty order on hot-rolled steel from South Korea. In that notice, Commerce preliminarily determined that POSCO, following a corporate organizational change in March 2022, is the successor-in-interest to the pre-reorganization POSCO entity (“POSCO(I)”). As such, POSCO is entitled to POSCO(I)'s antidumping duty cash deposit rates with respect to entries of subject merchandise in each of the above-referenced proceedings. POSCO provided comments regarding the initiation and preliminary results, stating Commerce should determine that POSCO is the successor-in-interest to POSCO(I) for the purposes of the antidumping duty order on hot-rolled steel from South Korea, because its operations are not materially dissimilar to those of POSCO(I). For the final results, Commerce continued to find that POSCO is the successor-in-interest to POSCO(I). Accordingly, POSCO is entitled to POSCO(I)'s antidumping duty cash deposit rate with respect to entries of hot-rolled steel from South Korea.⁴⁸

Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to all subject countries.⁴⁹ Tables I-11 through I-20 present the countervailable subsidy margins and dumping margins calculated by Commerce in its original investigations and five-year reviews.

Table I-11
Hot-rolled steel: Commerce’s original and first five-year dumping margins for producers/exporters in Australia

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
BlueScope Steel Ltd., BlueScope Steel (AIS) Pty Ltd., and BlueScope Steel Distribution Pty Ltd	29.58	---
All others	29.58	---

Source: 81 FR 53406, August 12, 2016, and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from Australia would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 29.58 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

⁴⁸ 87 FR 41661, July 13, 2022, and 87 FR 52910, August 30, 2022.

⁴⁹ 86 FR 72577, December 22, 2021; 87 FR 428, January 5, 2022; and 87 FR 750, 87 FR 751, January 6, 2022.

Table I-12**Hot-rolled steel: Commerce's original and first five-year countervailable subsidy margins for producers/exporters in Brazil**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Companhia Siderurgica Nacional (CSN)	11.30	11.30
Usiminas Siderurgicas de Minas Gerais S.A. (Usiminas)	11.09	11.09
All others	11.20	11.20

Source: 81 FR 53416, August 12, 2016 and 87 FR 750, January 6, 2022.

Table I-13**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in Brazil**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Companhia Siderurgica Nacional (CSN)	33.14	---
Usiminas Siderurgicas de Minas Gerais S.A. (Usiminas)	34.28	---
All others	33.14	---

Source: 81 FR 53424, August 12, 2016 and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from Brazil would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 34.28 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-14**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in Japan**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Nippon Steel & Sumitomo Metal Corporation/Nippon Steel & Sumikin Bussan Corporation	4.99	---
JFE Steel Corporation/JFE Shoji Trade Corporation	7.51	---
All others	5.58	---

Source: 81 FR 53409, August 12, 2016 and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from Japan would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 11.70 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-15**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in the Netherlands**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Tata Steel IJmuiden B.V.	3.73	---
All others	3.73	---

Source: 81 FR 53421, August 12, 2016 and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from the Netherlands would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 3.73 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-16**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in Russia**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)
JSC Severstal	73.59	73.59	73.59	73.59	73.59
All others	184.56	184.56	184.56	184.56	184.56

Source: 64 FR 38626, July 19, 1999; 69 FR 54633, September 9, 2004; 75 FR 47263, August 5, 2010; 81 FR 62094, September 8, 2016; and 86 FR 72577, December 22, 2021.

Table I-17**Hot-rolled steel: Commerce's original and first five-year countervailable subsidy margins for producers/exporters in South Korea**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Hyundai Steel Company	9.49	3.98
POSCO	3.89	41.64
All others	5.55	3.89

Source: 81 FR 53419, August 12, 2016 and 87 FR 428, January 5, 2022.

Table I-18**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in South Korea**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Hyundai Steel Company	9.49	---
POSCO	3.89	---
All others	5.55	---

Source: 81 FR 53419, August 12, 2016 and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from South Korea would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 11.10 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-19**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in Turkey**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Colakoglu Metalurji A.S./Colakoglu Dis Ticaret A.S.	7.15	---
Eregli Demir ve Celik Fabrikalari T.A.S./Iskenderun Demir Ve Celik	3.66	---
All others	6.67	---

Source: 81 FR 53428, August 12, 2016 and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from Turkey would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 24.32 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-20**Hot-rolled steel: Commerce's original and first five-year dumping margins for producers/exporters in the United Kingdom**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Tata Steel UK Ltd.	33.06	---
All others	33.06	----

Source: 81 FR 53436, August 12, 2016 and 87 FR 751, January 6, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on hot-rolled steel from the United Kingdom would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 33.06 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

The subject merchandise

Commerce's scope⁵⁰

In the current proceeding, Commerce has defined the scope with respect to Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and the United Kingdom as follows⁵¹:

The products covered by this order are certain hot-rolled, flat-rolled steel products, with or without patterns in relief, and whether or not annealed, painted, varnished, or coated with plastics or other non-metallic substances. The products covered do not include those that are clad, plated, or coated with metal. The products covered include coils that have a width or other lateral measurement ("width") of 12.7 mm or greater, regardless of thickness, and regardless of form of coil (e.g., in successively superimposed layers, spirally oscillating, etc.). The products covered also include products not in coils (e.g., in straight lengths) of a thickness of less than 4.75 mm and a width that is 12.7 mm or greater and that measures at least 10 times the thickness. The products described above may be rectangular, square, circular, or other shape and include products of either rectangular or non-rectangular cross-section where such cross-section is achieved subsequent to the rolling process, i.e., products which have been "worked after rolling" (e.g., products which have been beveled or rounded at the edges). For purposes of the width and thickness requirements referenced above: (1) Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above unless the resulting measurement makes the product covered by the existing antidumping or countervailing duty-orders on Certain Cut-To- Length Carbon-Quality Steel Plate Products From the Republic of Korea (A-580-836; C-580-837), and

(2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross-section, the width of certain products with non-rectangular shape, etc.), the measurement at its greatest width or thickness applies.

⁵⁰ Commerce Issues and Decision Memorandum for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, the Republic of Korea, the Netherlands, the Republic of Turkey, and the United Kingdom, December 29, 2021.

⁵¹ Appendix L provides Commerce's scope with respect to Russia. The scope of the orders is substantively the same across all reviews.

Steel products included in the scope of this order are products in which: (1) Iron predominates, by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

- 2.50 percent of manganese, or*
- 3.30 percent of silicon, or*
- 1.50 percent of copper, or*
- 1.50 percent of aluminum, or*
- 1.25 percent of chromium, or*
- 0.30 percent of cobalt, or*
- 0.40 percent of lead, or*
- 2.00 percent of nickel, or*
- 0.30 percent of tungsten, or*
- 0.80 percent of molybdenum, or*
- 0.10 percent of niobium, or*
- 0.30 percent of vanadium, or*
- 0.30 percent of zirconium.*

Unless specifically excluded, products are included in this scope regardless of levels of boron and titanium.

For example, specifically included in this scope are vacuum degassed, fully stabilized (commonly referred to as interstitial-free (IF)) steels, high strength low alloy (HSLA) steels, the substrate for motor lamination steels, Advanced High Strength Steels (AHSS), and Ultra High Strength Steels (UHSS). IF steels are recognized as low carbon steels with microalloying levels of elements such as titanium and/or niobium added to stabilize carbon and nitrogen elements. HSLA steels are recognized as steels with micro-alloying levels of elements such as chromium, copper, niobium, titanium, vanadium, and molybdenum. The substrate for motor lamination steels contains micro-alloying levels of elements such as silicon and aluminum. AHSS and UHSS are considered high tensile strength and high elongation steels, although AHSS and UHSS are covered whether or not they are high tensile strength or high elongation steels.

Subject merchandise includes hot-rolled steel that has been further processed in a third country, including but not limited to pickling, oiling, levelling, annealing, tempering, temper rolling, skin passing, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the hot-rolled steel.

All products that meet the written physical description, and in which the chemistry quantities do not exceed any one of the noted element levels listed above, are within the scope of this investigation unless specifically excluded. The following products are outside of and/or specifically excluded from the scope of this investigation:

- *Universal mill plates (i.e., hot-rolled, flat-rolled products not in coils that have been rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, of a thickness not less than 4.0 mm, and without patterns in relief);*
- *Products that have been cold-rolled (cold-reduced) after hotrolling;*
- *Ball bearing steels;*
- *Tool steels; and*
- *Silico-manganese steels.*

Tariff treatment

Based upon the scope set forth by the Department of Commerce, the products subject to these reviews are currently imported under the Harmonized Tariff Schedule of the United States (HTSUS) numbers: 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7210.70.3000,⁵² 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, 7225.11.0000, 7225.19.0000, 7225.30.3050, 7225.30.7000, 7225.40.7000, 7225.99.0090, 7226.11.1000, 7226.11.9030, 7226.11.9060, 7226.19.1000, 7226.19.9000, 7226.91.5000, 7226.91.7000, and 7226.91.8000.⁵³ The column 1-general duty rate on all of these products is free.⁵⁴ The HTSUS subheadings above are provided for convenience and U.S. Customs purposes only. The written description of the scope of the reviews is dispositive.

⁵² HTS number 7210.70.3000 was excluded from the import statistics used in this report because it is believed to include primarily cold-rolled steel products.

⁵³ The products subject to the reviews may also be imported under the following HTSUS statistical reporting numbers: 7210.90.9000, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7214.99.0060, 7214.99.0075, 7214.99.0090, 7215.90.5000, 7226.99.0180, and 7228.60.6000.

⁵⁴ Decisions on the tariff classification and treatment of imported goods are solely within the authority of U.S. Customs and Border Protection.

Effective March 23, 2018, hot-rolled steel was included in the enumeration of iron and steel articles that became subject to the additional 25 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended.⁵⁵ The President also issued subsequent Proclamations to exempt or adjust these duties for selected U.S. trade partners:

- Presidential Proclamation 9711, March 22, 2018 (83 FR 13361, March 28, 2018) exempted iron and steel mill products originating in Argentina, Australia, Brazil, Canada, the EU member states (including the United Kingdom), South Korea, and Mexico, effective March 23, 2018.
- Presidential Proclamation 9740, April 30, 2018 (83 FR 20683, May 7, 2018) continued the duty exemptions for Argentina, Australia, Brazil, but within annual absolute quota limits on iron and steel mill products originating in South Korea, effective May 1, 2018; and did not continue the duty exemptions on iron and steel mill products originating in Canada, Mexico, and the EU member states (including the United Kingdom), effective June 1, 2018.
- Presidential Proclamation 9759, May 31, 2018 (83 FR 25857, June 5, 2018) continued the duty exemptions but within annual absolute quota limits on iron and steel mill products originating in Argentina, Brazil, and South Korea, effective June 1, 2018.
- Presidential Proclamation 9772, August 10, 2018 (83 FR 40429, August 15, 2018) continued the duty exemptions on iron and steel mill products originating in Australia; continued the duty exemptions within annual absolute quota limits on iron and steel mill products originating in Argentina, Brazil, and South Korea, effective June 1, 2018; but doubled the duty rate to 50 percent on such imported products originating in Turkey, effective August 13, 2018.
- Presidential Proclamation 9886, May 16, 2019 (84 FR 23421, May 21, 2019) restored the original additional duty rate of 25 percent on steel mill products originating from Turkey, effective May 21, 2019.
- Presidential Proclamation 9894, May 19, 2019 (84 FR 23987, May 23, 2019) restored the duty exemptions on steel mill products originating in Canada and Mexico, effective May 20, 2019.

⁵⁵ Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. §1862), authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, March 8, 2018 (83 FR 11625, March 15, 2018).

- Presidential Proclamation 10328, December 27, 2021 (87 FR 11, January 3, 2022) provided duty exemptions within annual TRQs on iron and steel mill products originating in EU member countries, effective January 1, 2022.
- Presidential Proclamation 10356, March 31, 2022 (87 FR 63, April 1, 2022) provided duty exemptions within annual TRQs on iron and steel mill products originating in Japan, effective April 1, 2022.
- Presidential Proclamation 10403, May 27, 2022 (87 FR 106, June 2, 2022) provided exemptions to section 232 duties on iron and steel mill products originating in Ukraine between June 1, 2022 and June 1, 2023.
- Presidential Proclamation 10406, May 31, 2022 (87 FR 107, June 3, 2022) provided duty exemptions within annual TRQs on iron and steel mill products originating in the United Kingdom, effective June 1, 2022.

At this time, imports of hot-rolled steel originating in Australia, Canada, and Mexico are exempt from Section 232 duties or quota limits; imports of hot-rolled steel originating in Argentina (10,942 short tons), Brazil (143,416 short tons), and South Korea (584,544 short tons) are exempt from these duties but within annual absolute quota limits (quantities for 2022);^{56,57}

⁵⁶ Quota ID Nos. 9903.80.05: Hot-rolled sheet, 9903.80.06: Hot-rolled strip, and 9903.80.10: Hot-rolled plate, in coils. See the CBP quota bulletin No. QB 22-601 2022, December 23, 2021, at <https://www.cbp.gov/trade/quota/bulletins/qb-22-601-2022-first-quarter-absolute-quota-steel-mill-articles-argentina-brazil-and-south> for a full list of product groups as well as their specified quotas and HTS definitions. Quota ID numbers are used by CBP to track the pertinent imports and are cited in the Quota Bulletins. The ID numbers also match HTS subheadings that may be used for more than one country or purpose. Thus, Quota ID numbers included in this section should not be directly compared with the matching HTS subheadings.

⁵⁷ Korea's annual quota usage rates for HTS statistical reporting numbers containing Hot-rolled steel products in 2021: HTS 9903.80.05 (71 percent of 404,694,045 kg filled), HTS 9903.80.06 (4 percent of 249,173 kg filled), HTS 9903.80.07 (99 percent of 125,346,920 kg filled). Brazil's annual quota usage rates for HTS statistical reporting numbers containing Hot-rolled products in 2021: HTS 9903.80.05 (0 percent of 108,453,546 kg filled), HTS 9903.80.06 (0 percent of 5,730 kg filled), HTS 9903.80.07 (0 percent of 21,656,653 kg filled). U.S. Customs and Border Protection, QB 21-604 2021 Fourth Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea, [QB 21-604 2021 Fourth Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea | U.S. Customs and Border Protection \(cbp.gov\)](#)

the European Union (“EU”) member countries (481,178),^{58,59} the United Kingdom (54 short tons),⁶⁰ and Japan (250,115 short tons)⁶¹ are exempt from these duties within annual tariff rate quotas (“TRQs”) (quantities for 2022); and imports of hot-rolled steel originating in Turkey and any other U.S. trade partner are subject to these 25 percent additional duties.^{62,63}

Table I-21 summarizes the current 232 duties, quotas, or limits for the subject countries.

⁵⁸ Quota ID Nos. 9903.80.65: Hot-rolled sheet, 9903.80.66: Hot-rolled strip, and 9903.80.67: Hot-rolled plate. See the CBP quota bulletin No. QB 22-801 2022, January 12, 2022, at <https://www.cbp.gov/trade/quota/bulletins/qb-22-611-2022-first-and-second-quarter-tariff-rate-quota-trq-steel-mill-articles-0> and CBP, “EU Sec 232 Steel Tariff Rate Quota (TRQ) 2022 Q1 and Q2,” January 12, 2022, at https://www.cbp.gov/sites/default/files/assets/documents/2022-Jan/EU%20Steel%20TRQ%20Limit%20Table%202022_Q1_Q2R.pdf for a full list of product groups as well as their specified quotas and HTS definitions.

⁵⁹ The Netherlands share of the European Union’s TRQ is 215,087 short tons.

⁶⁰ Quota ID Nos. 9903.81.25: Hot-rolled sheet, 9903.81.26: Hot-rolled strip, and 9903.81.27: Hot-rolled plate, in coils. See the CBP quota bulletin No. QB 22-622a 2022, June 1, 2022, at <https://www.cbp.gov/trade/quota/bulletins/qb-22-622a-2022>

⁶¹ Quota ID Nos. 9903.81.25: Hot-rolled sheet, 9903.81.26: Hot-rolled strip, and 9903.81.27: Hot-rolled plate, in coils. See the CBP quota bulletin No. QB 22-622 2022, March 31, 2022, at <https://www.cbp.gov/trade/quota/bulletins/qb-22-622-2022-tariff-rate-quota-trq-steel-articles-japan>.

⁶² See also HTS heading 9903.80.01 and U.S. notes 16(a)(i), 16(b), 16(e), and 16(f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2022) Basic Edition, Publication 5277, January 2022, pp. 99-III-5 – 99-III-7, 99-III-175 – 99-III-177, 99-III-238 – 99-III-239, 99-III-246 – 99-III-247.

⁶³ Effective September 1, 2019, hot-rolled steel originating in China is subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974, as amended. Section 301 duties are administered in addition to any other existing duties. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Table I-21
Hot-rolled steel: Section 232 tariff actions

Subject country	Tariff action	Additional considerations
Australia	Exempt	
Brazil	Annual import quota limits	The annual import quota limit for hot-rolled steel imports originating in Brazil is 143,416 short tons.
Japan	Annual tariff rate quotas	The annual TRQ limit for imports of hot-rolled steel originating in Japan is 250,115 short tons.
South Korea	Annual import quota limits	The annual import quota limit for hot-rolled steel imports originating in South Korea is 584,544 short tons.
Netherlands	Annual tariff rate quotas	The annual TRQ limit for imports of hot-rolled steel originating in the Netherlands is 215,087 short tons.
Russia	25 percent ad valorem	Following Russia's 2022 invasion of Ukraine, the Senate and House passed H.R. 7108 on April 7 to revoke Russia's permanent normal trade relations (PNTR) status, which provides unconditional, nondiscriminatory, most-favored nation (MFN) treatment to goods and services traded with Russia.
Turkey	25 percent ad valorem	Turkey's ad valorem rate was increased to 50 percent in August 2018, but subsequently reduced back to 25 percent in May 2019.
United Kingdom	Annual tariff rate quotas	The annual TRQ limit for imports of hot rolled steel originating in the United Kingdom is 54 short tons.

Source: Presidential proclamations 9705, 9772, 9886, 10328, 10356, 10406; USITC, HTSUS (2022) Basic Edition, Publication 5277, January 2022; Congressional Research Service, Russia's Trade Status, Tariffs, and WTO Issues, April 2022, <https://crsreports.congress.gov/product/pdf/IF/IF12071#:~:text=Following%20Russia's%202022%20invasion%20of,and%20services%20traded%20with%20Russia> (accessed 9/23/2022)..

Under Section 232, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined "not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States." Commerce reviews all exclusion requests and any objections, rebuttals, and sur-

rebuttals to the requests and determines whether the items are warranting an exclusion based on the above criteria.⁶⁴

If an organization manufactures steel products in the United States and wishes to object to an existing exclusion request, it has 30 days from the posting of an exclusion request to submit an objection. Any individual or organization in the United States may file an objection to an exclusion request.⁶⁵

If objections are submitted during the 30-day comment period, Commerce reviews each objection for conformance with the submission requirements. If the objection meets the requirements, it will be posted. Once an objection is posted, the Commerce will re-open the exclusion request for a rebuttal period of 7 calendar days.

On December 14, 2020, Commerce published an interim final rule (the “December 14 rule”) that revised aspects of the process for requesting exclusions from the duties and quantitative limitations on imports of aluminum and steel discussed in three previous Commerce interim final rules implementing the exclusion process authorized by the President under Section 232 of the Trade Expansion Act of 1962, as amended, as well as a May 26, 2020, notice of inquiry. The December 14 rule included adding 123 General Approved Exclusions (GAEs) to the regulations.⁶⁶ GAEs may be used by any importer and are indefinite in length. Hot-rolled steel products imported under HTS reporting numbers 7208.10.1500 and are eligible for exclusions based on this rule.⁶⁷

⁶⁴ U.S. Department of Commerce, “Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process,” <https://www.bis.doc.gov/index.php/232-steel>.

⁶⁵ For an objection filing to be considered, organizations must provide factual information on: 1) The steel products that they manufacture in the United States; 2) The production capabilities at steel manufacturing facilities that they operate in the United States; and 3) The availability and delivery time of the products that they manufacture relative to the specific steel product that is subject to an exclusion request. U.S. Department of Commerce, “Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process,” <https://www.bis.doc.gov/index.php/232-steel>.

⁶⁶ GAEs address a long-standing request from public comments of exclusion requesters to create a more efficient process to approve certain exclusions for use by all importers where Commerce has determined that no objections will be received and where it is warranted to approve an exclusion for all importers to use. Determinations for what steel or aluminum articles warrant being included in a GAE were made by Commerce, in consultation with other Federal agencies. The public was not involved in requesting new or revised GAEs, but Commerce uses the information provided in exclusion requests to inform its review process for what additional GAE should be added or what revisions should be made to existing GAEs. 86 FR 234, December 9, 2021.

⁶⁷ 86 FR 234, December 9, 2021.

Commerce’s Bureau of Industry and Security (“BIS”) granted 600 exclusions from these duties for the particular products (including hot-rolled steel) currently reported under the HTS provisions listed in the opening paragraph of this section (above) from among the exclusion requests posted between June 2019 to August 2022 (table I-22).⁶⁸ BIS denied 139 of the 739 exclusion requests submitted for products currently reported under the HTS provisions that are associated with hot-rolled steel.

The exclusions listed below are not generally applicable to all imports under each HTS or to imports from all countries. Therefore, each exclusion listed below may not cover imports of subject merchandise and/or may only cover a portion of imports of subject merchandise. Each granted exclusion is specific to certain criteria listed below:⁶⁹

- 1) **A granted exclusion is only applicant-specific** (*i.e.* can only be used by the applicant who must be a “directly affected individuals or organizations located in the United States” which is generally an importer of record but may also be an end-user);
- 2) **is supplier-specific;**
- 3) **is product-specific** (not only must a single 10-digit HTSUS code, be listed, including its specific dimension, but a full description of the properties of the steel product it seeks to import, including chemical composition, dimensions, strength, toughness, ductility, magnetic permeability, surface finish, coatings, and other relevant data);
- 4) **is country(ies) of origin-specific** (can only cover imports from specific country(ies) listed in a request);
- 5) **is limited by the volume listed in the request** (an applicant must certify that the exclusion “amount requested in a given year is in line with what the organization expects to import based on its current business outlook”); and **is limited to one year** (applicants must re-apply to use the exclusion after a year).

⁶⁸ Under Section 232, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined “not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States.” Commerce reviews all exclusion requests and any objections, rebuttals, and sur-rebuttals to the requests and determines whether the items are warranting an exclusion based on the above criteria. U.S. Department of Commerce, “Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process,” <https://www.bis.doc.gov/index.php/232-steel>.

⁶⁹ The criteria presented in the list were derived from U.S. Department of Commerce, “Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process,” <https://www.bis.doc.gov/index.php/232-steel>; 83 FR 53, March 19, 2018; U.S. Department of Commerce, “Section 232 Frequently Asked Questions,” pp. 11–12;

A product exclusion will be granted if the article is not produced in the United States: (1) in sufficient and reasonably available amount, (2) satisfactory quality, or (3) there is a specific national security consideration warranting an exclusion. Applicants must list one of these as a reason for the request and must certify that the reason for the request is correct and accurate to the best of their knowledge.

Table I-22
Hot-rolled steel: Individual product exclusions from the Section 232 steel tariffs granted for requests posted from June 21, 2019 to August 1, 2022, by HTS heading and subheading

HTS heading and subheading	Description	Number of exemptions granted	Number of exemptions denied
7208	Flat-rolled products of iron or nonalloy steel, of a width of 600 mm or more, hot-rolled, not clad, plated or coated:	N/A	N/A
7208.10	In coils, not further worked than hot-rolled, with patterns in relief:	113	34
7208.25	Of a thickness of 4.75 mm or more:	38	1
7208.26	Of a thickness of 3 mm or more but less than 4.75 mm	99	4
7208.27	Of a thickness of less than 3 mm	169	25
7208.36	Of a thickness exceeding 10 mm	5	10
7208.37	Of a thickness of 4.75 mm or more but not exceeding 10 mm	49	11
7208.38	Of a thickness of 3 mm or more but less than 4.75 mm	18	4
7208.39	Of a thickness of 3 mm or more	45	12
7208.40	Not in coils, not further worked than hot-rolled, with patterns in relief:	24	6
7208.53	Of a thickness of 3 mm or more but less than 4.75 mm	4	30
7208.54	Of a thickness of less than 3 mm	0	2
7208.90	Other	0	0
7210	Flat-rolled products of iron or nonalloy steel, of a width of 600 mm or more, clad, plated or coated:	N/A	N/A
7210.70	Painted, varnished or coated with plastics	0	0
7211	Flat-rolled products of iron or nonalloy steel, of a width of less than 600 mm, not clad, plated or coated:	N/A	N/A
7211.14	Other, of a thickness of 4.75 mm or more	13	0
7211.19	Other, of a width of less than 300mm	23	0
Total		600	139

Source: BIS, "Section 232 Steel and Aluminum, Published Exclusion Requests," web portal, <https://232app.azurewebsites.net/steelalum>, retrieved June 15, 2022.

Note: Exclusion requests for the particular imported products reported under the HTSUS provisions listed in the opening paragraph of the "Tariff Treatment" section above.

The product

Description and applications⁷⁰

Steel is generally defined as a combination of carbon and iron that is usefully malleable as first cast, and in which iron predominates, by weight, over each of the other contained elements and the carbon content is two percent or less, by weight.⁷¹ Carbon steel includes most common grades of steel and is generally less expensive to produce than the various grades of alloy steels, due primarily to the cost of the alloying elements.

The majority of hot-rolled steel production is consumed internally or transferred to affiliates for downstream processing into cold-rolled and/or galvanized or metallic-coated sheet products, cut-to-length plate, or welded pipe. The remainder is sold commercially to end users, service centers, and to processors for conversion into steel pipe and tube products and, in some cases, other downstream steel products, including cold-rolled steel and coated steel.

Common material specifications for hot-rolled steel include ASTM A 1011, which applies to products less than 0.230 inch in thickness, and ASTM A 1018, which applies to material 0.230 inch or greater in thickness. Both specifications cover hot-rolled carbon steel, including commercial steel, drawing quality steel, high-strength low-alloy steel, and ultra-high strength steel sheet and strip, in coils and cut lengths (coils only for A 1018).

Steel may compete against other materials, such as aluminum, plastics, and advanced composites. Hot-rolled steel is used in general structural functional areas where surface finish and light weight are not crucial. Hot-rolled steel is extensively used in automotive applications such as body frames and wheels, tubing, and floor decks in steel construction. Hot-rolled steel is also used in transportation equipment (such as rail cars, ships, and barges), non-residential construction, appliances, heavy machinery, and machine parts. Interstitial-free (“IF”) steel is low-carbon steel having unique deep-drawing ability on stamping presses.⁷² High strength-low

⁷⁰ Unless otherwise noted, this information is based on Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom Publication pp. I-19-I-21.

⁷¹ *Harmonized Tariff Schedule of the United States* (2015), chap. 72, note 1(d), Steel: Ferrous materials other than those of heading 7203 which (with the exception of certain types produced in the form of castings) are usefully malleable and which contain by weight 2 percent or less of carbon. However, chromium steels may contain higher proportions of carbon.

⁷² IF steels have very low amounts of interstitial elements (primarily carbon and nitrogen) with small amounts of titanium or niobium added to tie up the remaining interstitial atoms. Without free interstitial elements, these steels are very ductile and soft. American Iron and Steel Institute, “IF (Interstitial-Free Steel),” found at <https://www.ispatguru.com/interstitial-free-steels/#:~:text=The%20term%20'Interstitial%20Free%20steel,resulting%20in%20very%20soft%20steel.>

(continued...)

alloy (“HSLA”) steels are used in structural applications for the construction, automotive, machinery, and equipment industries where strength and other attributes are important.

Although uses of hot-rolled steel include applications where surface finish and light weight have historically not been crucial, “lightweighting” is becoming increasingly important. As a result, producers are striving to produce higher-strength steel in thinner gauges to substitute for regular-strength hot-rolled or even for cold-rolled steel in thicknesses of 2 mm or less. In the automotive sector, lightweighting is important to meet regulatory requirements such as the U.S. Corporate Average Fuel Economy (CAFE) requirements.⁷³ Lightweighting uses advanced high-strength (“AHSS”) or ultra high-strength⁷⁴ (“UHSS”) steels, which can reduce a vehicle’s structural weight by as much as 35 percent,⁷⁵ and substitutes other materials for steel as well.

AHSS and UHSS combine light weight, great strength, and a high degree of formability, among other characteristics. The increase in steel strength is achieved through alloy additions and controlled rates of cooling from processing temperatures. Specific grades of AHSS and UHSS are often designated by the acronym followed by a number roughly equal to the steel’s tensile strength measured in megapascals.⁷⁶

[&text=These%20steels%20normally%20have%20low,rate%20sensitivity%20and%20good%20formability](#), accessed November 22, 2021.

⁷³ “First enacted by Congress in 1975, the purpose of CAFE is to reduce energy consumption by increasing the fuel economy of cars and light trucks.” National Highway Traffic Safety Administration, “CAFE – Fuel Economy,” found at <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy>, accessed November 22, 2021.

⁷⁴ According to World Auto Steel, the automotive group of the World Steel Association, which provides guidelines on usage of AHSS, ultra high-strength steel (“UHSS”) is not a distinct product from AHSS and does not have official guidelines or specifications beyond those determined by the producers. In general, UHSS is a term used for AHSS with very high minimum tensile strength levels. Several companies choose 980 MPa as the threshold where “Ultra” high strength begins, while others use higher thresholds of 1180 MPa or 1270 MPa. World Auto Steel, *Defining Steels*, found at <https://ahssinsights.org/metallurgy/defining-steels/> (accessed October 11, 2022).

⁷⁵ World Steel Association, “*FutureSteelVehicle Provides Lightweight, Low Carbon Footprint Vehicle Options*,” found at <http://www.worldautosteel.org/projects/future-steel-vehicle/phase-2-results/> accessed November 22, 2021.

⁷⁶ “Megapascal” is the usual International System of Units (SI) unit for steel strength. One thousand megapascals is equivalent to about 145 thousand pounds per square inch.

Manufacturing processes⁷⁷

Broadly speaking, a producer of hot-rolled steel may be: (1) an integrated mill, producing steel from iron ore and a limited amount of scrap, and with a thick-slab casting and rolling operation; (2) a minimill or electric-arc-furnace (EAF) mill, producing steel from purchased scrap and supplemented with primary iron products (scrap substitutes), usually with a thin slab casting and rolling operation; or (3) a rolling-only operation, with no on-site steelmaking, using slabs purchased from other steelmakers (usually imported). Each of these three types of operations has an inherent cost structure that differs from the other two; an integrated producer typically has the highest fixed costs and the highest value added in its cost structure; a mini-mill generally has higher raw material costs but less value added; and a rolling-only operation has the highest raw material cost and lowest value added. The manufacturing processes for hot-rolled steel products are summarized below. In general, the production of hot-rolled steel encompasses three distinct stages: (1) melting and refining, (2) casting molten steel into semi-finished forms, and (3) hot-rolling semi-finished forms into flat-rolled carbon steel mill products.

Melt stage

Steel for the manufacture of hot-rolled steel products is produced from raw materials by either an “integrated” or “nonintegrated” process. In the integrated process, iron ore, the principal iron-containing raw material is smelted in a blast furnace, using coke, usually supplemented with coal, natural gas, or fuel oil, to produce molten pig iron, which is drained into a large ladle and transported to an oxygen steelmaking furnace. The molten pig iron is poured into a steelmaking furnace, together with a lesser amount of steel scrap and flux materials such as burnt lime, burnt dolomite, and fluorspar. High-purity oxygen is injected into the furnace and reacts with dissolved carbon and other impurities in the charge materials, raising the temperature to that necessary for further processing. Molten steel is poured from the furnace to a ladle to be transported to a ladle metallurgy station or directly to casting.

The nonintegrated, or scrap-based, process produces molten steel by melting scrap and scrap substitutes in an EAF.⁷⁸ The charge materials are melted by electrical current passing

⁷⁷ Unless otherwise noted, this information is based on Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom Publication, pp. I-21-I-26.

⁷⁸ Because scrap is generally considered to be the main raw material for electric-arc steelmaking, primary iron products that reduce the amount of scrap needed are often referred to as “scrap substitutes.” Their use depends upon their prices relative to that of scrap and upon particular end-

(continued...)

through an arc between an electrode and the material in the furnace. Oxygen is used to burn off impurities, but at a fraction of the amounts used in oxygen steelmaking. After melting, the molten steel is tapped into a ladle for further processing.

Whether integrated or nonintegrated, steelmakers often utilize a secondary steelmaking stage, also called a ladle metallurgy station. Shifting the final refining stages to the ladle metallurgy station allows shorter cycles in the primary steelmaking vessel, effectively raising steelmaking capacity. Special ladle treatments include desulfurization and vacuum degassing, which improve steel cleanliness, formability, surface quality, chemistry, and strength. Steelmakers employ additional techniques to refine the product further into extra-clean or low-carbon steels. These refinements are needed to satisfy stringent surface or internal quality, and mechanical properties.⁷⁹ Steelmakers may adjust the chemical content by adding alloying elements or by lowering the carbon content (decarburization) or adjusting the temperature of the steel for optimum casting. While carbon content may be reduced further by subsequent hydrogen annealing of the coiled steel, the steel's essential characteristics are established prior to the casting stage.

Slab casting stage

Following the production of molten steel with the desired properties, it is cast into a form that can enter the rolling process. Continuous casters convert molten steel into slabs for rolling into finished product and the vast majority of carbon sheet steels produced in the United States are continuously cast.⁸⁰ There are two broad categories of continuous casting used by most U.S. and foreign producers of hot-rolled steel products: conventional or thick-slab continuous casters and thin-slab casters. Most U.S. integrated producers use the conventional

product-related requirements for material containing smaller amounts of undesirable elements than does scrap.

⁷⁹ The goals of secondary steelmaking include controlling gases (e.g., decreasing the concentration of oxygen, hydrogen, and nitrogen, called “degassing”), reducing sulfur, removing undesirable nonmetallic inclusions such as oxides and sulfides, changing the composition and/or shape of oxides and sulfides that cannot be completely removed, and improving the mechanical properties of the finished steel. American Iron and Steel Institute, “Secondary Refining,” found at <https://www.steel.org/wp-content/uploads/2020/12/2020-AISI-Profile-Book.pdf>, retrieved August 22, 2022.

⁸⁰ Continuous slab casting bypasses several steps of the conventional ingot casting process by casting steel directly into semifinished shapes, called slabs, in the desired cross-sectional dimensions. The many benefits derived from this quicker casting method include increased yield, improved product quality, and decreased energy consumption. American Iron and Steel Institute, “Continuous Casting of Steel: Basic Principles,” found at <http://www.steel.org/Making%20Steel/How%20Its%20Made/Processes/Processes%20Info/Continuous%20Casting%20of%20Steel%20-%20Basic%20Principles.aspx>, retrieved August 22, 2022.

process, whereas most of the nonintegrated facilities use thin- or thinner-slab casting processes. Thin slab casting eliminates the need for a reheat furnace. Additional differences between thin-slab casting and conventional continuous-strand slab casting include the shape of the casting mold, the thickness of the slab, and the linkage of steel casting with direct hot rolling.

Rolling stage

Hot-rolled carbon steel flat is produced on hot-strip mills. Essential components of a hot-strip mill are a rolling mill, a run-out table for cooling the hot-rolled strip after rolling, and equipment to coil the strip. There are many different configurations of hot-strip mills depending upon the capacity of the operation, the thickness of the slabs entering the mill, and properties of the hot-rolled coil to be produced. When rolling from a thick slab, as described above, there is normally a slab heating furnace, a roughing section consisting of several rolling stands (sets of rollers), typically four or five, that reduce the slab or a single, reversing roughing mill in which the slab is rolled back and forth through the stand, and a finishing train of four to seven stands to further reduce the thickness and impart the desired surface finish to the steel. The steel exits the finishing train onto a runout table where it is cooled by water and/or air. The steel is then coiled. Hot-rolled steel destined for the outside market may either be shipped directly from the hot-rolling operation, or further processed by cleaning in an acid bath and sold as pickled band. These products are used in non-critical surface applications such as automotive frames and wheels, construction products, pipe, off-highway equipment, and guardrails.

“Thin” slabs are typically 2 to 3 inches in thickness, and are transferred directly from the casting operation to the rolling mill. Because thin slabs require fewer rolling passes than thick slabs, a roughing mill may not be required and the finishing mill may be a single, reversing mill rather than a series of in-line mills as described above. The reversing mill could be of the “Steckel” type, in which the strip is coiled between passes in special furnaces on each side of the mill, to reduce heat loss.

A more recent technology, pioneered by Nucor, is a twin-roll strip casting process that produces a solid strip approximately 2 mm thick directly from a pool of molten steel established between two counter-rotating rolls. The strip is fed directly into a hot-rolling mill for reduction to final thickness and then along a cooling table to a coiler. The first of these new facilities started up in 2002 and the second, more advanced unit started up in 2009.⁸¹ Advantages

⁸¹ In 1988, BHP Steel of Australia and Ishikawajima-Harima Heavy Industries (“IHI”) of Japan began a collaborative effort to determine the commercial feasibility of twin-roll strip casting of steel. BHP and IHI
(continued...)

claimed for the twin-roll strip casting process in comparison to conventional thick-slab or thin-slab processing include the capability to economically produce hot-rolled steel 1 to 2 mm in thickness, which can be used in some applications as a substitute for more expensive cold-rolled steel. In addition, a steel plant incorporating the twin-roll strip casting practice may be built at a much lower capital cost, with a lower economic capacity, than a conventional hot-rolling plant.

Subsequent operations

Hot-rolled steel may undergo a number of subsequent processes before being used internally by a steel producer or sold. Processing subsequent to hot-rolling may include a temper pass to improve surface finish, gauge tolerance, and coil tightness; pickling and light oil coating;⁸² and operations that level, slit, or shear hot-strip mill products to width or length. Pickling, oiling, tempering, leveling, slitting, or shearing may take place at the producing mill; alternatively, such operations may be performed by separate firms.

Users of hot-rolled steel generally prefer to purchase coils that are as large as their equipment is able to process. Large coils require fewer welds on continuous processing lines and less time lost between coils on discrete processing lines. Additionally, large coils result in less material wasted at the head and tail ends of the sheet. Coil size is generally expressed in pounds per inch of width (“PIW”). For example, a coil of hot-rolled steel, regardless of the thickness of the sheet, with a width of 60 inches and a weight of 60,000 pounds would be said to have a PIW of 1,000.

needed a partner with the ability to commercialize the process (trademarked as “Castrip”) and in 2000 Nucor Corp. joined BHP and IHI to form Castrip LLC. Castrip LLC owns the technology and Nucor has the exclusive license to the process in the United States.

⁸² During the hot-rolling process, exposure to water and air results in the formation of oxides on the surface of the steel. Pickling involves passing the hot-rolled product through a series of acid baths to remove the oxides. The material is then dried and oiled to prevent reformation of oxides and recoiled.

Domestic like product issues

In its original determination and its first, second, and third five-year review determination concerning Russia, and in its original determinations concerning Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom, the Commission defined a single domestic like product consisting of all hot-rolled steel, coextensive with Commerce's scope.⁸³ 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.⁸⁴ Domestic interested parties Nucor, SSAB, Steel Dynamics, and U.S. Steel agreed with the domestic like product definition used by the Commission in the original investigations (i.e., a single domestic like product, consisting of hot-rolled steel that is coextensive with Commerce's scope), but stated they reserve the right to comment on this issue during these full reviews.⁸⁵ Domestic interested party Cleveland-Cliffs and respondent interested party BlueScope agreed with the Commission's definitions of the domestic like product set forth in the notice of institution.⁸⁶ Respondent interested parties JFE, NSC, and USIMINAS did not object to the definition of the domestic like product but reserved the right to address this issue in the course of these proceedings.⁸⁷ Respondent interested party CSN stated it intended to address the domestic like product definition during these full reviews.⁸⁸ Respondent interested parties TATA Netherlands and TSUK stated they are evaluating issues relating to the domestic like product which they would address at a later date if necessary.⁸⁹ No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires. Domestic interested parties Cleveland-Cliffs, Nucor, SSAB, Steel Dynamics, and U.S. Steel, and respondent interested

⁸³ 86 FR 49057, September 1, 2021.

⁸⁴ Ibid.

⁸⁵ Nucor, SSAB, Steel Dynamics, and U. S. Steel's response to the notice of institution, September 30, 2021, p. 72.

⁸⁶ Cleveland Cliffs' response to the notice of institution, September 30, 2021, p. 50. BlueScope's response to the notice of institution, September 30, 2021, p. 13.

⁸⁷ JFE's response to the notice of institution, September 30, 2021, p. 14. NSC's response to the notice of institution, September 30, 2021, p. 18. USIMINAS' response to the notice of institution, September 30, 2021, p. 14.

⁸⁸ CSN's response to the notice of institution, September 30, 2021, p. 14.

⁸⁹ TATA Netherlands and TSUK also stated HTS code 7225.99.00.90 should not be used when looking at import statistics. TATA Netherlands' response to the notice of institution, September 30, 2021, p. 8. TSUK's response to the notice of institution, September 30, 2021, p. 7. Staff believe statistical reporting number 7225.99.0090 primarily includes out-of-scope merchandise and therefore excluded it from the import statistics used in this report.

party POSCO, noted in their prehearing briefs the Commission should again define the domestic like product to consist of domestically produced HRS, as defined in the scope.⁹⁰

U.S. market participants

U.S. producers

During the final phase of the original Russia investigation, the Commission received U.S. producer questionnaires from 24 firms, which accounted for 95 percent of production of hot-rolled steel in the United States during 1998.⁹¹ During the first five-year review of the suspended Russia investigation, the Commission received U.S. producer questionnaires from 19 firms, which accounted for virtually all U.S. production of hot-rolled steel in the United States during 2004.⁹² During the second five-year review of the suspended Russia investigation, the Commission received U.S. producer questionnaires from 14 firms, which accounted for all or virtually all production of hot-rolled steel in the United States during 2010.⁹³ During the third five-year review of the antidumping duty order on Russia, domestic interested parties provided data for six known and currently operating U.S. producers of hot-rolled steel, which accounted for approximately *** percent of production of hot-rolled steel in the United States during 2015.⁹⁴ The Commission conducted full first and second reviews; however, the third review was an expedited review.

During the final phase of the original Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom investigations, the Commission received U.S. producer questionnaires from 10 firms, which accounted for all known production of hot-rolled steel in the United States during 2015.⁹⁵

⁹⁰ Cleveland Cliffs' prehearing brief, p. 13. Domestic interested parties' prehearing brief, p. 7. POSCO's prehearing brief, p. 3.

⁹¹ Original Japan publication, page III-1. The publication for Brazil and Russia presents only information related specifically to Commerce's final determinations. All other data collected in the investigations is presented in the Commission's report on Japan. Original Russia publication, p. I-1.

⁹² Russia first review publication, p. III-1.

⁹³ Russia second review publication, pp. I-30 – I-31.

⁹⁴ Investigation. Nos. 731-TA-808 (Third Review): Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Russia, Confidential Report, INV-OO-064, July 25, 2016 ("Russia third review confidential report"), pp. I-3 and I-31.

⁹⁵ The 10 U.S. producers that supplied the Commission with usable questionnaire information during the original investigations were: AK Steel, ArcelorMittal USA, California Steel, EVRAZ, NLMK (Top Gun), North Star BlueScope, Nucor, SDI, SSAB and U.S. Steel. Original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and United Kingdom publication, p. III-1.

In these current proceedings, the Commission issued U.S. producers' questionnaires to 11 firms, 10 of which provided the Commission with information on their product operations.⁹⁶ These firms are believed to account for *** percent of U.S. production of hot-rolled steel in 2021.⁹⁷ Presented in table I-23 is a list of current domestic producers of product and each company's position on continuation of the orders, production location, and share of reported production of hot-rolled steel in 2021.

Table I-23
Hot-rolled steel: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2021

Share in percent

Firm	Position on orders	Production locations	Share of production
AM/NS Calvert	***	Calvert, AL	***
Big River Steel	***	Osceola, AR	***
CSI	***	Fontana, CA	***
Cleveland-Cliffs	***	Burns Harbor, IN Lyndora, PA Cleveland, OH East Chicago, IN Middletown, OH Riverdale, IL	***
EVRAZ	***	Portland, OR	***
NLMK USA	***	Farrell, PA Portage, IN	***
North Star Bluescope	***	Delta, OH	***
Nucor	***	Blytheville, AR Berkeley, SC Trinity, AL Crawfordsville, IN Ghent, KY	***

Table continued.

⁹⁶ ***.

⁹⁷ The coverage estimate is based on *** production of *** short tons in the United States in 2021.
 ***.

Table I-23 Continued

Hot-rolled steel: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2021

Share in percent

Firm	Position on orders	Production locations	Share of production
SSAB	***	Axis, AL Muscatine, IA	***
SDI	***	Butler, IN Columbus, MS Sinton, TX	***
U.S. Steel	***	Gary, IN Portage, IN Granite City, IL Ecorse, MI West Mifflin, PA	***
All firms	Various	Various	100.0

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

Note: ***.

As indicated in table I-24, U.S. producers *** are related to foreign producers of hot-rolled steel. In addition, U.S. producers *** are related to U.S. importers of hot-rolled steel. As discussed in greater detail in Part III, U.S. producers *** purchase the subject merchandise from U.S. importers. No U.S. producers directly import the subject merchandise.⁹⁸

⁹⁸ Three firms (***) are related to subject importers through common ownership. ***, a producer of hot-rolled steel in ***, owns ***, a U.S. importer of subject merchandise from Japan.

Table I-24

Hot-rolled steel: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
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***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***

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

Note: ***.

U.S. importers

During the final phase of the original Russia investigation, the Commission received U.S. importer questionnaires from 52 firms, which accounted for 74.0 percent of subject imports of hot-rolled steel from Russia during 1998.⁹⁹ Among the responding U.S. importers none were a domestic producer. During the first five-year review of the suspended Russia investigation, the Commission received U.S. importer questionnaires with usable data from 15 firms, which accounted for 60 percent of subject imports from Russia.¹⁰⁰ Among the responding U.S. importers none were a domestic producer. During the second five-year review of the suspended Russia investigation, the Commission received U.S. importer questionnaires from 37 firms, which accounted for 71.4 percent of subject imports from Russia during 2005-2010.¹⁰¹ Among the responding U.S. importers none was a domestic producer. The Commission did not receive responses from any respondent interested parties in its third five-year review of the antidumping duty order on Russia and thus the import data presented in the third reviews were based on official Commerce statistics.¹⁰² The Commission conducted full first and second reviews; however, the third review was an expedited review.

During the final phase of the original Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom investigations, the Commission received U.S. importer questionnaires from 56 companies, representing essentially all U.S imports of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, *** percent from Turkey, and *** percent from the United Kingdom.¹⁰³ Of the responding U.S. importers, four were domestic producers: ArcelorMittal USA, North Star BlueScope, CSI, and Nucor.

⁹⁹ Original Japan publication, p. IV-1.

¹⁰⁰ Russia first review publication, p. IV-1.

¹⁰¹ Russia second review publication, p. IV-1.

¹⁰² Russia third review publication, p. I-28.

¹⁰³ Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom confidential report, p. I-7.

In the current proceedings, the Commission issued U.S. importers' questionnaires to 73 firms believed to be importers of hot-rolled steel, as well as to all U.S. producers of hot-rolled steel. Usable questionnaire responses were received from 34 firms, representing 96.6 percent of total U.S. imports during 2021 and virtually all imports from subject sources during 2021.¹⁰⁴

Table I-25 lists all responding U.S. importers of hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, Russia, and the United Kingdom and other sources, their locations, and their shares of U.S. imports in 2021.

¹⁰⁴ The coverage estimate is based on questionnaire data for U.S. imports of non-alloy hot-rolled steel and does not include questionnaire data for alloy and micro-alloy hot-rolled steel for all sources except Turkey. Imports for Turkey (subject) are based on export shipment data of non-alloy and micro alloy hot-rolled steel to the United States by Turkish responding firms. Therefore, a difference in timing may impact estimates of import quantity in 2021. These data are used for coverage in lieu of official stats for Turkey (subject). U.S. imports of hot-rolled steel were compared to official U.S import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, and 7211.19.7590.

The following statistical reporting numbers are listed in Commerce's scope definition but are not included in official import statistics in this report: 7210.70.3000, 7210.90.9000, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7214.99.0060, 7214.99.0075, 7214.99.0090, 7215.90.5000, 7226.99.0180, and 7228.60.6000. Staff excluded these numbers because they primarily include out-of-scope products.

Table I-25**Hot-rolled steel: U.S. importers, their headquarters, and share of imports from subject and nonsubject sources, 2021**

Share in percent

Firm	Headquarters	Subject sources	Nonsubject sources	All import sources
AHMSA	San Antonio, TX	***	***	***
Algoma	Wilmington, DE	***	***	***
ArcelorMittal Dofasco	Hamilton, On,	***	***	***
Axis	Bryan, TX	***	***	***
Bluescope Americas	Long Beach, CA	***	***	***
CSN	Chicago, IL	***	***	***
EVRAZ	Chicago, IL	***	***	***
Hartree	New York, NY	***	***	***
Hyundai Steel	Seoul, South Korea,	***	***	***
Janco	Stoney Creek, ON	***	***	***
JFE Shoji America	Long Beach, CA	***	***	***
Macsteel	White Plains, NY	***	***	***
Marubeni Itochu	New York, NY	***	***	***
Medtrade	Houston, TX	***	***	***
Metal One	Rosemont, IL	***	***	***
NLMK Trading	Lugano, TI	***	***	***
NSC Americas	Schaumburg, IL	***	***	***
Optima	Pleasant Hill, CA	***	***	***
Plasan	Walker, MI	***	***	***
PLM Steel Tubes	Laredo, TX	***	***	***
POSCO America	Johns Creek, GA	***	***	***
POSCO International	Teaneck, NJ	***	***	***
Productos Laminados	Nuevo León, México	***	***	***
Prolamsa	Houston, TX	***	***	***
SSAB	Moon Township, PA	***	***	***
Steel Hub	Danville, IL	***	***	***
Stelco	Hamilton, ON	***	***	***
Tata International	Schaumburg, IL	***	***	***
Tata Netherlands	Ijmuiden, Netherlands,	***	***	***
Tata UK	London, UK	***	***	***
Ternium	Houston, TX	***	***	***
Thyssenkrupp Materials	Southfield, MI	***	***	***
ThyssenKrupp Steel	Southfield, MI	***	***	***
Toyota Tsusho	Various	***	***	***
All firms	Various	100.0	100.0	100.0

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

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

U.S. purchasers

The Commission received 33 usable questionnaire responses from firms that have purchased hot-rolled steel since 2016.¹⁰⁵ ¹⁰⁶ Twenty-one responding purchasers are distributors and 12 are end users. Nine are tubular goods end users, three are auto/transport end users, three are construction end users, two are appliances/machinery end users, and four are “other” end users. In general, responding U.S. purchasers were located in the Midwest, Southeast, South Central, and West Coast regions. Large purchasers of hot-rolled steel include ***.

¹⁰⁵ The following firms provides purchaser questionnaire responses: ***.

¹⁰⁶ Of the 33 responding purchasers, 28 purchased the domestic product, one purchased imports of the subject merchandise from Australia, six purchased imports of the subject merchandise from Japan, four purchased imports of the subject merchandise from the Netherlands, sixteen purchased imports of the subject merchandise from South Korea, one purchased imports of the subject merchandise from Turkey, one purchased imports of the subject merchandise from the United Kingdom and 21 purchased imports of hot-rolled steel from other sources. No purchasers reported purchasing product from Brazil and Russia.

Apparent U.S. consumption and market shares

Quantity

Table I-26 presents data on apparent U.S. consumption and U.S. market shares by quantity for hot-rolled steel. Apparent U.S. consumption increased irregularly by 0.3 percent from 2016 to 2021 but was 13.6 percent lower during January-March 2022 compared to January-March 2021. The largest changes in apparent U.S. consumption occurred during 2019-20, when apparent U.S. consumption decreased by approximately 7.7 million short tons (13.2 percent) and during 2020-2021, when apparent U.S. consumption increased by approximately 7.4 million short tons (14.6 percent). The decrease from 2019 to 2020 reflected decreases in U.S. producers' U.S. shipments, imports from subject sources, and imports from nonsubject sources. Similarly, the increase in apparent U.S. consumption from 2020 to 2021 reflected higher U.S. shipments by U.S. producers as well as increases in imports from all sources.^{107 108}

U.S. producers' market share decreased irregularly from 93.1 percent in 2016 to 93.0 percent in 2021, remaining at 93.0 percent or higher in each year and peaking at 95.3 percent in 2020. U.S. producers' market share was 92.4 percent during January-March 2022, 2.2 percentage points lower than during January-March 2021. The market shares of U.S. imports from each of the subject sources, except South Korea, were *** in every year during 2016-21 and January-March 2022. The market share for U.S. imports from South Korea ranged from *** percent to *** percent during 2016-21 and January-March 2022. The market shares of subject U.S. imports from Brazil, Russia, Turkey, and the United Kingdom each were consistently *** percent during 2016-21 and January-March 2022. Overall subject imports' market share decreased irregularly from 2.6 percent in 2016 to 1.8 percent in March 2022, with a low of 1.3 percent in 2017 and 2021.

Imports of hot-rolled steel from nonsubject sources accounted for a greater share of apparent U.S. consumption than did imports from subject sources throughout 2016-21 and January-March 2022. After increasing from 4.3 percent in 2016 to 4.8 percent in 2018, the market share of imports from nonsubject sources decreased to 3.5 percent in 2019, further declined to 3.3 percent in 2020, and then increased to 5.3 percent in 2021 and to 5.8 percent during January-March 2022.

¹⁰⁷ These changes correspond with reported decreases in demand during 2020 due to COVID followed by a supply-demand imbalance as the economy rebounded from the immediate impacts of the pandemic. Email from ***.

¹⁰⁸ For further discussions on the trends in U.S. producers' U.S. shipments, see Part III. For further discussions on trends in subject and nonsubject imports, see Part IV.

Table I-26
Hot-rolled steel: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent

Source	Measure	2016	2017	2018
U.S. producers	Quantity	53,620,345	55,941,696	57,257,632
Australia	Quantity	107,843	10,210	2,993
Brazil	Quantity	13,441	36	11
Japan	Quantity	***	***	***
Netherlands	Quantity	***	***	***
Russia	Quantity	---	6,777	---
South Korea	Quantity	***	***	***
Turkey, subject	Quantity	***	***	***
United Kingdom	Quantity	***	***	***
Subject sources	Quantity	1,523,225	761,450	1,056,388
Turkey, nonsubject	Quantity	***	***	***
All other sources	Quantity	***	***	***
Nonsubject sources	Quantity	2,467,284	2,623,784	2,917,675
All import sources	Quantity	3,990,509	3,385,235	3,974,062
All sources	Quantity	57,610,854	59,326,931	61,231,694
U.S. producers	Share of quantity	93.1	94.3	93.5
Australia	Share of quantity	0.2	0.0	0.0
Brazil	Share of quantity	0.0	0.0	0.0
Japan	Share of quantity	***	***	***
Netherlands	Share of quantity	***	***	***
Russia	Share of quantity	---	0.0	---
South Korea	Share of quantity	***	***	***
Turkey, subject	Share of quantity	***	***	***
United Kingdom	Share of quantity	***	***	***
Subject sources	Share of quantity	2.6	1.3	1.7
Turkey, nonsubject	Share of quantity	***	***	***
All other sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	4.3	4.4	4.8
All import sources	Share of quantity	6.9	5.7	6.5
All sources	Share of quantity	100.0	100.0	100.0

Table continued.

Table I-26 Continued

Hot-rolled steel: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
U.S. producers	Quantity	55,288,896	48,043,711	53,720,314	13,731,760	11,583,861
Australia	Quantity	2,241	25	---	---	---
Brazil	Quantity	336	---	---	---	8
Japan	Quantity	***	***	***	***	***
Netherlands	Quantity	***	***	***	***	***
Russia	Quantity	---	---	4	---	---
South Korea	Quantity	***	***	***	***	***
Turkey, subject	Quantity	***	***	***	***	***
United Kingdom	Quantity	***	***	***	***	***
Subject sources	Quantity	783,222	677,379	1,014,193	240,104	226,477
Turkey, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	2,009,243	1,678,843	3,043,078	542,167	725,554
All import sources	Quantity	2,792,466	2,356,222	4,057,272	782,270	952,030
All sources	Quantity	58,081,362	50,399,933	57,777,586	14,514,030	12,535,891
U.S. producers	Share of quantity	95.2	95.3	93.0	94.6	92.4
Australia	Share of quantity	0.0	0.0	---	---	---
Brazil	Share of quantity	0.0	---	---	---	0.0
Japan	Share of quantity	***	***	***	***	***
Netherlands	Share of quantity	***	***	***	***	***
Russia	Share of quantity	---	---	0.0	---	---
South Korea	Share of quantity	***	***	***	***	***
Turkey, subject	Share of quantity	***	***	***	***	***
United Kingdom	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	1.3	1.3	1.8	1.7	1.8

Table continued.

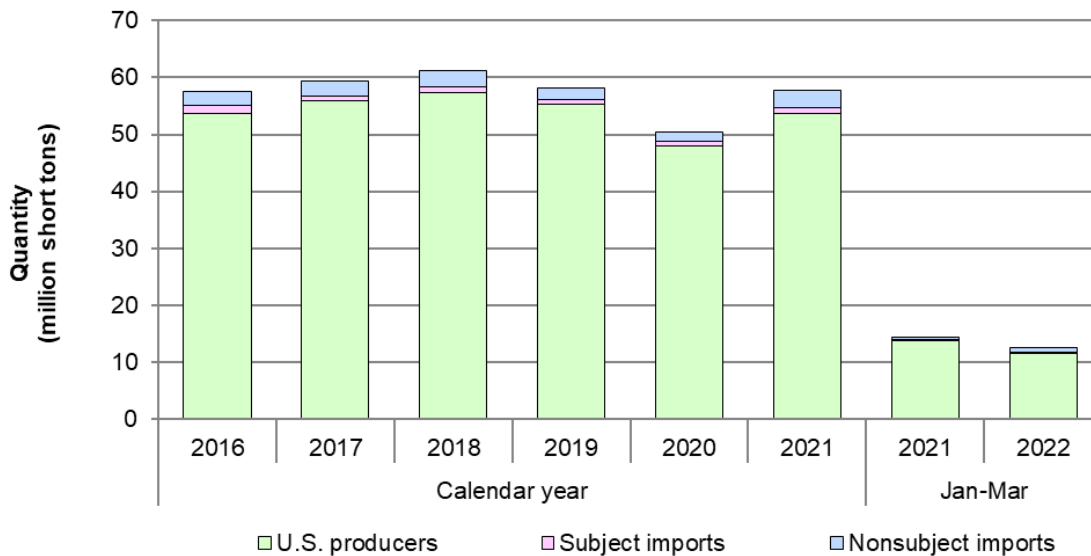
Table I-26 Continued**Hot-rolled steel: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in short tons; shares in percent

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Turkey, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	3.5	3.3	5.3	3.7	5.8
All import sources	Share of quantity	4.8	4.7	7.0	5.4	7.6
All sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, and 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series.

Figure I-2
Hot-rolled steel: Apparent U.S. consumption based on quantity, by source and period



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series.

Value

Table I-27 presents data on apparent U.S. consumption and U.S. market shares by value for hot-rolled steel. During 2016-21, the value of apparent U.S. consumption moved in same direction as quantity, increasing by 61.4 percent during 2016-18, decreasing by 41.7 percent during 2018-20, and then increasing by 158.6 percent during 2020-21; however, unlike quantity the value of apparent consumption was 31.9 percent higher during January-March 2022 compared to January-March 2021.^{109 110}

U.S. producers' market share increased irregularly from 93.2 percent in 2016 to 93.5 percent in 2021 before decreasing to 92.3 percent during January-March 2022. U.S. producers' market share by value remained at 93.2 percent or higher throughout 2016-21. Market shares by value for U.S. imports from South Korea ranged from *** percent to *** percent, with the highest market share period occurring in 2016 and the lower occurring in 2017. The market shares of subject U.S. imports from Brazil, Russia, Turkey, and the United Kingdom each were consistently *** percent during 2016-21 and January-March 2022.

Nonsubject imports' market share by value increased steadily from 4.4 percent to 4.7 percent during 2016-18, then decreased from 4.7 percent to 3.5 percent during 2018-20, and then increased to 5.0 percent in 2021 and to 5.9 percent during January-March 2022.

¹⁰⁹ During 2020-21, unit values for U.S. imports from Japan, the Netherlands, nonsubject sources, and U.S. producers' U.S. shipments increased by *** percent, while the unit values for U.S. imports from South Korea and the United Kingdom increased by *** percent and *** percent respectively. Unit values for the U.S. imports from the Netherlands, South Korea, and the United Kingdom were *** percent higher during January-March 2022 compared to January-March 2021, while unit values for U.S. producers' U.S. shipments and U.S. imports from Japan were 51.5 percent and *** percent higher, respectively, during the same time period.

¹¹⁰ For further discussions on the trends in the value of U.S. producers' U.S. shipments, see Part III. For further discussions on trends in the value of subject and nonsubject imports, see Part IV.

Table I-27
Hot-rolled steel: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2016	2017	2018
U.S. producers	Value	26,870,801	33,334,708	43,517,554
Australia	Value	35,041	4,235	2,098
Brazil	Value	5,301	48	19
Japan	Value	***	***	***
Netherlands	Value	***	***	***
Russia	Value	---	4,311	---
South Korea	Value	***	***	***
Turkey, subject	Value	***	***	***
United Kingdom	Value	***	***	***
Subject sources	Value	699,893	445,220	802,489
Turkey, nonsubject	Value	***	***	***
All other sources	Value	***	***	***
Nonsubject sources	Value	1,255,994	1,603,785	2,202,080
All import sources	Value	1,955,886	2,049,005	3,004,568
All sources	Value	28,826,687	35,383,713	46,522,122
U.S. producers	Share of value	93.2	94.2	93.5
Australia	Share of value	0.1	0.0	0.0
Brazil	Share of value	0.0	0.0	0.0
Japan	Share of value	***	***	***
Netherlands	Share of value	***	***	***
Russia	Share of value	---	0.0	---
South Korea	Share of value	***	***	***
Turkey, subject	Share of value	***	***	***
United Kingdom	Share of value	***	***	***
Subject sources	Share of value	2.4	1.3	1.7
Turkey, nonsubject	Share of value	***	***	***
All other sources	Share of value	***	***	***
Nonsubject sources	Share of value	4.4	4.5	4.7
All import sources	Share of value	6.8	5.8	6.5
All sources	Share of value	100.0	100.0	100.0

Table continued.

Table I-27 Continued
Hot-rolled steel: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
U.S. producers	Value	35,229,308	25,804,831	65,604,884	11,422,519	14,597,715
Australia	Value	1,043	21	---	---	---
Brazil	Value	249	---	---	---	11
Japan	Value	***	***	***	***	***
Netherlands	Value	***	***	***	***	***
Russia	Value	---	---	15	---	---
South Korea	Value	***	***	***	***	***
Turkey, subject	Value	***	***	***	***	***
United Kingdom	Value	***	***	***	***	***
Subject sources	Value	514,818	366,928	1,023,234	157,841	292,383
Turkey, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	1,316,057	959,581	3,523,603	409,793	926,971
All import sources	Value	1,830,875	1,326,509	4,546,837	567,634	1,219,354
All sources	Value	37,060,183	27,131,340	70,151,721	11,990,153	15,817,069
U.S. producers	Share of value	95.1	95.1	93.5	95.3	92.3
Australia	Share of value	0.0	0.0	---	---	---
Brazil	Share of value	0.0	---	---	---	0.0
Japan	Share of value	***	***	***	***	***
Netherlands	Share of value	***	***	***	***	***
Russia	Share of value	---	---	0.0	---	---
South Korea	Share of value	***	***	***	***	***
Turkey, subject	Share of value	***	***	***	***	***
United Kingdom	Share of value	***	***	***	***	***
Subject sources	Share of value	1.4	1.4	1.5	1.3	1.8

Table continued.

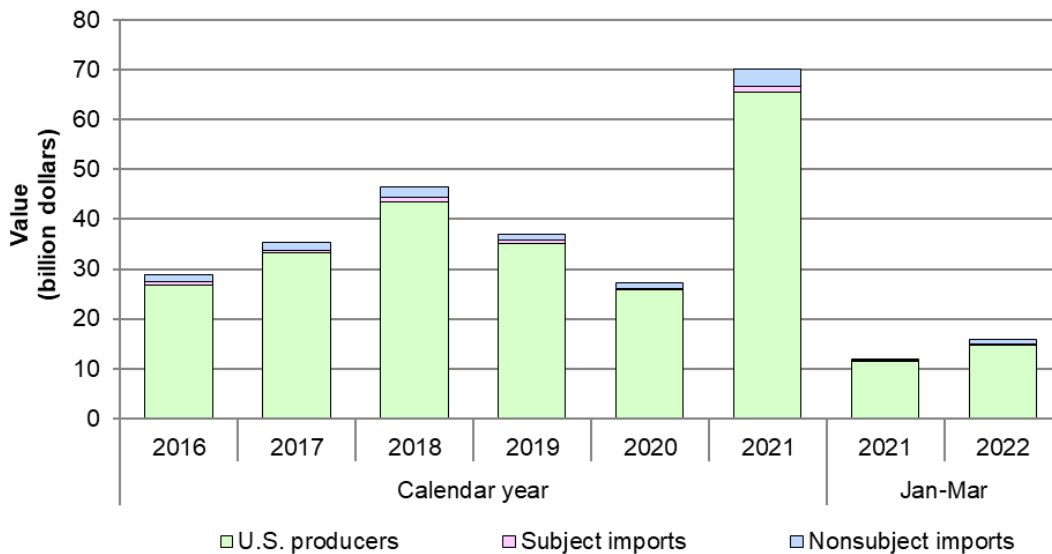
Table I-27 Continued**Hot-rolled steel: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; shares in percent

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Turkey, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	3.6	3.5	5.0	3.4	5.9
All import sources	Share of value	4.9	4.9	6.5	4.7	7.7
All sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Figure I-3
Hot-rolled steel: Apparent U.S. consumption based on value, by source and period



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

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

U.S. market characteristics

Hot-rolled steel is an input used in a variety of applications, including downstream steel products (e.g., cold-rolled and corrosion-resistant steel), pipes and tubes, construction materials, automobiles, and appliances. A large portion of hot-rolled steel is not sold on the merchant market but instead is used internally for the production of downstream products, particularly cold-rolled steel, galvanized sheet, and galvalume.¹ Major purchasers of hot-rolled steel include steel service centers and distributors, manufacturers of tubular products, and automotive and construction end users.

As discussed in greater detail in Parts I and III of this report, since 2016, the domestic hot-rolled steel industry has experienced substantial consolidation, led by Cleveland-Cliffs, Nucor, and U.S. Steel. Additionally, the domestic industry is shifting towards “decarbonization” and lower emission steel production.²

The domestic producers supply the majority of the domestic market, and nonsubject sources supply a greater share of the market than subject sources. Hot-rolled steel products from many sources have been subject to various section 232 measures since 2018, including:³

- Australia: exempt from section 232 measures.
- Brazil: exempt from section 232 duties within annual absolute quota limits.
- Japan: exempt from section 232 duties within annual tariff rate quotas.
- Netherlands: exempt from section 232 duties within annual tariff rate quotas.
- Russia: 25 percent section 232 duties.
- South Korea: exempt from section 232 duties within annual absolute quota limits
- Turkey: 25 percent section 232 duties.
- United Kingdom: exempt from section 232 duties within annual tariff rate quotas.

Apparent U.S. consumption of hot-rolled steel grew from 2016 until 2018, then decreased in 2019 and 2020 before increasing again in 2021. However, despite a 13.3 percent

¹ Hearing transcript, pp. 60 (Schneider), 225 (de Haan), and 305 (Finan).

² Hearing transcript, pp. 54 (Query) and 71 (Goncalves) and ***.

³ See Part I “Tariff treatment” for a discussion on the varying section 232 measures applied to subject sources.

decrease between 2019 and 2020, apparent U.S. consumption by 2021 was 0.3 percent higher than in 2016.

When asked whether there had been any significant changes in the product range, product mix, or marketing of hot-rolled steel since January 1, 2016, the majority of U.S. producers (6 of 11) reported that there had been, while almost all responding importers (24 of 26) reported that there had not been. Most U.S. producers (8 of 11) anticipate future changes to the product range, product mix, and/or marketing of hot-rolled steel. Regarding specific changes, U.S. producers reported that they anticipate greater volume availability due to capacity expansion, and that new types of steel include: lighter gauges, higher strengths, a greater range of thicknesses, and more “green” sustainably-produced steel with a reduced carbon footprint.

Impact of section 232 tariffs

All U.S. producers, 20 of 27 responding importers, and 30 of 33 purchasers reported that section 232 measures or changes in the measures had an impact on the hot-rolled steel market in the United States, including impacts on the cost, price, supply, and/or demand of steel since 2016. Three of 8 responding U.S. producers, 20 of 27 responding importers, and 14 of 29 responding purchasers expect section 232 measures to continue in the future. Five purchasers asked for and received a section 232 exclusion for hot-rolled steel from subject countries.⁴

U.S. producers *** credited the section 232 measures with encouraging domestic production and capacity utilization and discouraging imports of hot-rolled steel, prompting domestic investment in additional capacity and re-opening idled facilities. U.S. producer *** characterized antidumping and countervailing duty orders as having had a “more durable effect” on limiting imports than the section 232 measures, and that country and product exemptions have “narrowed” the measures’ impacts. U.S. importer *** reported that the section 232 measures created price volatility, increasing the cost of importing, and disrupted supply. U.S. importer *** reported that ***. Nearly all purchasers reported that section 232 measures increased prices for hot-rolled steel. Purchasers also reported that as availability became limited, domestic producers’ utilization and lead times

⁴ ***.

increased. However, no purchaser reported that customer demand had decreased as a result of section 232 measures.

With regard to future expectations, importer *** reported that it includes the section 232 measures into its sales prices. Importer *** reported that section 232 measures limit the company's import levels from ***. Among purchasers, only *** expects section 232 measures to be lifted in the future. Purchaser *** reported that it expects the section 232 measures will be replaced with a carbon tax. Several purchasers *** reported that section 232 measures will not affect them since they purchase domestic hot-rolled steel. Several purchasers reported that they did not know or that the trend was towards tariff rate quotas.

Channels of distribution

U.S. producers sold mainly to end users, while subject importers from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, and the United Kingdom sold mainly to steel service centers and distributors between January 2016 and March 2022, as shown in table II-1. U.S. producers internally consumed *** percent of U.S. shipments from January 2016 to March 2022. U.S. producers typically sold approximately 70 percent of their merchant market sales to end users and the rest to distributors. Importers *** and *** from 2016-21. Importers sold almost all of their U.S. shipments of hot-rolled steel from Japan to end users. Importers sold the majority of hot-rolled steel from the Netherlands to steel service centers and distributors; selling the highest share of shipments in 2017, after which the share sold declined in 2019 and 2020 before remaining constant in 2021. Importers ***.⁵ Importers sold the vast majority of hot-rolled steel from South Korea to steel distributors and service centers in 2016-21; the share sold to steel distributors and service centers declined from its peak in 2018 until 2021. Importers ***.⁶

5 ***.

6 ***.

Table II-1**Hot-rolled steel: Share of U.S. producers' and importers' U.S. shipments by channel of distribution within source, 2016-21, January to March 2021, and January to March 2022**

Shares in percent

Channel	Source	2016	2017	2018
Share to distributors	United States	33.0	31.8	30.3
Share to end users	United States	67.0	68.2	69.7
Share to distributors	Australia	***	***	***
Share to end users	Australia	***	***	***
Share to distributors	Brazil	***	***	***
Share to end users	Brazil	***	***	***
Share to distributors	Japan	***	***	***
Share to end users	Japan	***	***	***
Share to distributors	Netherlands	***	***	***
Share to end users	Netherlands	***	***	***
Share to distributors	Russia	***	***	***
Share to end users	Russia	***	***	***
Share to distributors	South Korea	***	***	***
Share to end users	South Korea	***	***	***
Share to distributors	Turkey, subject	***	***	***
Share to end users	Turkey, subject	***	***	***
Share to distributors	United Kingdom	***	***	***
Share to end users	United Kingdom	***	***	***
Share to distributors	Subject	***	***	***
Share to end users	Subject	***	***	***
Share to distributors	Turkey, nonsubject	***	***	***
Share to end users	Turkey, nonsubject	***	***	***
Share to distributors	All other sources	***	***	***
Share to end users	All other sources	***	***	***
Share to distributors	Nonsubject	***	***	***
Share to end users	Nonsubject	***	***	***
Share to distributors	All imports	68.6	63.0	70.9
Share to end users	All imports	31.4	37.0	29.1

Table continued.

Table II-1 Continued

Hot-rolled steel: Share of U.S. producers' and importers' U.S. shipments by channel of distribution within source, 2016-21, January to March 2021, and January to March 2022

Shares in percent

Channel	Source	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Share to distributors	United States	29.1	29.1	31.1	27.8	28.4
Share to end users	United States	70.9	70.9	68.9	72.2	71.6
Share to distributors	Australia	***	***	***	***	***
Share to end users	Australia	***	***	***	***	***
Share to distributors	Brazil	***	***	***	***	***
Share to end users	Brazil	***	***	***	***	***
Share to distributors	Japan	***	***	***	***	***
Share to end users	Japan	***	***	***	***	***
Share to distributors	Netherlands	***	***	***	***	***
Share to end users	Netherlands	***	***	***	***	***
Share to distributors	Russia	***	***	***	***	***
Share to end users	Russia	***	***	***	***	***
Share to distributors	South Korea	***	***	***	***	***
Share to end users	South Korea	***	***	***	***	***
Share to distributors	Turkey, subject	***	***	***	***	***
Share to end users	Turkey, subject	***	***	***	***	***
Share to distributors	United Kingdom	***	***	***	***	***
Share to end users	United Kingdom	***	***	***	***	***
Share to distributors	Subject	***	***	***	***	***
Share to end users	Subject	***	***	***	***	***
Share to distributors	Turkey, nonsubject	***	***	***	***	***
Share to end users	Turkey, nonsubject	***	***	***	***	***
Share to distributors	All other sources	***	***	***	***	***
Share to end users	All other sources	***	***	***	***	***
Share to distributors	Nonsubject	***	***	***	***	***
Share to end users	Nonsubject	***	***	***	***	***
Share to distributors	All imports	67.2	67.2	67.4	70.0	60.0
Share to end users	All imports	32.8	32.8	32.6	30.0	40.0

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

Distributor shipments by end-use markets

Steel service centers and distributors⁷ were asked to estimate the share of their firm's shipments of domestic and imported hot-rolled steel to different end-use markets in 2021. As shown in table II-2, steel service centers and distributors shipped 17.9 percent of their domestic shipments sold to end users to the tubular goods market, and 14.4 percent of their domestic shipments to the sold to end users to the auto/transportation market.

Table II-2
U.S. distributor/service centers' aggregated U.S. shipments to end users, by sector

Source	Measure	Tubular goods	Auto/ transportation	Construction/ structural
U.S.-produced U.S. shipments to end users	Quantity	7,745,555	6,236,462	4,715,692
Imported U.S. shipments to end users	Quantity	443,155	379,089	499,124
All shipments to end users regardless of source	Quantity	8,188,710	6,615,551	5,214,815
U.S.-produced U.S. shipments to end users	Share across	17.9	14.4	10.9
Imported U.S. shipments to end users	Share across	21.9	18.7	24.6
All shipments to end users regardless of source	Share across	18.0	14.6	11.5
U.S.-produced U.S. shipments to end users	Share down	94.6	94.3	90.4
Imported U.S. shipments to end users	Share down	5.4	5.7	9.6
All shipments to end users regardless of source	Share down	100.0	100.0	100.0

Table continued.

⁷ Of the 30 responding purchasers, 20 are steel service centers or distributors.

Table II-2 Continued
U.S. distributor/service centers' aggregated U.S. shipments to end users, by sector

Source	Measure	Appliances/ machinery	Other end uses/sectors	All sectors
U.S.-produced U.S. shipments to end users	Quantity	2,666,301	21,985,723	43,349,734
Imported U.S. shipments to end users	Quantity	138,397	567,198	2,026,962
All shipments to end users regardless of source	Quantity	2,804,698	22,552,921	45,376,695
U.S.-produced U.S. shipments to end users	Share across	6.2	50.7	100.0
Imported U.S. shipments to end users	Share across	6.8	28.0	100.0
All shipments to end users regardless of source	Share across	6.2	49.7	100.0
U.S.-produced U.S. shipments to end users	Share down	95.1	97.5	95.5
Imported U.S. shipments to end users	Share down	4.9	2.5	4.5
All shipments to end users regardless of source	Share down	100.0	100.0	100.0

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

Note: Share across refers to the sum of each end-use market sector column for each row, totaling 100.0 percent for all sectors. Share down refers to the sum of U.S.-produced shipments and imported U.S. shipments sold to end users, totaling 100.0 percent for all shipments to end users regardless of source.

Geographic distribution

U.S. producers and importers in aggregate reported selling hot-rolled steel to all regions in the contiguous United States (table II-3). Responding importers reported selling hot-rolled steel from Australia to the Pacific coast, from Japan to the Midwest, Southeast, Central Southwest, and Pacific Coast, from the Netherlands to the Northeast, Midwest, Southeast, Central Southwest, and Pacific Coast, from South Korea to all regions except for “Other” regions, from Turkey to the Northeast, Midwest, Central Southwest, Pacific Coast, and “Other” regions, and from the United Kingdom to the Midwest.

For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** of product from subject sources within 100 miles of their U.S. point of shipment, *** percent within 101 miles to 1,000 miles, and *** percent over 1,000 miles of their U.S. point of shipment.

Table II-3
Hot-rolled steel: Count of U.S. producers' and U.S. importers' geographic markets

Number of firms reporting

Region	U.S. producers	Australia	Brazil	Japan	Netherlands
Northeast	9	0	0	0	1
Midwest	10	0	0	2	1
Southeast	9	0	0	2	1
Central Southwest	11	0	0	3	1
Mountains	10	0	0	0	0
Pacific Coast	11	1	0	3	2
Other	1	0	0	0	0
All regions (except Other)	8	0	0	0	0
Reporting firms	11	1	0	7	2

Table continued.

Table II-3 Continued
Hot-rolled steel: Count of U.S. producers' and U.S. importers' geographic markets

Number of firms reporting

Region	Russia	South Korea	Turkey	United Kingdom	Subject sources
Northeast	0	1	2	0	4
Midwest	0	2	1	1	7
Southeast	0	4	0	0	7
Central Southwest	0	3	2	0	9
Mountains	0	1	0	0	1
Pacific Coast	0	4	2	0	8
Other	0	0	1	0	1
All regions (except Other)	0	1	0	0	1
Reporting firms	0	5	4	1	15

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-4 provides a summary of the supply factors regarding hot-rolled steel from U.S. producers and from subject countries. Producers in Russia had the highest reported capacity utilization from responding foreign producers. The United Kingdom had a substantial reduction in capacity of *** percent during 2016 to 2021. Australia experienced the next largest

increase, with 8.7 percentage points during 2016 to 2021. Domestic producers reported the lowest capacity utilization of all sources in 2021.

Table II-4
Hot-rolled steel: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	United States	Australia	Brazil	Japan	Netherlands
Capacity 2016	Quantity	72,583,078	***	***	***	***
Capacity 2021	Quantity	75,901,972	***	***	***	***
Capacity utilization 2016	Ratio	75.1	***	***	***	***
Capacity utilization 2021	Ratio	72.5	***	***	***	***
Ending inventories 2016	Ratio	***	***	***	***	***
Ending inventories 2021	Ratio	***	***	***	***	***
Home market 2021	Ratio	***	***	***	***	***
Non-US export markets 2021	Ratio	***	***	***	***	***
Ability to shift production	Count	***	***	***	***	***

Table continued.

Table II-4 Continued
Hot-rolled steel: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Factor	Measure	Russia	South Korea	Turkey	United Kingdom	Subject suppliers
Capacity 2016	Quantity	***	***	***	***	158,243,497
Capacity 2021	Quantity	***	***	***	***	152,126,802
Capacity utilization 2016	Ratio	***	***	***	***	87.1
Capacity utilization 2021	Ratio	***	***	***	***	92.4
Ending inventories 2016	Ratio	***	***	***	***	2.1
Ending inventories 2021	Ratio	***	***	***	***	2.9
Home market 2021	Ratio	***	***	***	***	81.1
Non-US export markets 2021	Ratio	***	***	***	***	18.3
Ability to shift production	Count	***	***	***	***	3 of 17

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

Note: Responding U.S. producers accounted for more than *** percent of U.S. production of hot-rolled steel in 2021. Responding foreign producer/exporter firms accounted for *** production in Australia, *** percent of production in Brazil, *** production in Japan, *** production in the Netherlands, *** percent of production in South Korea, *** percent of total production percent of imports from Turkey, *** production in the United Kingdom during 2021.

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" and Part IV, "U.S. imports and the foreign industries."

Note: Capacity utilization is measured as a ratio of production to capacity, ending inventories is measured as a ratio to total shipments, home market 2021 and non-U.S. export market 2021 shipments are measured as a share of total shipments.

Domestic production

Based on available information, U.S. producers of hot-rolled steel have the ability to respond to changes in demand with moderate changes in the quantity of shipments of U.S.-produced hot-rolled steel to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. The main factors mitigating responsiveness of supply include few production alternatives and some reported supply constraints.

U.S. producers' overall capacity increased by 4.6 percent between 2016 and 2021, while their total production increased by 1.0 percent. The ratio of U.S. producers' inventories to total shipments decreased by 0.1 percentage points. U.S. producers' exports made up *** percent of their total shipments in 2021. U.S. producers identified their major export markets as Canada and Mexico (8 firms each) as well as the European Union (1 firm). When asked about specific export constraints, U.S. producers cited excess global steel capacity, exchange rates, logistics networks, freight costs, packaging materials, lack of customer relationships, and import barriers as constraints to their ability to export. When asked whether their exports were subject to any tariff or non-tariff barriers to trade in other countries, 5 of 9 responding U.S. producers reported that they were (and 4 reported that they were not). The barriers noted included safeguard tariffs by the European Union and United Kingdom since 2016. Global supply was also noted as a disincentive to exporting.

Only two U.S. producers reported being able to shift production to or from alternate products; *** reported that it could shift to cut-to-length plate or other plate and *** also reported being able to switch to cut-to-length plate.

Subject imports from Australia

Based on available information, Bluescope, the responding producer of hot-rolled steel from Australia, has the ability to respond to changes in demand with small changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are high capacity utilization, and very low inventories. *** percent of commercial shipments were to the Australian home market during 2016-21. Capacity *** from 2016 to 2021, while production increased by *** percent, resulting in a capacity utilization decrease of ***. *** main export markets were to Asian markets. ***.

Subject imports from Brazil

Based on available information, ArcelorMittal Brasil, CSN, and USIMINAS, the three responding producers of hot-rolled steel from Brazil, have the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are high capacity utilization, very low inventories, and an inability to switch production to other products.

*** Brazilian shipments went to the Brazilian home market during 2016-21. Brazilian producers' production capacity fluctuated during 2016-21, with an overall increase of *** percent. Production also fluctuated, with an overall increase of *** percent from 2016 to 2021. Brazilian capacity utilization increased by *** percentage points between 2016 and 2021. Brazilian producers identified Portugal and Latin American countries such as Argentina, Chile, Colombia, Ecuador, Mexico, and Peru as export markets other than the United States where they developed or increased sales of hot-rolled steel since 2016. Producers from Brazil reported that they could not switch production between hot-rolled steel and other products using the same equipment and/or labor.

Subject imports from Japan

Based on available information, JFE, Kobe, and NSC, producers of hot-rolled steel from Japan, have the ability to respond to changes in demand with moderate changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are high capacity utilization, low inventories, an inability to switch production to other products, and relatively high exports to non-U.S. markets.

Japanese producers' capacity decreased by *** percent from 2016-21. Japanese producers' production fell by *** percent between 2017 and 2020, before increasing by *** percent in 2021. Overall, capacity utilization was relatively stable from 2016 to 2021. Japanese producers reported that their main export market was Asia, and specifically cited Indonesia as export markets other than the United States where they developed or increased sales of hot-rolled steel since 2016. Also, *** reported that they would increase exports to Mexico in the future. All Japanese producers of hot-rolled steel reported that they could not

shift production to other products. Reported barriers to shifting include specialized machinery not being suitable for other types of processing.

Subject imports from the Netherlands

Based on available information, TATA Netherlands, the Dutch foreign producer of hot-rolled steel, has the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are relatively high capacity utilization, low inventories, an inability to switch production to other products, and relatively high exports to non-U.S. markets.

Capacity was stable between 2016 and 2021, while production decreased by *** percent between 2017 and 2020 before increasing by *** percent between 2020 and 2021, leading capacity utilization to decline slightly. Foreign producer *** cited the EU, the United Kingdom, Mexico, and Turkey as its main export markets and ***. It also reported that ***.

Subject imports from Russia

Based on available information, producers of hot-rolled steel from Russia have the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are high capacity utilization, low inventories, and high exports to non-U.S. markets.

Capacity increased by *** percent during 2016-21, while production increased by *** percent, resulting in a *** percentage point increase in capacity utilization. One Russian producer reported that it could switch production between hot-rolled steel and other products, while the other reported that it could not. *** reported that its ability to shift is not affected by any factors, and that the product mix depends on the market. It also reported that no new export markets have been developed since 2016. ***.

Subject imports from South Korea

Based on available information, producers of hot-rolled steel from South Korea have the ability to respond to changes in demand with moderate changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of

responsiveness of supply are high capacity utilization, low inventories, and an inability to switch production to other products.

Capacity decreased by *** percent but production decreased by *** percent during 2016-21, resulting in a *** percentage point increase in its capacity utilization. Exports as a share of total shipments decreased overall by *** percentage points from 2016 to 2021. Exports to Asia accounted for *** percent of its exports in 2021. South Korean producers reported that they had increased exports to China, Malaysia, Mexico, Oman, and Saudi Arabia since 2016. All South Korean producers of hot-rolled steel reported that they could not switch production to other products using the same equipment/labor.

Subject imports from Turkey

Based on available information, Erdemir and Habas, producers of hot-rolled steel from Turkey have the ability to respond to changes in demand with moderate changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are high capacity utilization, and low inventories.

Capacity fluctuated over the period of review, declining by *** percent between 2016 and 2017 before increasing by *** percent during 2018-19 and ultimately decreasing by *** percent between 2020 and 2021. Production steadily increased over the period of review, for an overall increase of *** percent during 2016-21, resulting in a capacity utilization increase of *** percentage points. The EU was the main export market for Turkish producers of hot-rolled steel. Producer *** reported that it was able to switch production from hot-rolled steel to other products, while ***.

Subject imports from the United Kingdom

Based on available information, TSUK, the producer of hot-rolled steel from the United Kingdom, has the ability to respond to changes in demand with small changes in the quantity of shipments of hot-rolled steel to the U.S. market. The main factors contributing to this degree of responsiveness of supply are high capacity utilization, low inventories, an inability to switch production to other products, and some exports to non-U.S. markets.

TSUK's capacity decreased by more than *** percent between 2016 and 2017 before remaining constant over the rest of the period, while production decreased by *** percent during 2017-20, and its capacity utilization rate decreased by *** percentage points during 2016-21. Its shipments to the EU, its largest export market, decreased by *** percent overall during 2016-21. TSUK reported that it cannot switch production from hot-rolled steel to other products using the same equipment/labor.

Imports from nonsubject sources

Canada was the largest nonsubject source of U.S. imports of hot-rolled steel in 2021, followed by Mexico (see Part IV for more information on these imports). Nonsubject imports accounted for 62.2 percent of total imports in 2021.

Supply constraints

Six of 11 U.S. producers and 18 of 27 responding importers reported that they had not experienced supply constraints since January 1, 2016. U.S. producers reporting supply constraints cited the COVID-19 pandemic and short-term capacity constraints. Responding importers cited antidumping/countervailing duty investigations, capacity restrictions, commercial dynamics, lead times, logistical/shipping constraints, maintenance, production delays, and section 232 measures as supply constraints. Twenty of 32 responding purchasers reported supply constraints since 2016. Of these purchasers, six each reported allocations or the COVID-19 pandemic, two reported Russia's invasion of Ukraine, and two reported tariffs as supply constraints.

New suppliers

Twenty-two of 33 purchasers indicated that new suppliers entered the U.S. market since January 1, 2016, and 12 expect additional entrants. Purchasers cited expected capacity expansion/new facilities by Arcelor, Big River/U.S.S., Nucor, and Steel Dynamics.

U.S. demand

Based on available information, the overall demand for hot-rolled steel is likely to experience small to moderate changes in response to changes in price. The main contributing factors are the limited range of substitute products and the small cost share of hot-rolled steel in automotive end-use products, although hot-rolled steel has a moderate-to-large cost share in intermediate components.

End uses and cost share

U.S. demand for hot-rolled steel depends on the demand for U.S.-produced downstream products. Major end uses include automotive applications (such as body frames and wheels), pipe and tube, other transportation equipment (such as rail cars, ships, and

barges), nonresidential construction, appliances, heavy machinery, and machine parts.⁸ Except for one importer and one purchaser, all responding U.S. producers, U.S. importers, and purchasers reported no changes in end uses since 2016.⁹ According to AISI, pipe and tube was the largest market for shipments directly from U.S. producers to end users in 2016, followed by the automotive market and the construction market.¹⁰

Hot-rolled steel accounts for a small share of the cost of the ultimate end-use products in which it is used, although it accounts for a moderate share of the cost of the intermediate end-use products in which it is used.¹¹

Business cycles

Eight of 11 responding U.S. producers, 12 of 26 responding importers, and 22 of 33 purchasers indicated that the market was subject to business cycles or conditions of competition. When asked if the hot-rolled steel market is subject to distinct conditions of competition, U.S. producers cited demand conditions in end use markets, changes in government policy, excess global capacity and surges in imports of hot-rolled steel. U.S. importers reported that business cycles were seasonal for end use markets such as agriculture, automotives, construction, and drilling activities. Purchasers cited the COVID-19 pandemic, decarbonization, demand in end use markets, renewable energy, steel prices, and Ukraine as distinct conditions of competition.

⁸ *Hot-rolled steel flat products from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Publication 4638, August 2016, p. II-25.

⁹ ***.

¹⁰ *Hot-rolled steel flat products from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Publication 4638, August 2016, p. II-27.

¹¹ In the final investigations, for automotive applications, the cost share reported by U.S. producers was generally 1 to 2 percent. For pipe applications, including OCTG, U.S. producers usually reported a cost share of 70 to 90 percent, while importers usually reported within a somewhat wider range of 50 to 95 percent. Producers and/or importers also generally reported that hot-rolled steel was a small share (5 to 20 percent) of construction and truck trailer applications, but a larger share (81 to 93 percent) of cut-to-length (CTL) plate, cold-rolled, and steel service center applications. Purchasers also indicated that the share of the cost of end-use products accounted for by hot-rolled steel was in similar ranges as reported by U.S. producers and importers. Purchasers generally reported that hot-rolled steel accounted for 54 to 90 percent of pipe and tubular products, 60 to 82 percent of cold-rolled and galvanized products, and 1 to 5 percent of automobiles. Distributor and steel service center purchasers reported that hot-rolled steel was a high share (often 100 percent) of the products they sold.

Six of 9 responding U.S. producers, 5 of 15 responding importers, and 15 of 23 responding purchasers reported that business cycles or conditions of competition have changed since 2016. U.S. producers cited automotive semiconductor chip shortages, COVID-19, foreign capacity and supply increases, government policy changes, mill openings and closures, and section 232 tariffs as changes. Importers cited the COVID-19 pandemic, economic cycles, growing spread between hot-rolled coil and cold-rolled coil, recession, and worldwide supply and demand as changes. Purchasers cited the COVID-19 pandemic, extreme weather in 2021, industry consolidation amongst steel manufacturers, renewable energy, tariffs on imported steel, and the war in Ukraine as changes.

Demand trends

U.S. demand for hot-rolled steel is impacted by changes in overall U.S. economic activity, and in particular, changes in demand in the automotive, construction, and overall GDP.¹²

As shown in figure II-1, automotive demand was stable throughout 2016-19 and declined sharply in February 2020 due to the COVID-19 pandemic. Auto and light truck sales were at pre-pandemic levels by March 2021, but they began to decline again throughout the summer of 2021. In March and April 2022, they increased again, but not to pre-pandemic levels. Overall, seasonally adjusted auto and light truck sales declined by 28.8 percent from January 2016 to December 2021. Between December 2021 and August 2022, auto and light truck sales increased by 5.1 percent overall.

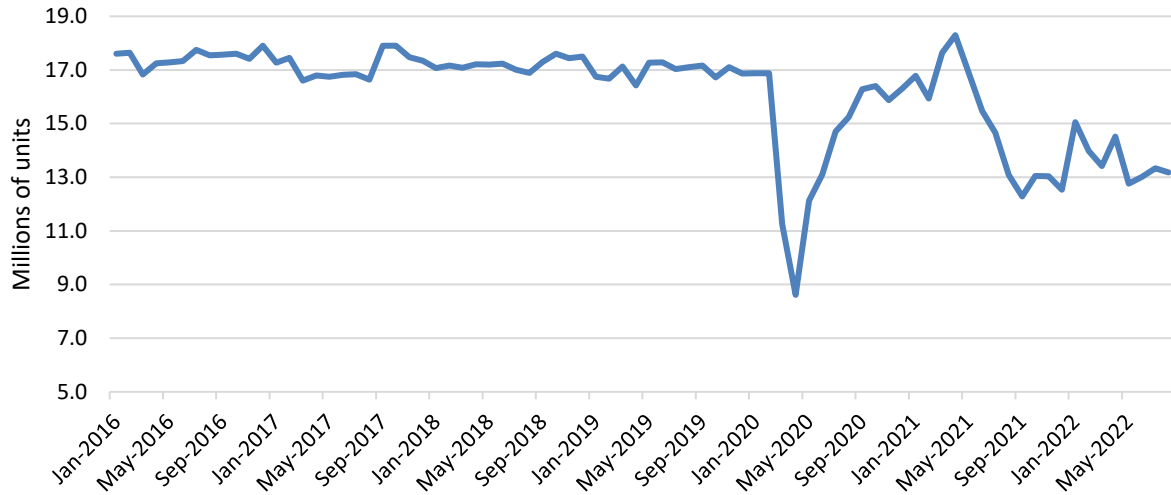
As shown with figure II-2, construction spending fluctuated slightly but generally increased during 2016-21, with the largest decline occurring during April to June 2021, which also coincided with the COVID-19 pandemic. Seasonally adjusted construction spending was 43.5 percent higher in December 2021 than it was in January 2016, and 4.8 percent higher in June 2022 than in December 2021.

Real gross domestic product (“GDP”, figure II-3)) grew by 9.3 percent from the first quarter of 2016 to the fourth quarter of 2019, before declining for two consecutive quarters in 2020 due to the COVID-19 pandemic. Real GDP increased at the end of 2020 and was 12.8 percent higher in the fourth quarter of 2021 than the first quarter of 2016, but was 0.6 percent lower in the second quarter of 2022 than the fourth quarter of 2021.

¹² *Hot-rolled steel flat products from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Publication 4638, August 2016, p. II-27.

Figure II-1

U.S. automotive sales: Automotive and light truck retail unit sales, monthly, seasonally adjusted at annual rates, millions of units, January 2016-August 2022

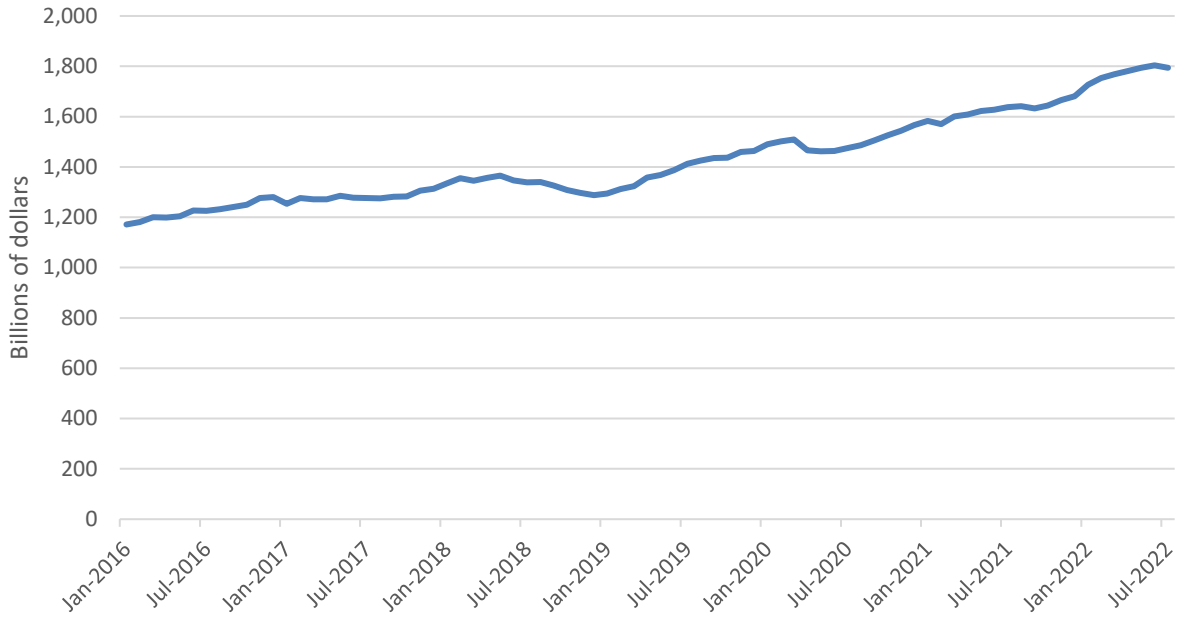


Source: U.S. Bureau of Economic Analysis, Light Weight Vehicle Sales: Autos and Light Trucks (ALTSALES), retrieved from FRED, Federal Reserve Bank of St. Louis, available at <https://fred.stlouisfed.org/series/ALTSALES>, retrieved October 10, 2022.

Note: Data for figure available in appendix E, table E-1.

Figure II-2

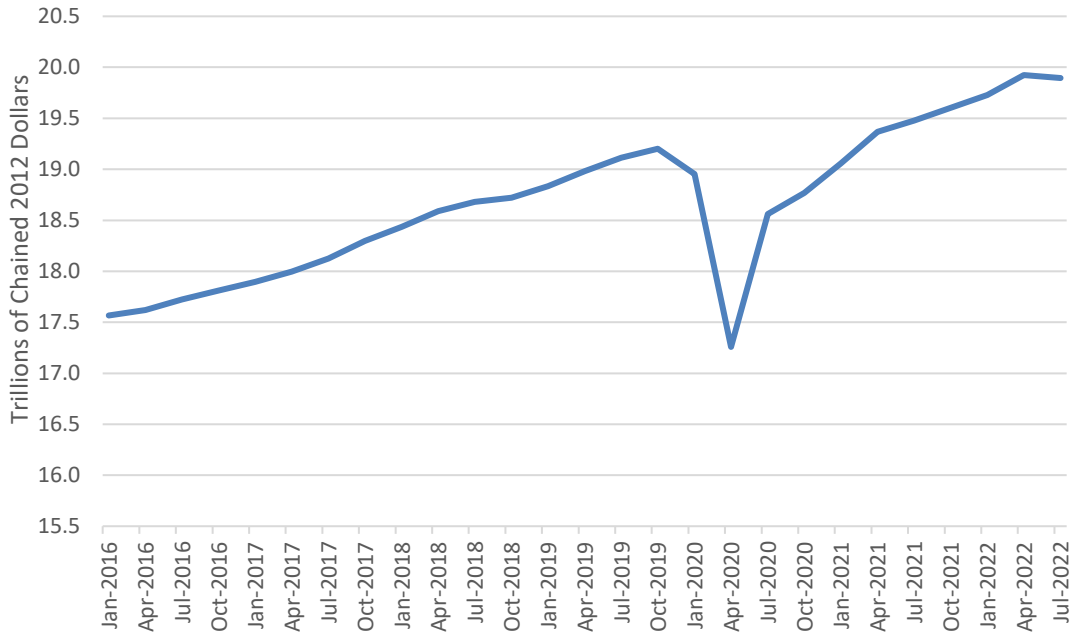
U.S. construction spending: Total construction spending, monthly, seasonally adjusted at annual rates, billions of dollars, January 2016-August 2022



Source: U.S. Census Bureau, Total Construction Spending: Total Construction in the United States (TTLCONS), retrieved from FRED, Federal Reserve Bank of St. Louis, available at <https://fred.stlouisfed.org/series/TTLCONS>, retrieved October 11, 2022.

Note: Data for figure available in appendix E, table E-2.

Figure II-3
Real GDP: Trillions of chained 2012 dollars, quarterly, seasonally adjusted annual rate, January 2016 – June 2022



Source: U.S. Bureau of Economic Analysis, Real Gross Domestic Product (GDPC1), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/GDPC1>, October 11, 2022.

Note: Data for figure available in appendix E, table E-3.

Most firms reported that U.S. demand for hot-rolled steel since January 1, 2016 had fluctuated (table II-5). Most importers and purchasers expect that U.S. demand for hot-rolled steel will continue to fluctuate over the next two years, while equal numbers of U.S. producers and foreign producers expect that U.S. demand will either increase or fluctuate (table II-6). Firms reported that the COVID-19 pandemic-related demand fluctuations, energy demand, global economic conditions and market factors, onshoring, population growth, automotive/appliance/construction downstream demand resulted in fluctuating demand for hot-rolled steel.

Table II-5**Hot-rolled steel: Count of firms' responses regarding overall and foreign demand since January 1, 2016, by firm type**

Market	Firm type	Increase	No change	Decrease	Fluctuate
U.S. demand	U.S. producers	3	0	1	7
U.S. demand	Importers	8	4	0	14
U.S. demand	Purchasers	5	7	1	17
U.S. demand	Foreign producers	5	1	0	9
Foreign demand	U.S. producers	1	0	2	4
Foreign demand	Importers	3	2	1	13
Foreign demand	Purchasers	1	8	4	7
Demand in subject home market	Foreign producers	7	0	0	9
Demand in other export markets	Foreign producers	5	2	1	8
Demand for end use products: OCTG	Purchasers	1	8	2	4
Demand for end use products: Other than OCTG	Purchasers	2	8	0	10

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

Table II-6**Hot-rolled steel: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type**

Market	Firm type	Increase	No change	Decrease	Fluctuate
U.S. demand	U.S. producers	5	0	1	5
U.S. demand	Importers	9	3	1	12
U.S. demand	Purchasers	8	8	2	12
U.S. demand	Foreign producers	7	2	1	6
Foreign demand	U.S. producers	2	0	2	1
Foreign demand	Importers	5	3	0	11
Foreign demand	Purchasers	2	8	4	4
Demand in subject home market	Foreign producers	9	0	0	7
Demand in other export markets	Foreign producers	8	1	0	7
Demand in subject countries	Purchasers	8	8	2	12
Demand in other export markets	Purchasers	2	8	4	4

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

Substitute products

Substitutes for hot-rolled steel are limited. Reported substitutes include cold-rolled steel (reported by one importer), PVC product, and third generation AHSS. Anticipated changes include the substitution of hot-rolled steel for cold-rolled steel (reported by one importer). Nearly all U.S. producers, importers, and purchasers reported that there were no changes in the number or types of products that can be substituted for hot-rolled steel since 2016 and did not anticipate any future changes in substitutes.

Substitutability issues

This section assesses the degree to which U.S.-produced hot-rolled steel and imports of hot-rolled steel from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of hot-rolled steel from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate to high degree of substitutability between domestically produced hot-rolled steel and hot-rolled steel imported from subject sources, with the possible exception of particular products for which U.S. or subject-country producers are specialized suppliers.¹³ Factors contributing to a higher level of substitutability include similarities between domestically produced hot-rolled steel and hot-rolled steel imported from subject countries across multiple purchase factors, similar quality, interchangeability between sources, and the absence of domestic content requirements. Factors that may have contributed to reducing substitutability include differences in availability, differing lead times by source, and certain specialized types of hot-rolled steel only being available from certain sources.

Factors affecting purchasing decisions¹⁴

Purchaser decisions based on source

As shown in table II-7, a plurality of purchasers always make purchasing decisions based on the producer and a plurality of their customers sometimes make purchasing decisions based on the producer. A plurality of purchasers and their customers sometimes make purchasing decisions based on country of origin. Of the 19 purchasers that reported that they always or usually make decisions based the manufacturer, firms cited the capabilities of specific coil facilities/mills and the quality performance of the producer as reasons why they did so. Purchaser *** reported that it sources hot-rolled steel from its parent

¹³ The degree of substitution between domestic and imported hot-rolled steel depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced hot-rolled steel to the hot-rolled steel imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

¹⁴ Thirty purchasers indicated they had marketing/pricing knowledge of domestic product, 5 of Australian product, 6 of Brazilian product, 10 of Japanese product, 8 of product from the Netherlands, 4 of Russian product, 17 of South Korean product, 10 of Turkish product, and 17 of product from nonsubject countries.

company, while *** reported that ***.¹⁵

Table II-7
Hot-rolled steel: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Count in number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	11	8	9	6
Customer	Producer	2	4	13	9
Purchaser	Country	9	7	11	6
Customer	Country	2	3	13	8

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

Importance of purchasing domestic product

As shown in table II-8, 28 of 30 responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. However, thirteen reported that domestic product was required by law (for 4.1 percent of their purchases in 2021), 16 reported it was required by their customers (for 16.8 percent of their purchases in 2021), and 3 reported other preferences for domestic product (for 1.6 percent of their purchases in 2021). Reasons cited for preferring domestic product included company preference and customer request/requirements.

Table II-8
Hot-rolled steel: Importance of purchasing domestic product

Shares in percent: Count in number of firms reporting

Source of purchases	Share of purchases	Count of firms
Purchases no domestic requirements	77.5	28
Purchases domestic requirements by law	4.1	13
Purchases domestic requirements by customers	16.8	16
Purchases domestic requirements other	1.6	3
Total	100.0	30

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

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for hot-rolled steel were price/cost (31 firms), quality (27 firms), and availability/supply (14 firms),

¹⁵ *** .

as shown in table II-9. Price was the most frequently cited first-most important factor (cited by 17 firms), followed by quality (12 firms); quality was also the most frequently reported second-most important factor (11 firms); and price/cost was the most frequently reported third-most important factor (9 firms).

Table II-9
Hot-rolled steel: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price / Cost	17	5	9	31
Quality	12	11	4	27
Availability / Supply	2	7	5	14
All other factors	2	10	15	NA

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

Sixteen of 33 purchasers reported that they usually purchase the lowest-priced product; 13 purchasers reported that they sometimes purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 17 factors in their purchasing decisions (table II-10). The factors rated as very important by more than half of responding purchasers were availability, price, and quality meets industry standards (31 purchasers each), reliability of supply (30), delivery time (26), product consistency (25), and quality exceeds industry standards (18). Several factors were rated as somewhat important by more than half of responding producers: product range (22 firms), prior experience with supplier (21), minimum quantity requirements and technical support/service (20 each), and delivery and payment terms (17 each).

Table II-10
Hot-rolled steel: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Availability	31	2	0
Availability of specialized, or proprietary grade steel	12	16	6
Delivery terms	15	17	3
Delivery time	26	8	0
Discounts offered	14	14	6
Minimum quantity requirements	5	20	8
Packaging	5	14	14
Payment terms	10	17	7
Price	31	2	0
Prior experience with supplier	12	21	2
Product consistency	25	8	0
Product range	11	22	1
Quality meets industry standards	31	3	0
Quality exceeds industry standards	18	14	2
Reliability of supply	30	3	0
Technical support/service	12	20	2
U.S. transportation costs	16	16	2

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

Lead times

Hot-rolled steel is primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days. U.S. importers reported that *** of their commercial shipments were produced-to-order, with lead times averaging *** days.¹⁶

Supplier certification

Eighteen of 33 responding purchasers require their suppliers to become certified or qualified to sell hot-rolled steel to their firm. Purchasers reported that the time to qualify a new supplier ranged from 1 to 365 days, with a plurality of purchasers reporting 180 days. Seven purchasers reported that two domestic suppliers and one foreign supplier had failed in their

¹⁶ For the *** percent of U.S. importers' commercial shipments from inventories, lead times averaged *** days. This is accounted for entirely by importer ***.

attempts to qualify hot-rolled steel, or had lost their approved status since 2016. *** reported that Big River Steel in Arkansas failed its initial qualification trial ***. *** reported that Ternium in Mexico was unable to because of quality. *** reported that Nucor in Tuscaloosa ***.

Minimum quality specifications

As can be seen from table II-11, 15 responding purchasers reported that domestically produced hot-rolled steel always met minimum quality specifications and 16 reported that they usually do. One purchaser (***) reported that domestically produced hot-rolled steel rarely or never met minimum quality specifications. Most responding purchasers reported that they did not know whether hot-rolled steel from subject sources met minimum quality specifications. Of those with knowledge of hot-rolled steel from subject sources, most reported that hot-rolled steel from Australia, Russia, and the Netherlands always met minimum quality specifications, and more than half reported that hot-rolled steel from South Korea usually met minimum quality specifications.

Table II-11
Hot-rolled steel: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely/Never	Don't Know
United States	15	16	1	1	0
Australia	7	1	0	0	24
Brazil	5	4	1	0	22
Japan	9	9	0	0	16
Netherlands	8	3	1	0	19
Russia	5	0	2	0	25
South Korea	7	11	1	0	13
Turkey	7	7	0	0	19
United Kingdom	5	2	1	0	24
Nonsubject sources	7	6	1	0	10

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

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

Fifteen of 33 purchasers reported factors that determined quality including: ability to meet technical specifications (API, Kenwal, and published industry standards), coating weight, chemistry, consistency, dimensions, flatness, formability, gauge control/tolerance, performance

(manufacturing and welding), properties (ASTM, chemical, mechanical), rolling, shape, surface, width control, and workability.

Changes in purchasing patterns

When asked whether they purchased hot-rolled steel from any of the subject countries before 2016, 20 of 33 purchasers reported that they did. When asked whether their pattern from subject sources changed since 2016, 6 of 33 firms reported that they discontinued purchases from subject sources due to the order. Most purchasers reported that they did not change their purchasing patterns for product from Australia, Brazil, Japan, the Netherlands, Russia, South Korea, Turkey, or the United Kingdom after the orders were initiated.

Purchasers were asked about changes in their purchasing patterns from different sources since 2016 (tables II-12 and II-13). Reasons reported for changes in sourcing included customer demand and mill availability. Specifically, four firms each reduced their purchases from Brazil and Turkey; reasons for reducing purchases from Brazil included a lack of qualified suppliers and changing customer needs, and reasons for reducing purchases from Turkey included a lack of qualified suppliers, the imposition of duties, and market factors. Eleven firms each increased their purchases or kept their purchases constant from the United States since 2016.

Nineteen of 33 responding purchasers reported that they had changed suppliers since January 1, 2016. Specifically, firms dropped or reduced purchases from Cleveland-Cliffs because of high prices and poor delivery, Macsteel because it was no longer offering material, and Nucor because of its volume requirements and contract mechanisms. Firms also reported dropping Arcelor Mittal and Nippon Steel. Firms added or increased purchases from AMNS, Arcelor Mittal Calvert, Big River Steel, Cleveland-Cliffs, Hyosung Holdings USA Inc., Mill Steel, Olympic Steel, Steel Dynamics, Target Steel, and Venture Steel. More generally, purchasers mentioned increasing domestic purchases and reducing subject country purchases, and reducing purchases from Mexico due to reliability. Purchasers also mentioned suppliers nominally changing due to industry consolidation, even though they continued purchasing from the same mill.

Table II-12**Hot-rolled steel: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries since orders went into effect**

Source of purchases	Yes, discontinued	Yes, reduced	Yes, changed	No, unchanged
United States	0	1	4	15
Australia	0	2	1	11
Brazil	2	0	2	10
Japan	0	2	3	9
Netherlands	2	0	3	11
Russia	1	0	1	11
South Korea	0	3	5	9
Turkey	1	3	5	8
United Kingdom	0	1	2	9
Nonsubject sources	21	2	3	8
Unknown sources	11	0	1	21

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

Table II-13**Hot-rolled steel: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries**

Source of purchases	Decreased	Increased	Constant	Fluctuated	Did not purchase
United States	3	11	11	6	1
Australia	1	2	1	0	27
Brazil	4	0	0	1	26
Japan	2	1	3	4	21
Netherlands	2	0	4	1	25
Russia	2	0	0	0	29
South Korea	3	7	3	7	12
Turkey	4	2	2	5	19
United Kingdom	2	0	0	0	29
Nonsubject sources	0	1	9	13	11
Unknown sources	1	0	2	3	22

Source: Compiled from data submitted in response to Commission questionnaires

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing hot-rolled steel produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 17 factors (table II-14) for which they were asked to rate the importance.

In comparisons with product from subject sources on factors other than price, the majority of purchasers rated domestic product as superior or comparable with product from each subject source on all factors. Nearly half of responding purchasers reported that the domestic product was inferior to hot-rolled steel from subject sources on price.¹⁷ A plurality of purchasers ranked domestic product as superior in comparisons with subject sources regarding availability (in comparisons with Australia, Brazil, and Russia), delivery time (in comparisons with Brazil, Japan, and South Korea), reliability of supply (in comparisons with Brazil), technical support/service (in comparisons with Brazil), and U.S. transportation costs (in comparison with Brazil). A plurality of purchasers reported that U.S. and nonsubject hot-rolled steel were comparable on packaging and technical support/service (13 purchasers each) and minimum quantity requirements, prior experience with a supplier, product consistency, quality meets industry standards, quality exceeds industry standards, and reliability of supply (12 purchasers each).

¹⁷ A rating of “inferior” on price and U.S. transportation costs indicates that the first country generally has higher prices than the second country.

Table II-14**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Australia	5	4	0
Availability of specialized, or proprietary grade steel	U.S. vs Australia	0	7	0
Delivery terms	U.S. vs Australia	0	5	4
Delivery time	U.S. vs Australia	3	5	1
Discounts offered	U.S. vs Australia	0	7	2
Minimum quantity requirements	U.S. vs Australia	0	9	0
Packaging	U.S. vs Australia	0	9	0
Payment terms	U.S. vs Australia	0	9	0
Price	U.S. vs Australia	1	2	6
Prior experience with supplier	U.S. vs Australia	1	8	0
Product consistency	U.S. vs Australia	0	9	0
Product range	U.S. vs Australia	0	6	3
Quality meets industry standards	U.S. vs Australia	0	9	0
Quality exceeds industry standards	U.S. vs Australia	0	9	0
Reliability of supply	U.S. vs Australia	2	7	0
Technical support/service	U.S. vs Australia	1	7	1
U.S. transportation costs	U.S. vs Australia	1	5	3

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Brazil	4	4	1
Availability of specialized, or proprietary grade steel	U.S. vs Brazil	3	5	0
Delivery terms	U.S. vs Brazil	4	3	2
Delivery time	U.S. vs Brazil	5	3	1
Discounts offered	U.S. vs Brazil	2	5	2
Minimum quantity requirements	U.S. vs Brazil	4	5	0
Packaging	U.S. vs Brazil	2	7	0
Payment terms	U.S. vs Brazil	3	5	1
Price	U.S. vs Brazil	2	3	4
Prior experience with supplier	U.S. vs Brazil	4	5	0
Product consistency	U.S. vs Brazil	3	6	0
Product range	U.S. vs Brazil	3	6	0
Quality meets industry standards	U.S. vs Brazil	3	6	0
Quality exceeds industry standards	U.S. vs Brazil	3	6	0
Reliability of supply	U.S. vs Brazil	5	3	1
Technical support/service	U.S. vs Brazil	4	4	1
U.S. transportation costs	U.S. vs Brazil	4	4	1

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Japan	4	11	5
Availability of specialized, or proprietary grade steel	U.S. vs Japan	3	12	3
Delivery terms	U.S. vs Japan	3	10	7
Delivery time	U.S. vs Japan	10	7	4
Discounts offered	U.S. vs Japan	2	13	3
Minimum quantity requirements	U.S. vs Japan	4	14	1
Packaging	U.S. vs Japan	1	18	1
Payment terms	U.S. vs Japan	2	16	2
Price	U.S. vs Japan	3	10	7
Prior experience with supplier	U.S. vs Japan	5	15	0
Product consistency	U.S. vs Japan	2	16	3
Product range	U.S. vs Japan	1	13	5
Quality meets industry standards	U.S. vs Japan	1	18	1
Quality exceeds industry standards	U.S. vs Japan	2	16	2
Reliability of supply	U.S. vs Japan	3	16	2
Technical support/service	U.S. vs Japan	4	15	1
U.S. transportation costs	U.S. vs Japan	5	12	3

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Netherlands	3	7	2
Availability of specialized, or proprietary grade steel	U.S. vs Netherlands	1	7	3
Delivery terms	U.S. vs Netherlands	1	11	0
Delivery time	U.S. vs Netherlands	3	9	0
Discounts offered	U.S. vs Netherlands	2	8	2
Minimum quantity requirements	U.S. vs Netherlands	2	9	1
Packaging	U.S. vs Netherlands	2	8	2
Payment terms	U.S. vs Netherlands	1	9	2
Price	U.S. vs Netherlands	1	6	5
Prior experience with supplier	U.S. vs Netherlands	2	9	1
Product consistency	U.S. vs Netherlands	2	7	3
Product range	U.S. vs Netherlands	1	9	2
Quality meets industry standards	U.S. vs Netherlands	2	8	2
Quality exceeds industry standards	U.S. vs Netherlands	2	8	2
Reliability of supply	U.S. vs Netherlands	3	8	1
Technical support/service	U.S. vs Netherlands	2	8	2
U.S. transportation costs	U.S. vs Netherlands	4	7	1

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Russia	4	2	0
Availability of specialized, or proprietary grade steel	U.S. vs Russia	2	4	0
Delivery terms	U.S. vs Russia	2	4	0
Delivery time	U.S. vs Russia	2	4	0
Discounts offered	U.S. vs Russia	1	3	2
Minimum quantity requirements	U.S. vs Russia	1	5	0
Packaging	U.S. vs Russia	1	5	0
Payment terms	U.S. vs Russia	1	5	0
Price	U.S. vs Russia	1	2	3
Prior experience with supplier	U.S. vs Russia	1	5	0
Product consistency	U.S. vs Russia	1	5	0
Product range	U.S. vs Russia	1	5	0
Quality meets industry standards	U.S. vs Russia	1	5	0
Quality exceeds industry standards	U.S. vs Russia	1	5	0
Reliability of supply	U.S. vs Russia	2	4	0
Technical support/service	U.S. vs Russia	1	5	0
U.S. transportation costs	U.S. vs Russia	3	3	0

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs South Korea	6	10	5
Availability of specialized, or proprietary grade steel	U.S. vs South Korea	4	12	3
Delivery terms	U.S. vs South Korea	5	12	4
Delivery time	U.S. vs South Korea	11	8	2
Discounts offered	U.S. vs South Korea	2	15	3
Minimum quantity requirements	U.S. vs South Korea	5	14	1
Packaging	U.S. vs South Korea	1	18	1
Payment terms	U.S. vs South Korea	2	16	2
Price	U.S. vs South Korea	3	8	10
Prior experience with supplier	U.S. vs South Korea	6	14	1
Product consistency	U.S. vs South Korea	3	16	2
Product range	U.S. vs South Korea	4	13	4
Quality meets industry standards	U.S. vs South Korea	4	15	2
Quality exceeds industry standards	U.S. vs South Korea	5	13	3
Reliability of supply	U.S. vs South Korea	6	14	1
Technical support/service	U.S. vs South Korea	7	13	0
U.S. transportation costs	U.S. vs South Korea	9	8	3

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Turkey	5	8	1
Availability of specialized, or proprietary grade steel	U.S. vs Turkey	4	9	1
Delivery terms	U.S. vs Turkey	4	9	1
Delivery time	U.S. vs Turkey	5	5	3
Discounts offered	U.S. vs Turkey	3	7	3
Minimum quantity requirements	U.S. vs Turkey	3	11	0
Packaging	U.S. vs Turkey	1	13	0
Payment terms	U.S. vs Turkey	2	11	1
Price	U.S. vs Turkey	3	5	7
Prior experience with supplier	U.S. vs Turkey	4	10	0
Product consistency	U.S. vs Turkey	3	11	0
Product range	U.S. vs Turkey	2	12	0
Quality meets industry standards	U.S. vs Turkey	2	12	0
Quality exceeds industry standards	U.S. vs Turkey	3	11	0
Reliability of supply	U.S. vs Turkey	5	8	1
Technical support/service	U.S. vs Turkey	5	8	0
U.S. transportation costs	U.S. vs Turkey	5	7	1

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs United Kingdom	1	4	0
Availability of specialized, or proprietary grade steel	U.S. vs United Kingdom	0	6	0
Delivery terms	U.S. vs United Kingdom	0	6	0
Delivery time	U.S. vs United Kingdom	1	5	0
Discounts offered	U.S. vs United Kingdom	0	4	2
Minimum quantity requirements	U.S. vs United Kingdom	1	5	0
Packaging	U.S. vs United Kingdom	0	6	0
Payment terms	U.S. vs United Kingdom	0	5	1
Price	U.S. vs United Kingdom	0	2	4
Prior experience with supplier	U.S. vs United Kingdom	0	6	0
Product consistency	U.S. vs United Kingdom	0	6	0
Product range	U.S. vs United Kingdom	0	6	0
Quality meets industry standards	U.S. vs United Kingdom	0	6	0
Quality exceeds industry standards	U.S. vs United Kingdom	0	6	0
Reliability of supply	U.S. vs United Kingdom	1	5	0
Technical support/service	U.S. vs United Kingdom	0	6	0
U.S. transportation costs	U.S. vs United Kingdom	1	5	0

Table continued.

Table II-14 Continued**Hot-rolled steel: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Nonsubject sources	3	11	0
Availability of specialized, or proprietary grade steel	U.S. vs Nonsubject sources	1	9	2
Delivery terms	U.S. vs Nonsubject sources	3	9	2
Delivery time	U.S. vs Nonsubject sources	7	6	1
Discounts offered	U.S. vs Nonsubject sources	2	10	2
Minimum quantity requirements	U.S. vs Nonsubject sources	1	12	1
Packaging	U.S. vs Nonsubject sources	1	13	0
Payment terms	U.S. vs Nonsubject sources	2	11	1
Price	U.S. vs Nonsubject sources	2	7	5
Prior experience with supplier	U.S. vs Nonsubject sources	2	12	0
Product consistency	U.S. vs Nonsubject sources	1	12	1
Product range	U.S. vs Nonsubject sources	2	10	2
Quality meets industry standards	U.S. vs Nonsubject sources	1	12	1
Quality exceeds industry standards	U.S. vs Nonsubject sources	1	12	1
Reliability of supply	U.S. vs Nonsubject sources	2	12	0
Technical support/service	U.S. vs Nonsubject sources	1	13	0
U.S. transportation costs	U.S. vs Nonsubject sources	6	5	2

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

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

Comparison of U.S.-produced and imported hot-rolled steel

In order to determine whether U.S.-produced hot-rolled steel can generally be used in the same applications as import from subject countries, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-15 to II-17, U.S. producers reported that hot-rolled steel can always be used interchangeably across sources. While importers' responses were mixed, no importer reported that hot-rolled steel is never interchangeable across sources, and a plurality of importers reported that domestically-produced hot-rolled steel is always interchangeable with imports from subject countries. Most purchasers reported that hot-rolled steel is always or frequently interchangeable across sources. *** reported that differences in interchangeability between domestically produced and German produced hot-rolled steel are mostly related to grade, quality, and cleanliness. Importers reported that interchangeability was based on the specific customer order requirements. *** reported that capacity and ability to fulfill narrow width and heavy weight coils affects interchangeability. *** reported that hot-rolled steel from the Netherlands is not interchangeable with hot-rolled steel from the United States, and mentioned the large number section 232 exclusions for hot-rolled steel from the Netherlands as evidence.

Table II-15**Hot-rolled steel: Interchangeability between product produced in the United States and in other countries reported by U.S. producers, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	9	0	0	0
United States vs. Brazil	9	0	0	0
United States vs. Japan	9	0	0	0
United States vs. Netherlands	9	0	0	0
United States vs. Russia	9	0	0	0
United States vs. South Korea	9	0	0	0
United States vs. Turkey	9	0	0	0
United States vs. United Kingdom	9	0	0	0
Australia vs. Brazil	9	0	0	0
Australia vs. Japan	9	0	0	0
Australia vs. Netherlands	9	0	0	0
Australia vs. Russia	9	0	0	0
Australia vs. South Korea	9	0	0	0
Australia vs. Turkey	9	0	0	0
Australia vs. United Kingdom	9	0	0	0
Brazil vs. Japan	9	0	0	0
Brazil vs. Netherlands	9	0	0	0
Brazil vs. Russia	9	0	0	0
Brazil vs. South Korea	9	0	0	0
Brazil vs. Turkey	9	0	0	0
Brazil vs. United Kingdom	9	0	0	0

Table continued.

Table II-15 Continued**Hot-rolled steel: Interchangeability between product produced in the United States and in other countries reported by U.S. producers, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
Japan vs. Netherlands	9	0	0	0
Japan vs. Russia	9	0	0	0
Japan vs. South Korea	9	0	0	0
Japan vs. Turkey	9	0	0	0
Japan vs. United Kingdom	9	0	0	0
Netherlands vs. Russia	9	0	0	0
Netherlands vs. South Korea	9	0	0	0
Netherlands vs. Turkey	9	0	0	0
Netherlands vs. United Kingdom	9	0	0	0
Russia vs. South Korea	9	0	0	0
Russia vs. Turkey	9	0	0	0
Russia vs. United Kingdom	9	0	0	0
South Korea vs. Turkey	9	0	0	0
South Korea vs. United Kingdom	9	0	0	0
Turkey vs. United Kingdom	9	0	0	0
United States vs. Other	9	0	0	0
Australia vs. Other	9	0	0	0
Brazil vs. Other	9	0	0	0
Japan vs. Other	9	0	0	0
Netherlands vs. Other	9	0	0	0
Russia vs. Other	9	0	0	0
South Korea vs. Other	9	0	0	0
Turkey vs. Other	9	0	0	0
United Kingdom vs. Other	9	0	0	0

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

Table II-16**Hot-rolled steel: Interchangeability between product produced in the United States and in other countries reported by U.S. importers, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	4	2	2	0
United States vs. Brazil	4	2	2	0
United States vs. Japan	4	2	6	0
United States vs. Netherlands	4	2	3	0
United States vs. Russia	4	1	2	0
United States vs. South Korea	4	2	3	0
United States vs. Turkey	4	2	3	0
United States vs. United Kingdom	4	2	1	0
Australia vs. Brazil	3	2	1	0
Australia vs. Japan	3	1	4	0
Australia vs. Netherlands	3	2	2	0
Australia vs. Russia	3	1	2	0
Australia vs. South Korea	3	2	2	0
Australia vs. Turkey	3	2	2	0
Australia vs. United Kingdom	3	2	1	0
Brazil vs. Japan	3	1	3	0
Brazil vs. Netherlands	3	2	2	0
Brazil vs. Russia	3	1	2	0
Brazil vs. South Korea	3	2	2	0
Brazil vs. Turkey	3	2	2	0
Brazil vs. United Kingdom	3	2	1	0

Table continued.

Table II-16 Continued**Hot-rolled steel: Interchangeability between product produced in the United States and in other countries reported by U.S. importers, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
Japan vs. Netherlands	3	1	3	0
Japan vs. Russia	3	1	2	0
Japan vs. South Korea	3	1	3	0
Japan vs. Turkey	3	2	2	0
Japan vs. United Kingdom	3	1	2	0
Netherlands vs. Russia	3	1	3	0
Netherlands vs. South Korea	3	2	3	0
Netherlands vs. Turkey	3	2	3	0
Netherlands vs. United Kingdom	3	2	2	0
Russia vs. South Korea	3	1	3	0
Russia vs. Turkey	3	2	2	0
Russia vs. United Kingdom	3	1	2	0
South Korea vs. Turkey	3	2	2	0
South Korea vs. United Kingdom	3	2	1	0
Turkey vs. United Kingdom	3	1	2	0
United States vs. Other	3	8	3	0
Australia vs. Other	2	3	2	0
Brazil vs. Other	2	3	1	0
Japan vs. Other	2	3	2	0
Netherlands vs. Other	2	3	2	0
Russia vs. Other	2	3	1	0
South Korea vs. Other	2	3	2	0
Turkey vs. Other	2	3	1	0
United Kingdom vs. Other	2	3	1	0

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

Table II-17**Hot-rolled steel: Interchangeability between product produced in the United States and in other countries reported by U.S. purchasers, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	10	3	0	0
United States vs. Brazil	8	3	3	0
United States vs. Japan	10	6	4	0
United States vs. Netherlands	7	4	1	2
United States vs. Russia	7	1	3	0
United States vs. South Korea	9	11	4	0
United States vs. Turkey	10	8	2	0
United States vs. United Kingdom	7	4	0	0
Australia vs. Brazil	6	0	1	0
Australia vs. Japan	7	2	1	0
Australia vs. Netherlands	6	1	0	1
Australia vs. Russia	6	0	2	0
Australia vs. South Korea	7	2	1	0
Australia vs. Turkey	6	2	1	0
Australia vs. United Kingdom	6	1	0	0
Brazil vs. Japan	7	1	2	0
Brazil vs. Netherlands	6	1	1	1
Brazil vs. Russia	6	0	2	0
Brazil vs. South Korea	7	1	2	0
Brazil vs. Turkey	6	2	1	0
Brazil vs. United Kingdom	6	1	1	0

Table continued.

Table II-17 Continued**Hot-rolled steel: Interchangeability between product produced in the United States and in other countries reported by U.S. purchasers, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
Japan vs. Netherlands	6	2	1	0
Japan vs. Russia	6	0	2	0
Japan vs. South Korea	9	3	2	0
Japan vs. Turkey	7	3	1	0
Japan vs. United Kingdom	6	2	0	0
Netherlands vs. Russia	6	0	2	1
Netherlands vs. South Korea	7	3	1	0
Netherlands vs. Turkey	6	2	1	1
Netherlands vs. United Kingdom	6	2	0	1
Russia vs. South Korea	6	0	3	0
Russia vs. Turkey	6	0	2	1
Russia vs. United Kingdom	6	0	1	0
South Korea vs. Turkey	7	4	1	0
South Korea vs. United Kingdom	6	3	0	0
Turkey vs. United Kingdom	6	1	1	0
United States vs. Other	10	4	3	1
Australia vs. Other	6	1	0	0
Brazil vs. Other	6	1	1	0
Japan vs. Other	6	2	1	0
Netherlands vs. Other	6	2	0	1
Russia vs. Other	6	0	1	0
South Korea vs. Other	6	2	1	0
Turkey vs. Other	6	1	1	0
United Kingdom vs. Other	6	2	0	0

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 hot-rolled steel from the United States, subject, or nonsubject countries. As seen in tables II-18 to II-20, most U.S. producers reported that factors other than price were never significant in sales of hot-rolled steel across sources, while a plurality of importers reported that factors other than price were sometimes significant in sales of hot-rolled steel across sources. Most purchasers reported that factors other than price were sometimes or never significant in sales of hot-rolled steel across sources except for comparisons between the United States and Japan and the United States and nonsubject sources.

Table II-18**Hot-rolled steel: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. producers, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	0	0	2	7
United States vs. Brazil	0	0	2	7
United States vs. Japan	0	0	2	7
United States vs. Netherlands	0	0	2	7
United States vs. Russia	0	0	2	7
United States vs. South Korea	0	0	2	7
United States vs. Turkey	0	0	2	7
United States vs. United Kingdom	0	0	2	7
Australia vs. Brazil	0	0	2	7
Australia vs. Japan	0	0	2	7
Australia vs. Netherlands	0	0	2	7
Australia vs. Russia	0	0	2	7
Australia vs. South Korea	0	0	2	7
Australia vs. Turkey	0	0	3	6
Australia vs. United Kingdom	0	0	2	7
Brazil vs. Japan	0	0	2	7
Brazil vs. Netherlands	0	0	2	7
Brazil vs. Russia	0	0	2	7
Brazil vs. South Korea	0	0	2	7
Brazil vs. Turkey	0	0	2	7
Brazil vs. United Kingdom	0	0	2	7

Table continued.

Table II-18 Continued**Hot-rolled steel: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. producers, by country pair**

Country pair	Always	Frequently	Sometimes	Never
Japan vs. Netherlands	0	0	2	7
Japan vs. Russia	0	0	2	7
Japan vs. South Korea	0	0	2	7
Japan vs. Turkey	0	0	2	7
Japan vs. United Kingdom	0	0	2	7
Netherlands vs. Russia	0	0	2	7
Netherlands vs. South Korea	0	0	2	7
Netherlands vs. Turkey	0	0	2	7
Netherlands vs. United Kingdom	0	0	2	7
Russia vs. South Korea	0	0	2	7
Russia vs. Turkey	0	0	2	7
Russia vs. United Kingdom	0	0	2	7
South Korea vs. Turkey	0	0	2	7
South Korea vs. United Kingdom	0	0	2	7
Turkey vs. United Kingdom	0	0	2	7
United States vs. Other	0	0	2	7
Australia vs. Other	0	0	2	7
Brazil vs. Other	0	0	2	7
Japan vs. Other	0	0	2	7
Netherlands vs. Other	0	0	2	7
Russia vs. Other	0	0	2	7
South Korea vs. Other	0	0	2	7
Turkey vs. Other	0	0	2	7
United Kingdom vs. Other	0	0	2	7

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

Table II-19**Hot-rolled steel: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. importers, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	0	0	5	2
United States vs. Brazil	0	0	5	2
United States vs. Japan	2	1	7	2
United States vs. Netherlands	0	1	4	2
United States vs. Russia	0	0	4	3
United States vs. South Korea	2	1	6	2
United States vs. Turkey	0	0	5	2
United States vs. United Kingdom	1	0	4	2
Australia vs. Brazil	0	0	4	1
Australia vs. Japan	0	1	5	1
Australia vs. Netherlands	1	0	4	1
Australia vs. Russia	0	0	4	1
Australia vs. South Korea	2	1	5	1
Australia vs. Turkey	0	0	5	1
Australia vs. United Kingdom	0	0	4	1
Brazil vs. Japan	1	0	5	1
Brazil vs. Netherlands	1	0	4	1
Brazil vs. Russia	0	0	4	1
Brazil vs. South Korea	2	1	5	1
Brazil vs. Turkey	0	0	5	1
Brazil vs. United Kingdom	0	0	4	1

Table continued.

Table II-19 Continued**Hot-rolled steel: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. importers, by country pair**

Country pair	Always	Frequently	Sometimes	Never
Japan vs. Netherlands	2	0	4	1
Japan vs. Russia	1	0	4	1
Japan vs. South Korea	2	1	5	1
Japan vs. Turkey	1	0	5	1
Japan vs. United Kingdom	1	0	4	1
Netherlands vs. Russia	1	0	4	1
Netherlands vs. South Korea	3	1	5	1
Netherlands vs. Turkey	1	0	5	1
Netherlands vs. United Kingdom	1	0	4	1
Russia vs. South Korea	2	1	5	1
Russia vs. Turkey	0	0	5	1
Russia vs. United Kingdom	0	0	4	1
South Korea vs. Turkey	0	0	5	1
South Korea vs. United Kingdom	0	0	4	1
Turkey vs. United Kingdom	0	0	4	1
United States vs. Other	1	1	7	3
Australia vs. Other	0	0	5	0
Brazil vs. Other	0	0	5	0
Japan vs. Other	2	0	5	0
Netherlands vs. Other	0	0	5	0
Russia vs. Other	0	0	5	0

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

Table II-20**Hot-rolled steel: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. purchasers, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	3	2	0	5
United States vs. Brazil	1	1	3	7
United States vs. Japan	3	5	4	6
United States vs. Netherlands	3	3	1	6
United States vs. Russia	1	1	2	5
United States vs. South Korea	3	5	8	6
United States vs. Turkey	3	3	4	8
United States vs. United Kingdom	1	3	0	6
Australia vs. Brazil	0	0	1	5
Australia vs. Japan	1	2	1	5
Australia vs. Netherlands	1	1	0	5
Australia vs. Russia	0	0	2	5
Australia vs. South Korea	1	2	1	5
Australia vs. Turkey	1	1	1	5
Australia vs. United Kingdom	0	1	0	5
Brazil vs. Japan	0	1	3	5
Brazil vs. Netherlands	1	0	2	5
Brazil vs. Russia	0	0	2	5
Brazil vs. South Korea	1	1	3	4
Brazil vs. Turkey	0	1	1	6
Brazil vs. United Kingdom	0	0	2	5

Table continued.

Table II-20 Continued**Hot-rolled steel: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. purchasers, by country pair**

Country pair	Always	Frequently	Sometimes	Never
Japan vs. Netherlands	0	1	0	6
Japan vs. Russia	0	0	2	5
Japan vs. South Korea	2	2	3	6
Japan vs. Turkey	1	1	2	6
Japan vs. United Kingdom	0	1	0	6
Netherlands vs. Russia	1	0	2	5
Netherlands vs. South Korea	0	2	2	5
Netherlands vs. Turkey	1	1	1	6
Netherlands vs. United Kingdom	1	1	1	5
Russia vs. South Korea	0	0	3	6
Russia vs. Turkey	0	0	2	5
Russia vs. United Kingdom	0	0	1	5
South Korea vs. Turkey	1	1	3	6
South Korea vs. United Kingdom	0	2	0	6
Turkey vs. United Kingdom	0	0	1	7
United States vs. Other	5	2	3	6
Australia vs. Other	0	1	0	5
Brazil vs. Other	0	0	2	5
Japan vs. Other	1	1	0	6
Netherlands vs. Other	1	1	1	5
Russia vs. Other	0	0	1	5
South Korea vs. Other	1	1	0	6
Turkey vs. Other	0	0	2	5
United Kingdom vs. Other	0	1	1	5

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

Elasticity estimates

This section discusses elasticity estimates.¹⁸

U.S. supply elasticity

The domestic supply elasticity for hot-rolled steel measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of hot-rolled steel. 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 hot-rolled steel. Analysis of these factors above indicates that the U.S. industry has the ability to increase or decrease shipments to the U.S. market; an estimate in the range of 2 to 4 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for hot-rolled steel measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of hot-rolled steel. 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 hot-rolled steel in the production of any downstream products. Based on the available information, the aggregate demand for hot-rolled steel is likely to be inelastic; a range of -0.1 to -0.3 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.¹⁹ 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, including similarities between domestically produced hot-rolled steel and hot-rolled steel imported from

¹⁸ ***. No other parties provided comments on elasticity estimates in their prehearing or posthearing briefs.

¹⁹ 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.

subject countries across multiple purchase factors, interchangeability between sources, similar quality, and the absence of domestic content requirements, the elasticity of substitution between U.S.-produced hot-rolled steel and imported hot-rolled steel is likely to be in the range of 3 to 5.

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. Eleven firms, which accounted for *** percent of domestic production of hot-rolled steel in 2021, supplied information on their operations in these reviews and other proceedings on hot-rolled steel.¹ Table III-1 lists the responding U.S. producers of hot-rolled steel and the types of production activities in which their facilities are involved.

Table III-1
Hot-rolled steel: U.S. producers’ production activities

Type of production activity	Firm
Blast furnace/oxygen furnace (“BOF”) steelmaking	Cleveland-Cliffs (acquired AK Steel and ArcelorMittal USA) U.S. Steel
Electric arc furnace (“EAF”) steelmaking	Big River Steel (owned by U.S. Steel) NLMK USA (Indiana facility) North Star BlueScope Nucor SDI SSAB
Hot rolling of purchased/imported slabs	AM/NS Calvert CSI EVRAZ NLMK USA (Pennsylvania facility)

Note: In 1999, 53.7 percent of hot-rolled steel produced in the U.S. was done through BOF while 46.3 percent was done through EAF. In 2017, 31.6 percent of hot-rolled steel produced in the U.S. was done through BOF while 68.4 percent was done through EAF. World Bureau of Metal Statistics Steel Statistical Yearbook 2000, p. 33. World Bureau of Metal Statistics Steel Statistical Yearbook 2018, p. 17.

Source: Original Australia, Brazil, Japan, Netherlands, South Korea, Turkey, and United Kingdom publication, p.III-2. Table updated to reflect industry consolidation events since the imposition of the orders.

¹ The coverage estimate is based on *** production of *** short tons in the United States in 2021. ***.

Changes experienced by the industry

The U.S. steel industry has expanded through plant openings by new and existing domestic producers and has undergone several mergers and acquisitions since January 2016. In December 2016, Big River Steel entered the industry with the opening of its electric arc furnace (“EAF”) steel mill in Osceola, Arkansas. In 2020, existing producer U.S. Steel began operations on its newly constructed EAF in Fairfield, Alabama and fully acquired Big River Steel in January 2021. Similarly, Cleveland Cliffs, an integrated steel producer, acquired both AK Steel and ArcelorMittal in 2020 becoming “the largest flat-rolled steel producer in North America.”² AM/NS Calvert is currently expanding through the construction of a new EAF which is scheduled to begin operating in 2023. SDI is currently construction a new EAF flat rolled steel mill in Sinton, Texas which is also expected to begin operations in 2023. Table III-2 summarizes the developments that have occurred in the hot-rolled steel industry since the Commission’s original investigations.

Table III-2
Hot-rolled steel: Important industry events since January 1, 2016

Item	Firm	Event
Plant opening	Big River Steel	December 2016— Big River Steel opened a new EAF steel mill in Osceola, Arkansas that had the capability to produce a range of flat-rolled steel products. The total hot-rolled steel production capacity at the mill was 1.6 million short tons per year.
Acquisition	U.S. Steel/Big River Steel	October 2019— U.S. Steel completed its acquisition of a 49.9 percent ownership interest in Big River Steel for approximately \$700 million, which implies an enterprise value of \$2.325 billion. The transaction included a call option that gave U.S. Steel the right to acquire the remaining 50.1 percent of Big River within four years at an agreed-upon price formula.
Expansion	North Star Bluescope	May 2022— North Star completed a \$700 million expansion to its EAF facility in Delta, Ohio. The expansion has created more than 100 new jobs and will increase annual hot rolled coil production by over 930,000 short tons.
Plant Closure	AK Steel	November 2019— AK steel permanently closed its Ashland Works integrated mill located in Ashland, Kentucky.
Expansion	U.S. Steel	October 2020— U.S. Steel started operations of a newly constructed electric-arc furnace (“EAF”) at its Fairfield, Alabama, operations. The EAF will have an annual steelmaking capacity of 1.6 million short tons.

² Cleveland-Cliffs Inc., “Cleveland-Cliffs Inc. Completes Acquisition of ArcelorMittal USA,” December 9, 2020, https://d1io3yog0oux5.cloudfront.net/_46bef89e9a3d93af24656b9a5b152f11/clevelandcliffs/db/1200/10545/link_to_file/Cleveland-Cliffs-Inc.-Completes-Acquisition-of-ArcelorMittal-USA-2020.pdf.

Item	Firm	Event
Acquisition	Cleveland Cliffs/AK Steel	March 2020— Cleveland Cliffs completed the acquisition of AK Steel for \$1.1 billion.
Closure	Cleveland Cliffs/AK Steel	May 2020— Cleveland Cliffs announced it was shutting down its hot strip mill, annealing and tempering operations at its newly acquired Dearborn Works facility.
Acquisition	Cleveland Cliffs/ArcelorMittal	December 2020— Cleveland Cliffs Inc. completed the acquisition of substantially all of the operations of ArcelorMittal USA LLC and its subsidiaries (“ArcelorMittal USA”), forming “the largest flat-rolled steel producer in North America.”
Idling	Cleveland Cliffs	February 2022— Cleveland Cliffs Inc. announced that it was indefinitely idling its #4 blast furnace at its Indiana Harbor integrated mill. The #3 blast furnace at the mill was previously idled, leaving the mill with just its flagship #7 blast furnace in operation.
Acquisition	EVRAZ	August 2022— EVRAZ plc announced that it is launching the process of soliciting proposals for the acquisition of its North American subsidiaries
Acquisition	U.S. Steel/Big River Steel	January 2021— U.S. Steel completed its acquisition of the remaining equity shares of Big River Steel for approximately \$774 million.
Expansion (under construction)	ArcelorMittal (owned by U.S. Steel)	December 2020— ArcelorMittal signed a definitive agreement with Nippon Steel Corporation to build an EAF at AM/NS Calvert, their 50-50 joint venture in Calvert, Alabama. Construction began in early 2021. The new furnace will have annual capacity of 1.5 million short tons per year, and is anticipated to begin operating in the first half of 2023.
Expansion (under construction)	SDI	SDI is building a new EAF flat-rolled steel mill in Sinton, Texas. The mill will have a total annual steel production capacity of 3.0 million tons. Production at this mill is anticipated to begin production in 2023.

Source: Association for Iron and Steel Technology (“AIST”), “America’s Newest Steel Mill,” August 22, 2017, https://bigriversteel.com/wp-content/uploads/2017/12/17_sept_38_50_Big_River.pdf.

U.S. Steel Corp, “United States Steel Corporation Completes Strategic Investment in Big River Steel,” <https://investors.ussteel.com/news/news-details/2019/United-States-Steel-Corporation-Completes-Strategic-Investment-in-Big-River-Steel/default.aspx>, October 31, 2019.

U.S. Steel Corp., “U. S. Steel Announces Successful Start-Up of New Electric Arc Furnace at Its Alabama Facility,” October 26, 2020, <https://investors.ussteel.com/news/news-details/2020/U.-S.-Steel-Announces-Successful-Start-Up-of-New-Electric-Arc-Furnace-at-Its-Alabama-Facility/default.aspx>

Big River Steel, “Big River Steel Expanding Arkansas Flex Mill™,” June 29, 2018, <https://bigriversteel.com/wp-content/uploads/2018/06/Big-River-Steel-Announces-Expansion-of-Osceola-Flex-Mill-FINAL.pdf>; Big River Steel, “Big River Steel Doubles Capacity: Expansion Project Achieved Ahead Of Schedule And Under Budget,” November 18, 2020, <https://bigriversteel.com/phase-two-expansion/>.

BlueScope News, “North Star facility expansion boosts production.” May 13, 2022, <https://www.bluescope.com/bluescope-news/2022/05/north-star-facility-expansion-boosts-production/>

Jones Day, “Cleveland-Cliffs acquires AK Steel in \$1.1 billion stock swap,” March 2020, <https://www.jonesday.com/en/practices/experience/2020/03/clevelandcliffs-to-acquire-ak-steel-in-1-1-billion>.

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Source (Continued): Cleveland-Cliffs Inc., “Cleveland-Cliffs Inc. Completes Acquisition of ArcelorMittal USA,” December 9, 2020, https://d1io3yog0oux5.cloudfront.net/46bef89e9a3d93af24656b9a5b152f11/clevelandcliffs/db/1200/10545/link_to_file/Cleveland-Cliffs-Inc.-Completes-Acquisition-of-ArcelorMittal-USA-2020.pdf.

EVRAZ plc, “EVRAZ is launching soliciting of proposals for its North American subsidiaries acquisition,” August 10, 2022, https://www.evraz.com/en/news-and-media/press-releases-and-news/evraz-is-launching-soliciting-of-proposals-for-its-north-american-subsidiaries-acquisition/?utm_referrer=https://www.google.com/

United States Steel Corporation Completes Big River Steel Acquisition, January 15, 2021, <https://investors.ussteel.com/news/news-details/2021/United-States-Steel-Corporation-Completes-Big-River-Steel-Acquisition/default.aspx>.

ArcelorMittal, “ArcelorMittal announces that it has today signed a definitive agreement with Nippon Steel Corporation (‘Nippon Steel’) to build an electric arc furnace (‘EAF’) at AM/NS Calvert in Alabama, USA, a 50:50 joint venture between ArcelorMittal and Nippon Steel. ArcelorMittal first announced its intention to build an EAF at AM/NS Calvert on 12 August 2020,” <https://corporate.arcelormittal.com/media/news-articles/arcelormittal-and-nippon-steel-sign-definitive-agreement-to-build-eaf-at-am-ns-calvert.>;

AL.com, “Ground broken for massive steel mill expansion near Mobile,” <https://www.al.com/news/mobile/2021/02/ground-broken-for-massive-steel-mill-expansion-near-mobile.html>.

SDI “Second Quarter 2021 Investor Call Presentation,” July 21, 2021, <https://s3.amazonaws.com/b2icontent.irpass.cc/2197/184465.pdf>.

Argus Media, “AK Steel Ashland Works ceases operations,” November 2019, <https://www.argusmedia.com/en/news/2014683-ak-steel-ashland-works-ceases-operations>.

Cleveland Cliffs, “Cleveland-Cliffs Announces Indefinite Idle of Indiana Harbor #4 Blast Furnace and Notices of Flat-Rolled Price Increase,” February 21, 2022, <https://www.clevelandcliffs.com/news/news-releases/detail/542/cleveland-cliffs-announces-indefinite-idle-of-indiana>.

Detroit News, “Former Rouge Steel mill closing some operations, throwing more than 200 out of work,” May 2 2020, <https://www.detroitnews.com/story/business/2020/05/05/cleveland-cliffs-closing-operations-ak-steel-dearborn-works-plant/3086633001/>.

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 hot-rolled steel since 2016. Ten of the 11 domestic producers which provided responses in these reviews indicated that they had experienced such changes; their responses are presented in table III-3.

Table III-3
Hot-rolled steel: Reported changes in operations since January 1, 2016

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Plant openings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged curtailments	***
Prolonged curtailments	***
Prolonged curtailments	***
Expansions	***

Type of change	Firm name and narrative on changes in operations
Expansions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Consolidations	***
Revised labor agreements	***
Revised labor agreements	***
Revised labor agreements	***
Other	***

Type of change	Firm name and narrative on changes in operations
Other	***
Other	***
Other	***

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

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of hot-rolled steel. Their responses appear in table III-4.

Table III-4
Hot-rolled steel: Anticipated changes in operations

Item	Firm name and narrative on changes in operations
SDI	***
Nucor	***
CSI	***
U.S. Steel	***

Item	Firm name and narrative on changes in operations
Big River Steel	***
North Star Bluescope	***
NLMK USA	***

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

U.S. production, capacity, and capacity utilization

Table III-5 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. U.S. producers' combined capacity increased irregularly by 4.6 percent during 2016-21, but was 5.2 percent lower during January-March 2022 compared to January-March 2021.³ Overall capacity increased by 3.3 percent during 2016-18, then declined by 1.8 percent during 2018-20 before rebounding by 3.0 percent during 2020-21.⁴

³ The decline in capacity during January-March 2022 was driven primarily by *** following the permanent shut down of ***. See email from ***, August 19, 2022.

⁴ The increase in capacity during 2016-18 largely reflects Big River Steel's entrance into the market. The decrease in capacity during 2019-20 correlated with reported decreases in demand due to COVID and associated plant shutdowns. See, e.g., *** U.S. producer questionnaire response, section II-2a.

Table III-5
Hot-rolled steel: Firm-by-firm capacity, by period

Capacity

Capacity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	72,583,078	74,408,078	75,008,078

Table continued.

Table III-5
Hot-rolled steel: Firm-by-firm capacity, by period

Capacity

Capacity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All other firms	74,808,078	73,689,820	75,901,972	19,125,243	18,126,703

Table continued.

Table III-5 Continued
Hot-rolled steel: Firm-by-firm production, by period

Production

Production in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	54,498,225	57,313,746	58,481,583

Table continued.

Table III-5 Continued
Hot-rolled steel: Firm-by-firm production, by period

Production

Production in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	56,296,852	49,098,465	55,025,234	14,121,051	11,678,887

Table continued.

Table III-5 Continued
Hot-rolled steel: Firm-by-firm capacity utilization, by period

Capacity utilization

Capacity utilization ratios in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	75.1	77.0	78.0

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity

Table continued.

Table III-5 Continued
Hot-rolled steel: Firm-by-firm capacity utilization, by period

Capacity utilization

Capacity utilization ratios in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	75.3	66.6	72.5	73.8	64.4

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity

Table continued.

Table III-5 Continued
Hot-rolled steel: Firm-by-firm share of production, by period

Share of production

Share of production in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	100.0	100.0	100.0

Table continued.

Table III-5 Continued
Hot-rolled steel: Firm-by-firm share of production, by period

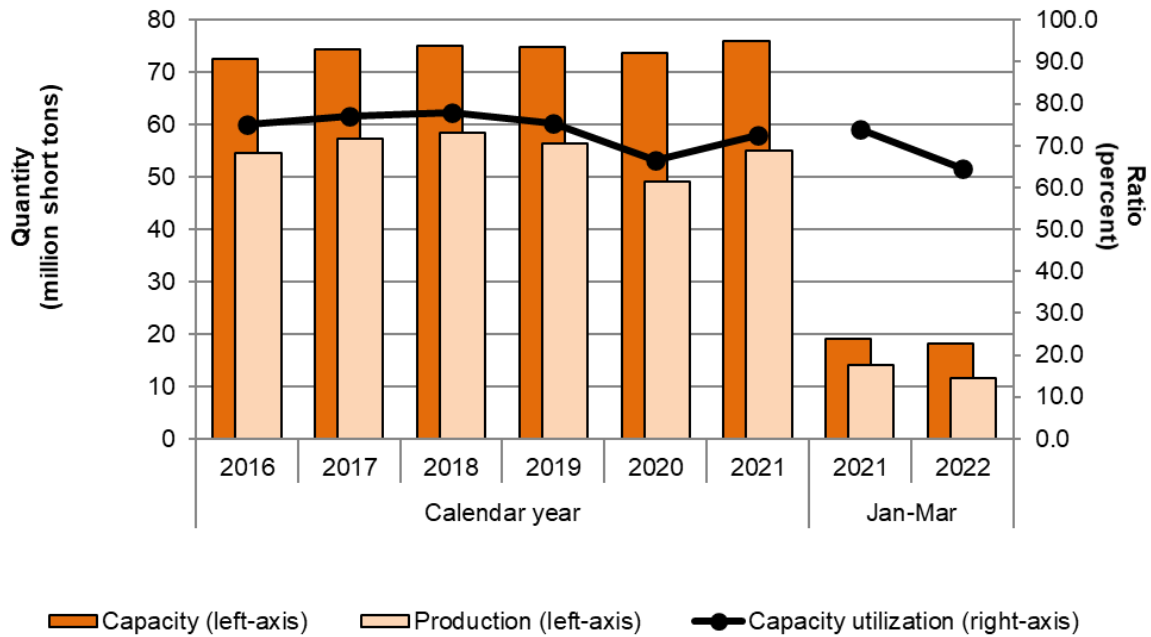
Share of production

Share of production in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure III-1
Hot-rolled steel: U.S. producers' production, capacity, and capacity utilization, by period



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

Following a similar trend to capacity, U.S. producers' combined production increased irregularly with a net increase of 1.0 percent during 2016-21 but was 17.3 percent lower during January-March 2022 compared to January-March 2021. Overall production increased by 7.3 percent during 2016-18, then declined by 16.0 percent during 2018-20 before rebounding by 12.1 percent during 2020-21.

Overall U.S. producers' capacity utilization rate decreased irregularly by 2.6 percentage points between during 2016-21 and was 9.4 percentage points lower during January-March 2022 compared to January-March 2021. *** and *** each maintained a capacity utilization rate above 90 percent throughout 2016-21 and January-March 2022, while ***, ***, and ***, each of which acquire slabs as part of their production process, experienced capacity utilization rates below 60 percent throughout the same time period.

Alternative products

As shown in table III-6, hot-rolled steel accounted for *** of total production on shared equipment during 2016-21 and January-March 2022. Four firms reported producing out-of-scope merchandise using the same equipment as subject production.⁵

Table III-6
Hot-rolled steel: U.S. producers' overall capacity and production on the same equipment as subject production, by period

Quantity in short tons; ratio and share in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	75,223,409	77,048,409	77,648,409
Hot-rolled steel production	Quantity	54,498,225	57,313,746	58,481,583
Other production	Quantity	3,103,307	3,268,892	3,377,479
Total production	Quantity	57,601,532	60,582,638	61,859,062
Overall capacity utilization	Ratio	76.6	78.6	79.7
Hot-rolled steel production	Share	94.6	94.6	94.5
Other production	Share	5.4	5.4	5.5
Total production	Share	100.0	100.0	100.0

Table continued.

Table III-6 Continued
Hot-rolled steel: U.S. producers' overall capacity and production on the same equipment as subject production, by period

Quantity in short tons; ratio and share in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Overall capacity	Quantity	77,448,409	76,330,151	78,542,303	***	***
Hot-rolled steel production	Quantity	56,296,852	49,098,465	55,025,234	14,121,051	11,678,887
Other production	Quantity	3,232,409	3,117,942	3,184,628	***	***
Total production	Quantity	59,529,261	52,216,407	58,209,862	***	***
Overall capacity utilization	Ratio	76.9	68.4	74.1	***	***
Hot-rolled steel production	Share	94.6	94.0	94.5	***	***
Other production	Share	5.4	6.0	5.5	***	***
Total production	Share	100.0	100.0	100.0	100.0	100.0

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

⁵ ***, **, *, and *** reported producing ***.

Constraints on capacity

Ten of the 11 responding U.S. producers reported constraints in the manufacturing process. ***. ***. ***. ***. ***.

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

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments consistently accounted for more than 95 percent of total shipments by quantity. Internal consumption's share of U.S. shipments by quantity ranged between *** percent and *** percent during 2016-21 and January-March 2022, while transfers to related firms' share of U.S. shipments ranged between *** and *** percent during the same time period.⁶ U.S. shipments increased irregularly by 0.2 percent during 2016-21 and were 15.6 percent lower during January-March 2022 compared to January-March 2021. U.S. shipments initially increased by 6.8 percent during 2016-18 before declining by 16.1 percent during 2018-20. U.S. shipments increased by 11.8 percent during 2020-21 but remained lower than U.S. shipments reported during the 2018 peak. During 2019-20, commercial U.S. shipments and internal consumption decreased by *** percent and *** percent respectively, while transfers to related firms increased by *** percent during the same time period.⁷

⁶ Appendix J presents data on responding U.S. producers' commercial U.S. shipments, internal consumption, and transfers to related firms during 2016-21.

⁷ The increase in transfers to related firms during 2019-20 was primarily driven by ***. ***. See email from ***, August 19, 2022.

Table III-7
Hot-rolled steel: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; shares in percent

Item	Measure	2016	2017	2018
U.S. shipments	Quantity	53,620,345	55,941,696	57,257,632
Export shipments	Quantity	912,047	1,310,122	1,131,266
Total shipments	Quantity	54,532,392	57,251,818	58,388,898
U.S. shipments	Value	26,870,801	33,334,708	43,517,554
Export shipments	Value	483,062	623,797	607,990
Total shipments	Value	27,353,863	33,958,505	44,125,544
U.S. shipments	Unit value	501	596	760
Export shipments	Unit value	530	476	537
Total shipments	Unit value	502	593	756
U.S. shipments	Share of quantity	98.3	97.7	98.1
Export shipments	Share of quantity	1.7	2.3	1.9
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	98.2	98.2	98.6
Export shipments	Share of value	1.8	1.8	1.4
Total shipments	Share of value	100.0	100.0	100.0

Table continued.

Table III-7 Continued
Hot-rolled steel: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; shares in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
U.S. shipments	Quantity	55,288,896	48,043,711	53,720,314	13,731,760	11,583,861
Export shipments	Quantity	1,179,612	1,194,279	1,133,186	300,450	258,743
Total shipments	Quantity	56,468,508	49,237,990	54,853,500	14,032,210	11,842,604
U.S. shipments	Value	35,229,308	25,804,831	65,604,884	11,422,519	14,597,715
Export shipments	Value	639,888	529,089	710,155	159,938	189,104
Total shipments	Value	35,869,196	26,333,920	66,315,039	11,582,457	14,786,819
U.S. shipments	Unit value	637	537	1,221	832	1,260
Export shipments	Unit value	542	443	627	532	731
Total shipments	Unit value	635	535	1,209	825	1,249
U.S. shipments	Share of quantity	97.9	97.6	97.9	97.9	97.8
Export shipments	Share of quantity	2.1	2.4	2.1	2.1	2.2
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	98.2	98.0	98.9	98.6	98.7
Export shipments	Share of value	1.8	2.0	1.1	1.4	1.3
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

U.S. producers' inventories

Table III-8 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' inventories increased irregularly by 1.0 percent during 2016-21 but were 5.4 percent lower during January-March 2022 compared to January-March 2021. Inventories increased by 9.9 percent during 2016-18, then decreased by 18.1 percent during 2018-20 before rebounding by 12.2 percent during 2020-21. The ratio of U.S. producers' inventories to U.S. production ranged between 2.6 percent and 3.0 percent during 2016-21 and January-March 2022, while the ratio of U.S. producers' inventories to U.S. shipments ranged between 2.7 percent and 3.1 percent during the same time period.

Table III-8
Hot-rolled steel: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio are inventories to production and shipments

Item	Measure	2016	2017	2018
End-of-period inventory	Quantity	1,563,891	1,625,819	1,718,503
Inventory to U.S. production	Ratio	2.9	2.8	2.9
Inventory to U.S. shipments	Ratio	2.9	2.9	3.0
Inventory to total shipments	Ratio	2.9	2.8	2.9

Table continued.

Table III-8 Continued
Hot-rolled steel: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio are inventories to production and shipments

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
End-of-period inventory	Quantity	1,546,843	1,407,321	1,579,054	1,496,161	1,415,337
Inventory to U.S. production	Ratio	2.7	2.9	2.9	2.6	3.0
Inventory to U.S. shipments	Ratio	2.8	2.9	2.9	2.7	3.1
Inventory to total shipments	Ratio	2.7	2.9	2.9	2.7	3.0

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

U.S. producers' imports from subject sources

U.S. producers' imports of hot-rolled steel are presented in table III-9, table III-10, and table III-11. No U.S. producer imported hot-rolled steel from subject sources during 2016-21 and January-March 2022; however three firms (***) are related to subject importers through common ownership.⁸ *** reported imports from ***. The ratio of ***'s imports from *** to ***'s U.S. production ranged from *** percent to *** percent during the same time period. *** reported imports from ***, and imports from *** and ***. The ratio of ***'s imports from *** to ***'s U.S. production was *** percent in 2016 and ranged from *** percent to *** percent during ***. The ratio of ***'s imports from *** and *** to ***'s U.S. production was *** percent each during ***. *** only reported imports from *** in *** and the ratio of those imports to *** production was less than *** percent.

⁸ ***.

Table III-9**Hot-rolled steel: ***'s U.S. production, affiliated U.S. importer ***'s subject imports, and ratio of imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2016	2017	2018
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***

Table continued.

Table III-9 Continued**Hot-rolled steel: ***'s U.S. production, affiliated U.S. importer ***'s subject imports, and ratio of imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

Table III-10**Hot-rolled steel: ***'s U.S. production, affiliated U.S. importer ***'s subject imports, and ratio of imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2016	2017	2018
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from subject sources	Quantity	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***

Table continued.

Table III-10 Continued**Hot-rolled steel: ***'s U.S. production, affiliated U.S. importer ***'s subject imports, and ratio of imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***

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

Table III-11**Hot-rolled steel: ***'s U.S. production, affiliated U.S. importer ***'s subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2016	2017	2018
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***

Table continued.

Table III-11 Continued**Hot-rolled steel: ***'s U.S. production, affiliated U.S. importer ***'s subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2020	Jan-Mar 2021
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

Table III-12**Hot-rolled steel: U.S. producers' reasons for importing**

Item	Narrative response on reason(s) for importation
***'s reason for importing	***

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

U.S. producers' purchases of imports from subject sources

U.S. producers' purchases of imports from subject sources and their reasons for purchasing are presented in table III-13, table III-14, and table III-15. *** reported purchases of imports from *** and *** in 2021 and during January-March 2022. *** reported purchases of imports from Japan each year during 2016-21 and January-March 2022 except in 2017 and 2019.

Table III-13

Hot-rolled steel: *'s purchases of imports from subject sources, by source, importer of record, and period**

Quantity in short tons; ratio in percent

Item	Measure	2016	2017	2018
*** U.S. purchases of imports from ***	Quantity	***	***	***
U.S. importers *** U.S. imports from ***	Quantity	***	***	***
Producer's purchases to importers' imports from ***	Ratio	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***
Producer's purchases to overall imports from ***	Ratio	***	***	***
*** U.S. purchases of imports from ***	Quantity	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***
Producer's purchases to overall imports from ***	Ratio	***	***	***

Table continued.

Table III-13 Continued

Hot-rolled steel: *'s purchases of imports from subject sources, by source, importer of record, and period**

Quantity in short tons; ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
*** U.S. purchases of imports from ***	Quantity	***	***	***	***	***
U.S. importers *** U.S. imports from ***	Quantity	***	***	***	***	***
Producer's purchases to importers' imports from ***	Ratio	***	***	***	***	***
Overall U.S. imports from ***	Quantity	159,834	124,925	282,668	47,342	94,901
Producer's purchases to overall imports from ***	Ratio	***	***	***	***	***
*** U.S. purchases of imports from ***	Quantity	***	***	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***	***	***
Producer's purchases to overall imports from ***	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 14th, 2022. Imports are based on the imports for consumption data series.

Table III-14**Hot-rolled steel: ***'s purchases of imports from subject sources, by source, importer of record, and period**

Quantity in short tons; ratio in percent

Item	Measure	2016	2017	2018
*** U.S. purchases of imports from ***	Quantity	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***
Producer's purchases to overall imports from ***	Ratio	***	***	***

Table continued.

Table III-14 Continued**Hot-rolled steel: ***'s purchases of imports from subject sources, by source, importer of record, and period**

Quantity in short tons; ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
*** U.S. purchases of imports from ***	Quantity	***	***	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***	***	***
Producer's purchases to overall imports from ***	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 14th, 2022. Imports are based on the imports for consumption data series.

Table III-15**Hot-rolled steel: U.S. producers' reasons for purchasing**

Item	Narrative response on purchases
***'s reason for importing	***
***'s reason for importing	***

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

U.S. employment, wages, and productivity

Table III-16 shows U.S. producers' employment-related data. The number of PRWs reported by U.S. producers' combined increased during 2016-19, decreased during 2020-21, but were slightly higher during January-March 2022 compared to January-March 2021. Hourly wages increased steadily by 24.0 percent during 2016-21, and were higher during January-March 2022 compared to January-March 2021. Total hours worked declined by 2.9 percent during 2016-21 but were 4.2 percent higher during January-March 2022 compared to January-March 2021. Productivity, in contrast, increased by 4.0 percent during 2016-21 and was 20.6 percent lower during January-March 2022 compared to January-March 2021.

Table III-16

Hot-rolled steel: U.S. producers' employment related information, by period

Item	2016	2017	2018
Production and related workers (PRWs) (number)	14,379	14,490	15,280
Total hours worked (1,000 hours)	30,106	31,283	33,113
Hours worked per PRW (hours)	2,094	2,159	2,167
Wages paid (\$1,000)	1,150,797	1,244,134	1,348,901
Hourly wages (dollars per hour)	\$38.22	\$39.77	\$40.74
Productivity (short tons per 1,000 hours)	1,810.2	1,832.1	1,766.1
Unit labor costs (dollars per short ton)	\$21.12	\$21.71	\$23.07

Table continued.

Table III-16 Continued

Hot-rolled steel: U.S. producers' employment related information, by period

Item	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Production and related workers (PRWs) (number)	15,449	14,164	13,769	13,393	13,849
Total hours worked (1,000 hours)	32,648	28,523	29,241	7,052	7,350
Hours worked per PRW (hours)	2,113	2,014	2,124	527	531
Wages paid (\$1,000)	1,348,179	1,180,798	1,386,314	303,762	347,906
Hourly wages (dollars per hour)	\$41.29	\$41.40	\$47.41	\$43.07	\$47.33
Productivity (short tons per 1,000 hours)	1,724.4	1,721.4	1,881.8	2,002.4	1,589.0
Unit labor costs (dollars per short ton)	\$23.95	\$24.05	\$25.19	\$21.51	\$29.79

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

Financial experience of U.S. producers

Background⁹

Eleven U.S. producers provided usable financial results on their hot-rolled steel operations: AM/NS Calvert, Big River Steel, Cleveland-Cliffs, CSI, EVRAZ, NLMK USA, North Star Bluescope, Nucor, SDI, SSAB, and U.S. Steel.¹⁰ While the financial results of most U.S. producers are based on information from accounting systems that generate/report overall financial results on a U.S. GAAP basis, the financial results of *** are based on information from accounting systems that generate/report overall financial results according to International Financial Reporting Standard (IFRS).

As noted previously, U.S. producers reported acquisitions, divestments, and expansions since 2016.¹¹ U.S. producers also suspended (temporarily, indefinitely, or permanently) hot-rolled steel facilities and/or selected operations.^{12 13} In general, acquisitions and related

⁹ The following abbreviations may be used in the tables and/or text of this section: generally accepted accounting principles (“GAAP”), fiscal year (“FY”), net sales (“NS”), cost of goods sold (“COGS”), selling, general, and administrative expenses (“SG&A expenses”), average unit values (“AUVs”), research and development expenses (“R&D expenses”), and return on assets (“ROA”).

¹⁰ Nucor acquired CSI in the first quarter 2022. Nucor 2021 10-K, p. 3. Having established an initial 49.5 percent ownership stake in the fourth quarter 2019, U.S. Steel acquired full ownership of Big River Steel in the first quarter 2021. U.S. Steel 2021 10-K, p. 106. Separate U.S. producer questionnaires were submitted for Big River Steel, CSI, Nucor, and U.S. Steel. In contrast, Cleveland-Cliffs, which acquired AK Steel in the first quarter 2020 and Arcelor Mittal USA in the fourth quarter 2020, submitted a U.S. producer questionnaire that combined the financial results of both companies.

¹¹ Among those U.S. producers reporting expansion activity during the period, *** reported that *** negatively impacted earnings before interest and taxes (EBIT) by approximately ***. ***. *** U.S. producer questionnaire, response to II-2a. Email with attachments from *** to USITC staff, July 29, 2022.

¹² ***. Email with attachment from *** to USITC staff, August 1, 2022.

¹³ *** reported the direct cost of facility idling during the period in net other expenses, below operating income. With respect to facility idling, *** noted ***. Email with attachments from *** to USITC staff, July 29, 2022.

divestments did not directly affect U.S. producers' hot-rolled steel operations.^{14 15 16} While *** hot-rolled steel operations reportedly did not change after ***, related accounting adjustments are included in financial results below operating income.¹⁷

Figure III-2 presents firm-specific shares of total 2021 net sales quantity.

¹⁴ ***. Email with attachments from *** to USITC staff, July 28, 2022.

¹⁵ ***. Email with attachments from *** to USITC staff, July 27, 2022.

¹⁶ ***. Email with attachment from *** to USITC staff, August 1, 2022. As described in footnote 49, the decline in *** total SG&A expenses is largely related to the ***.

¹⁷ ***. Email with attachments from *** to USITC staff, July 29, 2022. See also footnote 52.

Figure III-2
Hot-rolled steel: Share of net sales quantity in 2021, by firm

* * * * *

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

Operations on hot-rolled steel flat products

Table III-17 presents the U.S. industry's hot-rolled steel financial results. Table III-18 presents corresponding percentage and unit changes in AUVs (dollars per short ton). Table III-19 presents a variance analysis of the financial results.¹⁸ Appendix G presents selected company-specific financial data.

¹⁸ The Commission's variance analysis is calculated in three parts: sales variance, COGS variance, and SG&A expenses variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expenses variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. As summarized at the bottom of the variance analysis, the price variance is from sales, the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expenses variances. In general, the utility of the Commission's variance analysis is enhanced when product mix remains the same throughout the period. As described in the *Net sales* section below, most U.S. producers reported that changes in average sales values primarily reflect changes in underlying prices, as opposed to changes in product mix.

Table III-17**Hot-rolled steel: Results of operations of U.S. producers, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent

Item	Measure	2016	2017	2018
Commercial sales	Quantity	***	***	***
Internal consumption	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
Total net sales	Quantity	54,532,392	57,251,819	58,388,899
Commercial sales	Value	***	***	***
Internal consumption	Value	***	***	***
Transfers to related firms	Value	***	***	***
Total net sales	Value	27,355,191	33,959,669	44,129,236
COGS: Raw materials	Value	16,127,996	21,155,896	24,414,975
COGS: Direct labor	Value	2,128,925	2,195,664	2,292,942
COGS: Other factory costs	Value	6,165,474	6,867,244	7,362,582
COGS: Total	Value	24,422,395	30,218,804	34,070,499
Gross profit or (loss)	Value	2,932,796	3,740,865	10,058,737
SG&A expenses	Value	950,086	1,182,790	1,348,344
Operating income or (loss)	Value	1,982,710	2,558,075	8,710,393
Interest expense	Value	***	***	***
All other expenses	Value	***	***	***
All other income	Value	***	***	***
Net income or (loss)	Value	1,775,463	2,365,484	8,449,534
Depreciation/amortization	Value	591,036	695,634	688,590
Estimated cash flow	Value	2,366,499	3,061,118	9,138,124
COGS: Raw materials	Ratio to NS	59.0	62.3	55.3
COGS: Direct labor	Ratio to NS	7.8	6.5	5.2
COGS: Other factory costs	Ratio to NS	22.5	20.2	16.7
COGS: Total	Ratio to NS	89.3	89.0	77.2
Gross profit or (loss)	Ratio to NS	10.7	11.0	22.8
SG&A expenses	Ratio to NS	3.5	3.5	3.1
Operating income or (loss)	Ratio to NS	7.2	7.5	19.7
Net income or (loss)	Ratio to NS	6.5	7.0	19.1

Table continued.

Table III-17 Continued
Hot-rolled steel: Results of operations of U.S. producers, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	56,468,508	49,237,991	54,853,499	14,032,209	11,842,603
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	35,874,950	26,336,135	66,329,880	11,586,668	14,789,689
COGS: Raw materials	Value	22,202,507	17,785,714	28,394,304	6,243,778	6,990,349
COGS: Direct labor	Value	2,249,552	1,948,623	2,467,764	576,628	652,604
COGS: Other factory costs	Value	7,538,037	5,828,367	8,048,168	1,811,294	2,224,257
COGS: Total	Value	31,990,096	25,562,704	38,910,236	8,631,700	9,867,210
Gross profit or (loss)	Value	3,884,854	773,431	27,419,644	2,954,968	4,922,479
SG&A expenses	Value	1,213,894	1,032,098	1,512,272	324,357	359,866
Operating income or (loss)	Value	2,670,960	(258,667)	25,907,372	2,630,611	4,562,613
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	2,457,405	(420,313)	25,602,930	2,538,543	4,506,648
Depreciation/amortization	Value	707,318	651,913	805,105	214,056	212,276
Estimated cash flow	Value	3,164,723	231,600	26,408,035	2,752,599	4,718,924
COGS: Raw materials	Ratio to NS	61.9	67.5	42.8	53.9	47.3
COGS: Direct labor	Ratio to NS	6.3	7.4	3.7	5.0	4.4
COGS: Other factory costs	Ratio to NS	21.0	22.1	12.1	15.6	15.0
COGS: Total	Ratio to NS	89.2	97.1	58.7	74.5	66.7
Gross profit or (loss)	Ratio to NS	10.8	2.9	41.3	25.5	33.3
SG&A expenses	Ratio to NS	3.4	3.9	2.3	2.8	2.4
Operating income or (loss)	Ratio to NS	7.4	(1.0)	39.1	22.7	30.8
Net income or (loss)	Ratio to NS	6.8	(1.6)	38.6	21.9	30.5

Table continued.

Table III-17 Continued
Hot-rolled steel: Results of operations of U.S. producers, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2016	2017	2018
COGS: Raw materials	Share	66.0	70.0	71.7
COGS: Direct labor	Share	8.7	7.3	6.7
COGS: Other factory costs	Share	25.2	22.7	21.6
COGS: Total	Share	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***
Internal consumption	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
Total net sales	Unit value	502	593	756
COGS: Raw materials	Unit value	296	370	418
COGS: Direct labor	Unit value	39	38	39
COGS: Other factory costs	Unit value	113	120	126
COGS: Total	Unit value	448	528	584
Gross profit or (loss)	Unit value	54	65	172
SG&A expenses	Unit value	17	21	23
Operating income or (loss)	Unit value	36	45	149
Net income or (loss)	Unit value	33	41	145
Data	Count	10	11	11
Operating losses	Count	---	2	---
Net losses	Count	1	2	---

Table continued.

Table III-17 Continued
Hot-rolled steel: Results of operations of U.S. producers, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
COGS: Raw materials	Share	69.4	69.6	73.0	72.3	70.8
COGS: Direct labor	Share	7.0	7.6	6.3	6.7	6.6
COGS: Other factory costs	Share	23.6	22.8	20.7	21.0	22.5
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Total net sales	Unit value	635	535	1,209	826	1,249
COGS: Raw materials	Unit value	393	361	518	445	590
COGS: Direct labor	Unit value	40	40	45	41	55
COGS: Other factory costs	Unit value	133	118	147	129	188
COGS: Total	Unit value	567	519	709	615	833
Gross profit or (loss)	Unit value	69	16	500	211	416
SG&A expenses	Unit value	21	21	28	23	30
Operating income or (loss)	Unit value	47	(5)	472	187	385
Net income or (loss)	Unit value	44	(9)	467	181	381
Data	Count	11	11	11	11	11
Operating losses	Count	1	6	---	---	---
Net losses	Count	1	7	---	---	---

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

Note: Shares represent the share of COGS.

Table III-18
Hot-rolled steel: Changes in AUVs between comparison periods

Changes in percent

Item	2016-21	2016-17	2017-18	2018-19	2019-20	2020-21	Jan-Mar 2021-22
Commercial sales	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***
Total net sales	▲141.1	▲18.2	▲27.4	▼(15.9)	▼(15.8)	▲126.1	▲51.2
COGS: Raw materials	▲75.0	▲24.9	▲13.2	▼(6.0)	▼(8.1)	▲43.3	▲32.7
COGS: Direct labor	▲15.2	▼(1.8)	▲2.4	▲1.4	▼(0.7)	▲13.7	▲34.1
COGS: Other factory costs	▲29.8	▲6.1	▲5.1	▲5.9	▼(11.3)	▲23.9	▲45.5
COGS: Total	▲58.4	▲17.9	▲10.6	▼(2.9)	▼(8.4)	▲36.6	▲35.4

Table continued.

Table III-18 Continued
Hot-rolled steel: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2016-21	2016-17	2017-18	2018-19	2019-20	2020-21	Jan-Mar 2021-22
Commercial sales	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***
Total net sales	▲708	▲92	▲163	▼(120)	▼(100)	▲674	▲423
COGS: Raw materials	▲222	▲74	▲49	▼(25)	▼(32)	▲156	▲145
COGS: Direct labor	▲6	▼(1)	▲1	▲1	▼(0)	▲5	▲14
COGS: Other factory costs	▲34	▲7	▲6	▲7	▼(15)	▲28	▲59
COGS: Total	▲261	▲80	▲56	▼(17)	▼(47)	▲190	▲218
Gross profit or (loss)	▲446	▲12	▲107	▼(103)	▼(53)	▲484	▲205
SG&A expenses	▲10	▲3	▲2	▼(2)	▼(1)	▲7	▲7
Operating income or (loss)	▲436	▲8	▲104	▼(102)	▼(53)	▲478	▲198
Net income or (loss)	▲434	▲9	▲103	▼(101)	▼(52)	▲475	▲200

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

Table III-19
Hot-rolled steel: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars

Item	2016-21	2016-17	2017-18
Net sales price variance	38,813,611	5,240,326	9,495,093
Net sales volume variance	161,078	1,364,152	674,474
Net sales total variance	38,974,689	6,604,478	10,169,567
COGS cost variance	(14,344,033)	(4,578,510)	(3,251,518)
COGS volume variance	(143,808)	(1,217,899)	(600,177)
COGS total variance	(14,487,841)	(5,796,409)	(3,851,695)
Gross profit variance	24,486,848	808,069	6,317,872
SG&A expenses variance	(556,592)	(185,325)	(142,063)
SG&A expenses volume variance	(5,594)	(47,379)	(23,491)
SG&A expenses total variance	(562,186)	(232,704)	(165,554)
Operating income price variance	38,813,611	5,240,326	9,495,093
Operating income cost/exp. variance	(14,900,624)	(4,763,835)	(3,393,581)
Operating income volume variance	11,675	98,874	50,806
Total operating income variance	23,924,662	575,365	6,152,318

Table continued.

Table III-19 Continued
Hot-rolled steel: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars

Item	2018-19	2019-20	2020-21	Jan-Mar 2021-22
Net sales price variance	(6,802,890)	(4,945,203)	36,990,154	5,011,021
Net sales volume variance	(1,451,396)	(4,593,612)	3,003,591	(1,808,000)
Net sales total variance	(8,254,286)	(9,538,815)	39,993,745	3,203,021
COGS cost variance	959,836	2,331,216	(10,432,150)	(2,582,413)
COGS volume variance	1,120,567	4,096,176	(2,915,382)	1,346,903
COGS total variance	2,080,403	6,427,392	(13,347,532)	(1,235,510)
Gross profit variance	(6,173,883)	(3,111,423)	26,646,213	1,967,511
SG&A expenses variance	90,103	26,363	(362,465)	(86,122)
SG&A expenses volume variance	44,347	155,433	(117,709)	50,613
SG&A expenses total variance	134,450	181,796	(480,174)	(35,509)
Operating income price variance	(6,802,890)	(4,945,203)	36,990,154	5,011,021
Operating income cost/exp. variance	1,049,939	2,357,579	(10,794,615)	(2,668,535)
Operating income volume variance	(286,482)	(342,003)	(29,501)	(410,484)
Total operating income variance	(6,039,433)	(2,929,627)	26,166,039	1,932,002

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

Net sales

Internal consumption represents the majority of the U.S. industry's hot-rolled steel sales (** percent of total sales quantity (2019) to ** percent (2016)), followed by commercial sales (** percent (January-March 2022) to ** percent (2017)), and transfer sales to related firms (** percent (2016) to ** percent (2020)).^{19 20}

While most U.S. producers reported all three sales categories for at least part of the period, several reported only two (generally commercial sales and internal consumption). ** reported ** commercial sales.

¹⁹ The Commission's income statement format includes commercial sales and non-commercial sales (internal consumption and transfer sales to related firms). Of the two categories of non-commercial sales, only transfer sales to related firms are a routine category for accounting purposes. Transfer sales to related firms are generally valued according to the relevant transfer pricing policies adopted by individual U.S. producers; i.e., which are intended to ensure that transfers sales are consistent with arms-length transactions. Internal consumption, while not a routine sales category for accounting purposes, is classified as a sale in the Commission's income statement format. Pursuant to this format internal consumption is valued at estimated fair market value with corresponding manufacturing costs included in COGS.

During the period examined, as shown in table III-17, average commercial sales values were generally the highest of the three sales categories, transfer sales to related firms the lowest, and internal consumption generally in the middle. As shown in table G-1, **. ** U.S. producer questionnaire, responses to III-9d.

²⁰ **. ** U.S. producer questionnaire, response to II-12. USITC auditor prehearing notes. ** also reported tolling activity, reflecting commercial transactions with unrelated tollees. ** U.S. producer questionnaires, responses to II-12.

Quantity

Total sales quantity increased in 2017 and 2018,²¹ declined in 2019 and 2020,²² increased in 2021, and was lower in January-March 2022 compared to January-March 2021. The sales quantities reported in 2018 and 2020 reflect the highest and lowest annual levels of the period, respectively. Commercial sales and internal consumption, the two largest sales categories, shared the same directional pattern of change in every full and partial year except 2017.

While not directionally uniform, the majority of individual U.S. producers followed the overall sales quantity pattern described above. U.S. producers were the most directionally uniform after 2019: *** reported declines in 2020 sales quantity, increases in 2021, and lower sales quantity in January-March 2022 compared to January-March 2021.

Value

As shown in the sales section of the variance analysis (see table III-19), during most of the period, changes in total sales value were largely a function of positive and negative price variances. In contrast, the decline in total sales value in 2020 was attributable to a negative price variance and a negative volume variance, both of similar magnitudes. *** U.S. producers were directionally uniform with respect to changes in average sales value: reporting increases in 2017 and 2018, declines in 2019 and 2020, notably large increases in 2021, and higher average sales values in January-March 2022 compared to January-March 2021.

Most U.S. producers reported that changes in average sales values reflect changes in underlying prices and that changes in product mix were, at most, a secondary factor.²³ ***, in contrast, indicated that the pattern of its average sales value reflected changes in

²¹ In 2017, the overall increase in total sales quantity is largely attributable to ***, offsetting corresponding declines in sales quantity reported by ***.

²² In their description of factors impacting financial results during the period (see *Gross profit or loss* section below), U.S. producers generally attributed the decline in total sales quantity in 2020 to reduced demand from customers and corresponding inventory reductions in response to business conditions caused by COVID-19 and related mitigation efforts. The subsequent increase in 2021 sales quantity generally reflects the recovery in demand as business conditions stabilized and improved.

²³ Email with attachment from *** to USITC staff, August 1, 2022. Email with attachments from *** to USITC staff, July 29, 2022. Email with attachments from *** to USITC staff, July 29, 2022. Email with attachments from *** to USITC staff, July 26, 2022. Email with attachment from *** to USITC staff, July 29, 2022.

both hot-rolled steel prices and product mix.²⁴ U.S. producers also indicated that the pattern of average sales value can reflect other factors such as the level and types of contracts (e.g., short-term versus long-term) outstanding at any given time.²⁵

Cost of goods sold

Raw material cost

Raw material cost is the largest component of hot-rolled steel COGS (66.0 percent of COGS (2016) to 73.0 percent (2020)). As described in Part I of this report, U.S. producers consume a variety of raw material inputs, with some overlap, depending on the type and extent of underlying steel making production; i.e., blast furnace steel production (Cleveland-Cliffs and U.S. Steel)²⁶ or EAF steel production (Big River Steel, NLMK USA, North Star Bluescope, Nucor,

²⁴ Email with attachments from *** to USITC staff, July 28, 2022.

²⁵ Email with attachment from *** to USITC staff, July 28, 2022. Email with attachments from *** to USITC staff, July 29, 2022. Email with attachments from *** to USITC staff, July 29, 2022.

²⁶ Blast furnace steel producer *** reported that *** percent of its 2021 raw material costs reflect ***. *** U.S. producer questionnaire, response to III-9e. ***. Email with attachment from *** to USITC staff, August 1, 2022. The other blast furnace producer, ***, breaking out the basic steel making inputs, reported that its 2021 raw material costs reflect *** percent ***, *** percent ***, *** percent ***, and *** percent other material inputs (***). *** U.S. producer questionnaire, response to III-9e. Note: While U.S. Steel's Tubular division operates an EAF in Fairfield, Alabama, which commenced operations in October 2020, ***. U.S. Steel 2021 10-K, p. 114. *** U.S. producer questionnaire, response to I-2a.

SDI, and SSAB).²⁷ Slab converters (AM/NS Calvert, CSI, EVRAZ) do not produce steel at the U.S. facilities covered by this proceeding.^{28 29}

In addition to directly controlling scrap supply,³⁰ the overall operations of some U.S. producers process basic inputs.³¹ U.S. producers also reported a range of steel making inputs,

²⁷ EAF producers reported that *** account for the majority of 2021 raw material costs with a smaller share of costs accounted for by inputs such as ***. *** U.S. producer questionnaires, responses to III-9e. In addition to the steel making inputs noted previously, NLMK USA reported that it also ***. *** U.S. producer questionnaire response to III-9e. ***.

²⁸ ***. Email with attachments from *** to USITC staff, July 28, 2022.

²⁹ ***. Email with attachments from *** to USITC staff, July 29, 2022. EVRAZ, like some of the other U.S. producers (see footnote 30), also operates a scrap recycling network, primarily in western Canada along with three facilities in the U.S., to support its North American steel making operations. “EVRAZ Recycling,” July 29, 2022, <https://www.evrazrecycling.com/ev/index.jsp#undefined1>.

³⁰ North Star Bluescope purchased ferrous scrap recycling business MetalX in the fourth quarter 2021. “Australian steelmaker Bluescope has acquired ferrous scrap steel recycling business of US firm, MetalX, based in Indiana,” December 24, 2021, <https://www.recyclinginternational.com/ferrous-metals/bluescope-closes-us-240-million-deal-with-metalx>. ***. North Star Bluescope prehearing brief, Exhibit 2, p. 6. Cleveland-Cliffs purchased FPT, described as a “leading prime ferrous scrap processor in the U.S.,” in the third quarter 2021. Cleveland-Cliffs 2021 10-K, p. 4. Nucor’s wholly-owned subsidiary, DJJ, which was acquired in 2008, was described as “. . . the leading broker of ferrous scrap in North America and is a global trader of scrap metal, pig iron and other metallics.” Nucor 2021 10-K, p. 6, p. 20. In the fourth quarter 2007, SDI acquired OmniSource, which is engaged in “. . . ferrous and nonferrous processing, transportation, marketing, brokerage, and scrap management services. . . ” and acquired, in the third quarter 2020, Zimmer (now OmniSource Mexico), located in Monterrey, Mexico, which is an operator of several ferrous and nonferrous scrap facilities. SDI 2021 10-K, p. 59, p. 65. “Steel Dynamics Complete Acquisition of OmniSource,” October 29, 2007, <https://www.recyclingtoday.com/article/steel-dynamics-completes-acquisition-of-omnisource>. SDI’s acquisition of Zimmer was reportedly part of the company’s raw procurement strategy to support its new Southwest-Sinton Flat Roll Division.

³¹ Nucor operates two DRI plants: “. . . wholly owned subsidiary, Nu-Iron Unlimited, is in Trinidad and benefits from a low-cost supply of natural gas and favorable logistics for inbound iron ore and shipment of DRI to the United States. Nucor’s second DRI plant in Louisiana also benefits from favorable logistics and proximity to its steel mill customers.” Nucor 2021 10-K, p. 7. Prior to the period examined, during

(continued...)

such as iron ore, coke, scrap, DRI, HBI, as well as steel slabs, purchased from related suppliers.³² *** were the *** U.S. producers reporting no input purchases from related suppliers.³³ With direct ownership interests in mining resources (e.g., iron ore and coking coal) and related processing, Cleveland-Cliffs and U.S. Steel appear to be the most vertically integrated U.S. producers.³⁴

When considering the range of company-specific average per short ton raw material costs (see table G-1), blast furnace producers and EAF producers generally reported average

the second quarter 2015, SDI idled its jointly-owned iron making operations in Minnesota, reflecting an iron concentrate facility (Mining Resources) and an iron nugget production facility (Mesabi Nugget). “SDI Idles Minnesota Iron Ore Operations,” May 29, 2015, <https://www.recyclingtoday.com/article/sdi-steel-minnesota-iron-ore-idle>. To produce “internally sourced liquid pig iron” SDI currently operates an onsite liquid iron making facility (Iron Dynamics) at its Butler, Indiana flat roll mill. SDI 2021 10-K, p. 19, p. 31.

³² ***. *** U.S. producer questionnaire, response to III-7. Email from *** to USITC staff, August 5, 2022. ***. *** U.S. producer questionnaires, responses to III-7. Email with attachments from *** to USITC staff, July 29, 2022. ***. Ibid. ***. *** U.S. producer questionnaires, responses to III-7. Email with attachments from *** to USITC staff, July 28, 2022.

U.S. producers reported that the cost of inputs purchased from related suppliers, as reflected in the financial results reported to the Commission, is consistent with the cost basis reported in underlying accounting records.

³³ ***. Email with attachments from *** to USITC staff, July 29, 2022.

³⁴ As described by Cleveland-Cliffs, “. . . as a mine operator, we are also the largest manufacturer of iron ore pellets in North America. We are vertically integrated from mined raw materials, direct reduced iron and ferrous scrap to primary steelmaking . . .” Cleveland-Cliffs 2021 10-K, p. 4. With regard to its Flat Rolled segment, U.S. Steel describes itself as an integrated producer whose “. . . primary raw materials are iron units in the form of iron ore pellets and sinter ore, carbon units in the form of coal and coke (which is produced from coking coal) and steel scrap.” U.S. Steel 2021 10-K, p. 16. While U.S. Steel has access to iron ore from its own mines and a joint venture, all coal used to produce coke is supplied by third parties. U.S. Steel 2021 10-K, p. 17.

raw material costs that fell in the lower and middle parts of the range,³⁵ while slab converters fell in the middle and upper parts of the range.³⁶

Direct labor cost and other factory costs

Direct labor cost accounts for the smallest share of hot-rolled steel COGS (6.3 percent of COGS (2021) to 8.7 percent (2016)). Other factory costs, occupying a relatively stable range between direct labor cost and raw material costs, made up 20.7 percent of COGS (2021) to 25.2 percent (2016). The level of fixed costs (often, but not exclusively, classified as a component of

³⁵ USITC auditor notes (prehearing). The exception was ***, an EAF producer, which reported the *** company-specific average raw material cost in 2017, ***. In subsequent years, *** average raw material cost declined, relative to other U.S. producers.

³⁶ Ibid. ***.

other factory costs) versus variable costs vary by company, reflecting operational features specific to each company.^{37 38 39 40}

On an overall basis, average per short ton direct labor cost and other factory costs increased irregularly. The percentage changes (positive and negative) in average direct labor cost were relatively modest throughout much of the period with a large full-year increase

³⁷ ***. Email with attachments from *** to USITC staff, July 29, 2022.

³⁸ ***. Email with attachments from *** to USITC staff, July 26, 2022. In narrative accompanying its public financial statements, Nucor also noted the importance of variable costs, describing its operations, in general, as having a “highly variable, low cost structure” and that “Our pay-for-performance system that is closely tied to our levels of production also allows us to keep our highly experienced workforce intact and to continue operating our facilities when some of our competitors with greater fixed costs are forced to shut down some of their facilities. Because we use EAFs to produce our steel, we can easily vary our production levels to match short-term changes in demand, unlike our blast furnace-based integrated competitors.” Nucor 2021 10-K, p. 33.

³⁹ ***. Email with attachment from *** to USITC staff, July 28, 2022.

⁴⁰ ***. Email with attachment from *** to USITC staff, July 29, 2022.

occurring in 2021 (13.7 percent), followed by 34.1 percent higher average direct labor cost in January-March 2022 compared to January-March 2021.

While the percentage changes (positive and negative) in average other factory costs were somewhat larger compared to corresponding average direct labor cost, they, like average direct labor cost, were more notable in the latter part of the period: declining 11.3 percent in 2020, increasing 23.9 percent in 2021, and 45.5 percent higher in January-March 2022 compared to January-March 2021. On a company-specific basis, higher average other factory costs in 2021, and in January-March 2022 compared to January-March 2021, reflect a number of factors, generally, but not entirely, associated with variable costs.^{41 42 43 44}

Gross profit or loss

Company-specific average sales values and average COGS cover a relatively wide range, reflecting each company's unique hot-rolled steel product mix, as well as other operational features specific to each company (see table G-1). On a combined basis, *** accounted for a large, albeit declining, share of the U.S. industry's total sales quantity (*** percent (January-March 2022) to *** percent (2016)) and accordingly had an important influence on the overall trend of the U.S. industry's financial results. Among

⁴¹ ***. Email with attachments from *** to USITC staff, July 29, 2022.

⁴² ***. Email with attachments from *** to USITC staff, July 29, 2022.

⁴³ ***. Email with attachments from *** to USITC staff, July 26, 2022. ***, which also reported notably higher average other factory costs in January-March 2022 compared to January-March 2021, provided essentially the same explanation. Email with attachments from *** to USITC staff, July 27, 2022.

⁴⁴ ***. Email with attachments from *** to USITC staff, July 29, 2022.

these *** U.S. producers and with the exception of 2021, when *** reported the highest gross profit ratio (total gross profit divided by total sales), *** reported the highest gross profit ratio throughout the period. *** average sales value and average COGS, with some exceptions, were generally in the middle part of the overall range of company-specific average sales values and average COGS.⁴⁵ In contrast, ***, which reported the lowest gross profit ratio (or highest gross loss ratio) of the ***, reported average sales values that were generally in the middle or lower parts of the company-specific range of average sales values, while its average COGS were generally in the middle or upper parts of the company-specific range of average COGS.⁴⁶

In 2016 and 2017 and on an overall basis, the U.S. industry's gross profit ratios were at similar levels, increased in 2018, and then declined in 2019 back to a level close to 2016 and 2017.⁴⁷ The increase in 2018 gross profit ratio primarily reflects an increase in average sales value, which more than offset the corresponding increase in average COGS. This pattern reversed in 2019 as the spread between average sales value and raw material cost narrowed. In 2020, the U.S. industry's gross profit ratio declined further, this time to a level somewhat above breakeven, reflecting a decline in average sales value that, like 2019, exceeded the corresponding decline in average COGS. *** U.S. producers reported declines in their gross results in 2020 with *** reporting gross losses in that year. In 2021, *** U.S. producers reported improvements in

⁴⁵ USITC auditor notes (prehearing).

⁴⁶ Ibid. *** also reported the lowest overall gross profit ratios in ***. On an overall basis and when considering the U.S. producer reporting the lowest company-specific gross profit ratio (or highest gross loss ratio) in any given year or interim period, corresponding average sales values were variable (falling in the lower, middle, and upper parts of the range of company-specific average sales values). In contrast, *** U.S. producers reporting the lowest company-specific gross profit ratio (or highest gross loss ratio) in any given year or interim period reported average COGS that were usually in the upper part of the range of company-specific average COGS with *** reporting an average COGS that was in the lower part of the range. Conversely, while the U.S. producer reporting the highest gross profit ratio in any given year or interim period also reported average sales values that were variable (falling in the lower, middle, and upper parts of the range of company-specific average sales values), their average COGS were primarily in the lower part of the range of company-specific COGS with *** reporting average COGS that were in the upper part of the range of average company-specific COGS. ***.

⁴⁷ ***. Email with attachments from *** to USITC staff, July 29, 2022.

gross results, reflecting increases in total sales quantities and large increase in average sales value, which more than offset corresponding increases in average COGS.

Regarding the pattern of lower profitability in 2020 and higher profitability in 2021, U.S. producers provided descriptions that were broadly similar. For example and as described by ***.⁴⁸

While the U.S. industry's January-March 2022 gross profit ratio was higher compared to January-March 2021, it was lower than full-year 2021, reflecting both a reduced spread between average sales value and raw material cost, as well as higher direct labor costs and other factory costs (on both an average basis and as a ratio to sales).

SG&A expenses and operating income or loss

Total SG&A expenses increased in 2017 and 2018, declined in 2019 and 2020, increased in 2021, and were higher in January-March 2022 compared to January-March 2021. On a company-specific basis, the closest period of directional uniformity with respect to changes in total SG&A expenses was 2021, when *** U.S. producers, ***, reported higher SG&A expenses.⁴⁹

⁴⁸ Email with attachment from *** to USITC staff, July 28, 2022.

⁴⁹ ***. Email from *** to USITC staff, August 8, 2022.

While each company's SG&A expense ratio is unique to its operations, as reflected in the relatively broad range of company-specific SG&A expense ratios (total SG&A expenses divided by total sales value), company-specific SG&A expense ratios, with some exceptions, generally remained within a relatively narrow range (see table G-1).⁵⁰ On an overall basis, the U.S. industry's SG&A expense ratio also remained within a relatively narrow range throughout most of the period, declining somewhat in 2021 and the interim period. This decline, in part, reflects the increase in the U.S. industry's total sales value, as well as the relatively large decline in *** SG&A expenses in 2021 (see footnote 49).

The U.S. industry's operating income increased in 2017 and 2018, declined in 2019, transitioned to an operating loss in 2020,⁵¹ and then increased to its highest level of the period in 2021. Total operating income was higher in January-March 2022 compared to January-March 2021. While variations in total SG&A expenses and SG&A expense ratios affected the pattern of overall operating results to some extent, the relatively narrow range within which SG&A expense ratios moved indicates that operating results were largely determined by the same factors that explain financial results at the gross level.

Interest expense, other expenses and income, and net income or loss

Total interest expense fluctuated throughout the period, declining to its lowest level in 2020. While *** U.S. producers reported at least some interest expense, *** accounted for the majority: *** (**% percent of cumulative net interest expense); *** (**% percent); and *** (**% percent). Similarly and while a number of U.S. producers reported net other expenses, *** U.S. producers (**% percent of

⁵⁰ ***. Email with attachments from *** to USITC staff, July 29, 2022.

⁵¹ The U.S. producers that reported operating losses in 2020 include those already generating gross losses in that year, as noted above, as well as ***, whose corresponding gross profit ratios contracted substantially in 2020.

cumulative net other expenses) and *** (***) accounted for the majority.^{52 53} A small number of U.S. producers reported net other income.⁵⁴

Reflecting the net effect of interest expense, other expenses, and other income, the U.S. industry's net results were lower compared to corresponding operating results. Directionally, however, overall operating and net results followed the same pattern: increasing from 2016 through 2018, declining in 2019, transitioning to losses in 2020, increasing in 2021, and higher in January-March 2022 compared to January-March 2021.

Capital expenditures and research and development expenses

Table III-20 and table III-21 present the U.S. producers' total capital expenditures and each firm's narrative description, respectively. Table III-22 and table III-23 present total R&D expenses and each firm's narrative description, respectively.

*** U.S. producers reported capital expenditures during the period, reflecting a mix of relatively modest changes and more substantial changes. Of the latter group, the capital expenditures reported by *** generally reflect the large-scale projects described in table III-21. In contrast, the other U.S. producers reporting relatively large changes in the level of capital expenditures did not report similar large-scale projects: ***

⁵² ***, whose reported other expenses reflect a net of other income and other expenses, stated ***. Email with attachments from *** to USITC staff, July 29, 2022.

⁵³ ***, whose other expenses increased in 2021, stated the ***. Email with attachments from *** to USITC staff, July 29, 2022.

⁵⁴ In 2017, the large increase in overall other income is attributable to ***, which reported *** in other income in that year. ***. Email with attachment from *** to USITC staff, August 1, 2022.

Table III-20
Hot-rolled steel: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	929,292	1,652,482	1,313,460

Table continued.

Table III-20 Continued
Hot-rolled steel: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	1,767,757	2,550,626	2,798,465	489,458	282,112

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

Table III-21
Hot-rolled steel: Narrative descriptions of U.S. producers' capital expenditures, by firm

Firm	Narrative
AM/NS Calvert	***
Big River Steel	***
Cleveland-Cliffs	***
CSI	***
EVRAZ	***
NLMK USA	***
North Star Bluescope	***
Nucor	***
SDI	***
SSAB	***

Table continued.

Table III-21 Continued**Hot-rolled steel: Narrative descriptions of U.S. producers' capital expenditures, by firm**

Firm	Narrative
U.S. Steel	***

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

Note: *** capital expenditure description is based on narrative provided in response to staff follow-up questions. Email with attachments from *** to USITC staff, July 28, 2022. ***. Email with attachments from *** to USITC staff, July 29, 2022.

Table III-22**Hot-rolled steel: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table III-22 Continued
Hot-rolled steel: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: *** 2021 R&D expense amount reflects an estimate provided by the company in response to a staff follow-up question. Email with attachment from *** to USITC staff, July 28, 2022.

Table III-23
Hot-rolled steel: Narrative descriptions of U.S. producers R&D expenses, by firm

Firm	Narrative
AM/NS Calvert	***
Big River Steel	***
Cleveland-Cliffs	***
CSI	***
EVRAZ	***
NLMK USA	***
North Star Bluescope	***
Nucor	***

Table continued.

Table III-23 Continued
Hot-rolled steel: Narrative descriptions of U.S. producers R&D expenses, by firm

Firm	Narrative
SDI	***
SSAB	***
U.S. Steel	***

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

Note: ***, which was asked in staff follow-up questions to provide a description of the R&D activity reflected in its reported R&D expenses, stated ***. Email with attachments from *** to USITC staff, July 28, 2022.

Assets and return on assets

Table III-24 and table III-25 present data on the U.S. producers' total net assets and corresponding ROA, respectively.⁵⁶

⁵⁶ ROA is calculated here as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets, which are generally not product specific. High-level allocation factors are therefore often required in order to report a total asset amount on a product-specific basis. The ability of a U.S. producer to assign total asset values to discrete product lines affects the meaningfulness of calculated company-specific ROA. During the period and based on the total sales and asset information reported by U.S. producers, the U.S. industry's average asset turnover ratio (total sales divided by total assets) ranged from 1.3 (2020) to 2.5 (2021). For the Iron & Steel Industry in general, the average asset turnover ratio ranged from 0.7 (2020) to 1.2 (2017). USITC auditor notes (prehearing).

Table III-24
Hot-rolled steel: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2016	2017	2018	2019	2020	2021
AM/NS Calvert	***	***	***	***	***	***
Big River Steel	***	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***	***
CSI	***	***	***	***	***	***
EVRAZ	***	***	***	***	***	***
NLMK USA	***	***	***	***	***	***
North Star Bluescope	***	***	***	***	***	***
Nucor	***	***	***	***	***	***
SDI	***	***	***	***	***	***
SSAB	***	***	***	***	***	***
U.S. Steel	***	***	***	***	***	***
All firms	15,426,928	17,749,942	20,113,740	19,554,368	19,971,024	26,792,436

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

Note: ***.

Table III-25
Hot-rolled steel: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2016	2017	2018	2019	2020	2021
AM/NS Calvert	***	***	***	***	***	***
Big River Steel	***	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***	***
CSI	***	***	***	***	***	***
EVRAZ	***	***	***	***	***	***
NLMK USA	***	***	***	***	***	***
North Star Bluescope	***	***	***	***	***	***
Nucor	***	***	***	***	***	***
SDI	***	***	***	***	***	***
SSAB	***	***	***	***	***	***
U.S. Steel	***	***	***	***	***	***
All firms	12.9	14.4	43.3	13.7	(1.3)	96.7

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

Note: ***.

Part IV: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 73 firms that potentially imported hot-rolled steel since 2016.¹ Thirty-four firms provided data and information in response to the questionnaires, while nine firms indicated that they had not imported hot-rolled steel since 2016. Based on official Commerce statistics for imports of hot-rolled (non-alloy) steel, importers' questionnaire data accounted for 96.6 percent of total U.S. imports during 2021, including virtually all imports from subject sources during 2021.² 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, by quantity, during 2021).

¹ The Commission issued questionnaires to firms that based on a review of data from third-party sources, may have accounted for more than one percent of imports classified under HTS statistical reporting numbers 7208101500, 7208103000, 7208106000, 7208253000, 7208256000, 7208260030, 7208260060, 7208270030, 7208270060, 7208360030, 7208360060, 7208370030, 7208370060, 7208380015, 7208380030, 7208380090, 7208390015, 7208390030, 7208390090, 7208406030, 7208406060, 7208530000, 7208540000, 7208900000, 7210703000, 7211140030, 7211140090, 7211191500, 7211192000, 7211193000, 7211194500, 7211196000, 7211197530, 7211197560, and 7211197590 (non-alloy hot-rolled steel), and 7225110000, 7225190000, 7225303050, 7225307000, 7225407000, 7225990090, 7226111000, 7226119030, 7226119060, 7226191000, 7226199000, 7226915000, 7226917000, 7226918000, 7210 909000, 7211900000, 7212401000, 7212405000, 7212500000, and 7226990180 (alloy hot-rolled steel).

² The coverage estimate is based on questionnaire data for U.S. imports of non-alloy hot-rolled steel and does not include questionnaire data for alloy and micro-alloy hot-rolled steel for all sources except Turkey. See below for details regarding imports from Turkey. U.S. imports of (non-alloy) hot-rolled steel were compared to official U.S import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, and 7211.19.7590.

The following statistical reporting numbers are listed in Commerce's scope definition but are not included in official import statistics in this report: 7210.70.3000, 7210.90.9000, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7214.99.0060, 7214.99.0075, 7214.99.0090, 7215.90.5000, 7226.99.0180, and 7228.60.6000. Staff excluded these numbers because they primarily include out-of-scope products.

- *** percent of the subject imports from Japan during 2021
- *** subject imports from Netherlands during 2021³
- *** subject imports from South Korea during 2021
- *** percent of the subject imports from Turkey⁴ during 2021⁵
- Virtually all nonsubject imports during 2021

Imports from Australia and Brazil were 0 short tons in 2021 according to official Commerce statistics for imports of hot-rolled (non-alloy) steel. Additionally, while the Commission did not receive any questionnaire responses from any U.S. importers of hot-rolled steel from Russia and the United Kingdom in 2021, there were only 4 and *** short tons of hot-rolled steel imports from those sources in that year, respectively.

Import data in this report are based on official Commerce statistics for nonalloy hot-rolled steel, as adjusted to include alloy hot-rolled steel data collected separately in questionnaire responses, with the exception of Turkey.

Imports from subject and nonsubject countries

Table IV-1 and figure IV-1 presents information on U.S. imports of hot-rolled steel from Australia, Brazil, Japan, Netherlands, Russia, South Korea, and the United Kingdom and all other sources during 2016-21. By quantity, subject imports accounted for 38.2 percent of total imports in 2016 and less than one-third of total imports during 2017-21. South Korea accounted for the largest quantity of subject imports in all full or partial periods other than 2017, when Japan accounted for the largest quantity of imports from subject sources.

³ The main reason that the import data submitted by ***. Email from ***, August 25, 2022.

⁴ In this report, there are both subject and nonsubject imports from Turkey. Imports from Colakoglu are considered nonsubject as pursuant to the Court of International Trade's final judgment on April 23, 2020, Commerce amended the estimated weighted-average dumping margins for Turkish producers Erdemir (2.73 percent) and Colakoglu (0.00 percent), resulting in Colakoglu being exempted from the antidumping duty order. 85 FR 29399, May 15, 2020. Imports from all other Turkish producers are considered subject. The Commission received a questionnaire from ***, which represents *** imports from Colakoglu. These data are included in nonsubject sources.

⁵ Imports for Turkey (subject) are based on export shipment data of non-alloy and micro alloy hot-rolled steel to the United States by Turkish responding firms. Therefore, a difference in timing may impact estimates of import quantity in 2021. These data are used for coverage in lieu of official stats for Turkey (subject).

Table IV-1
Hot-rolled steel: U.S. imports by source and period

Quantity in short tons, Value in 1,000 dollars, Unit values in dollars per short ton, Shares and ratios in percent; Ratios represent the ratio to U.S. production

Source	Measure	2016	2017	2018
Australia	Quantity	107,843	10,210	2,993
Brazil	Quantity	13,441	36	11
Japan	Quantity	***	***	***
Netherlands	Quantity	***	***	***
Russia	Quantity	---	6,777	---
South Korea	Quantity	***	***	***
Turkey, subject	Quantity	***	***	***
United Kingdom	Quantity	***	***	***
Subject sources	Quantity	1,523,225	761,450	1,056,388
Turkey, nonsubject	Quantity	***	***	***
All other sources	Quantity	***	***	***
Nonsubject sources	Quantity	2,467,284	2,623,784	2,917,675
All import sources	Quantity	3,990,509	3,385,235	3,974,062
Australia	Value	35,041	4,235	2,098
Brazil	Value	5,301	48	19
Japan	Value	***	***	***
Netherlands	Value	***	***	***
Russia	Value	---	4,311	---
South Korea	Value	***	***	***
Turkey, subject	Value	***	***	***
United Kingdom	Value	***	***	***
Subject sources	Value	699,893	445,220	802,489
Turkey, nonsubject	Value	***	***	***
All other sources	Value	***	***	***
Nonsubject sources	Value	1,255,994	1,603,785	2,202,080
All import sources	Value	1,955,886	2,049,005	3,004,568

Table continued.

Table IV-1 Continued
Hot-rolled steel: Share of U.S. imports by source and period

Quantity in short tons, Value in 1,000 dollars, Unit values in dollars per short ton, Shares and ratios in percent; Ratios represent the ratio to U.S. production

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Australia	Quantity	2,241	25	---	---	---
Brazil	Quantity	336	---	---	---	8
Japan	Quantity	***	***	***	***	***
Netherlands	Quantity	***	***	***	***	***
Russia	Quantity	---	---	4	---	---
South Korea	Quantity	***	***	***	***	***
Turkey, subject	Quantity	***	***	***	***	***
United Kingdom	Quantity	***	***	***	***	***
Subject sources	Quantity	783,222	677,379	1,014,193	240,104	226,477
Turkey, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	2,009,243	1,678,843	3,043,078	542,167	725,554
All import sources	Quantity	2,792,466	2,356,222	4,057,272	782,270	952,030
Australia	Value	1,043	21	---	---	---
Brazil	Value	249	---	---	---	11
Japan	Value	***	***	***	***	***
Netherlands	Value	***	***	***	***	***
Russia	Value	---	---	15	---	---
South Korea	Value	***	***	***	***	***
Turkey, subject	Value	***	***	***	***	***
United Kingdom	Value	***	***	***	***	***
Subject sources	Value	514,818	366,928	1,023,234	157,841	292,383
Turkey, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	1,316,057	959,581	3,523,603	409,793	926,971
All import sources	Value	1,830,875	1,326,509	4,546,837	567,634	1,219,354

Table continued.

Table IV-1 Continued
Hot-rolled steel: Share of U.S. imports by source and period

Quantity in short tons, Value in 1,000 dollars, Unit values in dollars per short ton, Shares and ratios in percent; Ratios represent the ratio to U.S. production

Source	Measure	2016	2017	2018
Australia	Unit value	325	415	701
Brazil	Unit value	394	1,324	1,784
Japan	Unit value	***	***	***
Netherlands	Unit value	***	***	***
Russia	Unit value	---	636	---
South Korea	Unit value	***	***	***
Turkey, subject	Unit value	***	***	***
United Kingdom	Unit value	***	***	***
Subject sources	Unit value	459	585	760
Turkey, nonsubject	Unit value	***	***	***
All other sources	Unit value	***	***	***
Nonsubject sources	Unit value	509	611	755
All import sources	Unit value	490	605	756
Australia	Share of quantity	2.7	0.3	0.1
Brazil	Share of quantity	0.3	0.0	0.0
Japan	Share of quantity	***	***	***
Netherlands	Share of quantity	***	***	***
Russia	Share of quantity	---	0.2	---
South Korea	Share of quantity	***	***	***
Turkey, subject	Share of quantity	***	***	***
United Kingdom	Share of quantity	***	***	***
Subject sources	Share of quantity	38.2	22.5	26.6
Turkey, nonsubject	Share of quantity	***	***	***
All other sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	61.8	77.5	73.4
All import sources	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-1 Continued
Hot-rolled steel: Share of U.S. imports by source and period

Quantity in short tons, Value in 1,000 dollars, Unit values in dollars per short ton, Shares and ratios in percent; Ratios represent the ratio to U.S. production

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Australia	Unit value	465	836	---	---	---
Brazil	Unit value	741	---	---	---	1,439
Japan	Unit value	***	***	***	***	***
Netherlands	Unit value	***	***	***	***	***
Russia	Unit value	---	---	3,798	---	---
South Korea	Unit value	***	***	***	***	***
Turkey, subject	Unit value	***	***	***	***	***
United Kingdom	Unit value	***	***	***	***	***
Subject sources	Unit value	657	542	1,009	657	1,291
Turkey, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	655	572	1,158	756	1,278
All import sources	Unit value	656	563	1,121	726	1,281
Australia	Share of quantity	0.1	0.0	---	---	---
Brazil	Share of quantity	0.0	---	---	---	0.0
Japan	Share of quantity	***	***	***	***	***
Netherlands	Share of quantity	***	***	***	***	***
Russia	Share of quantity	---	---	0.0	---	---
South Korea	Share of quantity	***	***	***	***	***
Turkey, subject	Share of quantity	***	***	***	***	***
United Kingdom	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	28.0	28.7	25.0	30.7	23.8
Turkey, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	72.0	71.3	75.0	69.3	76.2
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-1 Continued
Hot-rolled steel: Share of U.S. imports by source and period

Quantity in short tons, Value in 1,000 dollars, Unit values in dollars per short ton, Shares and ratios in percent; Ratios represent the ratio to U.S. production

Source	Measure	2016	2017	2018
Australia	Share of value	1.8	0.2	0.1
Brazil	Share of value	0.3	0.0	0.0
Japan	Share of value	***	***	***
Netherlands	Share of value	***	***	***
Russia	Share of value	---	0.2	---
South Korea	Share of value	***	***	***
Turkey, subject	Share of value	***	***	***
United Kingdom	Share of value	***	***	***
Subject sources	Share of value	35.8	21.7	26.7
Turkey, nonsubject	Share of value	***	***	***
All other sources	Share of value	***	***	***
Nonsubject sources	Share of value	64.2	78.3	73.3
All import sources	Share of value	100.0	100.0	100.0
Australia	Ratio	0.2	0.0	0.0
Brazil	Ratio	0.0	0.0	0.0
Japan	Ratio	***	***	***
Netherlands	Ratio	***	***	***
Russia	Ratio	---	0.0	---
South Korea	Ratio	***	***	***
Turkey, subject	Ratio	***	***	***
United Kingdom	Ratio	***	***	***
Subject sources	Ratio	2.8	1.3	1.8
Turkey, nonsubject	Ratio	***	***	***
All other sources	Ratio	***	***	***
Nonsubject sources	Ratio	4.5	4.6	5.0
All import sources	Ratio	7.3	5.9	6.8

Table continued.

Table IV-1 Continued
Hot-rolled steel: Share of U.S. imports by source and period

Quantity in short tons, Value in 1,000 dollars, Unit values in dollars per short ton, Shares and ratios in percent; Ratios represent the ratio to U.S. production

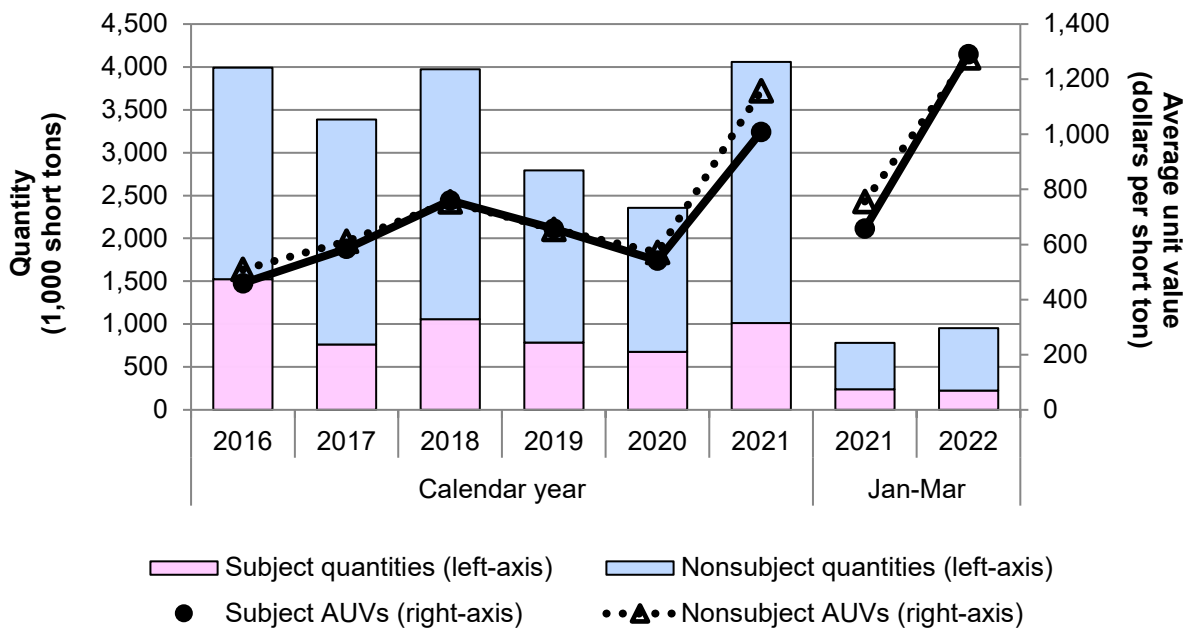
Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Australia	Share of value	0.1	0.0	---	---	---
Brazil	Share of value	0.0	---	---	---	0.0
Japan	Share of value	***	***	***	***	***
Netherlands	Share of value	***	***	***	***	***
Russia	Share of value	---	---	0.0	---	---
South Korea	Share of value	***	***	***	***	***
Turkey, subject	Share of value	***	***	***	***	***
United Kingdom	Share of value	***	***	***	***	***
Subject sources	Share of value	28.1	27.7	22.5	27.8	24.0
Turkey, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	71.9	72.3	77.5	72.2	76.0
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Australia	Ratio	0.0	0.0	---	---	---
Brazil	Ratio	0.0	---	---	---	0.0
Japan	Ratio	***	***	***	***	***
Netherlands	Ratio	***	***	***	***	***
Russia	Ratio	---	---	0.0	---	---
South Korea	Ratio	***	***	***	***	***
Turkey, subject	Ratio	***	***	***	***	***
United Kingdom	Ratio	***	***	***	***	***
Subject sources	Ratio	1.4	1.4	1.8	1.7	1.9
Turkey, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	3.6	3.4	5.5	3.8	6.2
All import sources	Ratio	5.0	4.8	7.4	5.5	8.2

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported exports to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and

on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1
Hot-rolled steel: U.S. import quantities and average unit values, by source and by period



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported exports to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Imports from South Korea, the Netherlands, and Japan collectively account for the vast majority of imports from subject sources. U.S. imports from South Korea, by quantity, fluctuated, decreasing by *** percent from 2016 to 2017, increasing by *** percent from 2017 to 2018, decreasing by *** percent from 2018 to 2020, before increasing by *** percent from 2020 to 2021. U.S. imports, by quantity, from South Korea were *** percent lower in interim 2022 compared to interim 2021. After decreasing by *** percent from 2016 to 2020, the quantity of U.S. imports from the Netherlands increased by *** percent from 2020 to 2021, ending 2021 *** percent lower than in 2016. U.S. imports from the Netherlands, by quantity, were *** percent higher in interim 2022 compared to interim 2021. The quantity of U.S. imports from Japan fluctuated, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. U.S. imports from Japan were *** percent higher in interim 2022 compared to interim 2021.

U.S. imports from Australia, Brazil, Russia, Turkey, and the United Kingdom had limited presences in the United States during 2016-21, collectively accounting for *** percent of total imports, by quantity, in any year, except 2016, when Australia accounted for 2.7 percent of total imports. U.S. imports from Australia were only reported during 2016-20, and imports decreased in each year, ending 100.0 percent lower in 2020 than in 2016. U.S. imports from Turkey, subject were only reported during 2016-18 and in 2021, and imports overall increased by *** percent during 2016-21. U.S. imports from the United Kingdom decreased by *** percent during 2016-21 and there were *** short tons imported in interim 2021 and less than *** short ton in interim 2022. U.S. imports from Brazil were only reported during 2016-19, and imports were 97.5 percent lower in 2019 than in 2016. While there were no imports from Brazil in interim 2021, 8 short tons were reported in interim 2022. Finally, imports from Russia were only reported in 2017 and 2021 (6,777 short tons in 2017 and 4 short tons in 2021). Overall, subject imports decreased irregularly by 33.4 percent from 2016 to 2021, with most of the decrease occurring from 2016 to 2017 and from 2019 to 2020, which offset a 49.7 percent increase from 2020 to 2021.⁶

Unlike the trend in quantity, the value of subject imports increased irregularly by 46.2 percent during 2016-21. The value of U.S. imports from South Korea trended in the same direction as quantity, decreasing by *** percent from 2016 to 2017, increasing by *** percent from 2017 to 2018, decreasing by *** percent from 2018 to 2020, before increasing

⁶ The decrease in imports from 2016 to 2017 aligns with the imposition of the antidumping and countervailing duty orders. The decrease from 2019 to 2020 follows the widespread decrease in demand for hot-rolled steel during the COVID-19 pandemic.

by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. Unlike quantity, the value of U.S. imports from South Korea were *** percent higher in interim 2022 compared to interim 2021. The value of U.S. imports from the Netherlands increased irregularly by *** percent in during 2016-21, with most of the increase occurring from 2020 to 2021. U.S. imports from the Netherlands, by value, was *** percent higher in interim 2022 than in interim 2021. The value of U.S. imports from Japan also increased irregularly by *** percent during 2016-21, with most of the increase occurring from 2020 to 2021. U.S. imports from Japan, by value, were *** percent higher in interim 2022 than in interim 2021.

The values of U.S. imports from Australia, Brazil, Russia, and the United Kingdom decreased irregularly during 2016-21, by 99.9, 95.3 percent, 99.7 percent, and *** respectively, including only the years imports were reported. The value of U.S. imports from the United Kingdom was *** percent lower in interim 2022 than in interim 2021. In contrast, the values of U.S. imports from Turkey, subject increased irregularly by *** percent during 2016-21.

The unit value of U.S. imports from South Korea fluctuated, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21. The unit value of U.S. imports from South Korea was a *** percent higher in interim 2022 than interim 2021. The unit value of U.S. imports from the Netherlands followed a similar trend, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21. The unit value of U.S. imports from the Netherlands was *** percent higher in interim 2022 than in interim 2021. The unit value of U.S. imports from Japan fluctuated like South Korea and the Netherlands, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21. The unit value of U.S. imports from Japan was *** percent higher in interim 2022 than in interim 2021.

The unit values of U.S. imports from Australia increased in each year during 2016-20, except from 2018 to 2019, ending 157.3 percent higher in 2020 than in 2016. Moving similarly, the unit value of U.S. imports from the United Kingdom increased in each year during 2016-21, except from 2018 to 2019, ending *** percent higher in 2020 than in 2016. The unit value for imports from the United Kingdom in interim 2022 was over *** than interim 2021, due to the low volume of imports reported. The unit values of U.S. imports from Brazil, Russia, and Turkey, subject increased irregularly by 87.9 percent, 497.0 percent, and

*** percent, respectively, during 2016-21, including only the years there were reported imports from these countries.

Overall, the unit value of subject imports fluctuated, increasing by 65.3 percent from 2016 to 2018, decreasing by 28.7 percent from 2018 to 2020, and increasing by 86.3 percent from 2020 to 2021, for an overall increase of 119.6 percent during 2016-21. Interim 2022 had a unit value of subject imports that was 96.4 percent higher than in interim 2021.

The quantity of U.S. imports from nonsubject sources fluctuated during 2016-21, increasing by 18.3 percent from 2016 to 2018, decreasing by 42.5 percent from 2018 to 2020, and increasing by 81.3 percent from 2020 to 2021, for an overall increase of 23.3 percent during 2016-21.⁷ U.S. imports from nonsubject sources were 33.8 percent higher in interim 2022 compared to interim 2021. Consequently, nonsubject sources continued to account for the majority of total imports in 2021. The value of U.S. imports from nonsubject sources increased irregularly by 180.5 percent, as the increase from 2020 to 2021 offset the decrease from 2018 to 2020. The unit value of imports from nonsubject sources increased irregularly by 127.5 percent during 2016-21.

Table IV-2 presents U.S. imports of hot-rolled non-alloy steel from leading nonsubject sources, specifically Canada and Mexico. Collectively, Canada and Mexico accounted for more than half of all U.S. imports of hot-rolled non-alloy steel in each full or partial period since 2017, while in 2016, Canada and Mexico accounted for 47.6 percent of such imports. After the imposition of section 232 tariffs in 2018, U.S. imports from Canada and Mexico increased by 3.2 percent from 2018 to 2021 and were 18.6 percent higher in interim 2022 compared to interim 2021. Imports for all other sources decreased by 42.8 percent from 2018 to 2021 but were 646.7 percent higher in interim 2022 than in interim 2021.

⁷ The increase in quantity of imports from nonsubject countries from 2016 to 2018 coincides with the imposition of the antidumping and countervailing duty orders on the subject countries.

Table IV-2
Hot-rolled steel: Nonsubject U.S. imports, by source and by period

Quantity in short tons; Share in percent and reflect share of imports from all import sources

Source	Measure	2016	2017	2018
Canada	Quantity	1,499,639	1,673,264	1,819,130
Mexico	Quantity	401,422	355,719	411,295
Canada and Mexico combined	Quantity	1,901,062	2,028,983	2,230,425
All other nonsubject sources	Quantity	298,507	372,433	390,083
Nonsubject sources	Quantity	2,199,569	2,401,416	2,620,508
Canada	Share	37.6	49.4	45.8
Mexico	Share	10.1	10.5	10.3
Canada and Mexico combined	Share	47.6	59.9	56.1
All other nonsubject sources	Share	7.5	11.0	9.8
Nonsubject sources	Share	55.1	70.9	65.9

Table continued.

Table IV-2 Continued
Hot-rolled steel: Nonsubject U.S. imports, by source and by period

Quantity in short tons; Share in percent and reflect share of imports from all import sources

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Canada	Quantity	1,508,664	1,323,652	1,947,786	462,798	424,745
Mexico	Quantity	192,342	150,558	353,442	25,576	154,508
Canada and Mexico combined	Quantity	1,701,006	1,474,210	2,301,228	488,374	579,254
All other nonsubject sources	Quantity	173,725	80,862	222,982	8,221	61,381
Nonsubject sources	Quantity	1,874,731	1,555,072	2,524,210	496,595	640,635
Canada	Share	54.0	56.2	48.0	59.2	44.6
Mexico	Share	6.9	6.4	8.7	3.3	16.2
Canada and Mexico combined	Share	60.9	62.6	56.7	62.4	60.8
All other nonsubject sources	Share	6.2	3.4	5.5	1.1	6.4
Nonsubject sources	Share	67.1	66.0	62.2	63.5	67.3

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel and do not include some volume of in-scope imports of micro-alloy hot-rolled steel that is imported under other basket category statistical reporting numbers. Official U.S. import statistics are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

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

Table IV-3 and figure IV-2 present data on U.S. producers' and U.S. importers' U.S. shipments of hot-rolled steel by end use type in 2021. U.S. producers' reported shipments of all end use types of hot-rolled steel in 2021, with other end uses such as internal consumption for cold-rolled steel and corrosion resistant production, accounting for 55.5 percent followed by tubular goods, which accounted for 20.5 percent of their total U.S. shipments. The largest share of end use types of responding U.S. importers of subject imports were construction/structural, which accounted for *** percent of their U.S. shipments. Importers reported that the majority of their U.S. shipments of hot-rolled steel from both subject and nonsubject sources were used for tubular goods. Overall, U.S. producers accounted for the vast majority of total shipments of each end use types of hot-rolled steel in 2021, representing more than 90.0 percent for each type.

Table IV-3
Hot-rolled steel: U.S. producers' and U.S. importers' U.S. shipments to end users, by sector, 2021

Quantity in short tons

Source	Tubular goods	Auto/ transportation	Construction/ structural	Appliances/ machinery	Other end uses/sectors	All sectors
U.S. producers	7,589,791	4,023,652	3,150,458	1,699,404	20,552,583	37,015,888
Australia	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Japan	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***
Russia	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
United Kingdom	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All imports	399,285	235,068	325,949	98,456	172,447	1,231,205
All sources	7,989,076	4,258,720	3,476,407	1,797,860	20,725,030	38,247,093

Table continued.

Table IV-3 Continued

Hot-rolled steel: U.S. producers' and U.S. importers' U.S. shipments to end users, by sector, 2021

Share across in percent

Source	Tubular goods	Auto/ transportation	Construction/ structural	Appliances/ machinery	Other end uses/sectors	All sectors
U.S. producers	20.5	10.9	8.5	4.6	55.5	100.0
Australia	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Japan	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***
Russia	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
United Kingdom	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All imports	32.4	19.1	26.5	8.0	14.0	100.0
All sources	20.9	11.1	9.1	4.7	54.2	100.0

Table continued.

Table IV-3 Continued

Hot-rolled steel: U.S. producers' and U.S. importers' U.S. shipments to end users, by sector, 2021

Share down in percent

Source	Tubular goods	Auto/ transportation	Construction/ structural	Appliances/ machinery	Other end uses/sectors	All sectors
U.S. producers	95.0	94.5	90.6	94.5	99.2	96.8
Australia	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Japan	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***
Russia	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
United Kingdom	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All imports	5.0	5.5	9.4	5.5	0.8	3.2
All sources	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as “0.0” 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 “--”. These data are based on a subset of overall U.S. shipments, U.S. shipments to end users. U.S. producers reported *** percent of overall U.S. shipments as U.S. shipments to end users in 2021, while U.S. importers from subject sources reported *** percent of overall U.S. shipments as U.S. shipments to end users in 2021.

Figure IV-2

Hot-rolled steel: U.S. producers' and U.S. importers' U.S. shipments to end users, by sector, 2021

* * * * *

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

Geographical markets

Table IV-4 presents data on U.S. imports of hot-rolled steel by border of entry in 2021. According to official U.S. import statistics, virtually all U.S. imports from Japan and the majority of U.S. imports from South Korea entered the United States through ports located in the West. The majority of U.S. imports from Turkey entered the United States through ports located in the South. Most U.S. imports from Netherlands, the United Kingdom, and nonsubject sources entered the United States through ports located in the North.

Table IV-4
Hot-rolled steel: U.S. imports in 2021, by source and border of entry

Quantity in short tons

Source	East	North	South	West	All borders
Australia	---	---	---	---	---
Brazil	---	---	---	---	---
Japan	131	285	---	275,658	276,074
Netherlands	6,545	110,873	89	0	117,507
Russia	---	---	---	4	4
South Korea	147	---	221,027	289,523	510,697
Turkey	670	37,716	216,987	---	255,373
United Kingdom	---	22	6	8	35
Subject sources	7,493	148,895	438,108	565,193	1,159,690
Nonsubject sources	288,106	1,714,745	504,991	16,367	2,524,210
All import sources	295,599	1,863,640	943,100	581,560	3,683,900

Table continued.

Table IV-4 Continued
Hot-rolled steel: U.S. imports in 2021, by source and border of entry

Share across in percent

Source	East	North	South	West	All borders
Australia	---	---	---	---	---
Brazil	---	---	---	---	---
Japan	0.0	0.1	---	99.8	100.0
Netherlands	5.6	94.4	0.1	0.0	100.0
Russia	---	---	---	100.0	100.0
South Korea	0.0	---	43.3	56.7	100.0
Turkey	0.3	14.8	85.0	---	100.0
United Kingdom	---	62.2	16.0	21.8	100.0
Subject sources	0.6	12.8	37.8	48.7	100.0
Nonsubject sources	11.4	67.9	20.0	0.6	100.0
All import sources	8.0	50.6	25.6	15.8	100.0

Table continued.

Table IV-4 Continued
Hot-rolled steel: U.S. imports in 2021, by source and border of entry

Share down in percent

Source	East	North	South	West	All borders
Australia	---	---	---	---	---
Brazil	---	---	---	---	---
Japan	0.0	0.0	---	47.4	7.5
Netherlands	2.2	5.9	0.0	0.0	3.2
Russia	---	---	---	0.0	0.0
South Korea	0.0	---	23.4	49.8	13.9
Turkey	0.2	2.0	23.0	---	6.9
United Kingdom	---	0.0	0.0	0.0	0.0
Subject sources	2.5	8.0	46.5	97.2	31.5
Nonsubject sources	97.5	92.0	53.5	2.8	68.5
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel and do not include some volume of in-scope imports of micro-alloy hot-rolled steel that is imported under other basket category statistical reporting numbers. Official U.S. import statistics are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Note: Data presented above are straight official stats with no adjustment to add questionnaire responses for micro-alloy imports. Additionally, Turkey and subject sources subtotals include nonsubject imports from Colakoglu.

Presence in the market

Table IV-5 and figures IV-3 and IV-4 present monthly data for subject and nonsubject imports during January 2016-June 2022. Table IV-6 presents data monthly data for domestic U.S. shipments and U.S. imports during January 2016-June 2022. U.S. imports from South Korea were present in every month during January 2016-June 2022. U.S. imports from Netherlands were present in every month, except January 2021. U.S. imports from Japan were present in 70 of 78 months. U.S. imports from Turkey were present in 56 of 78 months. U.S. imports from the United Kingdom were present in 31 of 77 months. U.S. imports from Brazil were present in 13 of 78 months. U.S. imports from Australia were present in 12 of 78 months. U.S. imports from Russia were present in 4 of 78 months. Overall, imports from subject and nonsubject sources were present in every month during January 2016-June 2022.

Table IV-5
Hot-rolled steel: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Australia	Brazil	Japan	Netherlands	Russia	South Korea	Turkey	United Kingdom
2016	January	62,088	9,536	5,519	18,697	---	82,857	45,060	6
2016	February	45,755	---	99	18,326	---	85,951	17,297	41
2016	March	---	1,330	407	6,556	---	50,103	28,378	129
2016	April	---	---	479	10,480	---	97,275	5	1
2016	May	---	2,515	750	6,977	---	113,889	26	---
2016	June	---	---	346	11,755	---	104,749	28	92
2016	July	---	---	53,958	20,172	---	150,117	41,976	---
2016	August	---	11	16,620	11,574	---	94,028	14,366	7
2016	September	---	0	20,462	13,949	---	104,491	10,114	16
2016	October	---	---	18,801	34,462	---	19,925	59,346	1
2016	November	---	---	4,241	17,720	---	60,435	5	---
2016	December	---	49	17,470	8,828	---	38,812	---	---
2017	January	---	---	21,790	173	---	20,409	5,498	---
2017	February	---	---	20,133	4,953	---	2,670	171	8
2017	March	---	14	18,882	2,683	---	36,585	7,117	2
2017	April	48	---	33,617	6,772	---	11,253	23,738	---
2017	May	---	13	20,746	11,035	4,969	13,924	1,732	1
2017	June	6,808	---	26,029	8,611	1,740	35,418	22,057	---
2017	July	3,353	---	32,358	6,723	---	28,341	29,523	---
2017	August	---	---	22,789	15,133	---	26,187	112	1
2017	September	---	9	47,045	9,264	---	9,114	8	3
2017	October	---	---	369	12,260	67	39,348	42	536
2017	November	---	---	7,992	26,003	---	10,145	---	53
2017	December	---	---	180	13,031	---	4,015	15,849	7

Table continued.

Table IV-5 Continued
Hot-rolled steel: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Australia	Brazil	Japan	Netherlands	Russia	South Korea	Turkey	United Kingdom
2018	January	74	---	32,108	357	---	13,482	24,423	4
2018	February	117	---	23,432	568	---	23,770	28	6
2018	March	---	---	22,794	1,554	---	62,696	24,933	---
2018	April	---	---	21,192	4,101	---	62,139	---	---
2018	May	---	---	16,408	12,528	---	124	---	---
2018	June	---	---	29,932	7,573	---	37,921	8,728	4
2018	July	2,198	---	54,617	12,465	---	41,472	34,543	---
2018	August	---	---	20,597	3,351	---	38,341	11,446	---
2018	September	321	---	20,475	9,766	---	75,099	44,708	---
2018	October	283	8	22,938	22,474	---	95,425	928	---
2018	November	---	3	20,148	18,682	---	44,184	68	---
2018	December	---	---	3,075	6,268	---	31,576	71	---
2019	January	---	---	22,677	8,036	---	36,697	5,006	---
2019	February	---	---	25,651	2,785	---	50,621	8,281	6
2019	March	2,241	---	3,641	4,885	---	29,769	7,966	---
2019	April	---	---	38,316	6,098	---	50,641	1,661	---
2019	May	---	---	21,455	3,098	---	32,362	34	---
2019	June	---	---	3,591	8,447	---	58,283	---	---
2019	July	---	---	19,588	14,977	---	11,230	---	---
2019	August	---	---	---	8,917	---	32,208	---	---
2019	September	---	---	7	5,038	---	44,685	---	---
2019	October	---	---	15	7,482	---	48,003	250	19
2019	November	---	---	60	19,785	---	24,685	---	---
2019	December	---	336	15,114	12,494	---	16,014	---	5

Table continued.

Table IV-5 Continued
Hot-rolled steel: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Australia	Brazil	Japan	Netherlands	Russia	South Korea	Turkey	United Kingdom
2020	January	---	---	14,982	452	---	12,540	---	---
2020	February	---	---	---	347	---	55,343	787	14
2020	March	---	---	---	103	---	34,477	---	47
2020	April	---	---	5	4,646	---	49,212	---	26
2020	May	---	---	24,264	12,011	---	29,437	---	8
2020	June	---	---	---	8,114	---	32,856	---	---
2020	July	---	---	10,868	13,688	---	16,505	---	---
2020	August	25	---	15,996	1,538	---	12,672	---	---
2020	September	---	---	22,022	4,350	---	55,440	---	---
2020	October	---	---	27,297	5,398	---	18,545	255	---
2020	November	---	---	---	9,328	---	44,205	---	---
2020	December	---	---	2,813	21,027	---	58,266	---	---
2021	January	---	---	3,418	---	---	34,215	---	---
2021	February	---	---	32,165	5,929	---	89,269	11,763	---
2021	March	---	---	10,186	609	---	50,162	1,420	8
2021	April	---	---	26,892	7,520	---	70,445	14,212	---
2021	May	---	---	22,017	8,645	---	29,003	33,696	---
2021	June	---	---	47,654	20,018	---	68,124	57,378	22
2021	July	---	---	---	3,195	4	67,564	25,799	---
2021	August	---	---	22,120	9,609	---	18,065	11,920	---
2021	September	---	---	17,068	16,864	---	25,087	28,828	---
2021	October	---	---	19,933	11,410	---	34,476	40,947	---
2021	November	---	---	57,744	24,513	---	14,309	24,916	6
2021	December	---	---	16,877	9,196	---	9,976	4,493	---
2022	January	---	---	52,590	6,434	---	22,615	7,825	0
2022	February	---	8	---	1,605	---	22,798	14,884	---
2022	March	---	---	42,091	1,943	---	49,406	---	---
2022	April	---	---	30	12,052	---	25,043	2,248	---
2022	May	---	---	33,056	12,339	---	14,268	2,849	3
2022	June	---	---	3	12,648	---	41,905	186	---

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed September 29th, 2022. U.S. import data are based on official U.S import statistics for non-alloy hot-rolled steel and do not include some volume of in-scope imports of micro-alloy hot-rolled steel that is imported under other basket category statistical reporting numbers. Official U.S. import statistics are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Note: Data presented above are straight official stats with no adjustment to add questionnaire responses for micro-alloy imports. Additionally, Turkey and subject sources subtotals include nonsubject imports from Colakoglu.

Table IV-6
Hot-rolled steel: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Subject sources (see note)	Nonsubject sources	All import sources
2016	January	223,763	175,445	399,207
2016	February	167,468	150,195	317,663
2016	March	86,904	184,041	270,944
2016	April	108,241	159,552	267,793
2016	May	124,157	190,727	314,884
2016	June	116,971	195,987	312,958
2016	July	266,223	177,495	443,718
2016	August	136,607	207,471	344,078
2016	September	149,033	162,541	311,575
2016	October	132,535	179,357	311,891
2016	November	82,400	231,189	313,589
2016	December	65,159	185,568	250,727
2017	January	47,870	210,216	258,085
2017	February	27,934	145,647	173,581
2017	March	65,283	178,886	244,169
2017	April	75,428	180,863	256,291
2017	May	52,421	223,145	275,566
2017	June	100,664	235,014	335,679
2017	July	100,299	227,530	327,828
2017	August	64,221	192,586	256,807
2017	September	65,444	190,482	255,926
2017	October	52,620	227,674	280,295
2017	November	44,193	198,545	242,739
2017	December	33,082	190,828	223,910

Table continued.

Table IV-6 Continued
Hot-rolled steel: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Subject sources (see note)	Nonsubject sources	All import sources
2018	January	70,448	223,533	293,981
2018	February	47,921	205,963	253,885
2018	March	111,977	245,891	357,868
2018	April	87,432	295,608	383,040
2018	May	29,059	307,983	337,042
2018	June	84,158	162,402	246,560
2018	July	145,295	196,838	342,133
2018	August	73,737	204,337	278,073
2018	September	150,368	193,047	343,416
2018	October	142,056	224,642	366,698
2018	November	83,085	189,195	272,281
2018	December	40,991	171,068	212,058
2019	January	72,415	216,139	288,554
2019	February	87,344	128,876	216,220
2019	March	48,502	150,002	198,504
2019	April	96,717	128,031	224,748
2019	May	56,948	140,414	197,362
2019	June	70,321	128,641	198,962
2019	July	45,795	185,746	231,541
2019	August	41,124	176,543	217,667
2019	September	49,730	164,338	214,067
2019	October	55,769	158,882	214,651
2019	November	44,530	121,786	166,316
2019	December	43,963	175,333	219,296

Table continued.

Table IV-6 Continued
Hot-rolled steel: U.S. imports, by source and by month

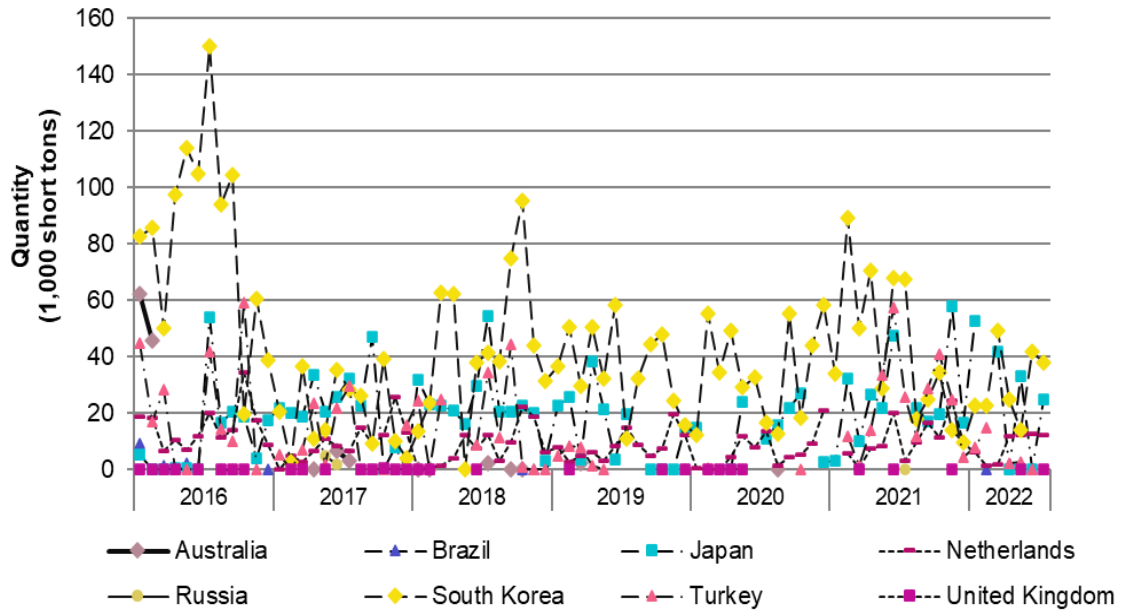
Quantity in short tons

Year	Month	Subject sources (see note)	Nonsubject sources	All import sources
2020	January	27,974	207,400	235,374
2020	February	56,491	147,909	204,400
2020	March	34,627	146,268	180,896
2020	April	53,888	108,173	162,061
2020	May	65,720	95,446	161,166
2020	June	40,971	111,855	152,826
2020	July	41,061	125,278	166,338
2020	August	30,231	116,993	147,224
2020	September	81,812	125,086	206,897
2020	October	51,496	125,793	177,288
2020	November	53,532	108,597	162,130
2020	December	82,106	136,275	218,381
2021	January	37,634	171,604	209,237
2021	February	139,126	140,137	279,263
2021	March	62,385	184,854	247,239
2021	April	119,069	188,011	307,080
2021	May	93,361	194,069	287,430
2021	June	193,197	203,221	396,418
2021	July	96,562	168,371	264,933
2021	August	61,713	220,712	282,426
2021	September	87,847	223,950	311,796
2021	October	106,767	259,731	366,498
2021	November	121,488	259,315	380,803
2021	December	40,542	310,235	350,777
2022	January	89,464	268,213	357,677
2022	February	39,295	154,804	194,099
2022	March	93,440	217,617	311,057
2022	April	39,373	219,387	258,760
2022	May	62,515	237,494	300,009
2022	June	54,742	269,835	324,577

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed September 29th, 2022. U.S. import data are based on official U.S import statistics for non-alloy hot-rolled steel and do not include some volume of in-scope imports of micro-alloy hot-rolled steel that is imported under other basket category statistical reporting numbers. Official U.S. import statistics are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

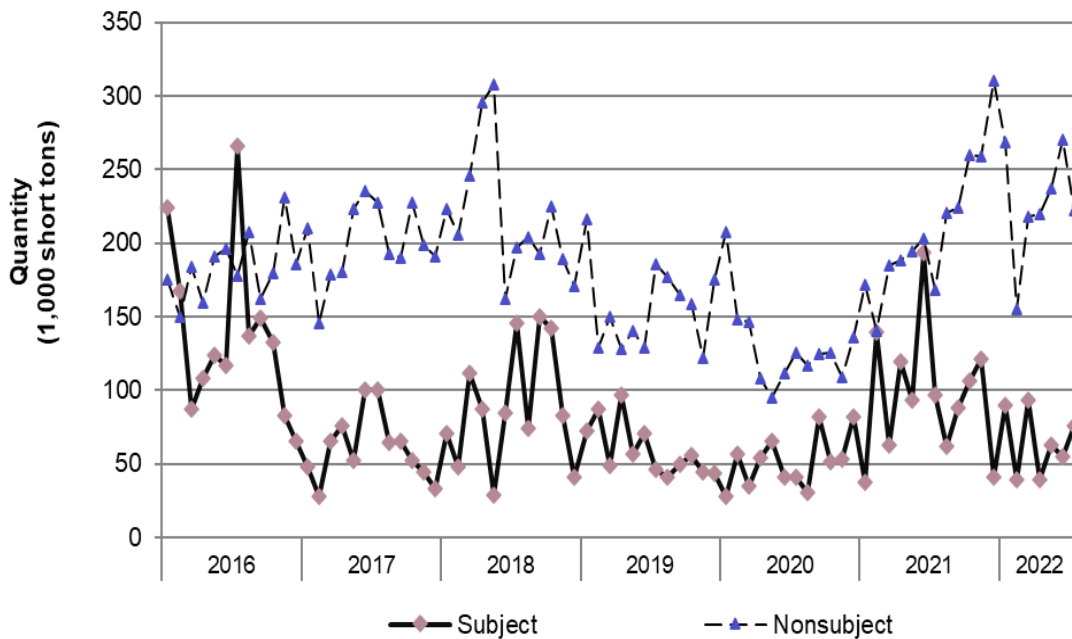
Note: Data presented above are straight official stats with no adjustment to add questionnaire responses for micro-alloy imports. Additionally, Turkey and subject sources subtotals include nonsubject imports from Colakoglu.

Figure IV-3
Hot-rolled steel: U.S. imports from individual subject sources, by month, January 2016 through June 2022



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed September 29th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel and do not include some volume of in-scope imports of micro-alloy hot-rolled steel that is imported under other basket category statistical reporting numbers. Official U.S. import statistics are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

Figure IV-4
Hot-rolled steel: U.S. imports from aggregated subject and nonsubject sources, by month, January 2016 through June 2022



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed September 29th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel and do not include some volume of in-scope imports of micro-alloy hot-rolled steel that is imported under other basket category statistical reporting numbers. Official U.S. import statistics are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

U.S. inventories of imported merchandise

Table IV-7 presents data for inventories of U.S. imports of hot-rolled steel from Australia, Brazil, Japan, Netherlands, South Korea, Turkey, Russia, the United Kingdom and all other sources held in the United States. Japan accounted for *** inventories of U.S. imports from subject countries of hot-rolled steel during all 2016-21, except for 2016 when Japan and South Korea accounted for *** inventories. The *** of end-of-period inventories of subject imports in interim 2021 and interim 2022 were imports from South Korea. There were *** inventories of imports from Brazil, Netherlands, Turkey (subject), Russia, and the United Kingdom during 2016-21, and Australia only reported inventories ***. Overall, end-of-period inventories of subject U.S. imports decreased by *** percent

from 2016 to 2021, with most of the decrease occurring from 2016 to 2017 as subject imports decreased at its highest rate between those years. End-of-period inventories were *** percent higher in interim 2022 compared to interim 2021.⁸

Imports from nonsubject sources accounted for the *** of responding U.S. importers' end-of-period inventories after 2016. End-of-period inventories of such imports decreased fluctuated during 2016-2021, overall increasing *** percent from 2016 to 2021. The largest increase, of *** percent, occurred from 2020 to 2021. End-of-period inventories of hot-rolled steel from nonsubject sources were *** percent higher in interim 2022 compared to interim 2021.⁹

⁸ The increase in the interim period reflects a ***. Email from ***, July 28, 2022.

⁹ ***. Email from ***, July 26, 2022.

Table IV-7
Hot-rolled steel: U.S. importers' end-of-period inventories of imports, by source and by period

Quantity in short tons; Ratios in percent

Measure	Source	2016	2017	2018
Inventories quantity	Australia	***	***	***
Ratio to imports	Australia	***	***	***
Ratio to U.S. shipments of imports	Australia	***	***	***
Ratio to total shipments of imports	Australia	***	***	***
Inventories quantity	Brazil	***	***	***
Ratio to imports	Brazil	***	***	***
Ratio to U.S. shipments of imports	Brazil	***	***	***
Ratio to total shipments of imports	Brazil	***	***	***
Inventories quantity	Japan	***	***	***
Ratio to imports	Japan	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***
Ratio to total shipments of imports	Japan	***	***	***
Inventories quantity	Netherlands	***	***	***
Ratio to imports	Netherlands	***	***	***
Ratio to U.S. shipments of imports	Netherlands	***	***	***
Ratio to total shipments of imports	Netherlands	***	***	***
Inventories quantity	Russia	***	***	***
Ratio to imports	Russia	***	***	***
Ratio to U.S. shipments of imports	Russia	***	***	***
Ratio to total shipments of imports	Russia	***	***	***
Inventories quantity	South Korea	***	***	***
Ratio to imports	South Korea	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***
Inventories quantity	Turkey, subject	***	***	***
Ratio to imports	Turkey, subject	***	***	***
Ratio to U.S. shipments of imports	Turkey, subject	***	***	***
Ratio to total shipments of imports	Turkey, subject	***	***	***
Inventories quantity	United Kingdom	***	***	***
Ratio to imports	United Kingdom	***	***	***
Ratio to U.S. shipments of imports	United Kingdom	***	***	***
Ratio to total shipments of imports	United Kingdom	***	***	***

Table continued.

Table IV-7 Continued
Hot-rolled steel: U.S. importers' end-of-period inventories of imports, by source and by period

Quantity in short tons; Ratios in percent

Measure	Source	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Inventories quantity	Australia	***	***	***	***	***
Ratio to imports	Australia	***	***	***	***	***
Ratio to U.S. shipments of imports	Australia	***	***	***	***	***
Ratio to total shipments of imports	Australia	***	***	***	***	***
Inventories quantity	Brazil	***	***	***	***	***
Ratio to imports	Brazil	***	***	***	***	***
Ratio to U.S. shipments of imports	Brazil	***	***	***	***	***
Ratio to total shipments of imports	Brazil	***	***	***	***	***
Inventories quantity	Japan	***	***	***	***	***
Ratio to imports	Japan	***	***	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***	***	***
Ratio to total shipments of imports	Japan	***	***	***	***	***
Inventories quantity	Netherlands	***	***	***	***	***
Ratio to imports	Netherlands	***	***	***	***	***
Ratio to U.S. shipments of imports	Netherlands	***	***	***	***	***
Ratio to total shipments of imports	Netherlands	***	***	***	***	***
Inventories quantity	Russia	***	***	***	***	***
Ratio to imports	Russia	***	***	***	***	***
Ratio to U.S. shipments of imports	Russia	***	***	***	***	***
Ratio to total shipments of imports	Russia	***	***	***	***	***
Inventories quantity	South Korea	***	***	***	***	***
Ratio to imports	South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***	***	***
Inventories quantity	Turkey, subject	***	***	***	***	***
Ratio to imports	Turkey, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey, subject	***	***	***	***	***
Ratio to total shipments of imports	Turkey, subject	***	***	***	***	***
Inventories quantity	United Kingdom	***	***	***	***	***
Ratio to imports	United Kingdom	***	***	***	***	***
Ratio to U.S. shipments of imports	United Kingdom	***	***	***	***	***
Ratio to total shipments of imports	United Kingdom	***	***	***	***	***

Table continued.

Table IV-7 Continued**Hot-rolled steel: U.S. importers' end-of-period inventories of imports, by source and by period**

Quantity in short tons; Ratios in percent

Measure	Source	2016	2017	2018
Inventories quantity	Subject	***	***	***
Ratio to imports	Subject	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***
Ratio to total shipments of imports	Subject	***	***	***
Inventories quantity	Turkey, nonsubject	***	***	***
Ratio to imports	Turkey, nonsubject	***	***	***
Ratio to U.S. shipments of imports	Turkey, nonsubject	***	***	***
Ratio to total shipments of imports	Turkey, nonsubject	***	***	***
Inventories quantity	All other sources	***	***	***
Ratio to imports	All other sources	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***
Inventories quantity	All	***	***	***
Ratio to imports	All	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***
Ratio to total shipments of imports	All	***	***	***

Table continued.

Table IV-7 Continued
Hot-rolled steel: U.S. importers' end-of-period inventories of imports, by source and by period

Quantity in short tons; Ratios in percent

Measure	Source	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Turkey, nonsubject	***	***	***	***	***
Ratio to imports	Turkey, nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey, nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Turkey, nonsubject	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

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

U.S. importers' imports subsequent to March 2022

The Commission requested importers to indicate whether they had imported or arranged for the importation of hot-rolled steel from Australia, Brazil, Japan, Netherlands, South Korea, Turkey, Russia, the United Kingdom, and all other sources for delivery after March 2022. Table IV-8 presents U.S. importers' arranged imports after March 2022. There were *** arranged imports from responding U.S. importers from Brazil, Russia, and the United Kingdom, and only *** arranged imports were reported from Australia. The majority of arranged imports from subject sources were led by ***, except from July-September 2022 when *** had the highest share of arranged imports from subject sources. According to official import stats, imports of non-alloy hot-rolled steel in April-June 2022 were as follows: 0 short tons imported from Australia, Brazil, and Russia; 3 short tons imported from the United Kingdom; 33,089 short tons from Japan, 37,039 short tons from the Netherlands, 81,216 short tons from South Korea, and 5,283 short tons from Turkey.

Table IV-8
Hot-rolled steel: Arranged imports, by quarter

Quantity in short tons

Source	Apr-Jun 2022	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Total
Australia	***	***	***	***	***
Brazil	***	***	***	***	***
Japan	***	***	***	***	***
Netherlands	***	***	***	***	***
Russia	***	***	***	***	***
South Korea	***	***	***	***	***
Turkey, subject	***	***	***	***	***
United Kingdom	***	***	***	***	***
Subject sources	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All sources	***	***	***	***	***

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

The industry in Australia

Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, BlueScope Steel Limited (“BlueScope”), which accounted for approximately *** percent of production of hot-rolled steel in Australia during 2015, and approximately *** percent of hot-rolled steel exports from Australia to the United States during 2015.¹⁰

In the current proceeding, the Commission issued questionnaires to two producers/exporters in Australia and received responses from one firm: BlueScope Limited (“BlueScope”). This firm accounted for *** hot-rolled steel production in Australia in 2021.^{11 12}

Table IV-9 presents data on gross production and apparent gross consumption of hot-rolled steel in Australia.¹³ Gross production of hot-rolled steel in Australia increased in each year during 2016-21, except for a *** percent decrease from 2018 to 2019, ending *** percent higher in 2021 than in 2016. Similarly, gross consumption in Australia increased in each year during 2016-21, except for a *** percent decrease from 2018 to 2019, overall increasing by *** percent during 2016-21.¹⁴

¹⁰ Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom confidential report, pp. I-9 and VII-3.

¹¹ While coverage based the share of reported production to *** gross production data for Australia is *** percent, BlueScope states it is the only hot-rolled producer in Australia and reported in its questionnaires that it accounted for *** percent of hot-rolled steel production in Australia. BlueScope posthearing brief, p. 4. ***.

¹² *** submitted a questionnaire response indicating it did not produce hot-rolled steel in Australia.

¹³ Apparent gross consumption was unavailable from *** and therefore was calculated by using ***, GTA data, and questionnaire data. Similarly, production and consumption projections are unavailable for Australia.

¹⁴ According to ***, annual production capacity in Australia in 2021 for hot-rolled coil (carbon) is *** short tons. Australian capacity that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-9
Hot-rolled steel: Gross production and estimated apparent gross consumption in Australia, by year

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

Table IV-9 Continued
Hot-rolled steel: Gross production and estimated apparent gross consumption in Australia, by year

Quantity in short tons

Item	2019	2020	2021
Gross production	***	***	***
Apparent gross consumption	***	***	***

Source: Compiled from data from *** and official merchandise trade statistics reported under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Australian Bureau of Statistics in the Global Trade Atlas (GTA) database, accessed July 14th, 2022. Estimated apparent gross consumption was calculated as Australia's gross production (***) plus Australia's import statistics (GTA data) minus Australia's exports statistics (GTA data).

Table IV-10 presents information on the hot-rolled steel operations of BlueScope.

Table IV-10
Hot-rolled steel: Summary data for Australian producer BlueScope, 2021

Quantity in short tons

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)
BlueScope	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

As discussed in Part III, BlueScope has reported hot-rolled production capacity and expansion plans for its U.S. facilities. As presented in table IV-11, BlueScope reported

operational and organizational changes related to its U.S. investments since the original investigations.

Table IV-11

Hot-rolled steel: Reported changes in operations Australian producer BlueScope, since January 1, 2016

Item	Firm name and narrative on changes in operations
Acquisitions	***.

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

Note: BlueScope reported total investments into the United States since the antidumping case was initiated, BlueScope has invested \$2.5 billion in the United States steel market, including \$1.5 billion in U.S. hot-rolled steel production capability. BlueScope posthearing brief, p. 4.

Table IV-12 presents developments in the Australian industry since the original investigations.

Table IV-12

Hot-rolled steel: Recent developments in the Australian industry

Item	Firm	Event
Expansion/update	BlueScope	Australia’s New South Wales (NSW) state government granted “critical infrastructure status” to BlueScope’s planned reline of the blast furnace at Port Kemba steelworks. The designation is expected to facilitate the planning approval process in an effort to ensure it will be ready to operate when the existing furnace is decommissioned in 2026.

Source: Argus Media, “Australia’s NSW backs BlueScope blast furnace reline”, May 31, 2021, <https://www.argusmedia.com/en/news/2220020-australias-nsw-backs-bluescope-blast-furnace-reline>.

Operations on hot-rolled steel

Tables IV-13 and 14 present data on BlueScope’s hot-rolled steel operations in Australia. Capacity remained constant in each year from 2016 to 2021 and interim 2022 was equivalent to interim 2021.¹⁵ Production, however, fluctuated over the period, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2019, and increased *** percent from 2019 to 2021, for an overall increase of *** percent. Production in interim 2022 was *** percent higher than in interim 2021. Consequently, BlueScope’s capacity utilization

¹⁵ ***.

increased by *** percentage points during 2016-2021 and was *** percentage points higher in interim 2022 compared to interim 2021.¹⁶

Table IV-13
Hot-rolled steel: Data for Australian producer BlueScope, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

¹⁶ ***.

Table IV-13 Continued
Hot-rolled steel: Data for Australian producer BlueScope, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-13 Continued
Hot-rolled steel: for Australian producer BlueScope, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	100.0	100.0	100.0

Table continued.

Table IV-13 Continued
Hot-rolled steel: Data for Australian producer BlueScope, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	100.0	100.0	100.0	100.0	100.0

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

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

Home market shipments, by quantity, accounted for the vast majority of BlueScope's total shipments, ranging between *** percent of total shipments during 2016-21. BlueScope's home market shipments fluctuated, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2019, and increasing by *** percent from 2019 to 2021, for an overall increase of *** percent during 2016-21.¹⁷ Additionally, home market shipments, by quantity, were *** percent higher in interim 2022 compared to interim 2021. The value of BlueScope's home market shipments increased throughout 2016-2021, for an overall increase of *** percent from 2016 to 2021, and interim 2022 was *** percent higher than interim 2021.¹⁸ Consequently, the unit value of home market shipments increased in each year during 2016-21, except for a *** percent decrease from 2019 to 2020, overall,

¹⁷ The increase from 2020-21 reflects the increase in ***. Email from ***, August 3, 2022.

¹⁸ ***. Email from ***, August 3, 2022.

increasing by *** percent during 2016-21. Similarly, the unit value of home markets shipments was *** percent higher in interim 2021 compared to interim 2021. Quantity of internal consumption and transfers accounted for the *** share of home market shipments, irregularly increasing *** percent during 2016-21 and were *** percent higher in interim 2022 compared to interim 2021.

BlueScope's end-of-period inventories fluctuated over the period, decreasing by *** percent from 2016 to 2021, despite increasing by *** percent from 2019 to 2020.¹⁹ End-of-period inventories were *** percent higher in interim 2022 compared to interim 2021. The ratio of BlueScope's end-of-period inventories to its production and total shipment ranged from *** percent to *** percent during each full and partial year.

Table IV-14 presents information on export shipments by market by BlueScope. Export shipments, by quantity, accounted for a ***, and largely decreasing, share of BlueScope's total shipments in each year during 2016-21. BlueScope *** to any market in interim 2022.²⁰ BlueScope reported export shipments to the United States only during 2016-19, accounting for *** percent of its export shipments by quantity in 2016, *** percent in 2017, *** percent in 2018, and *** percent in 2019.²¹ The value of export shipments to the United States decreased in each year from 2016 to 2019, decreasing overall by *** percent. The unit value of export shipments to the United States increased by *** percent from 2016 to 2018 before decreasing by *** percent from 2018 to 2019.

¹⁹ ***. Email from ***, August 3, 2022.

²⁰ ***. Email from ***, August 3, 2022.

²¹ In its questionnaire response, ***.

Table IV-14**Hot-rolled steel: BlueScope's export shipments, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-14 Continued

Hot-rolled steel: Export shipments by BlueScope, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-14 Continued**Hot-rolled steel: Export shipments by BlueScope, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-14 Continued
Hot-rolled steel: Export shipments by BlueScope, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

The majority of export shipments from BlueScope were to *** in each year during 2016-21, except for 2018 and 2021, when exports to *** represented a higher share of export shipments.²² After increasing by *** percent from 2016 to 2017, BlueScope's export shipments to Asia, by quantity, decreased irregularly, decreasing by *** percent from 2017 to 2018, increasing from 2018 to 2019 by *** percent, before decreasing by *** percent from 2019 to 2020, overall decreasing by *** percent from 2016 to 2020 and ***.²³ BlueScope's exports to the European Union fluctuated during 2016-20, decreasing by *** percent from 2016 to 2017, increasing by *** percent from 2017 to 2018, decreasing by *** percent from 2018 to 2019 and increasing by *** percent from 2019 to 2020, overall increasing by *** percent from 2016 to 2020 and ***

²² BlueScope only exported to *** in 2021.

²³ BlueScope *** to Asia in 2021.

***. BlueScope's quantity of export shipments to all other markets fluctuated from 2016 to 2021, overall decreasing by *** percent from 2016 to 2021.

The value of BlueScope's export shipments to Asia fluctuated from 2016 to 2020, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2018, increasing by *** percent from 2018 to 2019, before decreasing by *** percent from 2019 to 2020, overall increasing by *** percent during 2016-21. The value of BlueScope's export shipments to all other markets fluctuated but ultimately increased by *** percent from 2016 to 2021. The value of export shipments to the European Union increased in each year from 2016 to 2020, except for a *** percent decrease from 2018 to 2019, overall increasing by *** during 2016-20.

The unit value for exports to Asia increased by *** percent from 2016 to 2018 before decreasing by *** percent from 2018 to 2020, overall increasing by *** percent during 2016-20. The unit value for exports to all other markets increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, before increasing by *** percent from 2020 to 2021, overall increasing by *** percent from 2016 to 2021. The unit value for exports to the European Union increased by *** percent from 2016 to 2017 before decreasing by *** percent from 2017 to 2020, overall decreasing by *** percent from 2016 to 2020.

Affiliation

No responding producer in Australia reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing.

Alternative products

No responding producer in Australia reported production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.

Exports

Table IV-15 presents Global Trade Atlas data for exports of hot-rolled steel from Australia in descending order of quantity for 2021. By quantity, the leading export markets for hot-rolled steel from Australia in 2021 were Vietnam, Indonesia, and Papua New Guinea accounting for 88.0 percent, 5.0 percent, 2.4 percent, respectively. The United States accounted for 2.4 percent of exports of hot-rolled steel from Australia, by quantity, in 2021.

Table IV-15
Hot-rolled flat products of iron or nonalloy steel: Exports from Australia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	45,790	10,585	3,033
Vietnam	Quantity	57,251	1,789	14,586
Indonesia	Quantity	26	107	77
Papua New Guinea	Quantity	206	154	173
New Zealand	Quantity	31,676	4,262	4,733
Cambodia	Quantity	---	18	46
Malaysia	Quantity	---	3	5,512
Samoa (Western)	Quantity	---	---	---
Singapore	Quantity	174	19	---
All other destination markets	Quantity	255,772	311,430	269,480
Non-U.S. destination markets	Quantity	345,106	317,783	294,608
All destination markets	Quantity	390,896	328,369	297,641
United States	Value	15,224	4,449	1,103
Vietnam	Value	16,398	817	5,145
Indonesia	Value	21	93	111
Papua New Guinea	Value	252	319	373
New Zealand	Value	10,536	2,662	3,825
Cambodia	Value	---	15	52
Malaysia	Value	---	10	1,749
Samoa (Western)	Value	---	---	---
Singapore	Value	240	4	---
All other destination markets	Value	76,962	128,433	109,699
Non-U.S. destination markets	Value	104,409	132,354	120,953
All destination markets	Value	119,633	136,803	122,056

Table continued.

Table IV-15 Continued
Hot-rolled flat products of iron or nonalloy steel: Exports from Australia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	2,396	9,068	419
Vietnam	Quantity	76,643	86,796	15,506
Indonesia	Quantity	---	142	873
Papua New Guinea	Quantity	426	532	416
New Zealand	Quantity	12,118	432	216
Cambodia	Quantity	---	89	85
Malaysia	Quantity	3,473	8,835	24
Samoa (Western)	Quantity	---	---	23
Singapore	Quantity	---	130	22
All other destination markets	Quantity	304,205	201,371	44
Non-U.S. destination markets	Quantity	396,865	298,328	17,210
All destination markets	Quantity	399,261	307,396	17,629
United States	Value	1,448	5,814	1,696
Vietnam	Value	31,401	33,714	6,950
Indonesia	Value	---	127	858
Papua New Guinea	Value	1,010	1,948	1,187
New Zealand	Value	5,457	429	883
Cambodia	Value	---	123	141
Malaysia	Value	1,451	3,668	9
Samoa (Western)	Value	---	---	33
Singapore	Value	---	188	17
All other destination markets	Value	134,790	87,886	117
Non-U.S. destination markets	Value	174,107	128,083	10,196
All destination markets	Value	175,555	133,897	11,892

Table continued.

Table IV-15 Continued
Hot-rolled flat products of iron or nonalloy steel: Exports from Australia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	332	420	363
Vietnam	Unit value	286	456	353
Indonesia	Unit value	787	873	1,432
Papua New Guinea	Unit value	1,222	2,068	2,154
New Zealand	Unit value	333	625	808
Cambodia	Unit value	---	840	1,123
Malaysia	Unit value	---	3,048	317
Samoa (Western)	Unit value	---	---	---
Singapore	Unit value	1,385	214	---
All other destination markets	Unit value	301	412	407
Non-U.S. destination markets	Unit value	303	416	411
All destination markets	Unit value	306	417	410
United States	Share of quantity	11.7	3.2	1.0
Vietnam	Share of quantity	14.6	0.5	4.9
Indonesia	Share of quantity	0.0	0.0	0.0
Papua New Guinea	Share of quantity	0.1	0.0	0.1
New Zealand	Share of quantity	8.1	1.3	1.6
Cambodia	Share of quantity	---	0.0	0.0
Malaysia	Share of quantity	---	0.0	1.9
Samoa (Western)	Share of quantity	---	---	---
Singapore	Share of quantity	0.0	0.0	---
All other destination markets	Share of quantity	65.4	94.8	90.5
Non-U.S. destination markets	Share of quantity	88.3	96.8	99.0
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-15 Continued
Hot-rolled flat products of iron or nonalloy steel: Exports from Australia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	604	641	4,045
Vietnam	Unit value	410	388	448
Indonesia	Unit value	---	898	983
Papua New Guinea	Unit value	2,371	3,661	2,856
New Zealand	Unit value	450	992	4,077
Cambodia	Unit value	---	1,383	1,659
Malaysia	Unit value	418	415	367
Samoa (Western)	Unit value	---	---	1,416
Singapore	Unit value	---	1,447	781
All other destination markets	Unit value	443	436	2,675
Non-U.S. destination markets	Unit value	439	429	592
All destination markets	Unit value	440	436	675
United States	Share of quantity	0.6	2.9	2.4
Vietnam	Share of quantity	19.2	28.2	88.0
Indonesia	Share of quantity	---	0.0	5.0
Papua New Guinea	Share of quantity	0.1	0.2	2.4
New Zealand	Share of quantity	3.0	0.1	1.2
Cambodia	Share of quantity	---	0.0	0.5
Malaysia	Share of quantity	0.9	2.9	0.1
Samoa (Western)	Share of quantity	---	---	0.1
Singapore	Share of quantity	---	0.0	0.1
All other destination markets	Share of quantity	76.2	65.5	0.2
Non-U.S. destination markets	Share of quantity	99.4	97.1	97.6
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Australian Bureau of Statistics in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-5 presents data on the average unit values for exports from Australia to the United States and to all other destination markets. Data for figure IV-5 are derived from tables IV-14 and 15.

Figure IV-5

Hot-rolled steel: Average unit values for exports from Australia to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Australian Bureau of Statistics in the Global Trade Atlas database, accessed July 14th, 2022.

The industry in Brazil

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, ArcelorMittal Brasil SA (“ArcelorMittal Brasil”), Companhia Siderurgica Nacional SA (“CSN”), and Usinas Siderúrgicas de Minas Gerais S.A. (“USIMINAS”), which accounted for approximately *** percent of production of hot-rolled steel in Brazil during 2015, and approximately *** percent of hot-rolled steel exports from Brazil to the United States during 2015.²⁴

In the current proceeding, the Commission issued questionnaires to eight producers/exporters in Brazil and received responses from the same three firms: ArcelorMittal

²⁴ Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom confidential report, pp. I-9 and VII-9.

Brasil, CSN, and USIMINAS. These firms collectively accounted for *** percent of hot-rolled steel production in Brazil in 2021.^{25 26 27}

Table IV-16 presents data on gross production and apparent gross consumption of hot-rolled steel in Brazil. Gross production of hot-rolled steel in Brazil initially increased by *** percent from 2016 to 2018, then decreased by *** percent from 2018 to 2020 and increased by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2016. Gross production is projected to be *** percent lower in 2022 than in 2021. Apparent gross consumption moved in the same direction as gross production during 2016-21, increasing by *** percent from 2016 to 2018, then decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2016. It is projected to be *** percent lower in 2022 than in 2021.²⁸

²⁵ Coverage is based on the share of reported production to *** gross production data for Brazil. Data include hot-rolled sheet and coiled plate. ***. Brazilian responding producers reported in their questionnaires that they collectively accounted for *** percent of hot-rolled steel production in Brazil.

²⁶ The Brazilian steel industry includes five producers of hot-rolled steel. The three largest producers are ArcelorMittal Tubarão, Cia. Siderúrgica Nacional (CSN), and Usinas Siderúrgicas de Minas Gerais (Usiminas), which according to data compiled by the Instituto Aço Brasil, account for approximately 90 percent of Brazilian carbon steel flat product production (a category that includes cut-to-length plate). Aperam South America also produces carbon steel flat product but is predominantly a producer of special-alloy steel. Finally, Gerdau Açominas cast slabs and produces hot-rolled coils (which are sold in the domestic and export market) and heavy plates at its Ouro Branco mill. The company also has announced that its annual production capacity of hot-rolled coils will expand by 250,000 tons per year, with commercial startup slated for early 2024, as “part of Gerdau’s mission of continuing to meet the growing demand from the sectors that consume these products in Brazil and Latin America.” Instituto Aço Brasil, Anuário Estatístico/2022, pp. 24 (Produção de Laminados) and 83-84 (As Empresas Siderúrgicas e seus Produtos); Gerdau S.A. Form 20-F, Fiscal Year Ended December 31, 2021; and Gerdau S.A. Form 6-K, August 9, 2021.

²⁷ Two firms, *** submitted questionnaires indicating they did not produce or export hot-rolled steel during 2016-21. Staff sent a questionnaire to *** but were unable to reach a contact. While Companhia Siderúrgica Suape (CSS) was identified as a possible Brazilian producer of hot-rolled steel, there are no indications that CSS’s hot-rolled steel productions are in operation in Brazil; indeed, the firm “does not exist” according to witness testimony. Hearing transcript, p. 352 (Delgado). Marcegaglia do Brasil was not identified as a Brazilian producer of hot-rolled steel in Instituto Aço Brasil, Anuário Estatístico/2022 or ***.

²⁸ According to ***, annual production capacity in Brazil in 2021 for hot-rolled coil (carbon) is *** short tons. Brazilian capacity that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-16**Hot-rolled steel: Gross production and apparent gross consumption in Brazil, by year**

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

Table IV-16 Continued**Hot-rolled steel: Gross production and apparent gross consumption in Brazil, by year**

Quantity in short tons

Item	2019	2020	2021	Projected 2022
Gross production	***	***	***	***
Apparent gross consumption	***	***	***	***

Source: ***.

Table IV-17 presents information on the hot-rolled steel operations of the responding producers and exporters in Brazil.

Table IV-17**Hot-rolled steel: Summary data on firms in Brazil, 2021**

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 Brasil	***	***	***	***	***	***
CSN	***	***	***	***	***	***
USIMINAS	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

As presented in table IV-18 producers in Brazil reported several operational and organizational changes since January 1, 2016.

Table IV-18

Hot-rolled steel: Reported changes in operations by producers in Brazil, since January 1, 2016

Item	Firm name and narrative on changes in operations
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***

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

Table IV-19 presents developments in the Brazilian industry since the original investigations.

Table IV-19
Hot-rolled steel: Recent developments in the Brazilian industry

Item	Firm	Event
Expansion	CSN	In November 2020, CSN resumed operating one of its furnaces at its Presidente Vargas plant, allowing it to increase slab production by 11 percent in one quarter.
Expansion	USIMINAS	In its second quarter 2021 financial results presentation, USIMINAS announced plans to invest \$377 million over the next three years to upgrade its number three blast furnace.
Expansion	Aperam South America	In 2021, Aperam announced plans to invest \$42.6 million to expand production capacity at the company's Timóteo plant in the state of Minas Gerais which produces stainless, electrical, and special carbon steel flat products.
Expansion	Gerdau	Gerdau has announced that its annual production capacity of hot-rolled coils will expand by 250,000 tons per year at its Ouro Branco plant in Minas Gerais state, with commercial startup slated for early 2024.

Source: CSN 2Q21 Financial Results Presentation, attached at Exhibit 15 in the domestic interested parties response to the Notice of Institution; Steel Orbis, "Aperam investing \$42.6 million in Brazilian plant," April 2021, <https://www.steelorbis.com/steel-news/latest-news/aperam-investing-426-million-in-brazilian-plant-1195112.htm>. SP Global, "Gerdau to expand HRC, beam production capacities in Brazil: CEO," August 2021, <https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/metals/080421-gerdau-to-expand-hrc-beam-production-capacities-in-brazil-ceo>

Operations on hot-rolled steel

Tables IV-20 and IV-21 presents data on the hot-rolled steel operations of the responding producers and exporters in Brazil. After increasing by *** percent from 2016 to 2017, the Brazilian producers reported that their annual production capacity decreased by *** percent from 2017 to 2020 and increased by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2016.²⁹ Additionally, capacity was *** percent lower in interim 2022 compared to interim 2021. Reported production similarly fluctuated, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and reaching a

²⁹ This increase was driven by ***, who attributed the increase to ***. Email from ***, August 2, 2022. *** each year during 2016-21.

period high in 2021 for an overall increase of *** percent during 2016-21.³⁰ Production was *** percent lower in interim 2022 than interim 2021. The capacity utilization of responding producers in Brazil increased from *** percent in 2016 to *** percent in 2021, despite a *** percentage point decrease during 2018-20, reflecting the decrease in production in those same years. Capacity utilization in interim 2022 was *** percentage points lower than in interim 2021.

Table IV-20
Hot-rolled steel: Data on industry in Brazil, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

³⁰ The increase in production from 2020 to 2021 was largely driven by ***, which reported ***. ***. Correspondence from *** August 3, 2022.

Table IV-20 Continued
Hot-rolled steel: Data on industry in Brazil, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-20 Continued
Hot-rolled steel: Data on industry in Brazil, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-20 Continued
Hot-rolled steel: Data on industry in Brazil, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments, by quantity, accounted for between *** percent of total shipments by responding producers in Brazil during all full or partial years.³¹ Following trends in reported production, reported home market shipments increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and reached a period-high in 2021 for an overall increase of *** percent during 2016-21. Home market shipments, by quantity, were *** percent lower in interim 2022 than in interim 2021. The value of reported home market shipments also fluctuated in the similar direction during 2016-21. They increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and increased by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21. Home market shipments by value in interim 2022 was *** percent higher than in interim 2021. The unit value of reported home market shipments mirrored the same direction as value, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and reaching a period-high in 2021 for an overall increase of *** percent during 2016-21. The unit value for home shipments was *** percent higher in interim 2022 compared to interim 2021. Quantity of internal consumption and transfers accounted for the ***, but declining, share of home market shipments during 2016-21. Internal consumption and transfers, by quantity, overall increased *** percent during 2016-21 and were *** percent lower in interim 2022 compared to interim 2021.

End-of-period inventories for the responding producers in Brazil fluctuated widely, with the largest increase of *** percent occurring from 2020 to 2021, increasing overall by *** percent from 2016 to 2021.³² End-of-period inventories were *** percent higher in interim 2022 compared to interim 2021. The ratios of their end-of-period inventories to production ranged from *** percent to *** percent between 2016 and interim 2022 while the ratios of their end-of-period inventories to total shipments ranged from *** percent to *** percent.

Table IV-21 presents data on export shipments by market of the responding producers and exporters in Brazil. Export shipments, by quantity, accounted for minority and declining share of total shipments in Brazil during 2016-21, but was nearly *** higher in interim 2022 compared to interim 2021. The majority of export shipments were to all other markets during all full and partial years, followed by the European Union. Producers in Brazil reported

³¹ ***.

³² ***. Email from *** August 5, 2022.

exports to *** with less than *** percent of shipments going to the United States in each year.³³

Table IV-21
Hot-rolled steel: Brazilian producers' export shipments, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

³³ *** accounted for all exports to *** in 2016, and *** accounted for all exports to *** in 2019.

Table IV-21 Continued**Hot-rolled steel: Brazilian producers' export shipments, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-21 Continued**Hot-rolled steel: Brazilian producers' export shipments, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-21 Continued

Hot-rolled steel: Brazilian producers' export shipments, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

After increasing by *** percent from 2016 to 2018, the quantity of reported export shipments to all other markets decreased by *** percent from 2018 to 2020 and increased again by *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. Export shipments, by quantity, to all other markets was *** percent higher in interim 2022 compared to interim 2021.³⁴ The quantity of reported export shipments to the European Union decreased by *** percent from 2016 to 2020 before increasing by *** percent from 2020 to 2021, for an overall decrease of *** percent. Export shipments, by quantity, to the EU in interim 2022 were nearly *** higher than in interim 2021. The quantity of reported export shipments to Asia fluctuated, overall decreasing by *** percent

³⁴ ***. Email from ***, August 5, 2022.

during 2016-21, and *** accounted for the vast majority of these exports.³⁵ Export shipments, by quantity, to Asia decreased by *** percent from, 2016 to 2018, increased from 2018 to 2019 by *** percent and as there were *** exports in 2020, decreased by *** percent from 2019 to 2021, with the vast majority of these exports from ***. Finally, export shipments to other North American markets decreased by *** percent from 2016 to 2018, increased by *** percent from 2019 to 2021, overall decreasing by *** percent from 2016 to 2021.³⁶

The value of reported export shipments to all other markets fluctuated during 2016-21, ending *** percent higher in 2021 than in 2016. Additionally, the value of export shipments to all other markets interim 2021 was over *** times higher than in interim 2022. The value of reported export shipments to the European Union fluctuated during 2016-21, decreasing by *** percent from 2016 to 2019 and increasing by *** from 2019 to 2021, but overall decreasing by *** percent during 2016-21. Additionally, the value of export shipments to the European Union was over *** higher in interim 2022 compared to interim 2021. Export shipments to Asia, by value, also moved irregularly from 2016 to 2021, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2018, and increasing by *** percent from 2018 to 2019, overall decreasing by *** percent. Finally, export shipments to other North American markets decreased by *** percent from 2016 to 2019 and increased by *** percent from 2019 to 2021, overall increasing by *** percent from 2016 to 2021. The unit values of reported export shipments to all markets, all moved in the same direction throughout 2016-21, increasing from 2016 to 2018, decreasing from 2018 to 2020, and reaching a period high in 2021. Overall, export shipments to all other markets, the European Union, Asia, and other North American markets were *** percent, *** percent, *** percent, and *** percent higher in 2021 than in 2016, respectively.³⁷ Additionally, the unit values for exports to the European Union and all other markets were higher in interim 2022 compared to interim 2021.

³⁵ ***.

³⁶ The increase in shipments to other North American markets from 2019 to 2021 reflected ***. Correspondence from *** August 3, 2022. While *** had been a traditional export market for ***. Email from *** August 5, 2022.

³⁷ The increase in prices increased globally from 2020 to 2021 and into 2022 due to ***. Email from *** , August 2, 2022.

Affiliation

As presented in table IV-22, *** reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing only in ***.

Table IV-22
Hot-rolled steel: Exports to the United States by producers and resellers in Brazil, by affiliation and period

Quantity in short tons

Item	Measure	2016	2017	2018
Affiliated	Quantity	***	***	***
Other	Quantity	***	***	***
All types	Quantity	***	***	***
Affiliated	Share of quantity	***	***	***
Other	Share of quantity	***	***	***
All types	Share of quantity	***	***	***

Table continued.

Table IV-22 Continued
Hot-rolled steel: Exports to the United States by producers and resellers in Brazil, by affiliation and period

Quantity in short tons

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Affiliated	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
Affiliated	Share of quantity	***	***	***	***	***
Other	Share of quantity	***	***	***	***	***
All types	Share of quantity	***	***	***	***	***

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

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

Alternative products

No responding producer in Brazil reported production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.

Exports

Table IV-23 presents Global Trade Atlas data for exports of hot-rolled steel from Brazil in descending order of quantity for 2021, after the United States. The leading export markets for hot-rolled steel from Brazil in 2021 are Chile, Colombia, and Turkey, accounting for 24.2 percent, 17.3 percent, and 13.3 percent, respectively. The United States accounted for less than .01 percent of exports of hot-rolled steel from Brazil in 2021.

Table IV-23
Hot-rolled flat products of iron or nonalloy steel: Exports from Brazil, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	56,113	26,311	9
Chile	Quantity	167,699	138,955	135,182
Colombia	Quantity	125,475	89,588	144,414
Turkey	Quantity	263,149	260,459	279,854
Portugal	Quantity	212,830	403,502	289,435
Ecuador	Quantity	109,638	165,501	150,068
Peru	Quantity	64,868	50,184	59,109
Bolivia	Quantity	4,578	34,750	42,631
Dominican Republic	Quantity	3,898	12,069	8,469
All other destination markets	Quantity	654,187	613,122	344,294
Non-U.S. destination markets	Quantity	1,606,322	1,768,130	1,453,457
All destination markets	Quantity	1,662,434	1,794,441	1,453,466
United States	Value	17,213	9,159	73
Chile	Value	51,871	62,930	72,805
Colombia	Value	41,770	40,485	79,115
Turkey	Value	74,792	111,017	149,212
Portugal	Value	79,839	194,702	166,505
Ecuador	Value	34,813	74,755	81,640
Peru	Value	20,283	22,514	31,514
Bolivia	Value	1,881	16,445	24,060
Dominican Republic	Value	1,437	5,802	4,749
All other destination markets	Value	231,047	289,466	185,783
Non-U.S. destination markets	Value	537,733	818,116	795,382
All destination markets	Value	554,947	827,275	795,455

Table continued.

Table IV-23 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Brazil, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	8	7	19
Chile	Quantity	168,153	162,628	178,471
Colombia	Quantity	163,949	71,570	127,535
Turkey	Quantity	167,480	88,256	97,884
Portugal	Quantity	100,901	191,823	95,270
Ecuador	Quantity	146,669	79,329	77,666
Peru	Quantity	79,193	54,486	26,642
Bolivia	Quantity	11,315	10,189	21,920
Dominican Republic	Quantity	15,972	10,404	14,132
All other destination markets	Quantity	406,533	74,851	97,421
Non-U.S. destination markets	Quantity	1,260,164	743,536	736,941
All destination markets	Quantity	1,260,172	743,542	736,961
United States	Value	36	18	68
Chile	Value	74,911	70,101	141,901
Colombia	Value	76,832	31,177	103,279
Turkey	Value	70,855	31,994	83,551
Portugal	Value	47,456	89,322	90,370
Ecuador	Value	66,750	33,374	61,728
Peru	Value	35,953	22,854	18,329
Bolivia	Value	5,090	4,548	19,206
Dominican Republic	Value	7,639	4,521	12,923
All other destination markets	Value	177,039	36,486	80,331
Non-U.S. destination markets	Value	562,527	324,378	611,618
All destination markets	Value	562,562	324,396	611,686

Table continued.

Table IV-23 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Brazil, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	307	348	7,803
Chile	Unit value	309	453	539
Colombia	Unit value	333	452	548
Turkey	Unit value	284	426	533
Portugal	Unit value	375	483	575
Ecuador	Unit value	318	452	544
Peru	Unit value	313	449	533
Bolivia	Unit value	411	473	564
Dominican Republic	Unit value	369	481	561
All other destination markets	Unit value	353	472	540
Non-U.S. destination markets	Unit value	335	463	547
All destination markets	Unit value	334	461	547
United States	Share of quantity	3.4	1.5	0.0
Chile	Share of quantity	10.1	7.7	9.3
Colombia	Share of quantity	7.5	5.0	9.9
Turkey	Share of quantity	15.8	14.5	19.3
Portugal	Share of quantity	12.8	22.5	19.9
Ecuador	Share of quantity	6.6	9.2	10.3
Peru	Share of quantity	3.9	2.8	4.1
Bolivia	Share of quantity	0.3	1.9	2.9
Dominican Republic	Share of quantity	0.2	0.7	0.6
All other destination markets	Share of quantity	39.4	34.2	23.7
Non-U.S. destination markets	Share of quantity	96.6	98.5	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-23 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Brazil, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	4,471	2,679	3,550
Chile	Unit value	445	431	795
Colombia	Unit value	469	436	810
Turkey	Unit value	423	363	854
Portugal	Unit value	470	466	949
Ecuador	Unit value	455	421	795
Peru	Unit value	454	419	688
Bolivia	Unit value	450	446	876
Dominican Republic	Unit value	478	435	914
All other destination markets	Unit value	435	487	825
Non-U.S. destination markets	Unit value	446	436	830
All destination markets	Unit value	446	436	830
United States	Share of quantity	0.0	0.0	0.0
Chile	Share of quantity	13.3	21.9	24.2
Colombia	Share of quantity	13.0	9.6	17.3
Turkey	Share of quantity	13.3	11.9	13.3
Portugal	Share of quantity	8.0	25.8	12.9
Ecuador	Share of quantity	11.6	10.7	10.5
Peru	Share of quantity	6.3	7.3	3.6
Bolivia	Share of quantity	0.9	1.4	3.0
Dominican Republic	Share of quantity	1.3	1.4	1.9
All other destination markets	Share of quantity	32.3	10.1	13.2
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-6 presents data on the average unit values for exports from Brazil to the United States and to all other destination markets. Data for figure IV-6 are derived from tables IV-21 and IV-23.

Figure IV-6

Hot-rolled steel: Average unit values for exports from Brazil to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by the SECEX - Foreign Trade Secretariat Global Trade Atlas database, accessed July 14th, 2022.

The industry in Japan

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from five firms, JFE Steel Corporation (“JFE”), Kobe Steel Ltd (“Kobe”), Nippon Steel & Sumitomo Metal Corporation (“NSSMC”), Nisshin Steel Co. (“Nisshin”), and Tokyo Steel Corporation (“Tokyo Steel”), which accounted for *** percent of production of hot-rolled steel in Japan and *** percent of exports from Japan to the United States in 2015.³⁸

In the current proceeding, the Commission issued questionnaires to seven producers/exporters in Japan and received responses from four firms: JFE, Kobe, Nippon Steel

³⁸ Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom confidential report, pp. I-9 and VII-16.

Corporation (“NSC”), and Tokyo Steel.^{39 40} These firms collectively accounted for *** hot-rolled steel production in Japan in 2021.⁴¹

Table IV-24 presents data on gross production and apparent gross consumption of hot-rolled steel in Japan. After a slight increase from 2016 to 2017, gross production decreased by *** percent from 2017 to 2020, before increasing *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. Gross production is projected to be *** percent lower in 2022 than in 2021. Apparent gross consumption also increased by *** percent from 2016 to 2017, decreased *** percent from 2017 to 2020, before increasing *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. It is projected to be *** percent lower in 2021 than in 2021.⁴²

Table IV-24
Hot-rolled steel: Gross production and apparent gross consumption in Japan, by year

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

Table IV-24 Continued
Hot-rolled steel: Gross production and apparent gross consumption in Japan, by year

Quantity in short tons

Item	2019	2020	2021	Projected 2022
Gross production	***	***	***	***
Apparent gross consumption	***	***	***	***

Source: ***.

³⁹ In April 2019, Nippon Steel and Sumitomo Metal Corporation was renamed to Nippon Steel Corporation. Nippon Steel Corporation News Release, April 1, 2019. ***.

⁴⁰ *** did not respond to Staff’s repeated requests to complete a foreign producer questionnaire.

⁴¹ Coverage is based on the share of reported production to *** gross production data for Japan. Data include hot-rolled sheet and coiled plate. *** Japanese responding producers reported they collectively accounted for *** percent of hot-rolled steel production in Japan and *** percent of exports to the United States from Japan in their questionnaire responses.

⁴² According to ***, annual production capacity in Japan in 2021 for hot-rolled coil (carbon) is *** short tons. Japanese capacity that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-25 presents information on the hot-rolled steel operations of the responding producers and exporters in Japan.

Table IV-25
Hot-rolled steel: Summary data for producers in Japan, 2021

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)
JFE	***	***	***	***	***	***
Kobe	***	***	***	***	***	***
NSC	***	***	***	***	***	***
Tokyo Steel	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Table IV-26 presents information on the resales of hot-rolled steel operations of the responding producers and exporters in Japan.

Table IV-26
Hot-rolled steel: Summary data on resellers in Japan, 2021

Resellers	Resales exported to all destination markets (short tons)	Share of resales exported to all destination markets (percent)	Resales exported to the United States (short tons)	Share of resales reported exports to the United States (percent)
NSC	***	***	***	***
All firms	***	***	***	***

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

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

Changes in operations

As presented in table IV-27 producers in Japan reported several operational and organizational changes since January 1, 2016.

Table IV-27**Hot-rolled steel: Reported changes in operations by producers in Japan, since January 1, 2016**

Item	Firm name and narrative on changes in operations
Plant openings	***
Plant closings	***
Plant closings	***
Acquisitions	***
Consolidations	***

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

Table IV-28 presents developments in the Japanese industry since the original investigations.

Table IV-28**Hot-rolled steel: Recent developments in the Japanese industry**

Item	Firm	Event
Acquisition	NSC	In 2017, NSC acquired Nisshin Steel Company. The acquisition sought to increase NSC production capacity.
Acquisition	NSC	In 2018, NSC acquired Sanyo Special Steel Company. The acquisition, coupled with its 2017 acquisition of Nisshin Steel Company, sought to increase NSC production capacity.
Expansion	NSC	In 2020, NSC announced plans to invest \$883 million to undertake refurbishment of blast furnaces, coke ovens, and other facilities. It also plans to start a new blast furnace at its Wakayama Works that will increase its production capacity by 500 thousand tons per year.
Expansion	Kobe Steel	In 2020, Kobe Steel announced plans to invest \$132 million in its steel plate plant at Kakogawa Works to carry out a refurbishment of its finishing rolling mill.

Source: Nippon Steel Factbook 2020, pp. 7, 20, attached as Exhibit 20 in the domestic interested parties response to the Notice of Institution; Kobe Steel Press Release, attached as Exhibit 25 in the domestic interested parties response to the Notice of Institution.

Operations on hot-rolled steel

Tables IV-29 and IV-30 presents data on the hot-rolled steel operations of the responding producers and exporters in Japan.⁴³ After decreasing *** percent from 2016 to 2017, reported annual production capacity increased *** percent from 2017 to 2018, and decreased *** percent from 2018 to 2020, before increasing *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2016.⁴⁴ Capacity was *** percent lower in interim 2022 compared to interim 2021.⁴⁵ After decreasing *** percent from 2016 to 2017, production decreased by *** percent from 2017 to 2020 before increasing by *** percent from 2020 to 2021, for an overall decrease of *** percent from 2016 to 2021.⁴⁶ Production in Japan was *** percent lower in interim 2022 compared to interim 2021.⁴⁷ The capacity utilization of responding producers in Japan increased *** percentage points from 2016 to 2017, decreased by *** percent from 2017 to 2020, and increased *** percent from 2020 to 2021. Capacity utilization was *** percentage points lower in interim 2022 compared to interim 2021.

⁴³ ***.

⁴⁴ ***.

⁴⁵ ***.

⁴⁶ The increase from 2020 to 2021, which was largely ***. Correspondence with ***, August 3, 2022. Additionally, *** reported it the decrease in production from 2017 to 2020 was due to ***. Correspondence with ***, August 3, 2022.

⁴⁷ ***. Correspondence with ***, August 3, 2022.

Table IV-29
Hot-rolled steel: Data on industry in Japan, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-29 Continued
Hot-rolled steel: Data on industry in Japan, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-29 Continued
Hot-rolled steel: Data on industry in Japan, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-29 Continued
Hot-rolled steel: Data on industry in Japan, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments, by quantity, accounted for the majority of total shipments, falling between *** and *** percent of total shipments throughout 2016-21 and the partial periods. Quantity of home market shipments increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020 and increased by *** percent from 2020 to 2021, for an overall increase of *** percent. Home market shipments, by quantity, were *** percent lower in interim 2022 compared to interim 2021. Value of home market shipments increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020 and increased by *** percent from 2020 to 2021, for an overall increase of *** percent. Home market shipments, by value, were *** percent higher in interim 2022 compared to interim 2021. The unit value of reported home market shipments increased throughout 2016 to 2021, overall increasing by *** percent, with the largest increase from 2016 to 2017 of *** percent. Interim 2022 has a unit value of home market shipments that was *** percent higher than interim 2021.⁴⁸ Quantity of internal consumption and transfers accounted for the *** share of home market shipments, holding a relatively stable share of between *** percent during all full or partial periods.

Japan's end-of-period inventories fluctuated during 2016-21, ending *** percent higher in 2021 than 2016. After decreasing by *** percent from 2016 to 2019, end-of period inventories increased by *** percent from 2019 to 2021, following the similar increase in production, export shipments and total shipments all from 2019 to 2021.⁴⁹ Interim 2022 was *** percent higher in interim 2022 compared to interim 2021.⁵⁰ The ratios of Japan's end-of-period inventories to its production and total shipments both ranged from *** percent for all full and partial years.

Table IV-30 presents data on export shipments by market of the responding producers and resellers in Japan.⁵¹ Export shipments as a share of total shipments, by quantity, irregularly decreased by *** percentage points during 2016-21 and accounted for between *** and *** percent of total shipments by responding producers in Japan during any full or partial

⁴⁸ This increase was lower than that for the ***. Correspondence with ***, August 3, 2022.

⁴⁹ ***. Correspondence with ***, August 3, 2022.

⁵⁰ In interim 2022, inventories further increased because ***. Correspondence with ***, August 3, 2022.

⁵¹ All resales were reported by *** and were exported to *** in each full and partial year.

periods.⁵² The majority of export shipments went to ***. The quantity of Japan's export shipments to the United States were minimal, representing no more than *** percent of total export shipments during any full or partial periods. These exports to the United States, fluctuated, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and nearly *** from 2020 to 2021, for an overall increase of *** percent during 2016-21.⁵³ Export shipments to the United States by quantity was *** percent in interim 2022 compared to interim 2021.⁵⁴ The value of export shipments to the United States moved in the same direction as quantity, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, for an overall increase of *** percent. The value of export shipments to the United States was *** percent higher in interim 2022 compared to interim 2021. Unit value of exports to the United States also followed the same trend as quantity and value and saw an overall increase of *** percent from 2016 to 2021. Additionally, interim 2022 saw a *** percent higher unit value of exports to the United States than in interim 2021.

⁵² Total shipments do not include resale shipments.

⁵³ ***. The majority of the exports to the United States in each year were from ***. NSC states in its questionnaire that it primarily exports hot-rolled steel to ***.

⁵⁴ ***. Correspondence with ***, August 3, 2022.

Table IV-30**Hot-rolled steel: Export shipments by producers and resellers in Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-30 Continued

Hot-rolled steel: Export shipments by producers and resellers in Japan, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-30 Continued**Hot-rolled steel: Export shipments by producers and resellers in Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-30 Continued**Hot-rolled steel: Export shipments by producers and resellers in Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

By quantity, export shipments to Asia accounted for the majority of responding Japanese producers' total export shipments throughout 2016-21. The quantity of Japan's export shipments to Asia decreased in each year during 2016-21, except for a *** percent increase from 2020 to 2021, ending *** percent lower in 2021 than in 2016. Additionally, interim 2022 saw quantity of exports to Asia *** percent lower than in interim 2021. All other markets

accounted for the second largest share of Japan's export shipments by quantity.⁵⁵ Japan's export shipments to all other markets, by quantity, decreased irregularly, ending 2021 *** percent lower than 2016, despite a *** percent increase of from 2018 to 2020. The quantity of export shipments to all other markets was *** percent higher in interim 2022 compared to interim 2021. After increasing by *** percent from 2016 to 2017, export shipments to other North American markets decreased by *** percent from 2017 to 2020 and increased by *** percent from 2020 to 2021, ending *** percent higher in 2021 than 2016. However, the quantity of export shipments to other North American markets was *** percent lower in interim 2022 compared to interim 2021.⁵⁶ Finally, export shipments to the European Union accounted for the smallest share of total shipments from Japan and increased in each period except for a *** percent decrease from 2016 to 2017, ending 2021 *** percent higher in 2021 than in 2016.⁵⁷ The quantity of export shipments to the European Union was *** percent higher in interim 2022 compared to interim 2021.

While values of export shipments varied across export markets during 2016-21, they were higher in interim 2022 compared to interim 2021 for all markets except to other North American markets. The value of Japan's export shipments to Asia increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, before increasing by *** percent 2020 to 2021, overall increasing by *** percent during 2016-21. Export shipments to Asia, by value, were *** percent higher in interim 2022 compared to interim 2021. The value of Japan's export shipments to all other markets decreased by *** percent from 2016 to 2018 and increased by *** percent from 2018 to 2021, increasing overall by *** percent from 2016 to 2021.⁵⁸ Export shipments to all other markets, by value, were *** percent higher in interim 2022 compared to interim 2021. Export shipments, by value, to other North American markets increased in each period from 2016 to 2021, except for a *** percent decrease from 2018 to 2020, for an overall increase of *** from 2016 to 2021. Export

⁵⁵ ***.

⁵⁶ ***. Correspondence with ***, August 3, 2022.

⁵⁷ ***. Correspondence with ***, August 3, 2022.

⁵⁸ The increase reflects *** Correspondence with ***, August 3, 2022.

shipments to other North American markets, by value, were *** percent lower in interim 2022 compared to interim 2021. Finally, export shipments to the European Union, by value, moved in the same direction as its respective quantity, as it increased in each period except for a *** percent decrease from 2016 to 2017, overall ending 2021 *** than 2016. Overall, the unit values of Japan’s export shipments to Asia, all other markets, other North American markets, and the European Union, increased by *** percent, *** percent, *** percent, and *** percent, respectively, from 2016 to 2021, with the largest increase always occurring from 2020 to 2021. The unit value for export shipments was higher in interim 2022 compared to interim 2021 for every export market.

Affiliation

As shown in Table IV-31, *** reported exporting hot-rolled steel to the United States that were destined to affiliated firms for further processing. Exports to affiliated firms accounted for a largely *** share of total exports to the United States and was *** in interim 2022 compared to interim 2021.

Table IV-31
Hot-rolled steel: Exports to the United States by producers and resellers in Japan, by affiliation and period

Quantity in short tons; Share and ratio in percent

Item	Measure	2016	2017	2018
Affiliated	Quantity	***	***	***
Other	Quantity	***	***	***
All types	Quantity	***	***	***
Affiliated	Share of quantity	***	***	***
Other	Share of quantity	***	***	***
All types	Share of quantity	***	***	***

Table continued.

Table IV-31 Continued**Hot-rolled steel: Exports to the United States by producers and resellers in Japan, by affiliation and period**

Quantity in short tons; Share and in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Affiliated	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
Affiliated	Share of quantity	***	***	***	***	***
Other	Share of quantity	***	***	***	***	***
All types	Share of quantity	***	***	***	***	***

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

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

Alternative products

As shown in table IV-32, hot-rolled steel accounted for *** total production on shared equipment in each year during 2016-21.⁵⁹ ***

Table IV-32**Hot-rolled steel: Overall capacity and production on the same equipment as in-scope production in Japan, by period**

Quantity in short tons; Share and ratio in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	***	***	***
Hot-rolled steel production	Quantity	***	***	***
Other production	Quantity	***	***	***
Total production	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
Hot-rolled steel production	Share	***	***	***
Other production	Share	***	***	***
Total production	Share	***	***	***

Table continued.

59 ***.

Table IV-32 Continued**Hot-rolled steel: Overall capacity and production on the same equipment as in-scope production in Japan, by period**

Quantity in short tons; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Overall capacity	Quantity	***	***	***	***	***
Hot-rolled steel production	Quantity	***	***	***	***	***
Other production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Overall capacity utilization	Ratio	***	***	***	***	***
Hot-rolled steel production	Share	***	***	***	***	***
Other production	Share	***	***	***	***	***
Total production	Share	***	***	***	***	***

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

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

Exports

Table IV-33 presents Global Trade Atlas data for exports of hot-rolled steel from Japan in descending order of quantity for 2021, after the United States. The leading export markets for hot-rolled steel from Japan in 2021 were Thailand, South Korea, and China, accounting for 19.1 percent, 12.9 percent, and 8.6 percent, respectively. The United States accounted for 2.3 percent of exports of hot-rolled steel from Japan in 2021.

Table IV-33**Hot-rolled flat products of iron or nonalloy steel: Exports from Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	130,237	224,621	267,240
Thailand	Quantity	2,011,588	2,048,297	2,174,735
South Korea	Quantity	2,767,097	2,642,651	2,075,857
China	Quantity	1,115,202	1,338,549	1,232,714
Vietnam	Quantity	1,370,745	1,123,215	1,012,979
Mexico	Quantity	614,377	718,791	669,334
Indonesia	Quantity	671,902	562,850	545,546
Pakistan	Quantity	517,177	513,258	404,103
Bangladesh	Quantity	826,954	585,784	449,501
All other destination markets	Quantity	4,312,897	3,309,391	2,650,184
Non-U.S. destination markets	Quantity	14,207,938	12,842,786	11,214,953
All destination markets	Quantity	14,338,175	13,067,407	11,482,194
United States	Value	60,774	110,417	156,433
Thailand	Value	788,923	1,015,315	1,219,884
South Korea	Value	948,074	1,294,588	1,114,353
China	Value	464,359	696,287	668,058
Vietnam	Value	397,874	474,486	492,122
Mexico	Value	298,910	394,794	407,796
Indonesia	Value	262,297	293,509	317,432
Pakistan	Value	149,342	235,802	215,674
Bangladesh	Value	249,176	257,803	234,165
All other destination markets	Value	1,370,213	1,524,894	1,457,406
Non-U.S. destination markets	Value	4,929,167	6,187,477	6,126,890
All destination markets	Value	4,989,942	6,297,894	6,283,323

Table continued.

Table IV-33 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	158,552	164,365	294,280
Thailand	Quantity	1,841,585	1,249,941	2,255,972
South Korea	Quantity	2,201,673	1,924,186	1,529,403
China	Quantity	1,206,754	1,372,788	1,017,167
Vietnam	Quantity	1,191,147	1,522,421	882,153
Mexico	Quantity	519,282	483,914	675,337
Indonesia	Quantity	542,048	478,191	657,520
Pakistan	Quantity	323,589	521,664	627,847
Bangladesh	Quantity	545,613	764,432	474,787
All other destination markets	Quantity	3,289,515	3,557,433	3,406,485
Non-U.S. destination markets	Quantity	11,661,205	11,874,970	11,526,672
All destination markets	Quantity	11,819,757	12,039,335	11,820,952
United States	Value	74,781	66,952	271,195
Thailand	Value	998,063	619,924	1,482,532
South Korea	Value	1,024,828	810,039	1,161,652
China	Value	564,546	609,630	703,194
Vietnam	Value	495,674	583,029	584,350
Mexico	Value	325,224	257,083	486,267
Indonesia	Value	310,901	228,337	468,172
Pakistan	Value	147,005	212,437	465,686
Bangladesh	Value	237,093	293,473	345,885
All other destination markets	Value	1,506,115	1,458,289	2,631,776
Non-U.S. destination markets	Value	5,609,450	5,072,242	8,329,514
All destination markets	Value	5,684,231	5,139,194	8,600,708

Table continued.

Table IV-33 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	467	492	585
Thailand	Unit value	392	496	561
South Korea	Unit value	343	490	537
China	Unit value	416	520	542
Vietnam	Unit value	290	422	486
Mexico	Unit value	487	549	609
Indonesia	Unit value	390	521	582
Pakistan	Unit value	289	459	534
Bangladesh	Unit value	301	440	521
All other destination markets	Unit value	318	461	550
Non-U.S. destination markets	Unit value	347	482	546
All destination markets	Unit value	348	482	547
United States	Share of quantity	0.9	1.7	2.3
Thailand	Share of quantity	14.0	15.7	18.9
South Korea	Share of quantity	19.3	20.2	18.1
China	Share of quantity	7.8	10.2	10.7
Vietnam	Share of quantity	9.6	8.6	8.8
Mexico	Share of quantity	4.3	5.5	5.8
Indonesia	Share of quantity	4.7	4.3	4.8
Pakistan	Share of quantity	3.6	3.9	3.5
Bangladesh	Share of quantity	5.8	4.5	3.9
All other destination markets	Share of quantity	30.1	25.3	23.1
Non-U.S. destination markets	Share of quantity	99.1	98.3	97.7
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-33 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Japan, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	472	407	922
Thailand	Unit value	542	496	657
South Korea	Unit value	465	421	760
China	Unit value	468	444	691
Vietnam	Unit value	416	383	662
Mexico	Unit value	626	531	720
Indonesia	Unit value	574	478	712
Pakistan	Unit value	454	407	742
Bangladesh	Unit value	435	384	729
All other destination markets	Unit value	458	410	773
Non-U.S. destination markets	Unit value	481	427	723
All destination markets	Unit value	481	427	728
United States	Share of quantity	1.3	1.4	2.5
Thailand	Share of quantity	15.6	10.4	19.1
South Korea	Share of quantity	18.6	16.0	12.9
China	Share of quantity	10.2	11.4	8.6
Vietnam	Share of quantity	10.1	12.6	7.5
Mexico	Share of quantity	4.4	4.0	5.7
Indonesia	Share of quantity	4.6	4.0	5.6
Pakistan	Share of quantity	2.7	4.3	5.3
Bangladesh	Share of quantity	4.6	6.3	4.0
All other destination markets	Share of quantity	27.8	29.5	28.8
Non-U.S. destination markets	Share of quantity	98.7	98.6	97.5
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-7 presents data on the average unit values for exports from Japan to the United States and to all other destination markets. Data for figure IV-7 are derived from tables IV-30 and IV-33.

Figure IV-7

Hot-rolled steel: Average unit values for exports from Japan to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Japan Finance Ministry Global Trade Atlas database, accessed July 14th, 2022.

The industry in Netherlands

Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Tata Steel Ijmuiden BV (“Tata Netherlands”), which accounted for approximately *** percent of production of hot-rolled steel in the Netherlands during 2015, and approximately *** percent of hot-rolled steel exports from the Netherlands to the United States during 2015.⁶⁰

In the current proceeding, the Commission issued questionnaires to one producer/exporter in the Netherlands and received a response from one firm: TATA Netherlands. TATA Netherlands accounted for *** hot-rolled steel production in the Netherlands in 2021 and *** percent of exports to the United States in 2021.^{61 62}

⁶⁰ Original Australia, Brazil, Japan, Korea, Netherlands, Turkey, and United Kingdom confidential report, p. I-9 and VII-30.

⁶¹ TATA Netherland’s questionnaire response. *** was unavailable for Netherlands’ gross production and gross consumption. Staff research indicates TATA Netherlands is ***

⁶² According to ***, annual production capacity in the Netherlands in 2021 for hot-rolled coil (carbon) is *** short tons. Dutch capacity that includes hot-rolled coil (carbon) and hot-rolled

(continued...)

Table IV-34 presents information on the hot-rolled steel operations of the responding producer and exporter in Netherlands.

Table IV-34
Hot-rolled steel: Summary data for producer TATA Netherlands, 2021

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)
TATA Netherlands	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

As presented in table IV-35, TATA Netherlands reported several operational and organizational changes since January 1, 2016.

Table IV-35
Hot-rolled steel: Reported changes in operations by producer TATA Netherlands, since January 1, 2016

Item	Firm name and narrative on changes in operations
Revised labor agreements	***
Other	***

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

(carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Operations on hot-rolled steel

Tables IV-36 and IV-37 presents data on TATA Netherland's hot-rolled steel operations in the Netherlands. Capacity overall fluctuated over the period, increasing *** percent from 2016 to 2017, decreasing *** percent from 2017 to 2018, increasing *** percent from 2018 to 2020 and decreasing *** percent from 2020 to 2021, overall increasing *** from 2016 to 2021.⁶³ Interim 2022 however, was *** percent lower than interim 2021. Production on the other hand, overall decreased *** percent during 2016-21, after increasing *** percent from 2016 to 2017, decreasing *** percent from 2017 to 2020, and increasing again by *** percent from 2020 to 2021. Interim 2022 production was *** percent lower than interim 2021. Consequently, after increasing by *** percent from 2016 to 2017, TATA Netherlands' capacity utilization decreased by *** percentage points from 2017 to 2020 and increased by *** percentage points from 2020 to 2021. Moreover, capacity utilization increased by *** percentage points from interim 2021 to interim 2022.

Table IV-36
Hot-rolled steel: Data for producer TATA Netherlands, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

⁶³ ***.

Table IV-36 Continued
Hot-rolled steel: Data for producer TATA Netherlands, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-36 Continued
Hot-rolled steel: Data for producer TATA Netherlands, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-36 Continued
Hot-rolled steel: Data for producer TATA Netherlands, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments, by quantity, accounted for the majority of TATA Netherland's total shipments, in each year during 2016-21. Largely reflecting the trend of production, after increasing *** percent from 2016 to 2017, TATA Netherlands' home market shipments decreased by *** percent from 2017 to 2020 and increased by *** percent from 2020 to 2021, decreasing overall by *** percent from 2016 to 2021. Home market shipments, by quantity, in interim 2022 were *** percent lower than interim 2021. The value of TATA Netherland's home market shipments also fluctuated, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2018, increasing by *** percent from 2018 to 2019, decreasing by *** percent from 2019 to 2020, and increasing by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. Home market shipments, by value, were *** percent higher in interim 2022 compared to interim 2021. Consequently, the unit value of TATA Netherlands' home market shipments increased irregularly, overall increasing by *** percent during 2016-21. Quantity of internal consumption and transfers accounted for the *** share of home market shipments, holding a relatively stable share of between *** percent during 2016-2021 and interim 2021-22.

End-of-period inventories for Tata Netherlands did not move in the same direction as production, home market shipments, or export shipments. Rather, end-of-period inventories increased in each period during 2016-21, except for a *** decrease from 2019 to 2020, ending *** percent higher in 2021 than in 2016.⁶⁴ Additionally, end-of-period inventories were *** percent higher in interim 2022 than interim 2021.⁶⁵ The ratios of their end-of-period inventories to production ranged from *** percent to *** percent and ratios of their end-of-period inventories to total shipments ranged from *** percent to *** percent.

Table IV-37 presents data on TATA Netherlands' export shipments, by market. Export shipments, by quantity, accounted for between *** percent of TATA Netherlands' total shipments during any full or partial periods. The majority of those shipments went to the ***. TATA Netherlands reported export shipments to the *** in each full year and partial periods. Export shipments, by quantity, to the United States overall decreased by *** percent during 2016-21, decreasing in each year from 2016 to 2020, but

⁶⁴ In December 2020, ***, resulting in a lower ending inventory level in 2020 compared to 2021. Email from *** August 8, 2022.

⁶⁵ Similarly, the lower ending inventory level of interim 2021 was a result of *** Email from *** August 8, 2022.

increased by *** percent from 2020 to 2021.⁶⁶ Additionally, quantity of export shipments to the United States in interim 2022 was higher than interim 2021 by *** percent. The value of export shipments to the United States fluctuated, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2020 and increasing *** from 2020 to 2021, ending *** percent higher in 2021 than in 2016. Export shipments to the United States, by value, was *** percent higher in interim 2022 than in interim 2021. The unit value for exports to the United States increased by *** percent from 2016 to 2017, decreased from 2017 to 2020 by *** percent, and increased by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. The unit value for exports to the United States interim 2022 was *** percent higher than in interim 2021.

⁶⁶ *** Email from *** August 8, 2022.

Table IV-37**Hot-rolled steel: Export shipments by TATA Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-37 Continued**Hot-rolled steel: Export shipments by TATA Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-37 Continued**Hot-rolled steel: Export shipments by TATA Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-37 Continued**Hot-rolled steel: Export shipments by TATA Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

TATA Netherlands' export shipments to the European Union increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020 and increased by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. Export

shipments, by quantity, to the European Union was *** percent higher in interim 2022 compared to interim 2021. Exports to all other markets, by quantity, were the second largest export market for TATA Netherlands, and increased by *** percent from 2016 to 2019 before decreasing by *** percent from 2019 to 2021, overall decreasing by *** percent during 2016-21.⁶⁷ However, interim 2022 saw quantity of export shipments to all other markets *** percent higher than in interim 2021. Export shipments to other North American markets, by quantity, increased in every year during 2016-21, except for 2018 to 2019, increasing by *** percent from 2016 to 2021. However, quantity of exports to other North American markets was *** percent lower in interim 2022 compared to interim 2021. Export shipments to Asia, by quantity, decreased from 2016 to 2018 by *** percent, then was nearly *** in 2020 than in 2018, but decreased again by *** percent from 2020 to 2021, decreasing overall by *** percent.⁶⁸ Additionally, quantity of exports to Asia was *** percent lower in interim 2022 compared to interim 2021.

Overall, the value of all export markets nearly doubled from 2020 to 2021.⁶⁹ Tata Netherland's export shipments to the European Union, by value, increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and increased by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. The value of export shipments to the European Union was *** percent higher in interim 2022 compared to interim 2021. Export shipments to all other markets, by value, increased in every year during 2016-21, except for 2019-20, overall increasing *** percent from 2016 to 2021. The value of export shipments to all other markets was *** percent higher in interim 2022 than in interim 2021. Tata Netherland's export shipments to other North American markets, by value, increased *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and increased *** percent from 2020 to 2021, ending over *** higher in 2016 than in 2021. The value of export shipments to North America in interim 2022 was *** percent lower than in interim 2021. The value of export shipments to Asia fluctuated,

⁶⁷ The increase from 2017 to 2018 relates to ***. Email from *** August 8, 2022.

⁶⁸ The increase from 2018 to 2019 reflects an *** Email from *** August 8, 2022.

⁶⁹ *** Email from *** August 8, 2022.

decreasing by *** percent from 2016 to 2018, increasing by more than *** from 2018 to 2020, before decreasing *** percent from 2020 to 2021, overall increasing by *** percent. Additionally, export shipments to Asia, by value, was *** percent lower in interim 2022 compared to interim 2021.

The unit values of reported export shipments to the European Union and all other markets, moved in the same direction, increasing from 2016 to 2017, decreasing from 2017 to 2020, and peaking from 2020 to 2021, overall increasing by *** percent and by *** percent during 2016-21, respectively. The unit values for export shipments in interim 2022 was *** percent higher than interim 2021 for all export markets.⁷⁰ The unit values of reported export shipments to other North American markets increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and increased by *** percent from 2020 to 2021, ultimately increasing by *** percent during 2016-21. Finally, the unit values of reported export shipments to Asia fluctuated more widely, ultimately increasing by *** percent during 2016-21, despite a *** percent decrease from 2019 to 2020.

Affiliation

As shown in Table IV-38, *** reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing. These export shipments were a *** but largely growing share of total exports to the United States. Exports to affiliated firms increased *** percent during 2016-21 and quantity of exports to affiliated firms in interim 2022 was *** percent higher than interim 2021.

Table IV-38
Hot-rolled steel: Exports to the United States by TATA Netherlands, by affiliation and period

Quantity in short tons; Share and ratio in percent

Item	Measure	2016	2017	2018
Affiliated	Quantity	***	***	***
Other	Quantity	***	***	***
All types	Quantity	***	***	***
Affiliated	Share of quantity	***	***	***
Other	Share of quantity	***	***	***
All types	Share of quantity	***	***	***

Table continued.

⁷⁰ The largest increase was exports to ***, where interim 2022 was *** percent higher than interim 2021.

Table IV-38 Continued**Hot-rolled steel: Exports to the United States by TATA Netherlands, by affiliation and period**

Quantity in short tons; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Affiliated	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
Affiliated	Share of quantity	***	***	***	***	***
Other	Share of quantity	***	***	***	***	***
All types	Share of quantity	***	***	***	***	***

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

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

Alternative products

TATA Netherlands did not report production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.

Exports

Table IV-39 presents Global Trade Atlas data for exports of hot-rolled steel from the Netherlands in descending order of quantity for 2021. The leading export markets for hot-rolled steel from the Netherlands in 2021 are Germany, France, and Spain, accounting for 34.4 percent, 16.5 percent, and 8.2 percent, respectively. The United States accounted for 5.2 percent of exports of hot-rolled steel from the Netherlands in 2021.

Table IV-39**Hot-rolled flat products of iron or nonalloy steel: Exports from the Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	198,523	124,799	120,740
Germany	Quantity	736,257	828,287	825,664
France	Quantity	331,162	289,854	385,672
Spain	Quantity	130,418	151,816	167,533
Belgium	Quantity	82,145	116,151	138,119
Mexico	Quantity	40,062	43,557	75,039
Turkey	Quantity	71,574	80,345	111,729
United Kingdom	Quantity	59,364	78,104	103,085
Portugal	Quantity	4,230	11,829	19,048
All other destination markets	Quantity	223,265	226,253	283,602
Non-U.S. destination markets	Quantity	1,678,477	1,826,196	2,109,490
All destination markets	Quantity	1,877,000	1,950,995	2,230,230
United States	Value	88,544	77,336	86,814
Germany	Value	312,290	455,092	489,391
France	Value	126,833	150,579	229,302
Spain	Value	55,501	85,603	103,775
Belgium	Value	33,987	60,871	78,157
Mexico	Value	16,245	24,856	52,769
Turkey	Value	18,661	40,394	62,024
United Kingdom	Value	25,436	45,319	65,655
Portugal	Value	1,725	6,665	12,037
All other destination markets	Value	103,261	127,129	173,527
Non-U.S. destination markets	Value	693,939	996,507	1,266,637
All destination markets	Value	782,483	1,073,843	1,353,451

Table continued.

Table IV-39 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from the Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	81,316	78,028	120,651
Germany	Quantity	686,535	634,132	798,546
France	Quantity	398,886	336,099	381,492
Spain	Quantity	134,210	137,667	189,693
Belgium	Quantity	120,202	165,167	168,160
Mexico	Quantity	91,477	111,156	140,273
Turkey	Quantity	229,284	87,815	74,699
United Kingdom	Quantity	85,195	57,081	65,777
Portugal	Quantity	102,125	96,838	59,857
All other destination markets	Quantity	359,872	487,587	318,907
Non-U.S. destination markets	Quantity	2,207,786	2,113,542	2,197,404
All destination markets	Quantity	2,289,102	2,191,570	2,318,055
United States	Value	58,552	46,928	125,251
Germany	Value	373,860	321,009	622,300
France	Value	205,678	152,603	310,352
Spain	Value	74,258	68,389	145,772
Belgium	Value	60,932	83,998	151,027
Mexico	Value	50,019	53,428	136,073
Turkey	Value	113,195	36,165	61,156
United Kingdom	Value	49,099	31,089	53,832
Portugal	Value	47,478	44,654	43,398
All other destination markets	Value	185,903	217,456	268,780
Non-U.S. destination markets	Value	1,160,422	1,008,792	1,792,689
All destination markets	Value	1,218,974	1,055,720	1,917,941

Table continued.

Table IV-39 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from the Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	446	620	719
Germany	Unit value	424	549	593
France	Unit value	383	519	595
Spain	Unit value	426	564	619
Belgium	Unit value	414	524	566
Mexico	Unit value	406	571	703
Turkey	Unit value	261	503	555
United Kingdom	Unit value	428	580	637
Portugal	Unit value	408	563	632
All other destination markets	Unit value	463	562	612
Non-U.S. destination markets	Unit value	413	546	600
All destination markets	Unit value	417	550	607
United States	Share of quantity	10.6	6.4	5.4
Germany	Share of quantity	39.2	42.5	37.0
France	Share of quantity	17.6	14.9	17.3
Spain	Share of quantity	6.9	7.8	7.5
Belgium	Share of quantity	4.4	6.0	6.2
Mexico	Share of quantity	2.1	2.2	3.4
Turkey	Share of quantity	3.8	4.1	5.0
United Kingdom	Share of quantity	3.2	4.0	4.6
Portugal	Share of quantity	0.2	0.6	0.9
All other destination markets	Share of quantity	11.9	11.6	12.7
Non-U.S. destination markets	Share of quantity	89.4	93.6	94.6
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-39 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from the Netherlands, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	720	601	1,038
Germany	Unit value	545	506	779
France	Unit value	516	454	814
Spain	Unit value	553	497	768
Belgium	Unit value	507	509	898
Mexico	Unit value	547	481	970
Turkey	Unit value	494	412	819
United Kingdom	Unit value	576	545	818
Portugal	Unit value	465	461	725
All other destination markets	Unit value	517	446	843
Non-U.S. destination markets	Unit value	526	477	816
All destination markets	Unit value	533	482	827
United States	Share of quantity	3.6	3.6	5.2
Germany	Share of quantity	30.0	28.9	34.4
France	Share of quantity	17.4	15.3	16.5
Spain	Share of quantity	5.9	6.3	8.2
Belgium	Share of quantity	5.3	7.5	7.3
Mexico	Share of quantity	4.0	5.1	6.1
Turkey	Share of quantity	10.0	4.0	3.2
United Kingdom	Share of quantity	3.7	2.6	2.8
Portugal	Share of quantity	4.5	4.4	2.6
All other destination markets	Share of quantity	15.7	22.2	13.8
Non-U.S. destination markets	Share of quantity	96.4	96.4	94.8
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Eurostat in the Global Trade Atlas database, accessed July 14th, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-8 presents data on the average unit values for exports from the Netherlands to the United States and to all other destination markets. Data for figure IV-8 are derived from tables IV-37 and IV-39.

Figure IV-8

Hot-rolled steel: Average unit values for exports from Netherlands to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Eurostat Global Trade Atlas database, accessed July 14th, 2022.

The industry in Russia

Overview

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from three firms, Magnitogorsk Iron & Steel Works Combine, Novolipetsk Iron & Steel Corp. (“Novolipetsk”), and JSC Severstal (“Severstal”), which accounted for approximately *** percent of Russian production of hot-rolled steel in 1998.⁷¹

⁷¹ Russia third review confidential report, p. I-43. The petitions were filed soon after the sequence of events known as the “Asian financial crisis.” The initial crisis spread from Thailand in mid-1997 through Asia. According to Commerce, reduced Asian steel demand, declining Asian currency values, and increased U.S. steel demand contributed to an increase in U.S. steel imports. See Global Steel Trade: Structural Problems and Future Solutions, International Trade Administration, U.S. Department of Commerce, July 2000, pp. 17-29.

During the first and second five-year reviews, the same three firms provided responses to the Commission’s questionnaires and were believed to have accounted for virtually all of Russian production of hot-rolled steel in 2010 and 2015, respectively.⁷²

Although the Commission did not receive responses from foreign producers or exporters in its third five-year review, the domestic producers of hot-rolled steel provided a list of seven possible producers of hot-rolled steel in Russia.⁷³

In the current proceeding, the Commission issued questionnaires to eight producers/exporters in Russia and received responses from two firms: Novolipetsk Steel (“NLMK”), and PAO Severstal (“Severstal”).⁷⁴ These firms collectively accounted for approximately *** percent of total hot-rolled steel production in Russia in 2021.^{75 76}

Table IV-40 presents data on gross production and apparent gross consumption of hot-rolled steel in Russia. After a slight decrease from 2016 to 2017, gross production of hot-rolled steel in Russia increased by *** from 2017 to 2018, decreased by *** percent from 2018 to 2019, before increasing by *** percent from 2019 to 2021, overall increasing by *** percent during 2016-21. It is projected to be *** percent lower in 2022 than in 2021. Apparent gross consumption moved separately than gross production during 2016-21, increasing by *** percent from 2016 to 2019, decreasing by *** percent from 2019 to 2020, then increasing again by *** percent from 2020 to 2021, overall increasing by *** percent from 2016 to 2021. It is projected to be *** percent lower in 2022 than in 2021.⁷⁷

⁷² Russia third review publication, USITC Publication 4639, p. I-33.

⁷³ Ibid.

⁷⁴ PAO Severstal (PAO is an abbreviation for “public stock company” in Russian) was formerly known as JSC Severstal (JSC is an abbreviation for “joint stock option”).

⁷⁵ Coverage is based on the share of reported production to *** gross production data for Russia. Data include hot-rolled sheet and coiled plate. *** Russian responding producers reported in their questionnaires they collectively accounted for *** percent of hot-rolled steel production in Russia and *** percent of exports to the United States from Russia.

⁷⁶ Three firms, ***, submitted a questionnaire response indicating they did not produce or export hot-rolled steel. *** did not respond to staff’s request for a questionnaire. While MMK is one of the largest steel producers in the world, due to the ongoing conflict between Russia and Ukraine, as of August 2, 2022, MMK has been sanctioned by the United States. Erdemir Posthearing Brief, exh. 3, September 26, 2022.

⁷⁷ According to ***, annual production capacity in Russia in 2021 for hot-rolled coil (carbon) is *** short tons. Russian capacity that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-40**Hot-rolled steel: Gross production and apparent gross consumption in Russia, by year**

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

Table IV-40 Continued**Hot-rolled steel: Gross production and apparent gross consumption in Russia, by year**

Quantity in short tons

Item	2019	2020	2021	Projected 2022
Gross production	***	***	***	***
Apparent gross consumption	***	***	***	***

Source: ***.

Table IV-40 presents information on the hot-rolled steel operations of the responding producers and exporters in Russia.

Table IV-41**Hot-rolled steel: Summary data on firms in Russia, 2021**

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)
NLMK	***	***	***	***	***	***
Severstal	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

Producers in Russia did not report any operational or organizational changes since January 1, 2016.

Table IV-42 presents developments in the Russian industry from public sources since the original investigations.

Table IV-42
Hot-rolled steel: Recent developments in the Russian industry

Item	Firm	Event
Expansion	Novolipetsk Steel (NLMK)	In 2019, NLMK completed an upgrade to a 2.25 million MT per-year blast furnace to increase the productivity of its hot-rolling operations at its Lipetsk site. NLMK expected the upgrade to increase productivity by 15 percent to 10 million MT per year.
Expansion	Severstal	In 2019, Severstal installed two high-capacity slab reheating furnaces as part of reconstruction at its No. 2 rolling plant, which increased capacity at the hot strip mill by 140,000 MT per year. Severstal also installed new equipment in its rolling line that allowed it to expand its product range and increase efficiency.
Expansion (planned)	MMK	In June 2020, MMK announced a planned overhaul of its hot-rolled strip facility, which will increase overall capacity by 500,000 MT annually.
Expansion (planned)	EVRAZ	In 2021, EVRAZ announced plans to set up a new casting and rolling mill at its EVRAZ ZSMK facility. The \$650 million investment is expected to increase the mill's total annual capacity to 2.5 million MT. The project is expected to be completed in 2025.

Source: Steel Orbis, NLMK Upgrades Hot Rolled Steel Operations, July 24, 2017, <https://www.steelorbis.com/steel-news/latest-news/nlmk-upgrades-hot-rolled-steel-operations-995494.htm?searchKey=NLMK%20Upgrades%20Hot%20Rolled%20Steel%20Operations&sc=article>; Fives Group, Severstal orders world-class slab reheating furnaces from Fives, July 2019, <https://www.fivesgroup.com/severstal-orders-world-class-slab-reheating-furnaces-from-fives>; Association for Iron and Steel Technology, MMK Upgrades Soviet-Era Hot Strip Mill," June 2020, attached as Exhibit 61 in the domestic interested parties response to the notice of institution; Steel Orbis, Russia's EVRAZ to Set Up New Casting and Rolling Mill at EVRAZ ZSMK, June 2021, <https://www.steelorbis.com/steel-news/latest-news/russias-evraz-to-set-up-new-casting-and-rolling-mill-at-evraz-zsmk-1202899.htm>.

Operations on hot-rolled steel

Tables IV-43 and IV-44 presents data on the hot-rolled steel operations of the responding producers and exporters in Russia. Capacity fluctuated, decreasing by *** percent from 2016 to 2018, increasing by *** percent from 2018 to 2020 and decreasing by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. Capacity was *** percent lower in interim 2022 than in interim 2021. Moving the same as capacity, production fluctuated during 2016-21, decreasing by *** percent from 2016 to 2018, increasing by *** percent from 2018 to 2020 and decreasing by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. Production was *** percent lower in interim 2022 than in interim 2021. Capacity utilization increased irregularly throughout 2016-21, ending 2021 *** percentage points higher than in 2016. Capacity utilization in interim 2022 was *** percentage points higher than in interim 2021.

Table IV-43
Hot-rolled steel: Data on industry in Russia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-43 Continued
Hot-rolled steel: Data on industry in Russia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-43 Continued
Hot-rolled steel: Data on industry in Russia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-43 Continued
Hot-rolled steel: Data on industry in Russia, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments accounted for a *** of total shipments in Russia. Home market shipments, by quantity, increased *** percent from 2016 to 2017, decreased by *** percent from 2017 to 2018, increased by *** percent from 2018 to 2020, and decreased by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21.⁷⁸ Quantity of home market shipments were *** percent higher in interim 2022 compared to interim 2021. The value of home market shipments increased in each year during 2016-21, except for a *** percent decrease from 2019 to 2020, for an overall increase of *** percent from 2016 to 2021. Home market shipments, by value, were *** percent higher in interim 2022 than interim 2021. The unit value of home market shipments fluctuated, increasing by *** from 2016 to 2018, decreasing by *** percent from 2018 to 2020 and

⁷⁸ The increase from 2019 to 2020 is associated with *** Email from *** August 1, 2022.

increasing by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21. The unit value of home market shipments in interim 2022 was *** percent higher compared to interim 2021. Internal consumption and transfers represented a majority share of home market shipments, accounting for between *** percent for all full and partial years.⁷⁹

End-of-period inventories for the responding producers in Russia moved separately from their production and home market shipments, decreasing by *** percent from 2016 to 2017, increasing by *** percent from 2017 to 2018, and increasing by *** percent from 2018 to 2021 for an overall modest decrease of *** percent during 2016-21. However, end-of-period inventories were *** percent higher in interim 2022 than in interim 2021. The ratios of their end-of-period inventories to production ranged from *** percent to *** percent and the ratios of their end-of-period inventories to total shipments ranged from *** percent to ***.

Table IV-44 presents data on responding Russian producers' export shipments, by market. Export shipments, by quantity, accounted for between *** percent of total shipments during 2016-21. Quantity of export shipments in interim 2022 only accounted for *** percent of total shipments compared to *** percent in interim 2021. Responding Russian producers only reported exporting to ***, accounting for *** of all exports in that year.⁸⁰

⁷⁹ ***.

⁸⁰ The shipment to the United States in 2017 by *** Email from *** August 1, 2022.

Table IV-44**Hot-rolled steel: Export shipments by producers in Russia, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-44 Continued

Hot-rolled steel: Export shipments by producers in Russia, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-44 Continued**Hot-rolled steel: Export shipments by producers in Russia, by destination market and period**

Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-44 Continued
Hot-rolled steel: Export shipments by producers in Russia, by destination market and period

Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

Exports to all the European Union accounted for the largest share of quantity of export shipments in every year except 2016, 2017, and 2019, when in those years, exports to all other markets represented the largest share.⁸¹ After decreasing by *** percent from 2016 to 2017,

⁸¹ *** Email from *** August 1, 2022.

exports to the European Union, by quantity, increased in each year from 2017 to 2021 except for a *** percent decrease from 2018 to 2019, for an overall increase of *** percent during 2016-21. Interim 2022 saw a *** percent lower export shipments to the European Union than in interim 2021. Exports to all other markets moved opposite of those to the European Union during 2016-21, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2018, increasing by *** percent from 2018 to 2019, and then decreasing by *** percent from 2019 to 2021, decreasing overall by *** percent.⁸² By quantity, exports to all other markets were *** percent lower than in interim 2021. Export shipments, by quantity, to Asia fluctuated, overall decreasing by *** percent during 2016-21, after decreasing by *** percent from 2016 to 2018, increasing by *** percent from 2018 to 2020, and decreasing by *** percent from 2020 to 2021.⁸³ However, export shipments to Asia by quantity in interim 2022 was *** percent higher than interim 2021. Russian responding producers only exported to other North American markets in 2016-18 and in 2020, and these exports decreased by *** percent from 2016 to 2020.⁸⁴

Exports to the European Union, by value, fluctuated, decreasing by *** percent from 2016 to 2017, increasing by *** percent from 2017 to 2018, decreasing by *** percent from 2018 to 2019, and ultimately increasing by *** percent from 2019 to 2021, overall increasing by *** percent from 2016 to 2021. However, export shipments to the European Union, by value, in interim 2022 was *** percent lower than in interim 2021. The value of exports to all other markets overall increased by *** percent during 2016-21, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2020, and increasing by *** percent from 2020 to 2021. However, export shipments to all other markets by value in interim 2022 was *** percent lower than in interim 2021. Export shipments, by value, to Asia fluctuated, increasing by *** percent during 2016-21, after decreasing by *** percent from 2016 to 2018, increasing by *** percent from 2018 to 2020, and decreasing by *** percent from 2020 to 2021. Additionally, export shipments to Asia, by value, in interim 2022 was *** percent higher than in interim 2021. The unit values of exports to the EU, Asia, and all other markets increased from 2016 to 2018, decreased from 2018 to 2020, and saw the largest increase from 2020 to 2021. Exports to other North American

82 ***.

83 ***.

84 ***.

markets had a unit value that overall decreased by *** percent during 2016-2020. The unit value of exports to the EU, Asia, and all other markets were all higher in interim 2022 compared to interim 2021.

Affiliation

No responding producer in Russia reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing.

Alternative products

As shown in table IV-45, both Russian responding firms produced other products on the same equipment and machinery used to produce hot-rolled steel. ***⁸⁵

Table IV-45

Hot-rolled steel: Overall capacity and production on the same equipment as in-scope production in Russia, by period, 2016-21, January to March 2021, and January to March 2022

Quantity in short tons; share and ratio in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	***	***	***
Hot-rolled steel production	Quantity	***	***	***
Other production	Quantity	***	***	***
Total production	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
Hot-rolled steel production	Share	***	***	***
Other production	Share	***	***	***
Total production	Share	***	***	***

Table continued.

⁸⁵ ***.

Table IV-45 Continued**Hot-rolled steel: Overall capacity and production on the same equipment as in-scope production in Russia, by period, 2016-21, January to March 2021, and January to March 2022**

Quantity in short tons; share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Overall capacity	Quantity	***	***	***	***	***
Hot-rolled steel production	Quantity	***	***	***	***	***
Other production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Overall capacity utilization	Ratio	***	***	***	***	***
Hot-rolled steel production	Share	***	***	***	***	***
Other production	Share	***	***	***	***	***
Total production	Share	***	***	***	***	***

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

Exports

Table IV-46 presents Global Trade Atlas data for exports of hot-rolled steel from Russia in descending order of quantity for 2021. The leading export markets for hot-rolled steel from Russia in 2021 are Turkey, Poland, and Vietnam, accounting for 24.7 percent, 10.7 percent, and 9.2 percent, respectively. There were no reported exports to United States of hot-rolled steel from Russia in 2021.

Table IV-46**Hot-rolled flat products of iron or nonalloy steel: Exports from Russia, by destination market and period**

Quantity in short tons; Value in 1,000 dollars

Destination market	Measure	2016	2017	2018
United States	Quantity	---	---	---
Turkey	Quantity	2,081,165	2,362,814	1,835,245
Poland	Quantity	362,729	142,737	617,134
Vietnam	Quantity	437,786	391,870	635,093
Italy	Quantity	647,922	220,460	268,424
Uzbekistan	Quantity	121,273	136,169	176,963
Belgium	Quantity	22,914	1,105	17,863
Netherlands	Quantity	13,331	2,187	2,226
Belarus	Quantity	130,021	160,554	159,258
Latvia	Quantity	345,987	139,206	246,142
All other destination markets	Quantity	2,837,744	2,558,987	1,996,075
Non-U.S. destination markets	Quantity	7,000,873	6,116,088	5,954,423
All destination markets	Quantity	7,000,873	6,116,088	5,954,423
United States	Value	---	---	---
Turkey	Value	647,184	1,011,586	920,162
Poland	Value	114,529	64,621	306,711
Vietnam	Value	105,355	169,517	307,223
Italy	Value	188,441	88,782	133,873
Uzbekistan	Value	54,167	74,206	103,117
Belgium	Value	7,724	576	9,064
Netherlands	Value	4,129	983	1,122
Belarus	Value	50,879	81,395	86,446
Latvia	Value	108,235	63,008	125,444
All other destination markets	Value	878,907	1,099,438	1,007,823
Non-U.S. destination markets	Value	2,159,550	2,654,113	3,000,985
All destination markets	Value	2,159,550	2,654,113	3,000,985

Table continued.

Table IV-46 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Russia, by destination market and period**

Quantity in short tons; Value in 1,000 dollars

Destination market	Measure	2019	2020	2021
United States	Quantity	---	---	---
Turkey	Quantity	1,533,316	1,413,544	1,637,218
Poland	Quantity	550,084	543,820	709,966
Vietnam	Quantity	269,315	756,392	607,562
Italy	Quantity	299,824	295,853	434,526
Uzbekistan	Quantity	242,950	240,080	327,007
Belgium	Quantity	73,277	138,389	314,782
Netherlands	Quantity	4,805	31,845	262,289
Belarus	Quantity	174,023	208,797	231,122
Latvia	Quantity	193,331	195,637	227,561
All other destination markets	Quantity	1,582,494	1,796,013	1,871,716
Non-U.S. destination markets	Quantity	4,923,420	5,620,371	6,623,747
All destination markets	Quantity	4,923,420	5,620,371	6,623,747
United States	Value	---	---	---
Turkey	Value	623,286	534,036	1,190,409
Poland	Value	241,299	203,742	493,119
Vietnam	Value	108,623	288,560	440,760
Italy	Value	127,384	101,392	305,100
Uzbekistan	Value	132,303	119,168	263,876
Belgium	Value	30,456	51,112	244,396
Netherlands	Value	2,148	11,312	199,556
Belarus	Value	86,792	91,144	186,866
Latvia	Value	86,630	72,579	174,834
All other destination markets	Value	711,775	706,270	1,353,731
Non-U.S. destination markets	Value	2,150,697	2,179,316	4,852,647
All destination markets	Value	2,150,697	2,179,316	4,852,647

Table continued.

Table IV-46 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Russia, by destination market and period**

Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	---	---	---
Turkey	Unit value	311	428	501
Poland	Unit value	316	453	497
Vietnam	Unit value	241	433	484
Italy	Unit value	291	403	499
Uzbekistan	Unit value	447	545	583
Belgium	Unit value	337	522	507
Netherlands	Unit value	310	449	504
Belarus	Unit value	391	507	543
Latvia	Unit value	313	453	510
All other destination markets	Unit value	310	430	505
Non-U.S. destination markets	Unit value	308	434	504
All destination markets	Unit value	308	434	504
United States	Share of quantity	---	---	---
Turkey	Share of quantity	29.7	38.6	30.8
Poland	Share of quantity	5.2	2.3	10.4
Vietnam	Share of quantity	6.3	6.4	10.7
Italy	Share of quantity	9.3	3.6	4.5
Uzbekistan	Share of quantity	1.7	2.2	3.0
Belgium	Share of quantity	0.3	0.0	0.3
Netherlands	Share of quantity	0.2	0.0	0.0
Belarus	Share of quantity	1.9	2.6	2.7
Latvia	Share of quantity	4.9	2.3	4.1
All other destination markets	Share of quantity	40.5	41.8	33.5
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-46 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Russia, by destination market and period**

Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	---	---	---
Turkey	Unit value	406	378	727
Poland	Unit value	439	375	695
Vietnam	Unit value	403	381	725
Italy	Unit value	425	343	702
Uzbekistan	Unit value	545	496	807
Belgium	Unit value	416	369	776
Netherlands	Unit value	447	355	761
Belarus	Unit value	499	437	809
Latvia	Unit value	448	371	768
All other destination markets	Unit value	450	393	723
Non-U.S. destination markets	Unit value	437	388	733
All destination markets	Unit value	437	388	733
United States	Share of quantity	---	---	---
Turkey	Share of quantity	31.1	25.2	24.7
Poland	Share of quantity	11.2	9.7	10.7
Vietnam	Share of quantity	5.5	13.5	9.2
Italy	Share of quantity	6.1	5.3	6.6
Uzbekistan	Share of quantity	4.9	4.3	4.9
Belgium	Share of quantity	1.5	2.5	4.8
Netherlands	Share of quantity	0.1	0.6	4.0
Belarus	Share of quantity	3.5	3.7	3.5
Latvia	Share of quantity	3.9	3.5	3.4
All other destination markets	Share of quantity	32.1	32.0	28.3
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-9 presents data on the average unit values for exports from Russia to the United States and to all other destination markets. Data for figure IV-9 are derived from tables IV-44 and IV-46.

Figure IV-9

Hot-rolled steel: Average unit values for exports from Russia to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Customs Committee of Russia Global Trade Atlas database, accessed July 14th, 2022.

The industry in South Korea

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, Hyundai Steel Company (“Hyundai Steel”), Dongbu Steel, and POSCO (“POSCO”), which accounted for approximately *** percent of production of hot-rolled steel in South Korea during 2015, and approximately *** percent of hot-rolled steel exports from South Korea to the United States during 2015.⁸⁶

In the current proceeding, the Commission issued questionnaires to five producers/exporters in South Korea and received a response from three firms: Hyundai Steel,

⁸⁶ Original confidential report, p. I-9 and VII-23.

POSCO, and POSCO International (“POSCO International”). These firms collectively accounted for *** percent of total hot-rolled steel production in South Korea in 2021.^{87 88 89}

Table IV-47 presents data on gross production and apparent gross consumption of hot-rolled steel in South Korea. Gross production increased by *** percent during 2016-21, after increasing *** percent from 2016 to 2017, decreasing *** percent from 2017 to 2020, and increasing *** percent from 2020 to 2021. It is projected to be *** percent lower in 2022 than in 2021. Apparent gross consumption decreased by *** percent during 2016-21, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2020 and decreasing by *** percent from 2020 to 2021. It is projected to be *** percent lower in 2022 than in 2021.⁹⁰

Table IV-47
Hot-rolled steel: Gross production and apparent gross consumption in South Korea, by year

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

Table IV-47 Continued
Hot-rolled steel: Gross production and apparent gross consumption in South Korea, by year

Quantity in short tons

Item	2019	2020	2021	Projected 2022
Gross production	***	***	***	***
Apparent gross consumption	***	***	***	***

Source: ***.

Table IV-48 presents information on the hot-rolled steel operations of the responding producers and exporters in South Korea.

⁸⁷ ***.

⁸⁸ Coverage is based on the share of reported production to *** gross production data for South Korea. Data include hot-rolled sheet and coiled plate. *** South Korean responding producers reported in their questionnaires that they collectively accounted for *** percent of hot-rolled steel production in South Korea and *** percent of exports to the United States from South Korea.

⁸⁹ Two firms, ***, did not respond to Staff’s request to complete a questionnaire.

⁹⁰ According to ***, annual production capacity in South Korea in 2021 for hot-rolled coil (carbon) is *** short tons. South Korean capacity that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-48**Hot-rolled steel: Summary data on firms in South Korea, 2021**

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)
Hyundai	***	***	***	***	***	***
POSCO	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Table IV-49 presents information on the resales of hot-rolled steel operations of the responding producers and exporters in Japan.

Table IV-49**Hot-rolled steel: Summary data on resellers in South Korea, 2021**

Resellers	Resales exported to all destination markets (short tons)	Share of resales exported to all destination markets (percent)	Resales exported to the United States (short tons)	Share of resales reported exports to the United States (percent)
POSCO International	***	***	***	***
All firms	***	***	***	***

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

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

Changes in operations

As presented in table IV-50 producers in South Korea reported several operational and organizational changes since January 1, 2016.

Table IV-50**Hot-rolled steel: Reported changes in operations by producers in South Korea, since January 1, 2016**

Item	Firm name and narrative on changes in operations
Plant closings	***
Production curtailments	***
Expansions	***

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

Table IV-51 presents developments in the South Korean industry since the original investigations.

Table IV-51
Hot-rolled steel: Recent developments in the Korean industry

Item	Firm	Event
Expansion	POSCO	In 2017, POSCO expanded the size of its blast furnace at Pohang Works, where it produces hot-rolled coil and other products. The upgrades helped increase the daily production capacity to 14,000 tons.
Plant Construction	Dongbu	In 2020, Dongbu announced plans to close one of its plants in China and build a new plant in the South Chungcheong Province of South Korea. It plans to invest \$131 million in the new plant construction over three years with the goal of completion in 2024.

Source: Jung Min-hee, POSCO Takes Wrap Off World's Fifth Largest Super-Sized Blast Furnace after Repair, Business Korea, June 8, 2017, <http://www.businesskorea.co.kr/news/articleView.html?idxno=18317>; Lim Chang-won, Aju, KG Dongbu Steel relocates plant in China to home base in South Korea, Business Daily, November 2020, <https://www.ajudaily.com/view/20201103094832399> (accessed 9/23/2022).

Operations on hot-rolled steel

Tables IV-52 and IV-53 presents data on the responding producers and exporters in South Korea. After remaining constant from 2016 to 2019, production capacity decreased by *** percent from 2019 to 2021.⁹¹ There was a *** increase in capacity in interim 2022 from interim 2021. Production in South Korea fluctuated during 2016-21, as it decreased by *** percent from 2016 to 2017, increased by *** percent from 2017 to 2019, and decreased by *** percent from 2019 to 2020, and increased again by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2016. Production in interim 2022 was *** percent higher than in interim 2021. Consequently, following changes in production, responding South Korean producers reported capacity utilization fluctuated, overall increasing by *** percentage points during 2016-21. Capacity utilization was *** percentage points higher in interim 2022 than in interim 2021.

⁹¹ ***.

Table IV-52
Hot-rolled steel: Data on industry South Korea, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-52 Continued
Hot-rolled steel: Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-52 Continued
Hot-rolled steel: Data on industry in South Korea, by period

Unit values in dollars per short ton; Shares in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-52 Continued
Hot-rolled steel: Data on industry in South Korea, by period

Unit values in dollars per short ton; Shares in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments accounted for *** of South Korean total shipments, by quantity, in each year during each full and partial year. Its home market shipments increased in by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and increased by *** percent from 2020 to 2021, overall increasing by *** during 2016-21.^{92 93} Quantity of home market shipments in interim 2022 were *** percent higher than interim 2021. Internal consumption and transfers, by quantity, accounted for *** of total home market shipments during each full or partial year and irregularly increased during 2016-21,

⁹² The increase in domestic commercial shipments is a result of ***. Email from *** August 8, 2022.

⁹³ The decrease after 2019 was a result of the ***. Email from *** August 3, 2022, and email from *** August 8, 2022.

ending 2021 *** percent higher in 2021 than in 2016. The quantity of internal consumption and transfers were *** percent higher in interim 2022 than in interim 2021.

Home market shipments, by value, increased by *** percent from 2016 to 2018, decreased by *** percent from 2018 to 2020, and increased by *** percent from 2020 to 2021, increasing overall by *** percent during 2016-21. Home market shipments, by value, were *** percent higher in interim 2022 than interim 2021. The unit value of home market shipments increased irregularly, increasing by *** percent during 2016-21, with the largest increase occurring from 2020 to 2021. Similarly, the unit value of home market shipments was *** percent higher in interim 2022 compared to interim 2021.

End-of-period inventories in South Korea increased in every year during 2016-21, except for a *** percent decrease from 2017 to 2018, ending 2021 *** percent higher than 2016.⁹⁴ Ending inventories in interim 2022 were *** percent higher than interim 2021. The ratio of South Korean end-of-period inventories to its production and total shipments both ranged from *** percent to *** percent during 2016-21.

Table IV-53 presents data on export shipments by market of the responding producers and resellers in South Korea.⁹⁵ By quantity, export shipments including resales accounted for *** share of South Korea's total shipments during 2016-21 and interim 2021-22, with the majority of those shipments going to non-U.S. markets.⁹⁶ The quantity of its export shipments to the United States decreased by *** percent from 2016 to 2017, increased by *** percent from 2017 to 2018, decreased by *** from 2018 to 2019, and increased by *** percent from 2019 to 2021, overall increasing by *** percent during 2016-21.⁹⁷ ⁹⁸ Similarly, in interim 2022, the quantity of export shipments to the United States was *** percent lower than in interim 2021. After decreasing by *** percent from 2016 to 2017, the value of export shipments to the United States also fluctuated, overall increasing by *** percent during 2016-21, with the largest increase occurring from 2020 to 2021. The value of exports to the United States was *** percent higher in interim 2022 than interim 2021.

⁹⁴ The increased inventory reflects a *** Email from *** August 8, 2022.

⁹⁵ *** resales were reported by ***, which reported resales in each full and partial year.

⁹⁶ Total shipments do not include resale shipments.

⁹⁷ ***.

⁹⁸ The increase in exports to the United States was attributed to *** Email from *** August 3, 2022.

Consequently, the unit value of exports to the United States increased by *** percent during 2016-21, only decreasing during 2018-20. The unit value of exports to the United States was *** percent higher in interim 2022 compared to interim 2021.

Table IV-53

Hot-rolled steel: Export shipments by producers and resellers in South Korea, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-53 Continued

Hot-rolled steel: Export shipments by producers and resellers in South Korea, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-53 Continued**Hot-rolled steel: Export shipments by producers and resellers in South Korea, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-53 Continued

Hot-rolled steel: Export shipments by producers and resellers in South Korea, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

By quantity, export shipments to Asia accounted for *** of South Korea's export shipments throughout 2016-21. The export shipments to Asia, by quantity, decreased in every year from 2016-21, except from 2018-2019 when it rose *** percent, ending 2021 *** percent lower than 2016. Similarly, in interim 2022, the quantity of export shipments to Asia was *** percent lower than in interim 2021. After decreasing by *** percent from

2016 to 2018, South Korea's export shipments to all other markets, by quantity, increased by *** percent from 2018 to 2020, and decreased by *** percent from 2020 to 2021, ending 2021 *** percent higher than 2016.⁹⁹ Interim 2022 realized export shipments, by quantity, to all other markets *** percent lower than in 2021. Export shipments to all other North American markets increased from *** percent from 2016 to 2018, decreased by *** from 2018 to 2020 before increasing again by *** percent from 2020 to 2021, overall ending *** percent higher in 2021 than in 2016.¹⁰⁰ Similarly, in interim 2022, the quantity of export shipments to all other North American markets was *** percent lower than in interim 2021. By quantity, export shipments to the European Union decreased in every year during 2016-21, except for a *** percent increase from 2020 to 2021, ending 2021 *** percent lower than 2016. Export shipments by quantity to the European Union was *** percent higher in interim 2022 than in interim 2021.

The value of export shipments to Asia increased in each year during 2016-21, except for a *** percent decrease from 2019 to 2020, for an overall *** percent increase from 2016 to 2021. Contrarily, interim 2022 had a *** percent lower export shipment to Asia, by value, than in interim 2021. After decreasing *** percent from 2016 to 2017, the value of export shipments to all other markets fluctuated, increasing by *** from 2017 to 2020, and decreasing by *** percent from 2020 to 2021, for an overall increase of *** percent. Export shipments to all other markets, by value, were *** percent lower in interim 2022 than interim 2021. The value of export shipments to other North American markets increased in each year during 2016-21, except for a *** percent decrease from 2018 to 2020, for an overall *** percent increase from 2016 to 2021. Export shipments to other North American markets, by value, were *** percent higher in interim 2022 than in interim 2021. The value of export shipments to the European Union largely increased during 2016-21, except for decreasing by *** percent from 2018 to 2020, for an overall *** percent increase from 2016 to 2021, largely driven by a *** percent increase from 2020 to 2021.¹⁰¹ Export

⁹⁹ ***. Email from *** August 8, 2022.

¹⁰⁰ The increase from 2020 to 2021 was due to ***. Email from *** August 3, 2022.

¹⁰¹ ***. Email from *** August 8, 2022.

shipments to European Union, by value, were *** percent higher in interim 2022 than interim 2021.

The unit value of export shipments to all export markets followed the same pattern, increasing from 2016 to 2018, decreasing from 2018 to 2020, and peaking from 2020 to 2021. Interim 2022 realized a higher unit value for all export shipment markets than in interim 2021.

Affiliation

*** reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing. Exports to affiliated firms accounted for *** of all exports to the United States by ***. Table IV-53 presents data on exports to the United States by producers and resellers in South Korea.

Table IV-54
Hot-rolled steel: Exports to the United States by producers and resellers in South Korea, by affiliation and period

Quantity in short tons; Share and ratio in percent

Item	Measure	2016	2017	2018
Affiliated	Quantity	***	***	***
Other	Quantity	***	***	***
All types	Quantity	***	***	***
Affiliated	Share of quantity	***	***	***
Other	Share of quantity	***	***	***
All types	Share of quantity	***	***	***

Table continued.

Table IV-54 Continued
Hot-rolled steel: Exports to the United States by producers and resellers in South Korea, by affiliation and period

Quantity in short tons; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Affiliated	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
Affiliated	Share of quantity	***	***	***	***	***
Other	Share of quantity	***	***	***	***	***
All types	Share of quantity	***	***	***	***	***

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

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

Alternative products

No responding producer in South Korea reported production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.

Exports

Table IV-55 presents Global Trade Atlas data for exports of hot-rolled steel from South Korea in descending order of quantity for 2021. The leading export markets for hot-rolled steel from South Korea in 2021 are India, Japan, and Vietnam, accounting for 15.3 percent, 14.4 percent, and 10.3 percent, respectively. The United States accounted for 10.2 percent of exports of hot-rolled steel from South Korea in 2021.

Table IV-55**Hot-rolled flat products of iron or nonalloy steel: Exports from South Korea, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	995,927	287,910	573,224
India	Quantity	1,177,286	1,174,560	1,365,739
Japan	Quantity	1,032,206	1,012,695	881,752
Vietnam	Quantity	1,014,478	788,887	613,862
China	Quantity	410,735	423,432	414,996
Italy	Quantity	505,401	380,785	409,222
Mexico	Quantity	247,992	317,783	304,165
Indonesia	Quantity	444,656	544,978	334,784
Thailand	Quantity	458,576	250,924	286,909
All other destination markets	Quantity	1,739,723	1,125,361	997,486
Non-U.S. destination markets	Quantity	7,031,053	6,019,403	5,608,914
All destination markets	Quantity	8,026,980	6,307,313	6,182,139
United States	Value	428,765	163,202	407,301
India	Value	433,454	561,211	783,705
Japan	Value	362,769	469,785	449,378
Vietnam	Value	334,674	352,816	300,953
China	Value	205,585	249,110	253,624
Italy	Value	171,201	189,273	234,785
Mexico	Value	113,479	185,799	194,528
Indonesia	Value	156,494	272,553	189,973
Thailand	Value	165,470	131,291	165,341
All other destination markets	Value	686,114	582,319	594,688
Non-U.S. destination markets	Value	2,629,240	2,994,156	3,166,975
All destination markets	Value	3,058,005	3,157,358	3,574,276

Table continued.

Table IV-55 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from South Korea, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	392,037	493,323	569,823
India	Quantity	1,364,599	760,673	852,099
Japan	Quantity	1,007,739	732,061	805,589
Vietnam	Quantity	766,057	775,207	574,105
China	Quantity	563,419	1,031,489	412,154
Italy	Quantity	380,011	339,869	368,188
Mexico	Quantity	383,579	261,253	359,489
Indonesia	Quantity	450,595	327,614	250,408
Thailand	Quantity	244,368	193,933	229,014
All other destination markets	Quantity	1,369,217	1,983,473	1,163,475
Non-U.S. destination markets	Quantity	6,529,585	6,405,573	5,014,521
All destination markets	Quantity	6,921,621	6,898,896	5,584,344
United States	Value	228,115	248,294	571,662
India	Value	721,055	361,559	603,616
Japan	Value	514,016	331,378	524,562
Vietnam	Value	341,046	316,460	406,613
China	Value	289,450	446,196	298,748
Italy	Value	175,409	142,040	305,863
Mexico	Value	236,663	144,913	310,782
Indonesia	Value	228,683	148,676	187,490
Thailand	Value	136,651	92,891	148,836
All other destination markets	Value	673,518	867,960	934,661
Non-U.S. destination markets	Value	3,316,490	2,852,072	3,721,171
All destination markets	Value	3,544,605	3,100,367	4,292,833

Table continued.

Table IV-55 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from South Korea, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	431	567	711
India	Unit value	368	478	574
Japan	Unit value	351	464	510
Vietnam	Unit value	330	447	490
China	Unit value	501	588	611
Italy	Unit value	339	497	574
Mexico	Unit value	458	585	640
Indonesia	Unit value	352	500	567
Thailand	Unit value	361	523	576
All other destination markets	Unit value	394	517	596
Non-U.S. destination markets	Unit value	374	497	565
All destination markets	Unit value	381	501	578
United States	Share of quantity	12.4	4.6	9.3
India	Share of quantity	14.7	18.6	22.1
Japan	Share of quantity	12.9	16.1	14.3
Vietnam	Share of quantity	12.6	12.5	9.9
China	Share of quantity	5.1	6.7	6.7
Italy	Share of quantity	6.3	6.0	6.6
Mexico	Share of quantity	3.1	5.0	4.9
Indonesia	Share of quantity	5.5	8.6	5.4
Thailand	Share of quantity	5.7	4.0	4.6
All other destination markets	Share of quantity	21.7	17.8	16.1
Non-U.S. destination markets	Share of quantity	87.6	95.4	90.7
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-55 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from South Korea, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	582	503	1,003
India	Unit value	528	475	708
Japan	Unit value	510	453	651
Vietnam	Unit value	445	408	708
China	Unit value	514	433	725
Italy	Unit value	462	418	831
Mexico	Unit value	617	555	865
Indonesia	Unit value	508	454	749
Thailand	Unit value	559	479	650
All other destination markets	Unit value	492	438	803
Non-U.S. destination markets	Unit value	508	445	742
All destination markets	Unit value	512	449	769
United States	Share of quantity	5.7	7.2	10.2
India	Share of quantity	19.7	11.0	15.3
Japan	Share of quantity	14.6	10.6	14.4
Vietnam	Share of quantity	11.1	11.2	10.3
China	Share of quantity	8.1	15.0	7.4
Italy	Share of quantity	5.5	4.9	6.6
Mexico	Share of quantity	5.5	3.8	6.4
Indonesia	Share of quantity	6.5	4.7	4.5
Thailand	Share of quantity	3.5	2.8	4.1
All other destination markets	Share of quantity	19.8	28.8	20.8
Non-U.S. destination markets	Share of quantity	94.3	92.8	89.8
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-10 presents data on the average unit values for exports from South Korea to the United States and to all other destination markets. Data for figure IV-10 are derived from tables IV-53 and IV-55.

Figure IV-10

Hot-rolled steel: Average unit values for exports from South Korea to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Korea Trade Statistics Promotion Institute (KTSPI) ***, Korea Customs and Trade Development Institution (KCTDI) *** Global Trade Atlas database, accessed July 14th, 2022.

The industry in Turkey

Overview

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from two firms, Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (“Erdemir”) and Çolakoğlu Metalurji Anonim Şirketi (“Colakoglu”), which accounted for approximately *** percent of production of hot-rolled steel in Turkey during 2015, and approximately *** percent of hot-rolled steel exports from Turkey to the United States during 2015.¹⁰²

In the current proceeding, the Commission issued questionnaires to two producers/exporters in Turkey and received responses from two firms: Erdemir and Habas Sinai

¹⁰² Erdemir accounted for approximately *** percent of production of hot-rolled steel in Turkey during 2015, and approximately *** percent of hot-rolled steel exports from Turkey to the United States during 2015. Original confidential report, p. I-9 and p. VII-36. Erdemir’s Questionnaire response, original investigation.

Ve Tibbi Gazlar Istihsal Endustrisi A.S. (“Habas”). These firms collectively accounted for approximately *** percent of total hot-rolled steel production in Turkey in 2021.^{103 104}

Table IV-56 presents data on gross production and apparent gross consumption of hot-rolled steel in Turkey.¹⁰⁵ Gross production of hot-rolled steel in Turkey increased each year during 2016-21, except for a *** percent decrease from 2018 to 2019, for an overall increase of *** percent from 2016 to 2021. It is projected to be *** percent higher in 2022 than in 2021. Apparent gross consumption overall increased by *** percent 2016-21, increasing by *** percent from 2016 to 2017, decreasing by *** percent from 2017 to 2019, then increasing again by *** percent from 2019 to 2021. It is projected to *** percent lower in 2022 than in 2021.¹⁰⁶

Table IV-56
Hot-rolled steel: Gross production and apparent gross consumption in Turkey, by year

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

¹⁰³ This coverage figure includes Colakoglu’s production. Coverage is based on the share of reported production to *** gross production data for all of Turkey. Data include hot-rolled sheet and coiled plate. *** Turkish responding producers reported in their questionnaire that they collectively accounted for *** percent of hot-rolled steel production in Turkey and *** percent of exports to the United States from Turkey.

¹⁰⁴ While MMK Metaluji has been identified as a producer of hot-rolled steel in Turkey, the United States has imposed sanctions on MMK’s Turkish subsidiary, MMK Metaluji on August 2, 2022. MMK Metalurji is therefore unable to export to the U.S. market, the EU market, or even to sell in the domestic Turkish market. Posthearing brief of Turkish respondent party Erdemir, p.10, exh. 3.

¹⁰⁵ Colakoglu production and consumption data are included. Colakoglu accounted for approximately *** percent of hot-rolled steel capacity in Turkey in 2021. ***

¹⁰⁶ According to ***, annual production capacity in Turkey in 2021 for hot-rolled coil (carbon) is *** short tons. Turkish capacity that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is estimated to be *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-56 Continued**Hot-rolled steel: Gross production and apparent gross consumption in Turkey, by year**

Quantity in short tons

Item	2019	2020	2021	Projected 2022
Gross production	***	***	***	***
Apparent gross consumption	***	***	***	***

Source: ***.

Table IV-57 presents information on the hot-rolled steel operations of the responding producers and exporters in Turkey.

Table IV-57**Hot-rolled steel: Summary data on firms in Turkey, 2021**

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)
Erdemir	***	***	***	***	***	***
Habas	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

Producers in Turkey did not report any operational or organizational changes since January 1, 2016.

Table IV-58 presents developments in the Turkish industry from public sources since the original investigations.

Table IV-58
Hot-rolled steel: Recent developments in the Turkish industry

Item	Firm	Event
Expansion	MMK	In August 2021, Russian steel producer MMK commenced commercial production at its revitalized MMK Metalurji plant in Turkey. MMK made a \$40 million investment in the refurbishment of the Turkish plant, which had stopped production activity in 2012. The facility will produce hot rolled sheet and coil and has an annual capacity of 2.3 million MT. The plant is expected to be fully operational in 2022.
Expansion	Habas	In 2021, Habas announced plans to expand its hot strip rolling mill in Alağa, Turkey. Habas' plan is to boost production capacity at the facility from 2.5 million to 4.5 million MT per year. The expansion is scheduled for early 2023.

Source: Julia Bolatova, MMK Metalurji to start producing its own HRC again in Q3, FastMarkets, April 2021, <https://www.fastmarkets.com/insights/mmk-metalurji-to-start-producing-its-own-hrc-again-in-q3> (accessed 9/23/2022); David Fleschen, Habaş A.S. places order with SMS group to upgrade compact mill, Market Steel, June 2021, <https://www.marketsteel.com/news-details/haba%C5%9F-a-s-places-order-with-sms-group-to-upgrade-compact-mill.html> (accessed 9/23/2022).

Operations on hot-rolled steel

Table IV-59 and 60 presents data on the hot-rolled steel operations of the responding producers and exporters in Turkey. Responding producers' production capacity in Turkey decreased by *** percent from 2016 to 2018, increased by *** percent from 2018 to 2020 before decreasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2016.¹⁰⁷ Capacity in interim 2022 was *** percent lower than interim 2021. Production on the other hand, increased in each period during 2016-21, overall increasing by *** percent from 2016 to 2021. Production was *** percent lower in interim 2022 compared to interim 2021. Consequently, capacity utilization increased in each period during 2016-21, except from 2018 to 2019, where it decreased by *** percentage points, increasing overall by *** percentage points. Capacity utilization also was *** percentage point lower in interim 2022 compared to interim 2021, reflecting the decrease in both capacity and production.

¹⁰⁷ ***.

Table IV-59
Hot-rolled steel: Data on industry Turkey, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-59 Continued
Hot-rolled steel: Data on industry in Turkey, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-59 Continued
Hot-rolled steel: Data on industry in Turkey, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-59 Continued
Hot-rolled steel: Data on industry in Turkey, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments, by quantity, accounted for between *** and *** percent of total shipments by the responding producers in Turkey in each full or partial period after 2016. The quantity of reported home market shipments increased in every period during 2016-21, except for a *** percent decrease from 2017 to 2018, ending *** percent higher in 2021 than 2016.¹⁰⁸ Home market shipments by quantity were *** percent lower in interim 2022 compared to interim 2021. The value of home market shipments moved in a similar direction, increasing in every period during 2016-21, except for a *** percent decrease from 2018 to 2019, ending *** percent higher in 2021 than 2016, largely accounted for by a *** percent increase from 2020 to 2021. Despite a lower quantity, home market shipments, by value, were *** percent higher in interim 2022 compared to interim 2021. Internal

¹⁰⁸ During 2016-17, ***. Email from ***, August 1, 2022.

consumption and transfers were a *** share of home market shipments, overall increasing by *** percent during 2016-21 and were *** percent lower in interim 2022 than in interim 2021. *** accounted for almost *** of the internal consumption and transfers in Turkey.

End-of-period inventories for the responding producers in Turkey fluctuated. After decreasing by *** percent from 2016 to 2017, end-of-period inventories increased by *** percent from 2017 to 2019, decreased by *** percent from 2019 to 2020 and increased again by *** percent from 2020 to 2021.¹⁰⁹ Interim 2022 end-of-period inventories were *** percent higher in interim 2022 compared to interim 2021.¹¹⁰ Consequently, the ratios of their end-of-period inventories to production and total shipments both moved in the same direction, increasing in every period except for a *** percentage point decrease from 2016 to 2017 and a *** percentage points decrease between 2019 and 2020. The ratios of end-of-period inventories to production and total shipments ranged from *** and *** percent, respectively, during 2016-21.

Table IV-60 presents data on export shipments by market of the responding producers in Turkey. As a share of total shipments, export shipments have been declining since 2019. A majority of those shipments went to ***. Responding Turkish producers only reported ***, accounting for less than *** percent of all export shipments, by quantity, in those years. *** accounted for *** export shipments to the United States during 2016-18, while in 2021, *** and *** reported *** quantity of exports.¹¹¹ Reported export shipments to the United States, overall increased irregularly between 2016-21, decreasing by *** percent from 2016 to 2017 and increasing by *** percent from 2017 to 2018, for a net increase of *** percent between 2016 and 2021. The value of reported export shipments to the United States moved similarly to quantity, decreasing by *** percent from 2016 to 2017 and increasing by *** percent from 2017 to 2018, for a net increase of *** percent between 2016 and 2021. The unit value of reported export shipments to the United States *** from 2016 to 2021, with its peak occurring in 2021.

¹⁰⁹ High ending inventories after 2018 were a result of ***. Email from ***, August 1, 2022.

¹¹⁰ At the end of 2021, ***. Email from ***, August 1, 2022.

¹¹¹ ***.

Table IV-60**Hot-rolled steel: Export shipments by producers in Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-60 Continued**Hot-rolled steel: Export shipments by producers in Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-60 Continued**Hot-rolled steel: Export shipments by producers in Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-60 Continued**Hot-rolled steel: Export shipments by producers in Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

The quantity of reported export shipments to the European Union initially increased from 2016 to 2018 by *** percent before decreasing by *** percent from 2018 to 2021,

overall increasing by *** percent during 2016-21.¹¹² Export shipments to the European Union, by quantity, were *** percent lower in interim 2022 than in interim 2021. After decreasing by *** percent from 2016 to 2017, quantity of export shipments to all other markets increased by *** percent from 2017 to 2020 before decreasing by *** percent from 2020 to 2021. Quantity of export shipments to all other markets in interim 2022 was *** percent higher in interim 2022 than in interim 2021. Exports shipments to Asia, by quantity, followed similar patterns to all other markets, decreasing by *** percent from 2016 to 2017, increasing nearly *** from 2017 to 2020, and decreasing by *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21.¹¹³ Export shipments to Asia was *** percent higher in interim 2022 than in interim 2021. The quantity of reported export shipments to other North American markets widely fluctuated, increasing *** percent during 2016-21, with the largest increase from 2020 to 2021 of *** percent. The interim 2022 continued seeing an increase, as interim 2022 was *** percent higher than interim 2021.

The value of reported export shipments to the European Union fluctuated, initially increased from 2016 to 2018 by *** percent before decreasing by *** percent from 2018 to 2020 and increased again by *** percent from 2020 to 2021, overall ending 2021 *** than 2016. Export shipments to the European Union, by value, were *** percent lower in interim 2022 compared to interim 2021. After decreasing by *** percent from 2016 to 2017, the value of export shipments to all other markets increased by *** percent 2017 to 2020 before decreasing by *** percent from 2020 to 2021, overall increasing by *** percent during 2016-21. Export shipments to all other markets, by value, in interim 2022 was nearly *** than in interim 2021. Exports shipments to Asia, by value, decreased by *** percent from 2016 to 2017, increased by *** from 2017 to 2020, and decreased by *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. The value of export shipments to Asia was *** percent higher in interim 2022 than in interim 2021. The value of reported export shipments to other North American markets also widely fluctuated, ending the period over *** in 2021 than in 2016 and interim 2022 was *** percent higher than interim 2021.

¹¹² The decrease is a result of the ***. Email from *** August 1, 2022.

¹¹³ *** to Asia in 2017. The increase from 2018 to 2019 was driven ***. Email from ***, August 1, 2022.

Unit values to all export markets saw an overall decrease during 2016-21, with the largest increase occurring from 2020 to 2021. The unit values of exports to the European Union and all other markets, moved in the same direction, increasing from 2016 to 2018, decreasing from 2018 to 2020, and increasing from 2020 to 2021. The unit values of exports to Asia increased by *** percent from 2016 to 2017, decreased by *** percent from 2017 to 2020, and increased by *** percent from 2020 to 2021. The unit values of exports to other North American markets increased in every period from 2016-21, except for a *** percent decrease from 2018 to 2019. The unit values of all export shipments were *** percent higher in interim 2022 than in interim 2021.¹¹⁴

Affiliation

No responding producer in Turkey reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing.

Alternative products

As shown in table IV-61, hot-rolled steel accounted for *** of total production on shared equipment in each year during 2016-21. ***.

Table IV-61

Hot-rolled steel: Overall capacity and production on the same equipment as in-scope production in Turkey, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	***	***	***
Hot-rolled steel production	Quantity	***	***	***
Other production	Quantity	***	***	***
Total production	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
Hot-rolled steel production	Share	***	***	***
Other production	Share	***	***	***
Total production	Share	***	***	***

Table continued.

¹¹⁴ ***. Email from ***, August 1, 2022.

Table IV-61 Continued**Hot-rolled steel: Overall capacity and production on the same equipment as in-scope production in Turkey, by period**

Quantity in short tons; share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Overall capacity	Quantity	***	***	***	***	***
Hot-rolled steel production	Quantity	***	***	***	***	***
Other production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Overall capacity utilization	Ratio	***	***	***	***	***
Hot-rolled steel production	Share	***	***	***	***	***
Other production	Share	***	***	***	***	***
Total production	Share	***	***	***	***	***

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

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

Exports

Table IV-62 presents Global Trade Atlas data for exports of hot-rolled steel from Turkey in descending order of quantity for 2021. The leading export markets for hot-rolled steel from Turkey in 2021 are Italy, Spain, and Belgium, accounting for 25.0 percent, 14.1 percent, and 6.4 percent, respectively. The United States accounted for 15.7 percent of exports of hot-rolled steel from Turkey in 2021.

Table IV-62**Hot-rolled flat products of iron or nonalloy steel: Exports from Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	203,434	132,803	204,402
Italy	Quantity	417,192	739,585	1,470,283
Spain	Quantity	309,110	554,713	758,609
Belgium	Quantity	47,697	142,046	359,948
Egypt	Quantity	180,236	101,582	102,341
Iraq	Quantity	33,469	43,322	55,214
Greece	Quantity	118,046	103,666	134,211
Portugal	Quantity	112,003	133,435	263,878
Tunisia	Quantity	46,541	20,407	40,365
All other destination markets	Quantity	576,745	593,523	584,958
Non-U.S. destination markets	Quantity	1,841,041	2,432,279	3,769,807
All destination markets	Quantity	2,044,475	2,565,081	3,974,208
United States	Value	81,792	65,174	115,582
Italy	Value	146,204	358,486	799,569
Spain	Value	111,941	265,271	427,597
Belgium	Value	15,986	70,571	194,510
Egypt	Value	55,664	45,177	53,654
Iraq	Value	14,176	23,071	33,979
Greece	Value	39,978	49,764	74,395
Portugal	Value	40,610	65,300	144,974
Tunisia	Value	17,158	9,975	22,315
All other destination markets	Value	208,367	296,473	327,470
Non-U.S. destination markets	Value	650,084	1,184,088	2,078,463
All destination markets	Value	731,877	1,249,263	2,194,045

Table continued.

Table IV-62 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	12,971	24,140	446,816
Italy	Quantity	1,144,691	990,129	710,209
Spain	Quantity	651,078	356,752	402,030
Belgium	Quantity	140,808	80,332	182,276
Egypt	Quantity	305,569	397,421	148,273
Iraq	Quantity	78,390	129,582	101,383
Greece	Quantity	116,190	95,864	97,566
Portugal	Quantity	215,809	118,167	94,750
Tunisia	Quantity	29,107	31,739	90,004
All other destination markets	Quantity	791,227	800,842	570,355
Non-U.S. destination markets	Quantity	3,472,869	3,000,830	2,396,845
All destination markets	Quantity	3,485,840	3,024,970	2,843,661
United States	Value	6,281	10,367	396,984
Italy	Value	522,506	421,444	564,279
Spain	Value	304,976	154,559	330,525
Belgium	Value	66,524	34,714	162,139
Egypt	Value	133,442	166,423	118,805
Iraq	Value	40,196	60,080	74,828
Greece	Value	54,314	42,012	78,990
Portugal	Value	101,637	51,146	72,457
Tunisia	Value	13,926	14,505	67,315
All other destination markets	Value	373,757	333,563	454,374
Non-U.S. destination markets	Value	1,611,278	1,278,447	1,923,711
All destination markets	Value	1,617,558	1,288,814	2,320,696

Table continued.

Table IV-62 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from Turkey, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	402	491	565
Italy	Unit value	350	485	544
Spain	Unit value	362	478	564
Belgium	Unit value	335	497	540
Egypt	Unit value	309	445	524
Iraq	Unit value	424	533	615
Greece	Unit value	339	480	554
Portugal	Unit value	363	489	549
Tunisia	Unit value	369	489	553
All other destination markets	Unit value	361	500	560
Non-U.S. destination markets	Unit value	353	487	551
All destination markets	Unit value	358	487	552
United States	Share of quantity	10.0	5.2	5.1
Italy	Share of quantity	20.4	28.8	37.0
Spain	Share of quantity	15.1	21.6	19.1
Belgium	Share of quantity	2.3	5.5	9.1
Egypt	Share of quantity	8.8	4.0	2.6
Iraq	Share of quantity	1.6	1.7	1.4
Greece	Share of quantity	5.8	4.0	3.4
Portugal	Share of quantity	5.5	5.2	6.6
Tunisia	Share of quantity	2.3	0.8	1.0
All other destination markets	Share of quantity	28.2	23.1	14.7
Non-U.S. destination markets	Share of quantity	90.0	94.8	94.9
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-62 Continued
Hot-rolled flat products of iron or nonalloy steel: Exports from Turkey, by destination market and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	484	429	888
Italy	Unit value	456	426	795
Spain	Unit value	468	433	822
Belgium	Unit value	472	432	890
Egypt	Unit value	437	419	801
Iraq	Unit value	513	464	738
Greece	Unit value	467	438	810
Portugal	Unit value	471	433	765
Tunisia	Unit value	478	457	748
All other destination markets	Unit value	472	417	797
Non-U.S. destination markets	Unit value	464	426	803
All destination markets	Unit value	464	426	816
United States	Share of quantity	0.4	0.8	15.7
Italy	Share of quantity	32.8	32.7	25.0
Spain	Share of quantity	18.7	11.8	14.1
Belgium	Share of quantity	4.0	2.7	6.4
Egypt	Share of quantity	8.8	13.1	5.2
Iraq	Share of quantity	2.2	4.3	3.6
Greece	Share of quantity	3.3	3.2	3.4
Portugal	Share of quantity	6.2	3.9	3.3
Tunisia	Share of quantity	0.8	1.0	3.2
All other destination markets	Share of quantity	22.7	26.5	20.1
Non-U.S. destination markets	Share of quantity	99.6	99.2	84.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-11 presents data on the average unit values for exports from Turkey to the United States and to all other destination markets. Data for figure IV-11 are derived from tables IV-60 and IV-62.

Figure IV-11

Hot-rolled flat products of iron or nonalloy steel: Average unit values for exports from Turkey to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by State Institute of Statistics Global Trade Atlas database, accessed July 14th, 2022.

The industry in the United Kingdom

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, Tata Steel U.K., Ltd. (“TSUK”), which accounted for approximately *** percent of production of hot-rolled steel in the United Kingdom during 2015, and approximately *** percent of hot-rolled steel exports from the United Kingdom to the United States during 2015.¹¹⁵

In the current proceeding, the Commission issued questionnaires to four producers/exporters in the United Kingdom and received a response from one firm: TSUK.¹¹⁶

¹¹⁵ Original confidential report, p. I-9 and p. VII-42.

¹¹⁶ Staff received a questionnaire response from *** indicating it did not produce hot-rolled steel in the United Kingdom. *** reported only producing hot-rolled steel in the Netherlands. Staff did not receive a questionnaire response from ***. According to ***, Liberty Steel accounted for approximately *** percent of hot-rolled coil capacity in the United Kingdom in 2021. ***.

TSUK accounted for *** of hot-rolled steel production in the United Kingdom in 2021.¹¹⁷

Table IV-63 presents data on gross production and apparent gross consumption of hot-rolled steel in the United Kingdom. Gross production increased by *** percent from 2016 to 2017, decreased by *** percent from 2017 to 2020, and increased by *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. It is projected to be *** percent lower in 2022 than in 2021. Apparent gross consumption moved in the same direction, as it increased by *** percent from 2016 to 2017, decreased by *** percent from 2017 to 2020, and increased by *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. It is projected to be *** percent lower in 2022 than in 2021.¹¹⁸

Table IV-63

Hot-rolled steel: Gross production and apparent gross consumption in the United Kingdom, by year

Quantity in short tons

Item	2016	2017	2018
Gross production	***	***	***
Apparent gross consumption	***	***	***

Table continued.

Table IV-63 Continued

Hot-rolled steel: Gross production and apparent gross consumption in the United Kingdom, by year

Quantity in short tons

Item	2019	2020	2021	Projected 2022
Gross production	***	***	***	***
Apparent gross consumption	***	***	***	***

Source: ***.

Table IV-64 presents information on the hot-rolled steel operations of the responding producer and exporter in the United Kingdom.

¹¹⁷ Coverage is based on the share of reported production to *** gross production data for all of the United Kingdom. Data include hot-rolled sheet and coiled plate. *** TSUK reported in its questionnaire response it accounted for *** percent of hot-rolled steel production in the United Kingdom and *** percent of exports to the United States from the United Kingdom.

¹¹⁸ According to ***, annual production capacity in the United Kingdom in 2021 for hot-rolled coil (carbon) is *** short tons. *** estimate for capacity in the United Kingdom that includes hot-rolled coil (carbon) and hot-rolled (carbon)-processed is *** short tons in 2021, according to ***. *** and the prehearing brief of the domestic interested parties, exhibit 2.

Table IV-64**Hot-rolled steel: Summary data on UK producer TSUK, 2021**

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)
TSUK	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

As presented in table IV-65 producers in the United Kingdom reported several operational and organizational changes since January 1, 2016.

Table IV-65**Hot-rolled steel: Reported changes in operations by UK producer TSUK, since January 1, 2016**

Item	Firm name and narrative on changes in operations
Plant closings	***
Revised labor agreements	***

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

Table IV-66 presents developments in the United Kingdom industry since the original investigations.

Table IV-66**Hot-rolled steel: Recent developments in the United Kingdom industry**

Item	Firm	Event
Expansion	TSUK	In 2019, TSUK invested \$68 million to refit its blast furnace at its Port Talbot works. The company also plans to invest another \$1.4 billion on improvements over the next 10 years.
Expansion	Liberty	In 2021, Liberty announced plans to modernize its Newport HRS facility. The plans include the installation of an electric arc furnace. Upon completion, production capacity at the facility is expected to reach 2 million tons annually.

Source: BBC News, £50m fresh start for Port Talbot Tata steelworks, January 2019, <https://www.bbc.com/news/uk-wales-47039561> (accessed 9/23/2022); Liberty Steel Group, Liberty Steel Newport extends successful business turnaround, July 2021, <https://libertysteelgroup.com/news/liberty-steel-newport-extends-successful-business-turnaround/#:~:text=LIBERTY%20Steel%20Newport%20extends%20successful%20business%20turnaround,-LIBERTY%20Steel's%20Newport&text=LIBERTY%20Steel%20invested%20just%20over,three%20months%20of%20this%20year> (accessed 9/23/2022).

Operations on hot-rolled steel

Tables IV-67 and IV-68 presents data on TSUK's hot-rolled steel operations in the United Kingdom. After a *** percent decline in production capacity from 2016 to 2017, TSUK did not report any changes in production capacity during 2017-21.¹¹⁹ Capacity was *** percent lower in interim 2022 compared to interim 2021. Its production, however, fluctuated, increasing by *** percent from 2016 to 2017, decreased by *** percent from 2017 to 2020, and increased by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21. Production was *** percent lower in interim 2022 than interim 2021. Consequently, TSUK's capacity utilization increased from *** percent in 2016 to *** percent in 2021 and was *** percent in both interim 202 and interim 2022.¹²⁰

¹¹⁹ ***.

¹²⁰ ***. Email from ***.

Table IV-67
Hot-rolled steel: Data on UK producer TSUK, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-67 Continued
Hot-rolled steel: Data on UK producer TSUK, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-67 Continued
Hot-rolled steel: Data on UK producer TSUK, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-67 Continued
Hot-rolled steel: Data on UK producer TSUK, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Home market shipments, by quantity, accounted for the *** of TSUK's total shipments, in each year during 2016-21 and in interim 2021-2022. TSUK's home market shipments fluctuated, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21.¹²¹ Interim 2022 reflected a *** percent lower quantity of home market shipments than in interim 2021. TSUK's internal consumption and transfers accounted for the *** home market shipments, and followed a similar trend to home market shipments, overall increasing *** percent during 2016-21, but were *** percent lower in interim 2022 compared to interim 2021.¹²²

¹²¹ The increase reflects ***. Email from *** August 8, 2022.

¹²² ***.

TSUK's end-of-period inventories irregularly decreased by *** percent from 2016 to 2020, and then increased by *** percent from 2020 to 2021, for an overall increase of *** percent during 2016-21.¹²³ Interim 2022 saw a *** percent higher end-of-period inventories than interim 2021. The ratios of end-of-period inventories to production and total shipments ranged from *** and *** percent, respectively.

The value of TSUK's home market shipments also fluctuated similar to quantity, increasing by *** percent from 2016 to 2018, decreasing by *** percent from 2018 to 2020, and increasing by *** percent from 2020 to 2021 for an overall increase of *** percent during 2016-21. The value of home market shipments was *** percent higher in interim 2022 than in interim 2021. Consequently, the unit value of TSUK's home market shipments irregularly increased by *** percent during 2016-21, with the largest increase occurring from 2020 to 2021, and interim 2022 was *** percent higher than in interim 2021.¹²⁴

Table IV-68 presents data on export shipments by market of TSUK. Export shipments, by quantity, accounted for a *** share of TSUK's total shipments in each year during 2016-21. The vast majority of those shipments went to ***. TSUK reported export shipments to ***, accounting for *** percent of its quantity of export shipments that year.

¹²³ ***. Email from ***, August 8, 2022.

¹²⁴ The increase follows the increase in ***. Email from ***, August 8, 2022.

Table IV-68**Hot-rolled steel: Export shipments by TSUK, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
Other North American markets	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
Other North American markets	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
Other North American markets	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-68 Continued**Hot-rolled steel: Export shipments by TSUK, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	***	***	***	***	***
Other North American markets	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Other North American markets	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Other North American markets	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-68 Continued**Hot-rolled steel: Export shipments by TSUK, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
Other North American markets	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
Other North American markets	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-U.S. destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
Other North American markets	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-68 Continued**Hot-rolled steel: Export shipments by TSUK, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	***	***	***	***	***
Other North American markets	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
Other North American markets	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-U.S. destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
Other North American markets	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

After increasing by *** percent from 2016 to 2017, TSUK's export shipments to the European Union decreased by *** percent from 2017 to 2018, and then increased by *** percent from 2018 to 2020 and decreased again by *** percent from 2020 to 2021, for an overall decrease of *** percent during 2016-21. The quantity of export shipments to the

European Union were *** percent higher in interim 2022 than interim 2021. TSUK's export shipments to all other markets oscillated during 2016-21, decreasing by *** percent from 2016 to 2018 before a *** increase from 2018 to 2020, and subsequent decrease of *** percent from 2020 to 2021, for an overall decrease of *** percent.¹²⁵ Interim 2022 quantity of export shipments to all other markets was over *** higher than interim 2021. The quantity of its export shipments to other North American markets fluctuated during 2016-21, ending *** higher in 2021 than in 2016, largely due to the increase from 2020 to 2021.¹²⁶ Interim 2022's quantity of export shipments to other North American markets was *** percent higher than interim 2021. TSUK reported export shipments to Asia ***, accounting for *** percent of its export shipments in that year.

After increasing by *** percent from 2016 to 2017, TSUK's value of export shipments to the European Union irregularly decreased by *** percent from 2017 to 2020, and then increased by *** percent from 2020 to 2021 for an overall increase of *** percent during 2016-21. The value of export shipments to the European Union were *** higher in interim 2022 than interim 2021. TSUK's value of export shipments to all other markets increased irregularly, overall increasing by *** during 2016-21, increasing by *** percent from 2016 to 2017 before a *** decrease from 2017 to 2018, a *** increase from 2018 to 2020, and a subsequent *** percent decrease from 2020 to 2021. Export shipments, by value, to all other markets were over *** higher in interim 2022 than interim 2021. The value of TSUK's export shipments to other North American markets increased irregularly in each year during 2016-21, except 2017-19, ending *** higher in 2021 than in 2016, mostly due to the increase from 2020 to 2021. Interim 2022's value of export shipments to other North American markets was *** percent lower than in interim 2021. The unit value of TSUK's export shipments to the European Union, all other markets, and other North American markets all moved in the same direction, increasing from 2016 to 2018, decreasing from 2018 to 2020, and reaching a period high in 2021. Additionally, the unit values of exports to the European Union, all other markets, and all other North American markets were higher in interim 2022 than interim 2021 by *** percent, *** percent, and *** percent, respectively.

¹²⁵ Export shipments to all other markets decreased from 2017 to 2018 ***. Email from ***, August 8, 2022.

¹²⁶ The increase from 2020 to 2021 was due to ***. Email from ***, August 8, 2022.

Alternative products

No responding producer in the United Kingdom reported production of out-of-scope merchandise on the same equipment and machinery used to produce hot-rolled steel.

Affiliation

No responding producer in the United Kingdom reported exporting hot-rolled steel to the United States that was destined to affiliated firms for further processing.

Exports

Table IV-69 presents Global Trade Atlas data for exports of hot-rolled steel from the United Kingdom in descending order of quantity for 2021. By quantity, the leading export markets for hot-rolled steel from the United Kingdom in 2021 are Spain, the Netherlands, and Ireland, accounting for 28.6 percent, 15.7 percent, and 15.4 percent, respectively. The United States accounted for 0.1 percent of exports of hot-rolled steel from the United Kingdom, by quantity, in 2021.

Table IV-69**Hot-rolled flat products of iron or nonalloy steel: Exports from the United Kingdom, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2016	2017	2018
United States	Quantity	1,581	1,618	1,200
Spain	Quantity	86,052	119,460	146,082
Netherlands	Quantity	60,077	20,694	37,644
Ireland	Quantity	54,846	75,866	83,937
Turkey	Quantity	182,850	84,991	230
Portugal	Quantity	19,210	34,725	32,510
Canada	Quantity	2,602	952	1,073
France	Quantity	35,978	74,130	20,247
Mexico	Quantity	1,175	6,090	1,301
All other destination markets	Quantity	94,139	81,369	67,964
Non-U.S. destination markets	Quantity	536,930	498,276	390,987
All destination markets	Quantity	538,511	499,895	392,187
United States	Value	1,608	1,166	1,052
Spain	Value	35,752	64,080	87,629
Netherlands	Value	28,746	10,089	24,354
Ireland	Value	28,656	48,180	62,618
Turkey	Value	51,194	42,891	146
Portugal	Value	7,891	17,677	20,879
Canada	Value	1,663	631	772
France	Value	14,613	39,099	13,231
Mexico	Value	504	3,847	1,115
All other destination markets	Value	43,422	47,980	49,873
Non-U.S. destination markets	Value	212,441	274,474	260,617
All destination markets	Value	214,049	275,640	261,669

Table continued.

Table IV-69 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from the United Kingdom, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	5	98	322
Spain	Quantity	131,472	102,103	100,535
Netherlands	Quantity	52,065	54,043	55,099
Ireland	Quantity	80,886	78,851	53,987
Turkey	Quantity	131,926	131,890	44,153
Portugal	Quantity	60,717	50,688	22,081
Canada	Quantity	17	69	16,951
France	Quantity	18,196	19,217	15,206
Mexico	Quantity	284	1,230	11,604
All other destination markets	Quantity	69,856	220,319	31,471
Non-U.S. destination markets	Quantity	545,419	658,409	351,087
All destination markets	Quantity	545,424	658,507	351,409
United States	Value	113	351	466
Spain	Value	69,405	49,686	73,728
Netherlands	Value	27,144	24,020	41,172
Ireland	Value	53,582	45,962	59,132
Turkey	Value	63,876	48,387	32,110
Portugal	Value	28,773	22,671	16,635
Canada	Value	63	31	14,250
France	Value	10,576	9,413	12,167
Mexico	Value	206	598	16,865
All other destination markets	Value	36,025	82,691	29,469
Non-U.S. destination markets	Value	289,650	283,459	295,527
All destination markets	Value	289,763	283,809	295,993

Table continued.

Table IV-69 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from the United Kingdom, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2016	2017	2018
United States	Unit value	1,017	721	876
Spain	Unit value	415	536	600
Netherlands	Unit value	478	488	647
Ireland	Unit value	522	635	746
Turkey	Unit value	280	505	634
Portugal	Unit value	411	509	642
Canada	Unit value	639	663	720
France	Unit value	406	527	653
Mexico	Unit value	428	632	857
All other destination markets	Unit value	461	590	734
Non-U.S. destination markets	Unit value	396	551	667
All destination markets	Unit value	397	551	667
United States	Share of quantity	0.3	0.3	0.3
Spain	Share of quantity	16.0	23.9	37.2
Netherlands	Share of quantity	11.2	4.1	9.6
Ireland	Share of quantity	10.2	15.2	21.4
Turkey	Share of quantity	34.0	17.0	0.1
Portugal	Share of quantity	3.6	6.9	8.3
Canada	Share of quantity	0.5	0.2	0.3
France	Share of quantity	6.7	14.8	5.2
Mexico	Share of quantity	0.2	1.2	0.3
All other destination markets	Share of quantity	17.5	16.3	17.3
Non-U.S. destination markets	Share of quantity	99.7	99.7	99.7
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-69 Continued**Hot-rolled flat products of iron or nonalloy steel: Exports from the United Kingdom, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	21,121	3,567	1,447
Spain	Unit value	528	487	733
Netherlands	Unit value	521	444	747
Ireland	Unit value	662	583	1,095
Turkey	Unit value	484	367	727
Portugal	Unit value	474	447	753
Canada	Unit value	3,725	444	841
France	Unit value	581	490	800
Mexico	Unit value	726	486	1,453
All other destination markets	Unit value	516	375	936
Non-U.S. destination markets	Unit value	531	431	842
All destination markets	Unit value	531	431	842
United States	Share of quantity	0.0	0.0	0.1
Spain	Share of quantity	24.1	15.5	28.6
Netherlands	Share of quantity	9.5	8.2	15.7
Ireland	Share of quantity	14.8	12.0	15.4
Turkey	Share of quantity	24.2	20.0	12.6
Portugal	Share of quantity	11.1	7.7	6.3
Canada	Share of quantity	0.0	0.0	4.8
France	Share of quantity	3.3	2.9	4.3
Mexico	Share of quantity	0.1	0.2	3.3
All other destination markets	Share of quantity	12.8	33.5	9.0
Non-U.S. destination markets	Share of quantity	100.0	100.0	99.9
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed July 14, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

Figure IV-12 presents data on the average unit values for exports from the United Kingdom to the United States and to all other destination markets. Data for figure IV-12 are derived from tables IV-68 and IV-69.

Figure IV-12

Hot-rolled steel: Average unit values for exports from United Kingdom to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by Her Majesty's Customs & Excise Global Trade Atlas database, accessed July 14th, 2022.

Subject countries combined

Table IV-70 presents summary data on hot-rolled steel operations of the reporting subject producers in the subject countries.

Table IV-70
Hot-rolled steel: Combined Industry Data in subject countries, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Item	Measure	2016	2017	2018
Capacity	Quantity	158,243,497	155,548,260	155,696,663
Production	Quantity	137,802,296	140,640,583	140,235,397
End-of-period inventories	Quantity	2,909,067	2,988,072	3,176,118
Internal consumption and transfers	Quantity	75,484,221	78,219,236	78,149,876
Commercial home market shipments	Quantity	30,576,329	33,137,625	33,749,682
Home market shipments	Quantity	106,060,550	111,356,861	111,899,558
Export shipments	Quantity	31,870,464	29,117,961	28,083,209
Total shipments	Quantity	137,931,014	140,474,822	139,982,767
Internal consumption and transfers	Value	28,697,729	35,707,395	38,783,882
Commercial home market shipments	Value	13,143,889	17,992,684	19,654,308
Home market shipments	Value	41,841,618	53,700,079	58,438,190
Export shipments	Value	11,113,865	13,953,335	15,322,130
Total shipments	Value	52,955,483	67,653,414	73,760,320

Table continued.

Table IV-70 Continued
Hot-rolled steel: Combined Industry Data in subject countries, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Capacity	Quantity	154,825,082	152,235,549	152,126,802	38,330,834	37,359,313
Production	Quantity	136,827,162	127,530,741	140,574,348	35,022,421	33,624,599
End-of-period inventories	Quantity	3,171,842	3,037,441	4,013,101	3,229,169	3,938,442
Internal consumption and transfers	Quantity	75,748,612	67,758,785	78,539,314	19,540,095	19,224,878
Commercial home market shipments	Quantity	32,533,485	32,137,748	34,679,479	8,721,417	8,415,800
Home market shipments	Quantity	108,282,097	99,896,533	113,218,793	28,261,512	27,640,678
Export shipments	Quantity	28,457,693	27,666,442	26,356,318	6,532,462	6,044,436
Total shipments	Quantity	136,739,790	127,562,975	139,575,111	34,793,974	33,685,114
Internal consumption and transfers	Value	37,793,312	31,436,965	48,245,839	10,325,146	12,771,317
Commercial home market shipments	Value	17,941,582	16,454,408	26,762,421	5,481,433	7,625,999
Home market shipments	Value	55,734,894	47,891,373	75,008,260	15,806,579	20,397,316
Export shipments	Value	13,621,805	11,818,939	19,724,082	3,747,644	4,668,180
Total shipments	Value	69,356,699	59,710,312	94,732,342	19,554,223	25,065,496

Table continued.

Table IV-70 Continued
Hot-rolled steel: Combined Industry Data in subject countries, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	380	457	496
Commercial home market shipments	Unit value	430	543	582
Home market shipments	Unit value	395	482	522
Export shipments	Unit value	349	479	546
Total shipments	Unit value	384	482	527
Capacity utilization ratio	Ratio	87.1	90.4	90.1
Inventory ratio to production	Ratio	2.1	2.1	2.3
Inventory ratio to total shipments	Ratio	2.1	2.1	2.3
Internal consumption and transfers	Share	54.7	55.7	55.8
Commercial home market shipments	Share	22.2	23.6	24.1
Home market shipments	Share	76.9	79.3	79.9
Export shipments	Share	23.1	20.7	20.1
Total shipments	Share	100.0	100.0	100.0

Table continued.

Table IV-70 Continued
Hot-rolled steel: Combined Industry Data in subject countries, by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Internal consumption and transfers	Unit value	499	464	614	528	664
Commercial home market shipments	Unit value	551	512	772	629	906
Home market shipments	Unit value	515	479	663	559	738
Export shipments	Unit value	479	427	748	574	772
Total shipments	Unit value	507	468	679	562	744
Capacity utilization ratio	Ratio	88.4	83.8	92.4	91.4	90.0
Inventory ratio to production	Ratio	2.3	2.4	2.9	2.3	2.9
Inventory ratio to total shipments	Ratio	2.3	2.4	2.9	2.3	2.9
Internal consumption and transfers	Share	55.4	53.1	56.3	56.2	57.1
Commercial home market shipments	Share	23.8	25.2	24.8	25.1	25.0
Home market shipments	Share	79.2	78.3	81.1	81.2	82.1
Export shipments	Share	20.8	21.7	18.9	18.8	17.9
Total shipments	Share	100.0	100.0	100.0	100.0	100.0

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

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

Table IV-71**Hot-rolled steel: Export shipments by producers and resellers in aggregate subject countries, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Quantity	1,417,468	808,957	1,129,919
Other North American markets	Quantity	1,351,117	1,600,180	1,594,576
European Union markets	Quantity	4,687,121	4,036,930	5,647,487
Asia markets	Quantity	19,232,483	18,142,948	16,153,258
All other markets	Quantity	7,554,833	6,453,828	5,379,169
All destination markets	Quantity	32,825,554	30,233,886	28,774,490
Non-U.S. destination markets	Quantity	34,243,022	31,042,843	29,904,409
United States	Value	620,283	432,840	733,308
Other North American markets	Value	589,031	856,240	985,776
European Union markets	Value	1,646,322	1,969,340	3,006,432
Asia markets	Value	6,725,130	8,720,683	8,795,952
All other markets	Value	2,467,579	2,950,276	2,887,945
Non-U.S. destination markets	Value	11,428,062	14,496,539	15,676,105
All destination markets	Value	12,048,345	14,929,379	16,409,413
United States	Unit value	438	535	649
Other North American markets	Unit value	436	535	618
European Union markets	Unit value	351	488	532
Asia markets	Unit value	350	481	545
All other markets	Unit value	327	457	537
Non-U.S. destination markets	Unit value	348	479	545
All destination markets	Unit value	352	481	549

Table continued.

Table IV-71 Continued**Hot-rolled steel: Export shipments by producers and resellers in aggregate subject countries, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent; Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Quantity	732,257	718,157	1,158,896	293,333	255,172
Other North American markets	Quantity	1,327,835	1,259,888	1,925,287	550,558	231,876
European Union markets	Quantity	5,041,271	5,017,154	6,345,719	1,404,471	1,266,848
Asia markets	Quantity	16,872,055	15,989,417	14,118,575	3,544,452	3,124,070
All other markets	Quantity	6,412,849	6,878,259	4,910,182	1,234,841	1,673,714
Non-U.S. destination markets	Quantity	29,654,010	29,144,718	27,299,763	6,734,322	6,296,508
All destination markets	Quantity	30,386,267	29,862,875	28,458,659	7,027,655	6,551,680
United States	Value	401,610	351,890	1,109,179	203,466	268,581
Other North American markets	Value	792,790	609,174	1,539,808	314,209	284,137
European Union markets	Value	2,311,926	2,087,226	5,022,440	832,053	987,836
Asia markets	Value	8,276,505	7,014,020	10,135,336	2,016,160	2,377,281
All other markets	Value	2,857,679	2,802,468	3,712,810	705,772	1,207,384
Non-U.S. destination markets	Value	14,238,900	12,512,888	20,410,394	3,868,194	4,856,638
All destination markets	Value	14,640,510	12,864,778	21,519,573	4,071,660	5,125,219
United States	Unit value	548	490	957	694	1,053
Other North American markets	Unit value	597	484	800	571	1,225
European Union markets	Unit value	459	416	791	592	780
Asia markets	Unit value	491	439	718	569	761
All other markets	Unit value	446	407	756	572	721
Non-U.S. destination markets	Unit value	480	429	748	574	771
All destination markets	Unit value	482	431	756	579	782

Table continued.

Table IV-71 Continued**Hot-rolled steel: Export shipments by producers and resellers in aggregate subject countries, by destination market and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Share and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	4.1	2.6	3.8
Other North American markets	Share of quantity	3.9	5.2	5.3
European Union markets	Share of quantity	13.7	13.0	18.9
Asia markets	Share of quantity	56.2	58.4	54.0
All other markets	Share of quantity	22.1	20.8	18.0
Non-U.S. destination markets	Share of quantity	95.9	97.4	96.2
All destination markets	Share of quantity	100.0	100.0	100.0
United States	Share of value	5.1	2.9	4.5
Other North American markets	Share of value	4.9	5.7	6.0
European Union markets	Share of value	13.7	13.2	18.3
Asia markets	Share of value	55.8	58.4	53.6
All other markets	Share of value	20.5	19.8	17.6
Non-U.S. destination markets	Share of value	94.9	97.1	95.5
All destination markets	Share of value	100.0	100.0	100.0
United States	Ratio	1.0	0.6	0.8
Other North American markets	Ratio	1.0	1.1	1.1
European Union markets	Ratio	3.4	2.9	4.0
Asia markets	Ratio	13.9	12.9	11.5
All other markets	Ratio	5.5	4.6	3.8
Non-U.S. destination markets	Ratio	23.8	21.5	20.6
All destination markets	Ratio	24.8	22.1	21.4

Table continued.

Table IV-71 Continued**Hot-rolled steel: Export shipments by producers and resellers in aggregate subject countries, by destination market and period**

Shares and ratio in percent, Ratio are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
United States	Share of quantity	2.4	2.4	4.1	4.2	3.9
Other North American markets	Share of quantity	4.4	4.2	6.8	7.8	3.5
European Union markets	Share of quantity	16.6	16.8	22.3	20.0	19.3
Asia markets	Share of quantity	55.5	53.5	49.6	50.4	47.7
All other markets	Share of quantity	21.1	23.0	17.3	17.6	25.5
Non-U.S. destination markets	Share of quantity	97.6	97.6	95.9	95.8	96.1
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0
United States	Share of value	2.7	2.7	5.2	5.0	5.2
Other North American markets	Share of value	5.4	4.7	7.2	7.7	5.5
European Union markets	Share of value	15.8	16.2	23.3	20.4	19.3
Asia markets	Share of value	56.5	54.5	47.1	49.5	46.4
All other markets	Share of value	19.5	21.8	17.3	17.3	23.6
Non-U.S. destination markets	Share of value	97.3	97.3	94.8	95.0	94.8
All destination markets	Share of value	100.0	100.0	100.0	100.0	100.0
United States	Ratio	0.5	0.6	0.8	0.8	0.8
Other North American markets	Ratio	1.0	1.0	1.4	1.6	0.7
European Union markets	Ratio	3.7	3.9	4.5	4.0	3.8
Asia markets	Ratio	12.3	12.5	10.1	10.2	9.3
All other markets	Ratio	4.7	5.4	3.5	3.5	5.0
Non-U.S. destination markets	Ratio	21.7	22.8	19.6	19.4	18.7
All destination markets	Ratio	22.2	23.4	20.4	20.2	19.4

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

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

Third-country trade actions

Table IV-72 presents data on third-country trade actions involving the subject countries.

Table IV-72**Hot-rolled steel: Antidumping, countervailing duty, and safeguard actions in third-country markets**

Export Market	Subject Country	Measure
Gulf Cooperation Council	All Countries	Safeguard: Certain steel products including hot-rolled steel
Armenia	All Countries	Safeguard: Hot-rolled flat products
Canada	Brazil	Antidumping: Hot-rolled steel sheet
European Union	All countries	Safeguard: Certain steel products including hot-rolled steel
	Brazil, Russia, Turkey	Antidumping: Hot-rolled flat products
India	Brazil, Japan, Korea, Russia	Antidumping: Hot-rolled products of alloy and non-alloy steel
Indonesia	Korea, Russia	Antidumping: Hot-rolled coil
Mexico	Russia	Antidumping: Hot-rolled sheet
Mexico	All Countries	Safeguard: Steel products including hot-rolled steel
Morocco	All Countries	Safeguard: Hot-rolled sheets
South Africa	All Countries	Safeguard: Flat-rolled steel products
Taiwan	Brazil, Korea	Antidumping: Hot-rolled flat and plate
Thailand	Japan, Korea, Brazil, Russia, Turkey	Antidumping: Flat hot-rolled steel in coils and not in coils
United Kingdom	All countries	Safeguard: Steel products including hot-rolled steel
	Brazil, Russia	Antidumping: Hot-rolled flat products

Source: World Trade Organization (“WTO”), “Anti-dumping,” https://www.wto.org/english/tratop_e/adp_e/adp_e.htm, retrieved January 25, 2022; and WTO, “Subsidies and Countervailing Measures,” https://www.wto.org/english/tratop_e/scm_e/scm_e.htm, and Nucor, SSAB, Steel Dynamics and U.S. Steel’s response to the notice of institution, September 30, 2021, pp. 52-55.

Global market

Table IV-73 presents global export data for hot-rolled steel. Japan, Russia, India, and South Korea are largest exporters of HRS, accounting for 17.0, 9.5, 9.3, and 8.0 percent of global exports, respectively, in 2021. Global HRS exports grew by 2.0 percent in 2021.

Table IV-73**Hot-rolled flat products of iron or nonalloy steel: Global exports, by reporting country and by period**

Quantity in short tons; Value in 1,000 dollars

Exporting country	Measure	2016	2017	2018
United States	Quantity	1,399,084	1,788,300	1,160,521
Australia	Quantity	390,896	328,369	297,641
Brazil	Quantity	1,662,434	1,794,441	1,453,466
Japan	Quantity	14,338,175	13,067,407	11,482,194
Netherlands	Quantity	1,877,000	1,950,995	2,230,230
Russia	Quantity	7,000,873	6,116,088	5,954,423
South Korea	Quantity	8,026,980	6,307,313	6,182,139
Turkey	Quantity	2,044,475	2,565,081	3,974,208
United Kingdom	Quantity	538,511	499,895	392,187
Subject exporters	Quantity	35,879,345	32,629,589	31,966,488
India	Quantity	1,892,846	5,348,385	2,801,358
Taiwan	Quantity	4,879,011	4,675,479	4,858,502
Ukraine	Quantity	2,333,337	1,987,055	2,231,573
Germany	Quantity	3,630,664	4,374,604	3,953,022
Belgium	Quantity	3,620,439	4,069,185	4,070,813
France	Quantity	3,660,785	4,095,973	3,715,012
All other exporters	Quantity	14,615,639	14,846,426	15,913,863
Non-U.S. exporters	Quantity	70,512,066	72,026,695	69,510,632
All reporting exporters	Quantity	71,911,150	73,814,995	70,671,153
United States	Value	899,684	1,187,581	942,348
Australia	Value	119,633	136,803	122,056
Brazil	Value	554,947	827,275	795,455
Japan	Value	4,989,942	6,297,894	6,283,323
Netherlands	Value	782,483	1,073,843	1,353,451
Russia	Value	2,159,550	2,654,113	3,000,985
South Korea	Value	3,058,005	3,157,358	3,574,276
Turkey	Value	731,877	1,249,263	2,194,045
United Kingdom	Value	214,049	275,640	261,669
Subject exporters	Value	12,610,486	15,672,189	17,585,260
India	Value	705,114	2,381,473	1,458,294
Taiwan	Value	1,571,452	2,099,811	2,556,244
Ukraine	Value	700,166	819,788	1,038,520
Germany	Value	1,627,451	2,455,203	2,524,668
Belgium	Value	1,503,739	2,174,366	2,467,368
France	Value	1,465,745	2,181,555	2,220,772
All other exporters	Value	6,292,032	8,012,477	9,653,435
Non-U.S. exporters	Value	26,476,185	35,796,863	39,504,562
All reporting exporters	Value	27,375,868	36,984,444	40,446,910

Table continued

Table IV-73 Continued**Hot-rolled flat products of iron or nonalloy steel: Global exports, by reporting country and by period**

Quantity in short tons; Value in 1,000 dollars

Exporting country	Measure	2019	2020	2021
United States	Quantity	946,990	1,065,613	1,289,453
Australia	Quantity	399,261	307,396	17,629
Brazil	Quantity	1,260,172	743,542	736,961
Japan	Quantity	11,819,757	12,039,335	11,820,952
Netherlands	Quantity	2,289,102	2,191,570	2,318,055
Russia	Quantity	4,923,420	5,620,371	6,623,747
South Korea	Quantity	6,921,621	6,898,896	5,584,344
Turkey	Quantity	3,485,840	3,024,970	2,843,661
United Kingdom	Quantity	545,424	658,507	351,409
Subject exporters	Quantity	31,644,598	31,484,587	30,296,757
India	Quantity	5,631,380	7,207,915	6,455,356
Taiwan	Quantity	5,412,591	5,386,158	4,172,169
Ukraine	Quantity	2,102,966	2,468,417	3,418,430
Germany	Quantity	3,987,148	3,112,348	3,383,835
Belgium	Quantity	4,004,737	2,946,907	3,147,741
France	Quantity	3,514,880	2,820,895	2,879,019
All other exporters	Quantity	13,614,500	11,678,090	14,488,536
Non-U.S. exporters	Quantity	69,912,801	67,105,318	68,241,842
All reporting exporters	Quantity	70,859,791	68,170,931	69,531,295
United States	Value	752,112	740,895	1,119,618
Australia	Value	175,555	133,897	11,892
Brazil	Value	562,562	324,396	611,686
Japan	Value	5,684,231	5,139,194	8,600,708
Netherlands	Value	1,218,974	1,055,720	1,917,941
Russia	Value	2,150,697	2,179,316	4,852,647
South Korea	Value	3,544,605	3,100,367	4,292,833
Turkey	Value	1,617,558	1,288,814	2,320,696
United Kingdom	Value	289,763	283,809	295,993
Subject exporters	Value	15,243,947	13,505,512	22,904,396
India	Value	2,392,187	2,735,387	4,783,432
Taiwan	Value	2,535,470	2,302,630	3,090,939
Ukraine	Value	835,722	849,960	2,370,565
Germany	Value	2,301,002	1,725,921	2,830,527
Belgium	Value	2,184,624	1,518,109	2,481,586
France	Value	1,801,629	1,277,242	2,256,467
All other exporters	Value	7,194,987	5,832,818	13,890,994
Non-U.S. exporters	Value	34,489,567	29,747,579	54,608,906
All reporting exporters	Value	35,241,679	30,488,474	55,728,524

Table continued

Table IV-73 Continued**Hot-rolled flat products of iron or nonalloy steel: Global exports, by reporting country and by period**

Unit values in dollars per short ton; Shares in percent

Exporting country	Measure	2016	2017	2018
United States	Unit value	643	664	812
Australia	Unit value	306	417	410
Brazil	Unit value	334	461	547
Japan	Unit value	348	482	547
Netherlands	Unit value	417	550	607
Russia	Unit value	308	434	504
South Korea	Unit value	381	501	578
Turkey	Unit value	358	487	552
United Kingdom	Unit value	397	551	667
Subject exporters	Unit value	351	480	550
India	Unit value	373	445	521
Taiwan	Unit value	322	449	526
Ukraine	Unit value	300	413	465
Germany	Unit value	448	561	639
Belgium	Unit value	415	534	606
France	Unit value	400	533	598
All other exporters	Unit value	430	540	607
Non-U.S. exporters	Unit value	375	497	568
All reporting exporters	Unit value	381	501	572
United States	Share of quantity	1.9	2.4	1.6
Australia	Share of quantity	0.5	0.4	0.4
Brazil	Share of quantity	2.3	2.4	2.1
Japan	Share of quantity	19.9	17.7	16.2
Netherlands	Share of quantity	2.6	2.6	3.2
Russia	Share of quantity	9.7	8.3	8.4
South Korea	Share of quantity	11.2	8.5	8.7
Turkey	Share of quantity	2.8	3.5	5.6
United Kingdom	Share of quantity	0.7	0.7	0.6
Subject exporters	Share of quantity	49.9	44.2	45.2
India	Share of quantity	2.6	7.2	4.0
Taiwan	Share of quantity	6.8	6.3	6.9
Ukraine	Share of quantity	6.8	6.3	6.9
Germany	Share of quantity	3.2	2.7	3.2
Belgium	Share of quantity	5.0	5.5	5.8
France	Share of quantity	5.1	5.5	5.3
All other exporters	Share of quantity	20.3	20.1	22.5
Non-U.S. exporters	Share of quantity	98.1	97.6	98.4
All reporting exporters	Share of quantity	100.0	100.0	100.0

Table continued

Table IV-73 Continued**Hot-rolled flat products of iron or nonalloy steel: Global exports, by reporting country and by period**

Unit values in dollars per short ton; Shares in percent

Exporting country	Measure	2019	2020	2021
United States	Unit value	794	695	868
Australia	Unit value	440	436	675
Brazil	Unit value	446	436	830
Japan	Unit value	481	427	728
Netherlands	Unit value	533	482	827
Russia	Unit value	437	388	733
South Korea	Unit value	512	449	769
Turkey	Unit value	464	426	816
United Kingdom	Unit value	531	431	842
Subject exporters	Unit value	482	429	756
India	Unit value	425	379	741
Taiwan	Unit value	468	428	741
Ukraine	Unit value	397	344	693
Germany	Unit value	577	555	836
Belgium	Unit value	546	515	788
France	Unit value	513	453	784
All other exporters	Unit value	528	499	959
Non-U.S. exporters	Unit value	493	443	800
All reporting exporters	Unit value	497	447	801
United States	Share of quantity	1.3	1.6	1.9
Australia	Share of quantity	0.6	0.5	0.0
Brazil	Share of quantity	1.8	1.1	1.1
Japan	Share of quantity	16.7	17.7	17.0
Netherlands	Share of quantity	3.2	3.2	3.3
Russia	Share of quantity	6.9	8.2	9.5
South Korea	Share of quantity	9.8	10.1	8.0
Turkey	Share of quantity	4.9	4.4	4.1
United Kingdom	Share of quantity	0.8	1.0	0.5
Subject exporters	Share of quantity	44.7	46.2	43.6
India	Share of quantity	7.9	10.6	9.3
Taiwan	Share of quantity	7.6	7.9	6.0
Ukraine	Share of quantity	3.0	3.6	4.9
Germany	Share of quantity	5.6	4.6	4.9
Belgium	Share of quantity	5.7	4.3	4.5
France	Share of quantity	5.0	4.1	4.1
All other exporters	Share of quantity	20.5	18.7	22.7
Non-U.S. exporters	Share of quantity	98.7	98.4	98.1
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 as reported by various national statistical authorities in the Global Trade Atlas database, accessed July 14th, 2022.

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

Figure IV-13 presents data on the average unit values for exports from aggregated subject countries to the United States and to all other destination markets. Data for figure IV-13 are derived from tables IV-71 and IV-73.

Figure IV-13

Hot-rolled steel: Average unit values for exports from subject sources to the United States and to all other destination markets, by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official exports statistics under HS subheading 7208.10, 7208.26, 7208.27, 7208.36, 7208.37, 7208.38, 7208.39, 7208.53, 7208.54, 7208.90, 7211.14, 7211.19, and 7208.25 for the individual subject country national statistical authorities in the Global Trade Atlas (GTA) database, accessed July 14th, 2022. Specifically, the GTA lines combine data presented in tables IV-15, IV-23, IV-33, IV-39, IV-46, IV-55, IV-62, and IV-69.

Global production and apparent consumption

According to data from ***, global production of hot-rolled sheet and coil plate was *** short tons in 2021, an *** of *** percent since 2020 and an *** of *** percent since 2016. Apparent gross consumption of hot-rolled sheet and coil plate was *** short tons in 2021, an *** of *** percent since 2020.¹²⁷ Historically,

¹²⁷ ***.

global production of hot-rolled sheet and coil plate *** percent during 1999-2004¹²⁸ and *** percent during 2005-2010.¹²⁹

Global prices

Table IV-74 shows monthly prices for hot-rolled coil from selected markets from January 2016 to July 2022.

¹²⁸ According to *** Consumption of hot-rolled steel sheet *** percent in 1999-2004. Global consumption levels in 1999 were beginning to recover from the lower levels in 1998, a year that saw substantial declines in consumption in Asia, Russia and other regional markets, and to a lesser extent Latin America, but not in North America. The petitions were filed soon after the sequence of events known as the “Asian financial crisis.” The initial crisis spread from Thailand in mid-1997 through Asia. According to Commerce, reduced Asian steel demand, declining Asian currency values, and increased U.S. steel demand contributed to an increase in U.S. steel imports. See Global Steel Trade: Structural Problems and Future Solutions, International Trade Administration, U.S. Department of Commerce, July 2000, pp. 17-29.

¹²⁹ ***. Data for 2011-2015 was not available.

Table IV-74
Hot-rolled coil prices, selected countries, January 2016-July 2022

Dollars per short ton

Period	Turkey	European Union	Latin America	India	China	United States
Jan 2016	***	***	***	***	***	***
Feb 2016	***	***	***	***	***	***
Mar 2016	***	***	***	***	***	***
Apr 2016	***	***	***	***	***	***
May 2016	***	***	***	***	***	***
Jun 2016	***	***	***	***	***	***
Jul 2016	***	***	***	***	***	***
Aug 2016	***	***	***	***	***	***
Sep 2016	***	***	***	***	***	***
Oct 2016	***	***	***	***	***	***
Nov 2016	***	***	***	***	***	***
Dec 2016	***	***	***	***	***	***
Jan 2017	***	***	***	***	***	***
Feb 2017	***	***	***	***	***	***
Mar 2017	***	***	***	***	***	***
Apr 2017	***	***	***	***	***	***
May 2017	***	***	***	***	***	***
Jun 2017	***	***	***	***	***	***
Jul 2017	***	***	***	***	***	***
Aug 2017	***	***	***	***	***	***
Sep 2017	***	***	***	***	***	***
Oct 2017	***	***	***	***	***	***
Nov 2017	***	***	***	***	***	***
Dec 2017	***	***	***	***	***	***
Jan 2018	***	***	***	***	***	***
Feb 2018	***	***	***	***	***	***

Table continued

Table IV-74 Continued
Hot-rolled coil prices, selected countries, January 2016-July 2022

Dollars per short ton

Period	Turkey	European Union	Latin America	India	China	United States
Mar 2018	***	***	***	***	***	***
Apr 2018	***	***	***	***	***	***
May 2018	***	***	***	***	***	***
Jun 2018	***	***	***	***	***	***
Jul 2018	***	***	***	***	***	***
Aug 2018	***	***	***	***	***	***
Sep 2018	***	***	***	***	***	***
Oct 2018	***	***	***	***	***	***
Nov 2018	***	***	***	***	***	***
Dec 2018	***	***	***	***	***	***
Jan 2019	***	***	***	***	***	***
Feb 2019	***	***	***	***	***	***
Mar 2019	***	***	***	***	***	***
Apr 2019	***	***	***	***	***	***
May 2019	***	***	***	***	***	***
Jun 2019	***	***	***	***	***	***
Jul 2019	***	***	***	***	***	***
Aug 2019	***	***	***	***	***	***
Sep 2019	***	***	***	***	***	***
Oct 2019	***	***	***	***	***	***
Nov 2019	***	***	***	***	***	***
Dec 2019	***	***	***	***	***	***
Jan 2020	***	***	***	***	***	***
Feb 2020	***	***	***	***	***	***
Mar 2020	***	***	***	***	***	***
Apr 2020	***	***	***	***	***	***
May 2020	***	***	***	***	***	***
Jun 2020	***	***	***	***	***	***
Jul 2020	***	***	***	***	***	***
Aug 2020	***	***	***	***	***	***
Sep 2020	***	***	***	***	***	***
Oct 2020	***	***	***	***	***	***
Nov 2020	***	***	***	***	***	***
Dec 2020	***	***	***	***	***	***
Jan 2021	***	***	***	***	***	***
Feb 2021	***	***	***	***	***	***
Mar 2021	***	***	***	***	***	***

Table continued

Table IV-74 Continued
Hot-rolled coil prices, selected countries, January 2016-July 2022

Dollars per short ton

Period	Turkey	European Union	Latin America	India	China	United States
Apr 2021	***	***	***	***	***	***
May 2021	***	***	***	***	***	***
Jun 2021	***	***	***	***	***	***
Jul 2021	***	***	***	***	***	***
Aug 2021	***	***	***	***	***	***
Sep 2021	***	***	***	***	***	***
Oct 2021	***	***	***	***	***	***
Nov 2021	***	***	***	***	***	***
Dec 2021	***	***	***	***	***	***
Jan 2022	***	***	***	***	***	***
Feb 2022	***	***	***	***	***	***
Mar 2022	***	***	***	***	***	***
Apr 2022	***	***	***	***	***	***
May 2022	***	***	***	***	***	***
Jun 2022	***	***	***	***	***	***

Source: Fastmarkets/AMM

Note: Prices included are identified by Fastmarkets/AMM as: Steel hot-rolled coil export, fob main port Turkey, Steel hot-rolled coil index domestic, exw Northern Europe, Steel hot-rolled coil index, fob mill US, Steel hot-rolled coil (dry) export, fob main port Latin America, Steel hot-rolled coil import, cfr main port India, and Steel hot-rolled coil index export, fob main port China.

Part V: Pricing data

Factors affecting prices

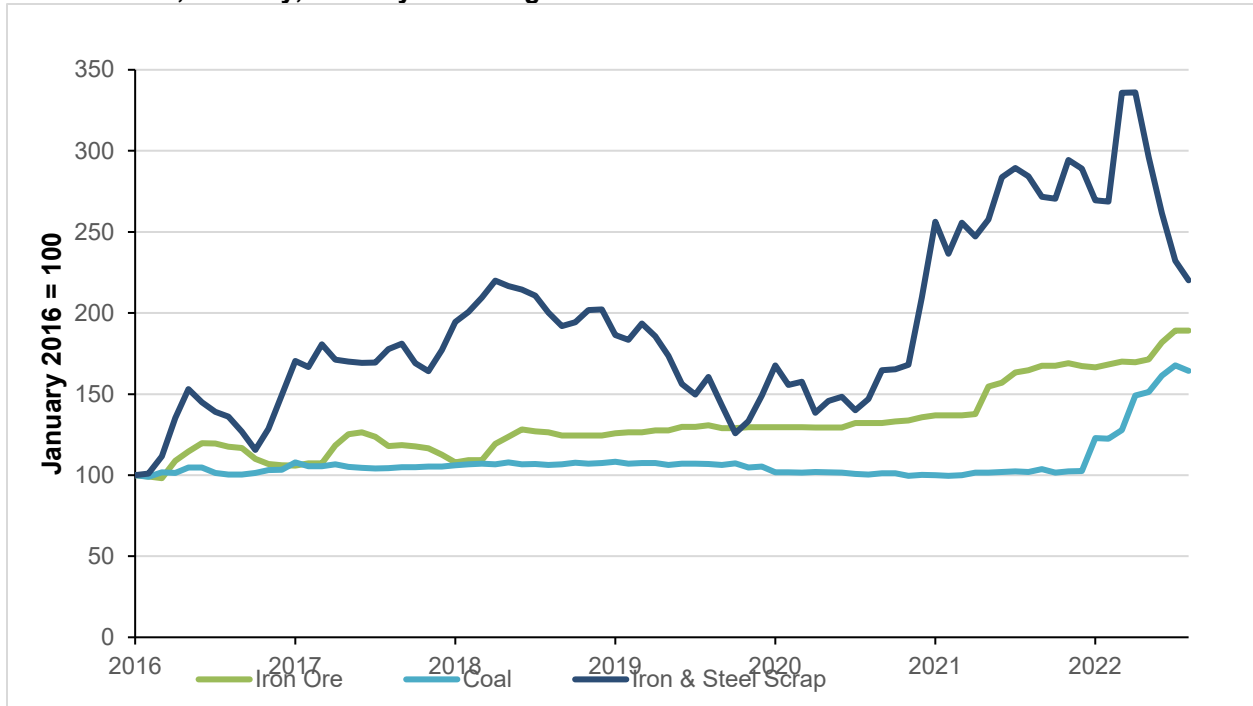
Raw material costs

The primary raw material inputs to hot-rolled steel include iron ore, coal, and iron and steel scrap. Costs for iron ore primary products exhibited a substantial increase in the initial months of 2021, while costs for coal remained low until the end of 2021. Iron and steel scrap costs were the most volatile raw materials costs; costs peaked in the early months of 2022.¹ U.S. producers' raw material costs as a share of the cost of goods sold (COGS), increased from *** percent in 2016 to *** percent in 2021.

As shown in figure V-1, prices for iron ore, coal, and iron and steel scrap increased by 67.3 percent, 2.5 percent, and 189.0 percent, respectively, between January 2016 and December 2021. Between December 2021 and August 2022, they increased by 13.0 percent, 60.3 percent, and 18.3 percent, respectively.

¹ Hot-rolled steel flat products from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Publication 4638, August 2016, p. V-1.

Figure V-1
Raw material costs: Producer price indexes of iron ore, coal, and iron and steel scrap in the United States, monthly, January 2016-August 2022

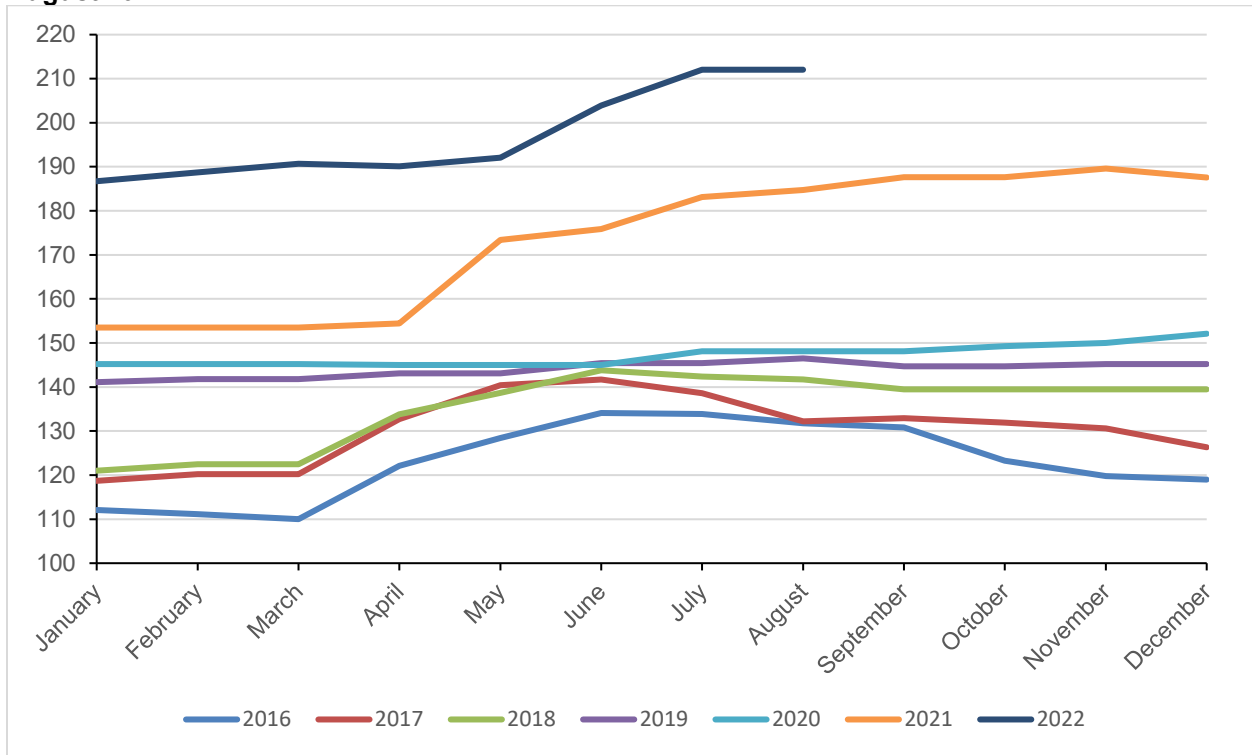


Source: U.S. Bureau of Labor Statistics via St. Louis FRED, retrieved October 10, 2022.

Note: Data for figure available in appendix E, table E-4.

Figure V-2 shows costs for iron ore initially declined in the beginning of 2016. In 2017, iron ore costs saw a substantial increase of 19.4 percent by June; however, they began steadily declining for the rest of 2017, decreasing by 10.9 percent overall. Iron ore costs stabilized in 2018, 2019, and 2020, but increased in 2021 and stayed high in 2022, increasing by 10.4 percent between May and July 2022.

Figure V-2
Raw materials costs: Producer price index, iron ore in the United States, monthly, January 2016-August 2022

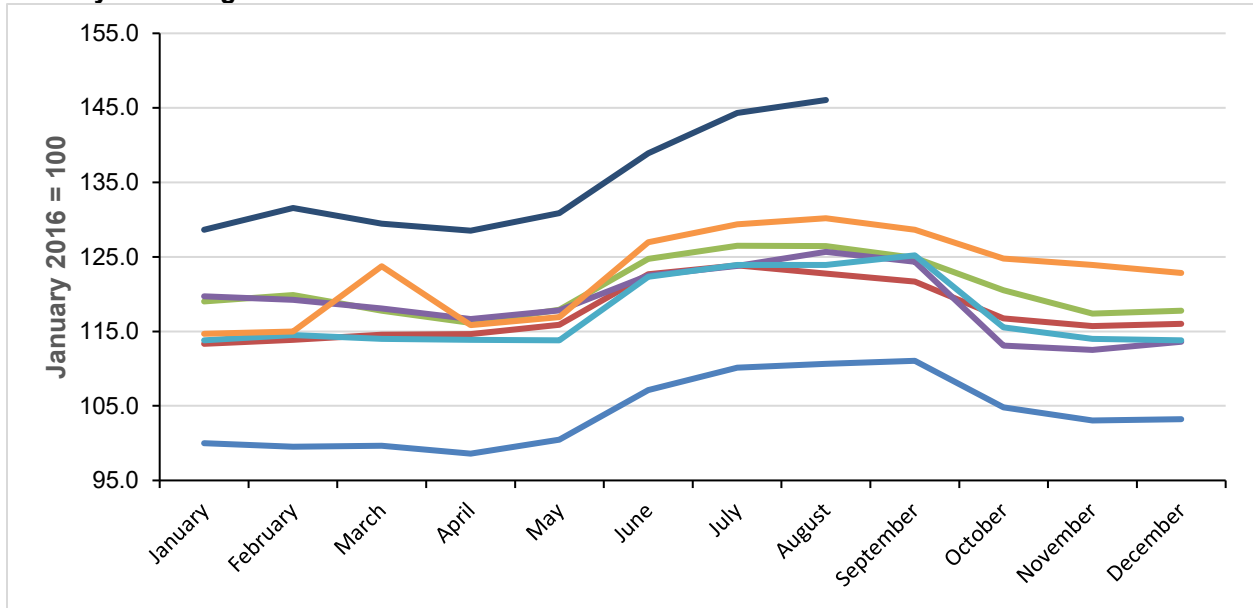


Source: U.S. Bureau of Labor Statistics via St. Louis FRED, retrieved October 10 2022.

Energy costs

Energy costs are also a factor in hot-rolled steel production costs. As demonstrated in figure V-3, industrial electric power costs were highest in 2022. The summer of 2021 (June, July, and August) had the second highest industrial electric power costs. Overall, industrial electric power costs were 30.9 percent higher during the summer of 2022 compared to 2016.

Figure V-3
Raw materials costs: Producer price index, industrial electric power in the United States, monthly, January 2016-August 2022



Source: U.S. Bureau of Labor Statistics via St. Louis FRED, retrieved October 10, 2022.

Note: Data for figure available in appendix E, table E-5.

Transportation costs to the U.S. market

Transportation costs for hot-rolled steel shipped from subject countries to the United States averaged 4.9 percent for Japan, 4.8 percent for the Netherlands, 2.5 percent for Russia, 5.4 percent for South Korea, 9.5 percent for Turkey, and 4.8 percent for the United Kingdom.² These estimates were derived from official import data and represent the transportation and other charges on imports.³

Pricing practices

Pricing methods

In the original investigations, U.S. producers and importers reported referencing industry publications from public quarterly price indices in price setting, such as CRU, as well as competing domestic and/or import prices and informal commitments by purchasers.

As discussed in greater detail below, in these reviews, most U.S. producers reported setting prices using transaction-by-transaction negotiations or contracts (table V-1). The vast majority of importers reported setting prices using transaction-by-transaction negotiations.

² No data were available for Australia and Brazil.

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2021 and then dividing by the customs value based on the HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590.

Table V-1
Hot-rolled steel: Count of U.S. producers' and importers' reported price setting methods

Number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	11	25
Contract	10	8
Set price list	1	3
Other	4	2
Responding firms	11	28

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers reported selling more than half of their hot-rolled steel under one-year contracts and over a quarter of their hot-rolled steel on the spot market. Importers reported selling most of their hot-rolled steel in the spot market, with short-term contracts accounting for their remaining sales (table V-2).

Table V-2
Hot-rolled steel: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2021

Share in percent

Item	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***

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

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

Most responding purchasers (22 of 32) reported that changes in raw material prices affected their price negotiations or contracts to purchase hot-rolled steel since 2016. Purchasers reported that they monitor prices from published indexes, as well as prices for raw materials such as coking coal, scrap, iron ore, pig iron, and metallics. Purchaser *** stated that raw material pricing directly impacts steel pricing. Purchasers also reported that they have pricing mechanisms with customers that reflect raw material price movements.

When asked if their firm's purchases of hot-rolled steel usually involve negotiations between suppliers and purchasers, 30 of 33 purchasers reported that theirs did. Of these 30 firms, only one (***) reported that CRU index factored into their market value negotiations, and three ***, cited indexing as a point of reference without naming a specific index.⁴ According to domestic producers, the vast majority of hot-rolled contract tons are not fixed-priced contracts, and instead adjust based upon external price mechanisms such as Platts or CRU.^{5 6} Importer SSAB maintained that the

⁴ For more information on these purchasers' responses, please see Appendix E.

⁵ Hearing transcript pp. 101-102 (Kopf).

⁶ The values presented in Platts are based on a timestamp at the close of typical trading day (Market on Close or "MOC"), then converted into \$/mt and \$/Cwt using standard conversions. They take into consideration confirmed transactions, firm bids, and offers for orders exceeding 100 st on an Ex Works (EXW) Indiana basis, and data are normalized to US Midwest basis. SP Global Commodity Insights, "Our Methodology", retrieved on September 23, 2022.

<https://www.spglobal.com/commodityinsights/en/our-methodology/price-assessments/metals/us-hot-rolled-coil-metals-price-assessments>.

The values presented in CRU Prices are for spot market transaction data on a weekly basis. Each price submitted by a data provider is compared with a price range set by reference to the arithmetic mean of all prices received during the collection window (week), and a price that falls outside this range is not included in the initial price index calculation. Individual price and volume submissions are compared to

(continued...)

suppressive effect of quotes are highly exaggerated, and that prices move over the period of the supply agreement over time.⁷ USMINAS reported that CRU, not Platts, is the most commonly used index in the U.S. steel industry, that Platts is used to understand pricing in foreign steel markets, and that CRU is based on sales, not offers.⁸

Ten purchasers reported that they purchase product daily, 6 purchase weekly, and 14 purchase monthly. Thirty of 31 responding purchasers reported that they did not expect their purchasing patterns to change in the next two years. A plurality of purchasers reported contacting 2 to 3 suppliers before making a purchase; most reported contacting fewer than 5 purchasers.

Sales terms and discounts

U.S. producers and importers typically quote prices on an f.o.b. basis; most U.S. producers and the vast majority of importers offer no set discount policy.

Price leadership

Fifteen purchasers reported that Nucor was a price leader, 10 reported that Cleveland Cliffs was a price leader, 6 reported that U.S. Steel was a price leader, and one each reported that POSCO and Ryerson were price leaders. Purchasers indicating the presence of price leaders indicated that these price leaders led by being the first to announce price increases, setting the market, controlling the majority of domestic capacity, change strategies for spot sales, or publish/distribute price increase letters including effective dates, reasons for increases, and amount of increases. One purchaser, ***, reported that there were no price leaders in the hot-rolled steel market.

the previous submission made by that provider and if they deviate more than a specific percentage range, they are flagged and may be excluded from the initial price index calculation CRU Prices, “Methodology and Definitions Guide – Carbon Steel”, p. 7, accessed September 23, 2022. <https://cruprod.blob.core.windows.net/media/ioyl1xsx/cru-prices-methodology-and-definitions-carbon-steel.pdf>

⁷ Hearing transcript pp. 102-103 (Moskaluk).

⁸ USMINAS posthearing brief, pp. 14-15 and Declaration of Jerry Richardson, Executive Director, Companhia Siderúrgica Nacional, LLC p. 1.

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 hot-rolled steel products shipped to unrelated U.S. customers during January 2016-March 2022.

Product 1.—Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36 and/or conversion to ASTM A36), 0.187” through 0.625” in nominal or actual thickness, 40” through 72” in width.

Product 2.—Hot-rolled carbon steel sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090” through 0.171” in nominal or actual thickness, 40” to 72” in width.

Product 3.—Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090” through 0.171” in nominal or actual thickness, 40” to 72” in width.

Product 4.—Ultra High Strength Steel (UHSS) or Advanced High Strength Steel, DRY, not tempered, 40-72” in width, and 0.071-0.250” in thickness.

Eleven U.S. producers and 12 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁹ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers’ commercial shipments sold to distributors of hot-rolled steel in 2021. Pricing data reported by subject importers accounted for approximately *** percent of commercial shipments sold to distributors in 2021. Pricing data reported by importers for product from Japan accounted for *** percent of commercial shipments in 2021, *** percent for Netherlands, *** percent for South Korea, and *** percent for Turkey.¹⁰ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers’ commercial shipments for sales to end users of hot-rolled steel in 2021. Pricing data reported

⁹ 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. ***.

¹⁰ Data for imports from Turkey were for imports other than from Colakoglu.

by subject importers accounted for *** percent of commercial shipments for sales to end users in 2021. Pricing data reported by importers for product from Japan accounted for *** percent of commercial shipments in 2021, and *** percent for South Korea.¹¹ No importers reported pricing data for product from Australia or Russia.

Price data for products 1-4 are presented in tables V-3 to V-7 and figures V-4 to V-11.

¹¹ Data were not available for Australia, Brazil, Netherlands, Russia, Turkey, and the United Kingdom. Pricing coverage is based on commercial U.S. shipments reported in questionnaires.

Table V-3**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), for sales to distributors, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Brazil price	Brazil quantity	Brazil margin	Japan price	Japan quantity	Japan margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-3 Continued**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), for sales to distributors, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Netherlands price	Netherlands quantity	Netherlands margin	South Korea price	South Korea quantity	South Korea margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-3 Continued

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), for sales to distributors, by quarter

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Turkey sources price	Turkey sources quantity	Turkey sources margin	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

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

Note: Product 1: Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36 and/or conversion to ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 1 for sales to distributors.

Table V-4**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), for sales to end users, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	South Korea price	South Korea quantity	South Korea margin	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

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

Note: Product 1: Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36 and/or conversion to ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 1 for sales to end users.

Table V-5
Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), for sales to distributors, by quarter

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan margin	Netherlands price	Netherlands quantity	Netherlands margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-5 Continued**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), for sales to distributors, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	South Korea price	South Korea quantity	South Korea margin	Turkey sources price	Turkey sources quantity	Turkey sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-5 Continued**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), for sales to distributors, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***
2016 Q2	***	***	***	***	***
2016 Q3	***	***	***	***	***
2016 Q4	***	***	***	***	***
2017 Q1	***	***	***	***	***
2017 Q2	***	***	***	***	***
2017 Q3	***	***	***	***	***
2017 Q4	***	***	***	***	***
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***

Table continued.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 2 for sales to distributors.

Table V-5 Continued

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), for sales to end users, by quarter

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan margin	Netherlands price	Netherlands quantity	Netherlands margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-5 Continued**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), for sales to end users, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	South Korea price	South Korea quantity	South Korea margin	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

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

Note: Product 2: Hot-rolled carbon steel sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 2 for sales to end users.

Table V-6**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), for sales to distributors, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Netherlands price	Netherlands quantity	Netherlands margin	South Korea price	South Korea quantity	South Korea margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-6 Continued

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling, sold) to distributors, by quarter

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	United Kingdom price	United Kingdom quantity	United Kingdom margin	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

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

Note: Product 3: Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 3 for sales to distributors.

Table V-6**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), for sales to end users, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan margin	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

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

Note: Product 3: Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 3 for sales to end users.

Note: ***.

Table V-7**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), for sales to distributors, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan margin	Netherlands price	Netherlands quantity	Netherlands margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-7 Continued

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), for sales to distributors, by quarter

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	South Korea price	South Korea quantity	South Korea margin	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

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

Note: Product 4: Ultra High Strength Steel (UHSS) or Advanced High Strength Steel, DRY, not tempered, 40-72" in width, and 0.071-0.250" in thickness.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 4 for sales to distributors.

Note: ***.

Table V-7**Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), for sales to end users, by quarter**

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan margin	South Korea price	South Korea quantity	South Korea margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***

Table continued.

Table V-7 Continued

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), for sales to end users, by quarter

Price in dollars per short tons, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Subject sources price	Subject sources quantity	Subject sources margin
2016 Q1	***	***	***	***	***
2016 Q2	***	***	***	***	***
2016 Q3	***	***	***	***	***
2016 Q4	***	***	***	***	***
2017 Q1	***	***	***	***	***
2017 Q2	***	***	***	***	***
2017 Q3	***	***	***	***	***
2017 Q4	***	***	***	***	***
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***

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

Note: Product 4: Ultra High Strength Steel (UHSS) or Advanced High Strength Steel, DRY, not tempered, 40-72" in width, and 0.071-0.250" in thickness.

Note: Each U.S. producer reported volumes that were *** times or more than the volumes reported by importers for Product 4 for sales to end users.

Figure V-4

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, for sales to distributors, by quarter

* * * * *

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

Note: Product 1: Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36 and/or conversion to ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width.

Figure V-5

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, for sales to end users, by quarter

* * * * *

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

Note: Product 1: Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36 and/or conversion to ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width.

Figure V-6

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, for sales to distributors, by quarter

* * * * *

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

Note: Product 2: Hot-rolled carbon steel sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Figure V-7

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, for sales to end users, by quarter

* * * * *

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

Note: Product 2: Hot-rolled carbon steel sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Figure V-8
Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, for sales to distributors, by quarter

* * * * *

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

Note: Product 3: Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Figure V-9

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, for sales to end users, by quarter

* * * * *

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

Note: Product 3: Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Figure V-10

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, for sales to distributors, by quarter

* * * * *

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

Note: Product 4: Ultra High Strength Steel (UHSS) or Advanced High Strength Steel, DRY, not tempered, 40-72" in width, and 0.071-0.250" in thickness.

Figure V-11

Hot-rolled steel: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, for sales to end users, by quarter

* * * * *

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

Note: Product 4: Ultra High Strength Steel (UHSS) or Advanced High Strength Steel, DRY, not tempered, 40-72" in width, and 0.071-0.250" in thickness.

Price trends

Overall, for the pricing products where trends can be analyzed, prices increased during January 2016-March 2022. Tables V-8-13 summarize the price trends, by distribution channel, by country, and by product. During January 2016-March 2022, domestic prices changed by *** percent for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4. During January 2016-March 2022, price increases ranged from *** percent for product 1 for sales to distributors, *** percent for product 2 for sales to distributors, *** percent for product 3 for sales to distributors, *** percent for product 3 for sales to end users, and *** percent for product 4 for sales to distributors in quarters for which comparisons were available.

Table V-8

Hot-rolled steel: Number of quarters containing observations low price, high price, and change in price over period, for sales to distributors, by product and source, January 2016 through March 2022

Quantity in short tons; Prices in dollars per short ton; Changes in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Australia	***	***	***	***	***	***	***
Product 1	Brazil	***	***	***	***	***	***	***
Product 1	Japan	***	***	***	***	***	***	***
Product 1	Netherlands	***	***	***	***	***	***	***
Product 1	Russia	***	***	***	***	***	***	***
Product 1	South Korea	***	***	***	***	***	***	***
Product 1	Turkey	***	***	***	***	***	***	***
Product 1	United Kingdom	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Australia	***	***	***	***	***	***	***
Product 2	Brazil	***	***	***	***	***	***	***
Product 2	Japan	***	***	***	***	***	***	***
Product 2	Netherlands	***	***	***	***	***	***	***
Product 2	Russia	***	***	***	***	***	***	***
Product 2	South Korea	***	***	***	***	***	***	***
Product 2	Turkey	***	***	***	***	***	***	***
Product 2	United Kingdom	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Australia	***	***	***	***	***	***	***
Product 3	Brazil	***	***	***	***	***	***	***
Product 3	Japan	***	***	***	***	***	***	***
Product 3	Netherlands	***	***	***	***	***	***	***
Product 3	Russia	***	***	***	***	***	***	***
Product 3	South Korea	***	***	***	***	***	***	***
Product 3	Turkey	***	***	***	***	***	***	***
Product 3	United Kingdom	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Australia	***	***	***	***	***	***	***
Product 4	Brazil	***	***	***	***	***	***	***
Product 4	Japan	***	***	***	***	***	***	***
Product 4	Netherlands	***	***	***	***	***	***	***
Product 4	Russia	***	***	***	***	***	***	***
Product 4	South Korea	***	***	***	***	***	***	***
Product 4	Turkey	***	***	***	***	***	***	***
Product 4	United Kingdom	***	***	***	***	***	***	***

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

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

Table V-9

Hot-rolled steel: Number of quarters containing observations low price, high price, and change in price over period, for sales to end users, by product and source, January 2016 through March 2022

Quantity in short tons; Prices in dollars per short ton; Changes in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Australia	***	***	***	***	***	***	***
Product 1	Brazil	***	***	***	***	***	***	***
Product 1	Japan	***	***	***	***	***	***	***
Product 1	Netherlands	***	***	***	***	***	***	***
Product 1	Russia	***	***	***	***	***	***	***
Product 1	South Korea	***	***	***	***	***	***	***
Product 1	Turkey	***	***	***	***	***	***	***
Product 1	United Kingdom	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Australia	***	***	***	***	***	***	***
Product 2	Brazil	***	***	***	***	***	***	***
Product 2	Japan	***	***	***	***	***	***	***
Product 2	Netherlands	***	***	***	***	***	***	***
Product 2	Russia	***	***	***	***	***	***	***
Product 2	South Korea	***	***	***	***	***	***	***
Product 2	Turkey	***	***	***	***	***	***	***
Product 2	United Kingdom	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Australia	***	***	***	***	***	***	***
Product 3	Brazil	***	***	***	***	***	***	***
Product 3	Japan	***	***	***	***	***	***	***
Product 3	Netherlands	***	***	***	***	***	***	***
Product 3	Russia	***	***	***	***	***	***	***
Product 3	South Korea	***	***	***	***	***	***	***
Product 3	Turkey	***	***	***	***	***	***	***
Product 3	United Kingdom	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Australia	***	***	***	***	***	***	***
Product 4	Brazil	***	***	***	***	***	***	***
Product 4	Japan	***	***	***	***	***	***	***
Product 4	Netherlands	***	***	***	***	***	***	***
Product 4	Russia	***	***	***	***	***	***	***
Product 4	South Korea	***	***	***	***	***	***	***
Product 4	Turkey	***	***	***	***	***	***	***
Product 4	United Kingdom	***	***	***	***	***	***	***

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

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

Table V-10**Hot-rolled steel: Indexed U.S. producers' prices for sales to distributors, by period and product**

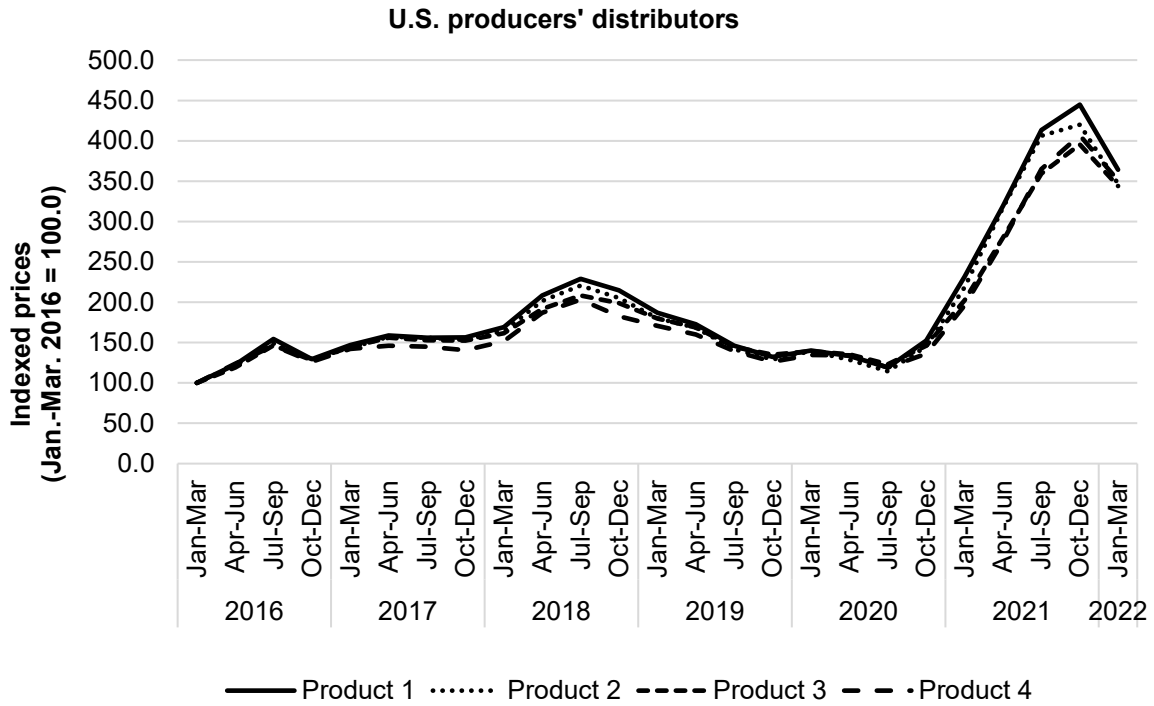
Indexed purchases prices in percent.

Period	Product 1	Product 2	Product 3	Product 4
2016 Q1	100.0	100.0	100.0	100.0
2016 Q2	122.6	121.8	119.1	123.9
2016 Q3	154.4	149.0	146.7	146.0
2016 Q4	129.5	129.3	128.1	126.1
2017 Q1	146.8	143.5	144.5	141.9
2017 Q2	158.9	157.0	156.1	146.0
2017 Q3	156.1	155.9	153.0	145.0
2017 Q4	156.5	153.2	152.4	140.4
2018 Q1	169.1	164.4	161.7	151.7
2018 Q2	208.3	201.7	191.8	187.1
2018 Q3	228.9	220.7	208.2	203.0
2018 Q4	214.7	205.1	198.8	182.6
2019 Q1	187.0	180.2	179.9	170.8
2019 Q2	172.8	168.2	168.6	160.0
2019 Q3	146.1	141.9	144.3	139.3
2019 Q4	132.3	129.2	135.2	126.4
2020 Q1	140.1	139.5	139.5	134.8
2020 Q2	133.5	128.7	135.3	134.0
2020 Q3	119.3	114.3	122.9	119.2
2020 Q4	152.5	145.1	146.2	136.4
2021 Q1	231.8	218.6	202.3	196.1
2021 Q2	319.2	317.6	280.1	275.6
2021 Q3	413.4	406.1	359.4	365.1
2021 Q4	444.8	420.0	395.4	406.8
2022 Q1	364.2	346.9	344.1	350.6

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

Note: Prices are indexed off the January to March 2016 starting period.

Figure V-12
Hot-rolled steel: Indexed U.S. producer prices for sales to distributors, January 2016 through March 2022



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

Table V-11
Hot-rolled steel: Indexed U.S. producers' prices for sales to end users, by period and product

Indexed purchases prices in percent.

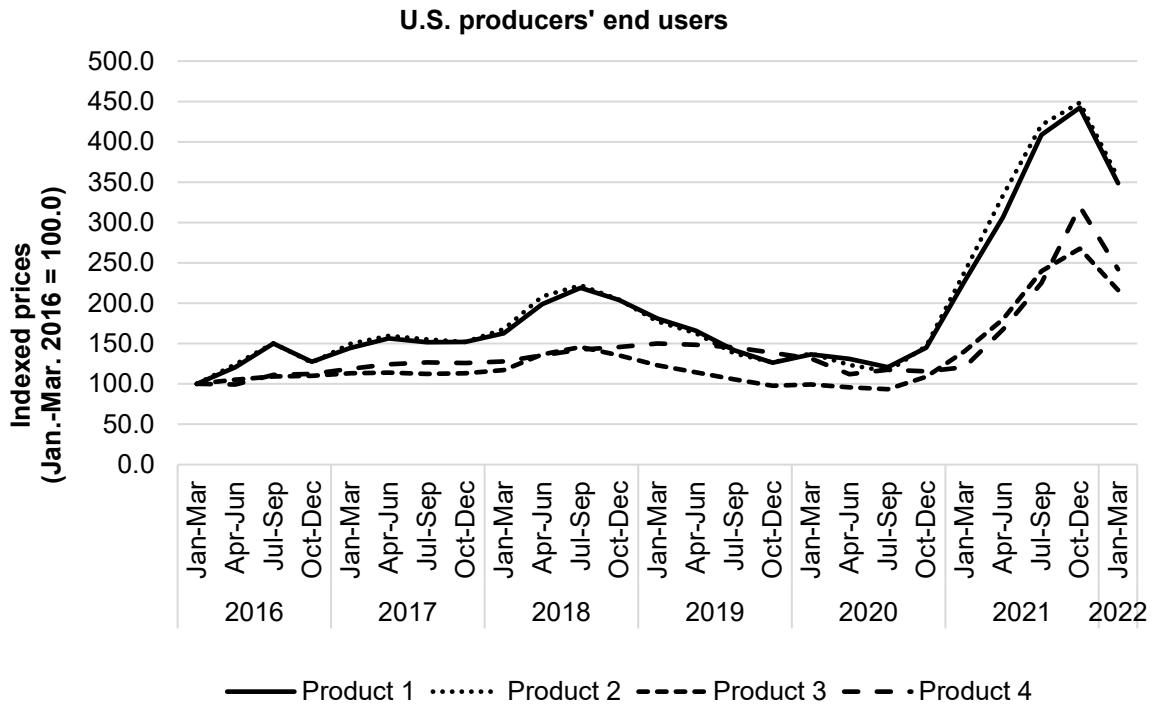
Period	Product 1	Product 2	Product 3	Product 4
2016 Q1	100.0	100.0	100.0	100.0
2016 Q2	120.7	124.3	105.3	99.3
2016 Q3	150.0	150.5	109.2	111.1
2016 Q4	127.5	126.1	110.0	112.2
2017 Q1	144.7	149.8	113.3	118.9
2017 Q2	156.6	159.4	114.0	124.1
2017 Q3	151.7	155.1	112.6	126.6
2017 Q4	152.0	152.2	113.1	125.9
2018 Q1	162.9	168.1	117.3	128.0
2018 Q2	198.6	208.5	136.7	135.5
2018 Q3	219.0	222.2	145.5	142.3
2018 Q4	203.8	204.2	135.5	145.6
2019 Q1	180.9	177.3	123.1	150.0
2019 Q2	165.7	162.9	114.5	148.3
2019 Q3	141.7	137.8	105.5	145.2
2019 Q4	126.3	126.8	97.5	138.4
2020 Q1	136.6	137.7	99.4	131.3
2020 Q2	130.9	123.4	95.6	112.0
2020 Q3	120.9	115.5	93.5	117.6
2020 Q4	145.1	146.7	108.9	115.4
2021 Q1	227.5	238.7	140.5	120.6
2021 Q2	306.7	333.7	180.1	167.4
2021 Q3	408.4	420.7	239.7	225.0
2021 Q4	442.3	448.5	267.7	319.8
2022 Q1	348.8	355.6	216.5	242.0

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

Note: Prices are indexed off the January to March 2016 starting period.

Figure V-13

Hot-rolled steel: Indexed U.S. producer prices for sales to end users, January 2016 through March 2022



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

Table V-12**Hot-rolled steel: Indexed subject U.S. importers' prices, for sales to distributors, by period and product**

Indexed purchases prices in percent

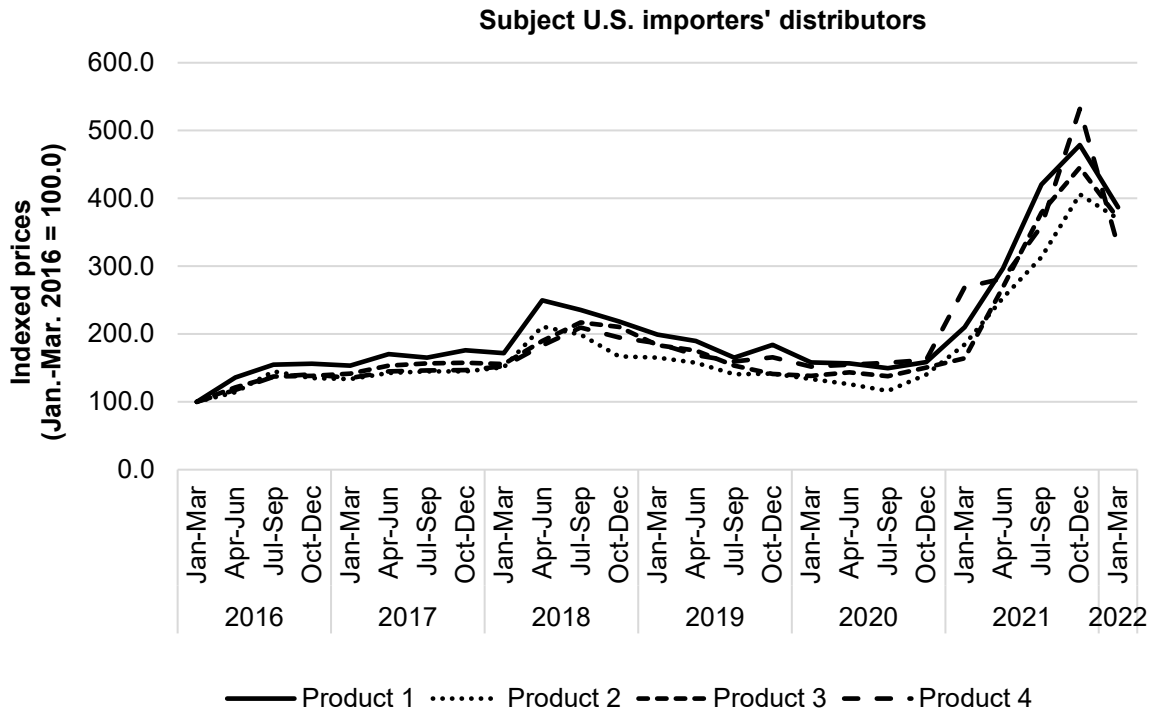
Period	Product 1	Product 2	Product 3	Product 4
2016 Q1	100.0	100.0	100.0	100.0
2016 Q2	135.8	114.1	121.4	117.6
2016 Q3	154.9	145.1	137.5	137.1
2016 Q4	156.4	135.1	138.3	140.6
2017 Q1	153.2	133.7	141.6	134.9
2017 Q2	170.4	142.7	153.2	145.1
2017 Q3	165.3	144.9	156.7	146.5
2017 Q4	176.2	144.8	157.5	146.9
2018 Q1	171.9	151.1	155.6	152.3
2018 Q2	249.6	210.7	189.6	183.0
2018 Q3	235.4	199.3	217.0	209.6
2018 Q4	218.4	166.9	210.3	194.9
2019 Q1	199.1	165.4	183.4	186.3
2019 Q2	189.8	157.8	175.4	169.0
2019 Q3	165.1	140.6	153.4	159.4
2019 Q4	184.0	141.6	141.1	165.6
2020 Q1	158.0	133.7	138.3	152.1
2020 Q2	156.5	125.9	143.4	154.6
2020 Q3	149.7	116.1	137.6	157.5
2020 Q4	158.8	140.0	150.8	162.1
2021 Q1	210.2	184.6	164.3	269.0
2021 Q2	296.8	253.4	269.7	281.7
2021 Q3	420.6	313.2	378.9	359.2
2021 Q4	478.7	405.9	445.6	532.0
2022 Q1	387.1	369.9	370.2	329.5

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

Note: Prices are indexed off the January to March 2016 starting period.

Figure V-14

Hot-rolled steel: Indexed U.S. importer prices, for sales to end users, January 2016 through March 2022



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

Table V-13**Hot-rolled steel: Indexed subject U.S. importers' prices, for sales to end users, by period and product**

Indexed purchases prices in percent

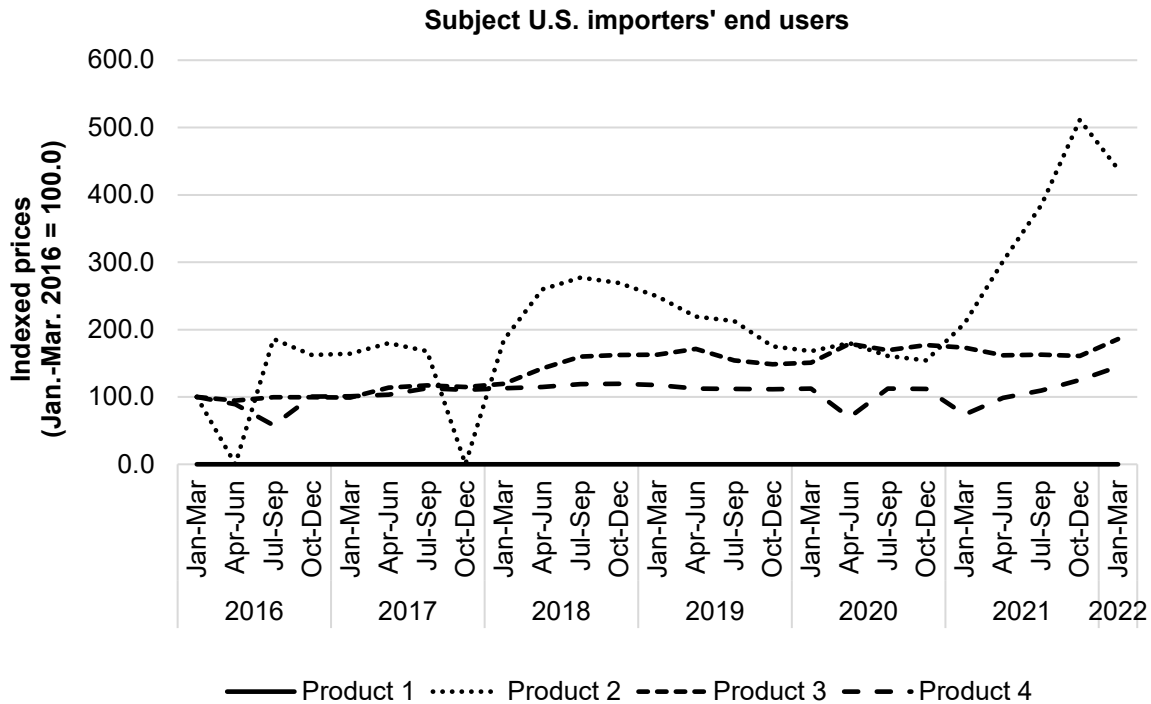
Period	Product 2	Product 3	Product 4
2016 Q1	100.0	100.0	100.0
2016 Q2	---	94.6	89.2
2016 Q3	185.9	99.6	58.0
2016 Q4	162.2	99.7	100.5
2017 Q1	164.1	99.0	100.8
2017 Q2	180.1	113.9	103.3
2017 Q3	167.8	117.0	112.8
2017 Q4	---	114.6	110.5
2018 Q1	184.7	119.6	113.1
2018 Q2	259.9	142.4	114.6
2018 Q3	277.2	160.1	119.1
2018 Q4	269.3	162.5	119.3
2019 Q1	249.4	162.7	117.6
2019 Q2	219.1	171.1	112.6
2019 Q3	212.6	154.2	111.9
2019 Q4	175.1	148.4	111.4
2020 Q1	167.8	150.8	112.5
2020 Q2	179.7	178.7	69.8
2020 Q3	160.7	169.4	112.5
2020 Q4	154.4	176.9	112.0
2021 Q1	209.3	173.0	73.8
2021 Q2	301.4	161.9	98.6
2021 Q3	385.0	163.0	109.5
2021 Q4	511.4	160.7	125.1
2022 Q1	438.5	185.9	144.8

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

Note: Prices are indexed off the January to March 2016 starting period.

Figure V-15

Hot-rolled steel: Indexed U.S. importer prices, for sales to end users, January 2016 through March 2022



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

Purchasers were first asked if there had been a change in the price of hot-rolled steel since 2016. Almost all responding purchasers reported that there had been changes in the price of hot-rolled steel from domestic and subject sources. Purchasers were then asked how the prices of hot-rolled steel from the United States had changed relative to the prices of hot-rolled steel from subject countries since 2016. A plurality of purchasers reported that the price of U.S.-produced hot-rolled steel is now relatively higher than product from each subject source. A plurality or majority of purchasers reported that U.S. prices were higher than prices of product from Australia and Brazil (7 of 12 responding purchasers each), Japan (12 of 17), Netherlands (8 of 15), Russia (8 of 13), and South Korea (12 of 22). Equal numbers of purchasers (6 each) reported that the price of hot-rolled steel from the United Kingdom either changed by the same percentage as U.S.-produced hot-rolled steel or that U.S. prices are now higher than prices for product from the United Kingdom.

Price comparisons¹²

As shown in table V-15, prices for hot-rolled steel imported from Japan for sales to distributors were below those for U.S.-produced product in 7 of 29 instances; margins of underselling ranged from *** percent. In the remaining 22 instances, prices for hot-rolled steel from Japan were between *** percent above prices for the domestic product. Prices for hot-rolled steel imported from Japan for sales to end users were below those for U.S.-produced product in 12 of 71 instances; margins of underselling ranged from *** percent. In the remaining 59 instances, prices for hot-rolled steel from Japan were between *** percent above prices for the domestic product.

Prices for hot-rolled steel imported from the Netherlands for sales to distributors were below those for U.S.-produced product in 9 of 84 instances; margins of underselling ranged from *** percent. In the remaining 75 instances, prices for hot-rolled steel from the Netherlands were between *** percent above prices for the domestic product. Prices for hot-rolled steel imported from the Netherlands for sales to end users were below those for U.S.-produced product in 1 instance; the margin of underselling was *** percent.

Prices for hot-rolled steel imported from South Korea for sales to distributors were below those for U.S.-produced product in 21 of 81 instances; margins of underselling ranged from *** percent. In the remaining 60 instances, prices for hot-rolled steel from South Korea were between *** percent above prices for the domestic product. Prices for hot-rolled steel imported from South Korea for sales to end users were below those for U.S.-produced product in 15 of 22 instances; margins of underselling ranged from 2.1 to 30.9 percent. In the remaining 7 instances, prices for hot-rolled steel from South Korea were between *** percent above prices for the domestic product.

¹² Pricing products in the final phase of the original investigations were defined as follows: Product 1: Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width; Product 2: Hot-rolled carbon steel sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width; Product 3: Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width; Product 4: Hot-rolled steel plate in coils, high strength low alloy, for conversion to API PSL 2 X70M, 0.250 to 0.750, 50" to 77" in width.

Prices for hot-rolled steel imported from Turkey for sales to distributors were below those for U.S.-produced product in 1 of 4 instances; the margin of underselling was *** percent. In the remaining 3 instances, prices for hot-rolled steel from Turkey were between *** percent above prices for the domestic product.

No comparisons were available for product from Australia, Brazil, or Russia for distributors or end users, or from Turkey for product for sales to end users.¹³

¹³ In the original investigations, subject imports sold to distributors and service centers from Australia were priced lower than domestic product in 9 of 22 comparisons, with underselling margins ranging from *** percent; subject imports from Brazil were priced lower than domestic product in 18 of 44 comparisons, with underselling margins ranging from *** percent; subject imports from Japan were priced lower than domestic product in 7 of 20 comparisons, with underselling margins ranging from ***; subject imports from the Netherlands were priced lower than domestic product in 23 of 37 comparisons, with underselling margins ranging from ***; subject imports from South Korea were priced lower than domestic product in 14 of 34 comparisons, with underselling margins ranging from ***; subject imports from Turkey were priced lower than domestic product in 16 of 33 comparisons, with underselling margins ranging from ***; subject imports from the United Kingdom were priced lower than domestic product in 15 of 18 comparisons, with underselling margins ranging from ***.

Subject imports sold to end users from Australia were priced lower than domestic product in 13 of 25 comparisons, with underselling margins ranging from *** percent; subject imports from Brazil were priced lower than domestic product in 19 of 38 comparisons, with underselling margins ranging from ***; subject imports from Japan were priced lower than domestic product in 8 of 13 comparisons, with underselling margins ranging from ***; subject imports from the Netherlands were priced lower than domestic product in 8 of 35 comparisons, with underselling margins ranging from ***; subject imports from Turkey were priced lower than domestic product in 15 of 26 comparisons, with underselling margins ranging from ***; subject imports from the United Kingdom were priced lower than domestic product in 10 of 11 instances, with underselling margins ranging from ***. *Hot-rolled steel flat products from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final)*, USITC Publication 4638, September 2016 at V-11 to V-13.

Table V-14**Hot-rolled steel: Instances of underselling and overselling and the range and average of margins, for sales to distributors, by product, January 2016 through March 2022**

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
All products	Underselling	38	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
All products	Overselling	163	***	***	***	***

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

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

Table V-15

Hot-rolled steel: Instances of underselling/overselling and the range and average of margins, for sales to distributors, by country, January 2016 through March 2022

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Australia	Underselling	---	***	***	***	***
Brazil	Underselling	---	***	***	***	***
Japan	Underselling	7	***	***	***	***
Netherlands	Underselling	9	***	***	***	***
Russia	Underselling	---	***	***	***	***
South Korea	Underselling	21	***	***	***	***
Turkey	Underselling	1	***	***	***	***
United Kingdom	Underselling	---	***	***	***	***
All subject sources	Underselling	38	***	***	***	***
Australia	Overselling	---	***	***	***	***
Brazil	Overselling	1	***	***	***	***
Japan	Overselling	22	***	***	***	***
Netherlands	Overselling	75	***	***	***	***
Russia	Overselling	---	***	***	***	***
South Korea	Overselling	60	***	***	***	***
Turkey	Overselling	3	***	***	***	***
United Kingdom	Overselling	2	***	***	***	***
All subject sources	Overselling	163	***	***	***	***

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

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

Table V-16

Hot-rolled steel: Instances of underselling and overselling and the range and average of margins, for sales to end users, by product, January 2016 through March 2022

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
All products	Underselling	28	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
All products	Overselling	66	***	***	***	***

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

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

Table V-17

Hot-rolled steel: Instances of underselling/overselling and the range and average of margins, for sales to end users, by country, January 2016 through March 2022

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Australia	Underselling	---	***	***	***	***
Brazil	Underselling	---	***	***	***	***
Japan	Underselling	12	***	***	***	***
Netherlands	Underselling	1	***	***	***	***
Russia	Underselling	---	***	***	***	***
South Korea	Underselling	15	***	***	***	***
Turkey	Underselling	---	***	***	***	***
United Kingdom	Underselling	---	***	***	***	***
All subject sources	Underselling	28	***	***	***	***
Australia	Overselling	---	***	***	***	***
Brazil	Overselling	---	***	***	***	***
Japan	Overselling	59	***	***	***	***
Netherlands	Overselling	---	***	***	***	***
Russia	Overselling	---	***	***	***	***
South Korea	Overselling	7	***	***	***	***
Turkey	Overselling	---	***	***	***	***
United Kingdom	Overselling	---	***	***	***	***
All subject sources	Overselling	66	***	***	***	***

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

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

Table V-18**Hot-rolled steel: Instances of underselling/overselling and the range of margins, total, by product, January 2016 through March 2022**

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Minimum margin	Maximum margin
Product 1	Underselling	***	***	***	***
Product 2	Underselling	***	***	***	***
Product 3	Underselling	***	***	***	***
Product 4	Underselling	***	***	***	***
All products	Underselling	***	***	***	***
Product 1	Overselling	***	***	***	***
Product 2	Overselling	***	***	***	***
Product 3	Overselling	***	***	***	***
Product 4	Overselling	***	***	***	***
All products	Overselling	***	***	***	***

Table continued.

Table V-18 Continued

Hot-rolled steel: Instances of underselling/overselling and the range of margins, total, by country, January 2016 through March 2022

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Minimum margin	Maximum margin
Australia	Underselling	---	***	***	***
Brazil	Underselling	---	***	***	***
Japan	Underselling	19	***	***	***
Netherlands	Underselling	10	***	***	***
Russia	Underselling	---	***	***	***
South Korea	Underselling	36	***	***	***
Turkey	Underselling	1	***	***	***
United Kingdom	Underselling	---	***	***	***
All subject sources	Underselling	66	***	***	***
Australia	Overselling	---	***	***	***
Brazil	Overselling	1	***	***	***
Japan	Overselling	81	***	***	***
Netherlands	Overselling	75	***	***	***
Russia	Overselling	---	***	***	***
South Korea	Overselling	67	***	***	***
Turkey	Overselling	3	***	***	***
United Kingdom	Overselling	2	***	***	***
All subject sources	Overselling	229	***	***	***

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

APPENDIX A
FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. 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
86 FR 49057, September 1, 2021	Commission's institution of five-year reviews	https://www.govinfo.gov/content/pkg/FR-2021-09-01/pdf/2021-18785.pdf
86 FR 48983, September 1, 2021	Commerce's initiation of five-year reviews	https://www.govinfo.gov/content/pkg/FR-2021-09-01/pdf/2021-18922.pdf
87 FR 3123, January 20, 2022	Commission's determinations to conduct full five-year reviews	https://www.govinfo.gov/content/pkg/FR-2021-09-01/pdf/2021-18922.pdf
86 FR 72577, December 22, 2021	Commerce's final results of the expedited five-year review of the antidumping duty order on hot-rolled steel from Russia	https://www.govinfo.gov/content/pkg/FR-2021-12-22/pdf/2021-27717.pdf
87 FR 428, January 5, 2022	Commerce's final results of the expedited five-year review of the countervailing duty order on hot-rolled steel from South Korea	https://www.govinfo.gov/content/pkg/FR-2022-01-05/pdf/2021-28556.pdf
87 FR 750, January 6, 2022	Commerce's final results of the expedited five-year reviews of the countervailing duty order on hot-rolled steel from Brazil	https://www.govinfo.gov/content/pkg/FR-2022-01-06/pdf/2022-00020.pdf
87 FR 751, January 6, 2022	Commerce's final results of the expedited five-year reviews of the antidumping duty orders on hot-rolled steel from Australia, Brazil, Japan, the Netherlands, South Korea, Turkey, and the United Kingdom	https://www.govinfo.gov/content/pkg/FR-2022-01-06/pdf/2022-00019.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing via videoconference:

Subject: Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, Netherlands, Russia, Turkey, and the United Kingdom

Inv. Nos.: 701-TA-545-546 and 731-TA-1291-1297 (Review) and 731-TA-808 (Fourth Review)

Date and Time: September 15, 2022 - 9:30 a.m.

CONGRESSIONAL APPEARANCES:

The Honorable Sherrod Brown, Senator, Ohio

The Honorable Marcy Kaptur, U.S. Representative, 9th District, Ohio

The Honorable James E. Clyburn, U.S. Representative, 6th District, South Carolina

The Honorable Pete Stauber, U.S. Representative, 8th District, Minnesota

The Honorable Frank J. Mrvan, U.S. Representative, 1st District, Indiana

STATE GOVERNMENT APPEARANCES:

The Honorable Asa Hutchinson, Governor of Arkansas

The Honorable Sally Wilson, Mayor of City of Osceola, Arkansas

EMBASSY APPEARANCE:

**Embassy of the Kingdom of the Netherlands
Washington, DC**

Ruth Schipper-Tops, First Embassy Secretary

FOREIGN GOVERNMENT APPEARANCE:

Government of the Republic of South Korea

**Lee Dong Ju, Deputy Director of Trade Legal Affairs and Planning Division,
Ministry of Trade, Industry, and Energy**

OPENING REMARKS:

In Support of Continuation (**Alan H. Price**, Wiley Rein LLP)

In Opposition to Continuation (**Craig A. Lewis**, Hogan Lovells US LLP; and **Daniel L. Porter**,
Curtis, Mallet-Prevost, Colt & Mosle LLP and)

**In Support of Continuation of
Antidumping and Countervailing Duty Orders:**

Wiley Rein LLP
Washington, DC
on behalf of

Nucor Corporation (“Nucor”)
California Steel Industries (“CSI”)

K. Rex Query, Executive Vice President, Sheet and Tubular Products, Nucor

Patrick Dempsey, Commercial Director, Nucor

Alan H. Price)
Christopher B. Weld) – OF COUNSEL
Derick G. Holt)

King & Spalding LLP
Washington, DC
on behalf of

Cleveland-Cliffs Inc. (“Cleveland-Cliffs”)

Lourenco Goncalves, Chairman, President, and Chief Executive Officer,
Cleveland-Cliffs

J.B. Chronister, Enterprise Director - Business Development,
Cleveland-Cliffs

Stephen P. Vaughn)
) – OF COUNSEL
Neal J. Reynolds)

**In Support of Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Schagrin Associates
Washington, DC
on behalf of

Steel Dynamics, Inc.
SSAB Enterprises LLC

Barry Schneider, Senior Vice President, Flat Roll Steel Group,
Steel Dynamics, Inc.

Tommy Scruggs, Vice President - Commercial, Steel Dynamics, Inc.

Jeff Moskaluk, Senior Vice President and Chief Commercial Officer,
SSAB Enterprises LLC

Roger B. Schagrin)
Jeffrey D. Gerrish) – OF COUNSEL
Christopher T. Cloutier)

Cassidy Levy Kent (USA) LLP
Washington, DC
on behalf of

United States Steel Corporation (“U.S. Steel”)

Kenneth Jaycox, Senior Vice President and Chief Commercial Officer,
U.S. Steel

Robert Kopf, Vice President for Marketing and Commercial Support, U.S. Steel

Thomas M. Beline)
Jack A. Levy) – OF COUNSEL
Sarah E. Shulman)

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,
Allied Industrial and Service Workers International Union
 (“United Steelworkers”)
Washington, DC

Roy Houseman, Legislative Director

**In Opposition to Continuation of
Antidumping and Countervailing Duty Orders:**

Hogan Lovells US LLP
Washington, DC
on behalf of

Companhia Siderúrgica Nacional S.A.
Companhia Siderúrgica Nacional, LLC
(collectively, “CSN”)

Jerry Richardson, Executive Director, Companhia Siderúrgica Nacional, LLC

Craig A. Lewis)
) – OF COUNSEL
Michael G. Jacobson)

Law Offices of David L. Simon
Washington, DC
on behalf of

Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (“Erdemir”)

Anıl SİYAMBAŞ, Sales Manager (North America), Erdemir

David L. Simon)
) – OF COUNSEL
Mark B. Lehnardt)

Sidley Austin LLP
Washington, DC
on behalf of

Nippon Steel Corporation (“NSC”)
JFE Steel Corporation (“JFE Steel”)
Kobe Steel, Ltd. (“Kobe Steel”)

Shawn Higgins)
) – OF COUNSEL
Justin R. Becker)

**In Opposition to Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Alston & Bird LLP
Washington, DC
on behalf of

Usinas Siderúrgicas de Minas Gerais S.A. (“USIMINAS”)

Gerardo Delgado, Commercial Planning General Manager, USIMINAS

Roberto Coelho, Export Sales General Manager, USIMINAS

Lian Yang)
) – OF COUNSEL
Lucas Queiroz Pires)

Trade Pacific PLLC
Washington, DC
on behalf of

POSCO and POSCO International Corporation (“PIC”)
POSCO America Corporation (“POSAM”)
POSCO International America (“PIA”)
(collectively, “POSCO”)

Jarrod M. Goldfeder) – OF COUNSEL

Morris, Manning & Martin, LLP
Washington, DC
on behalf of

Government of the Republic of Korea

Donald B. Cameron) – OF COUNSEL

**In Opposition to Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Step toe & Johnson LLP
Washington, DC
on behalf of

Tata Steel Nederland BV
Thomas Steel Strip Corp.
Steel Warehouse Company LLC

Ronald de Haan, Director, Regional Markets and Trade Matters,
Tata Steel Nederland BV

Ronald de Graaf, Trade Specialist, Tata Steel Nederland BV

Rowan Mekkes, Commercial Manager, Americas, Tata Steel Nederland BV

Michael Morris, President and Chief Executive Officer,
Thomas Steel Strip Corp.

Carl Parker, President and General Manager, Steel Warehouse Company LLC

Thomas J. Trendl)
) – OF COUNSEL
Stephanie W. Wang)

**In Opposition to Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Curtis, Mallet-Prevost, Colt & Mosle LLP
Washington, DC
on behalf of

BlueScope Limited (“BSL”)
BlueScope Steel America (“BSA”)
North Star BlueScope Steel (“North Star”)
Steelscape LLC
(collectively “BlueScope”)

Pat Finan, Chief Executive Officer, BlueScope North America

Mishca Waliczek, General Counsel, BlueScope North America

Gerry Tidd, Executive Vice President, Corporate Affairs, BlueScope Limited

Sarah Deukmejian, President, Steelscape LLC

Daniel L. Porter)
Christopher Dunn) – OF COUNSEL
James C. Beaty)

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**Stephen P. Vaughn**, King & Spalding LLP)

In Opposition to Continuation (**James C. Beaty**, Curtis, Mallet-Prevost, Colt & Mosle LLP;
Michael G. Jacobson, Hogan Lovells US LLP; **Justin R. Becker**, Sidley Austin LLP;
Thomas J. Trendl, Steptoe & Johnson LLP; **Jarrod M. Goldfeder**, Pacific Trade;
David L. Simon, The Law Offices of David L. Simon)

APPENDIX C
SUMMARY DATA

Table C-1
Hot-rolled steel: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	Calendar year					Jan-Mar		2022
	2016	2017	2018	2019	2020	2021	2021	
U.S. consumption quantity:								
Amount.....	57,610,854	59,326,931	61,231,694	58,081,362	50,399,933	57,777,586	14,514,030	12,535,891
Producers' share (fn1).....	93.1	94.3	93.5	95.2	95.3	93.0	94.6	92.4
Importers' share (fn1):								
Australia.....	0.2	0.0	0.0	0.0	0.0	---	---	---
Brazil.....	0.0	0.0	0.0	0.0	---	---	---	0.0
Japan.....	***	***	***	***	***	***	***	***
Netherlands.....	***	***	***	***	***	***	***	***
Russia.....	---	0.0	---	---	---	0.0	---	---
South Korea.....	***	***	***	***	***	***	***	***
Turkey, subject.....	***	***	***	***	***	***	***	***
United Kingdom.....	***	***	***	***	***	***	***	***
Subject sources.....	2.6	1.3	1.7	1.3	1.3	1.8	1.7	1.8
Turkey, nonsubject.....	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***
Nonsubject sources.....	4.3	4.4	4.8	3.5	3.3	5.3	3.7	5.8
All import sources.....	6.9	5.7	6.5	4.8	4.7	7.0	5.4	7.6
U.S. consumption value:								
Amount.....	28,826,687	35,383,713	46,522,122	37,060,183	27,131,340	70,151,721	11,990,153	15,817,069
Producers' share (fn1).....	93.2	94.2	93.5	95.1	95.1	93.5	95.3	92.3
Importers' share (fn1):								
Australia.....	0.1	0.0	0.0	0.0	0.0	---	---	---
Brazil.....	0.0	0.0	0.0	0.0	---	---	---	0.0
Japan.....	***	***	***	***	***	***	***	***
Netherlands.....	***	***	***	***	***	***	***	***
Russia.....	---	0.0	---	---	---	0.0	---	---
South Korea.....	***	***	***	***	***	***	***	***
Turkey, subject.....	***	***	***	***	***	***	***	***
United Kingdom.....	***	***	***	***	***	***	***	***
Subject sources.....	2.4	1.3	1.7	1.4	1.4	1.5	1.3	1.8
Turkey, nonsubject.....	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***
Nonsubject sources.....	4.4	4.5	4.7	3.6	3.5	5.0	3.4	5.9
All import sources.....	6.8	5.8	6.5	4.9	4.9	6.5	4.7	7.7
U.S. imports from:								
Australia:								
Quantity.....	107,843	10,210	2,993	2,241	25	---	---	---
Value.....	35,041	4,235	2,098	1,043	21	---	---	---
Unit value.....	\$325	\$415	\$701	\$465	\$836	---	---	---
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Brazil:								
Quantity.....	13,441	36	11	336	---	---	---	8
Value.....	5,301	48	19	249	---	---	---	11
Unit value.....	\$394	\$1,324	\$1,784	\$741	---	---	---	\$1,439
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Japan:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Netherlands:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued

Hot-rolled steel: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes						Jan-Mar 2021-22
	2016-21	2016-17	Comparison years		2019-20	2020-21	
			2017-18	2018-19	2019-20	2020-21	
U.S. consumption quantity:							
Amount.....	▲0.3	▲3.0	▲3.2	▼(5.1)	▼(13.2)	▲14.6	▼(13.6)
Producers' share (fn1).....	▼(0.1)	▲1.2	▼(0.8)	▲1.7	▲0.1	▼(2.3)	▼(2.2)
Importers' share (fn1):							
Australia.....	▼(0.2)	▼(0.2)	▼(0.0)	▼(0.0)	▼(0.0)	▼(0.0)	---
Brazil.....	▼(0.0)	▼(0.0)	▼(0.0)	▲0.0	▼(0.0)	---	▲0.0
Japan.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Netherlands.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Russia.....	▲0.0	▲0.0	▼(0.0)	---	---	▲0.0	---
South Korea.....	▼***	▼***	▲***	▼***	▲***	▲***	▼***
Turkey, subject.....	▲***	▼***	▲***	▼***	***	▲***	***
United Kingdom.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Subject sources.....	▼(0.9)	▼(1.4)	▲0.4	▼(0.4)	▼(0.0)	▲0.4	▲0.2
Turkey, nonsubject.....	▲***	▼***	▲***	▼***	▼***	▲***	▲***
All other sources.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Nonsubject sources.....	▲1.0	▲0.1	▲0.3	▼(1.3)	▼(0.1)	▲1.9	▲2.1
All import sources.....	▲0.1	▼(1.2)	▲0.8	▼(1.7)	▼(0.1)	▲2.3	▲2.2
U.S. consumption value:							
Amount.....	▲143.4	▲22.7	▲31.5	▼(20.3)	▼(26.8)	▲158.6	▲31.9
Producers' share (fn1).....	▲0.3	▲1.0	▼(0.7)	▲1.5	▲0.1	▼(1.6)	▼(3.0)
Importers' share (fn1):							
Australia.....	▼(0.1)	▼(0.1)	▼(0.0)	▼(0.0)	▼(0.0)	▼(0.0)	---
Brazil.....	▼(0.0)	▼(0.0)	▼(0.0)	▲0.0	▼(0.0)	---	▲0.0
Japan.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Netherlands.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Russia.....	▲0.0	▲0.0	▼(0.0)	---	---	▲0.0	---
South Korea.....	▼***	▼***	▲***	▼***	▲***	▼***	▼***
Turkey, subject.....	▲***	▼***	▲***	▼***	***	▲***	***
United Kingdom.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Subject sources.....	▼(1.0)	▼(1.2)	▲0.5	▼(0.3)	▼(0.0)	▲0.1	▲0.5
Turkey, nonsubject.....	▲***	▼***	▲***	▼***	▼***	▲***	▲***
All other sources.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Nonsubject sources.....	▲0.7	▲0.2	▲0.2	▼(1.2)	▼(0.0)	▲1.5	▲2.4
All import sources.....	▼(0.3)	▼(1.0)	▲0.7	▼(1.5)	▼(0.1)	▲1.6	▲3.0
U.S. imports from:							
Australia:							
Quantity.....	▼(100.0)	▼(90.5)	▼(70.7)	▼(25.1)	▼(98.9)	▼(100.0)	---
Value.....	▼(100.0)	▼(87.9)	▼(50.5)	▼(50.3)	▼(98.0)	▼(100.0)	---
Unit value.....	▼(100.0)	▲27.7	▲69.0	▼(33.6)	▲79.7	▼(100.0)	---
Ending inventory quantity.....	▼***	▼***	***	***	***	***	***
Brazil:							
Quantity.....	▼(100.0)	▼(99.7)	▼(70.0)	▲3,012.4	▼(100.0)	---	---
Value.....	▼(100.0)	▼(99.1)	▼(59.6)	▲1,193.4	▼(100.0)	---	▲***
Unit value.....	▼(100.0)	▲235.7	▲34.7	▼(58.4)	▼(100.0)	---	▲***
Ending inventory quantity.....	***	***	***	***	***	***	***
Japan:							
Quantity.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Netherlands:							
Quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued
Hot-rolled steel: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	2016	2017	Calendar year		2020	2021	Jan-Mar	
			2018	2019			2021	2022
U.S. imports from: (continued)								
Russia:								
Quantity.....	---	6,777	---	---	---	4	---	---
Value.....	---	4,311	---	---	---	15	---	---
Unit value.....	---	\$636	---	---	---	\$3,798	---	---
Ending inventory quantity.....	***	***	***	***	***	***	***	***
South Korea:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Turkey, subject:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
United Kingdom:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Subject sources:								
Quantity.....	1,523,225	761,450	1,056,388	783,222	677,379	1,014,193	240,104	226,477
Value.....	699,893	445,220	802,489	514,818	366,928	1,023,234	157,841	292,383
Unit value.....	\$459	\$585	\$760	\$657	\$542	\$1,009	\$657	\$1,291
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Turkey, nonsubject:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All other sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity.....	2,467,284	2,623,784	2,917,675	2,009,243	1,678,843	3,043,078	542,167	725,554
Value.....	1,255,994	1,603,785	2,202,080	1,316,057	959,581	3,523,603	409,793	926,971
Unit value.....	\$509	\$611	\$755	\$655	\$572	\$1,158	\$756	\$1,278
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All import sources:								
Quantity.....	3,990,509	3,385,235	3,974,062	2,792,466	2,356,222	4,057,272	782,270	952,030
Value.....	1,955,886	2,049,005	3,004,568	1,830,875	1,326,509	4,546,837	567,634	1,219,354
Unit value.....	\$490	\$605	\$756	\$656	\$563	\$1,121	\$726	\$1,281
Ending inventory quantity.....	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued

Hot-rolled steel: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes						
	2016-21	2016-17	Comparison years			2020-21	Jan-Mar 2021-22
			2017-18	2018-19	2019-20		
U.S. imports from: (continued)							
Russia:							
Quantity.....	▲***	▲***	▼(100.0)	---	---	▲***	---
Value.....	▲***	▲***	▼(100.0)	---	---	▲***	---
Unit value.....	▲***	▲***	▼(100.0)	---	---	▲***	---
Ending inventory quantity.....	***	***	***	***	***	***	***
South Korea:							
Quantity.....	▼***	▼***	▲***	▼***	▼***	▲***	▼***
Value.....	▲***	▼***	▲***	▼***	▼***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	▼***	▼***	▲***	▼***	***	***	▲***
Turkey, subject:							
Quantity.....	▲***	▼***	▲***	▼***	***	▲***	***
Value.....	▲***	▼***	▲***	▼***	***	▲***	***
Unit value.....	▲***	▲***	▲***	▼***	***	▲***	***
Ending inventory quantity.....	***	***	***	***	***	***	***
United Kingdom:							
Quantity.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Value.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	***	***
Subject sources:							
Quantity.....	▼(33.4)	▼(50.0)	▲38.7	▼(25.9)	▼(13.5)	▲49.7	▼(5.7)
Value.....	▲46.2	▼(36.4)	▲80.2	▼(35.8)	▼(28.7)	▲178.9	▲85.2
Unit value.....	▲119.6	▲27.3	▲29.9	▼(13.5)	▼(17.6)	▲86.3	▲96.4
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Turkey, nonsubject:							
Quantity.....	▲***	▼***	▲***	▼***	▼***	▲***	▲***
Value.....	▲***	▼***	▲***	▼***	▼***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	▲***	▲***	▲***	▼***	▼***	▼***	▲***
All other sources:							
Quantity.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Nonsubject sources:							
Quantity.....	▲23.3	▲6.3	▲11.2	▼(31.1)	▼(16.4)	▲81.3	▲33.8
Value.....	▲180.5	▲27.7	▲37.3	▼(40.2)	▼(27.1)	▲267.2	▲126.2
Unit value.....	▲127.5	▲20.1	▲23.5	▼(13.2)	▼(12.7)	▲102.6	▲69.0
Ending inventory quantity.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
All import sources:							
Quantity.....	▲1.7	▼(15.2)	▲17.4	▼(29.7)	▼(15.6)	▲72.2	▲21.7
Value.....	▲132.5	▲4.8	▲46.6	▼(39.1)	▼(27.5)	▲242.8	▲114.8
Unit value.....	▲128.6	▲23.5	▲24.9	▼(13.3)	▼(14.1)	▲99.1	▲76.5
Ending inventory quantity.....	▲***	▼***	▲***	▼***	▼***	▲***	▲***

Table continued.

Table C-1 Continued
Hot-rolled steel: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	Calendar year						Jan-Mar	
	2016	2017	2018	2019	2020	2021	2021	2022
U.S. producers ¹ :								
Average capacity quantity.....	72,583,078	74,408,078	75,008,078	74,808,078	73,689,820	75,901,972	19,125,243	18,126,703
Production quantity.....	54,498,225	57,313,746	58,481,583	56,296,852	49,098,465	55,025,234	14,121,051	11,678,887
Capacity utilization (fn1).....	75.1	77.0	78.0	75.3	66.6	72.5	73.8	64.4
U.S. shipments:								
Quantity.....	53,620,345	55,941,696	57,257,632	55,288,896	48,043,711	53,720,314	13,731,760	11,583,861
Value.....	26,870,801	33,334,708	43,517,554	35,229,308	25,804,831	65,604,884	11,422,519	14,597,715
Unit value.....	\$501	\$596	\$760	\$637	\$537	\$1,221	\$832	\$1,260
Export shipments:								
Quantity.....	912,047	1,310,122	1,131,266	1,179,612	1,194,279	1,133,186	300,450	258,743
Value.....	483,062	623,797	607,990	639,888	529,089	710,155	159,938	189,104
Unit value.....	\$530	\$476	\$537	\$542	\$443	\$627	\$532	\$731
Ending inventory quantity.....	1,563,891	1,625,819	1,718,503	1,546,843	1,407,321	1,579,054	1,496,161	1,415,337
Inventories/total shipments (fn1).....	2.9	2.8	2.9	2.7	2.9	2.9	2.7	3.0
Production workers.....	14,379	14,490	15,280	15,449	14,164	13,769	13,393	13,849
Hours worked (1,000s).....	30,106	31,283	33,113	32,648	28,523	29,241	7,052	7,350
Wages paid (\$1,000).....	1,150,797	1,244,134	1,348,901	1,348,179	1,180,798	1,386,314	303,762	347,906
Hourly wages (dollars per hour).....	\$38.22	\$39.77	\$40.74	\$41.29	\$41.40	\$47.41	\$43.07	\$47.33
Productivity (short tons per 1,000 hours).....	1,810.2	1,832.1	1,766.1	1,724.4	1,721.4	1,881.8	2,002.4	1,589.0
Unit labor costs.....	\$21	\$22	\$23	\$24	\$24	\$25	\$22	\$30
Net sales:								
Quantity.....	54,532,392	57,251,819	58,388,899	56,468,508	49,237,991	54,853,499	14,032,209	11,842,603
Value.....	27,355,191	33,959,669	44,129,236	35,874,950	26,336,135	66,329,880	11,586,668	14,789,689
Unit value.....	\$502	\$593	\$756	\$635	\$535	\$1,209	\$826	\$1,249
Cost of goods sold (COGS).....	24,422,395	30,218,804	34,070,499	31,990,096	25,562,704	38,910,236	8,631,700	9,867,210
Gross profit or (loss) (fn2).....	2,932,796	3,740,865	10,058,737	3,884,854	773,431	27,419,644	2,954,968	4,922,479
SG&A expenses.....	950,086	1,182,790	1,348,344	1,213,894	1,032,098	1,512,272	324,357	359,866
Operating income or (loss) (fn2).....	1,982,710	2,558,075	8,710,393	2,670,960	(258,667)	25,907,372	2,630,611	4,562,613
Net income or (loss) (fn2).....	1,775,463	2,365,484	8,449,534	2,457,405	(420,313)	25,602,930	2,538,543	4,506,648
Unit COGS.....	\$448	\$528	\$584	\$567	\$519	\$709	\$615	\$833
Unit SG&A expenses.....	\$17	\$21	\$23	\$21	\$21	\$28	\$23	\$30
Unit operating income or (loss) (fn2).....	\$36	\$45	\$149	\$47	\$(5)	\$472	\$187	\$385
Unit net income or (loss) (fn2).....	\$33	\$41	\$145	\$44	\$(9)	\$467	\$181	\$381
COGS/sales (fn1).....	89.3	89.0	77.2	89.2	97.1	58.7	74.5	66.7
Operating income or (loss)/sales (fn1).....	7.2	7.5	19.7	7.4	(1.0)	39.1	22.7	30.8
Net income or (loss)/sales (fn1).....	6.5	7.0	19.1	6.8	(1.6)	38.6	21.9	30.5
Capital expenditures.....	929,292	1,652,482	1,313,460	1,767,757	2,550,626	2,798,465	489,458	282,112
Research and development expenses.....	***	***	***	***	***	***	***	***
Net assets.....	15,426,928	17,749,942	20,113,740	19,554,368	19,971,024	26,792,436	NA	NA

Table continued.

Table C-1 Continued
Hot-rolled steel: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes						Jan-Mar 2021-22
	Comparison years						
	2016-21	2016-17	2017-18	2018-19	2019-20	2020-21	
U.S. producers':							
Average capacity quantity.....	▲4.6	▲2.5	▲0.8	▼(0.3)	▼(1.5)	▲3.0	▼(5.2)
Production quantity.....	▲1.0	▲5.2	▲2.0	▼(3.7)	▼(12.8)	▲12.1	▼(17.3)
Capacity utilization (fn1).....	▼(2.6)	▲1.9	▲0.9	▼(2.7)	▼(8.6)	▲5.9	▼(9.4)
U.S. shipments:							
Quantity.....	▲0.2	▲4.3	▲2.4	▼(3.4)	▼(13.1)	▲11.8	▼(15.6)
Value.....	▲144.1	▲24.1	▲30.5	▼(19.0)	▼(26.8)	▲154.2	▲27.8
Unit value.....	▲143.7	▲18.9	▲27.5	▼(16.2)	▼(15.7)	▲127.4	▲51.5
Export shipments:							
Quantity.....	▲24.2	▲43.6	▼(13.7)	▲4.3	▲1.2	▼(5.1)	▼(13.9)
Value.....	▲47.0	▲29.1	▼(2.5)	▲5.2	▼(17.3)	▲34.2	▲18.2
Unit value.....	▲18.3	▼(10.1)	▲12.9	▲0.9	▼(18.3)	▲41.5	▲37.3
Ending inventory quantity.....	▲1.0	▲4.0	▲5.7	▼(10.0)	▼(9.0)	▲12.2	▼(5.4)
Inventories/total shipments (fn1).....	▲0.0	▼(0.0)	▲0.1	▼(0.2)	▲0.1	▲0.0	▲0.3
Production workers.....	▼(4.2)	▲0.8	▲5.5	▲1.1	▼(8.3)	▼(2.8)	▲3.4
Hours worked (1,000s).....	▼(2.9)	▲3.9	▲5.8	▼(1.4)	▼(12.6)	▲2.5	▲4.2
Wages paid (\$1,000).....	▲20.5	▲8.1	▲8.4	▼(0.1)	▼(12.4)	▲17.4	▲14.5
Hourly wages (dollars per hour).....	▲24.0	▲4.0	▲2.4	▲1.4	▲0.3	▲14.5	▲9.9
Productivity (short tons per 1,000 hours).....	▲4.0	▲1.2	▼(3.6)	▼(2.4)	▼(0.2)	▲9.3	▼(20.6)
Unit labor costs.....	▲19.3	▲2.8	▲6.3	▲3.8	▲0.4	▲4.8	▲38.5
Net sales:							
Quantity.....	▲0.6	▲5.0	▲2.0	▼(3.3)	▼(12.8)	▲11.4	▼(15.6)
Value.....	▲142.5	▲24.1	▲29.9	▼(18.7)	▼(26.6)	▲151.9	▲27.6
Unit value.....	▲141.1	▲18.2	▲27.4	▼(15.9)	▼(15.8)	▲126.1	▲51.2
Cost of goods sold (COGS).....	▲59.3	▲23.7	▲12.7	▼(6.1)	▼(20.1)	▲52.2	▲14.3
Gross profit or (loss) (fn2).....	▲834.9	▲27.6	▲168.9	▼(61.4)	▼(80.1)	▲3,445.2	▲66.6
SG&A expenses.....	▲59.2	▲24.5	▲14.0	▼(10.0)	▼(15.0)	▲46.5	▲10.9
Operating income or (loss) (fn2).....	▲1,206.7	▲29.0	▲240.5	▼(69.3)	▼***	▲***	▲73.4
Net income or (loss) (fn2).....	▲1,342.0	▲33.2	▲257.2	▼(70.9)	▼***	▲***	▲77.5
Unit COGS.....	▲58.4	▲17.9	▲10.6	▼(2.9)	▼(8.4)	▲36.6	▲35.4
Unit SG&A expenses.....	▲58.2	▲18.6	▲11.8	▼(6.9)	▼(2.5)	▲31.5	▲31.5
Unit operating income or (loss) (fn2).....	▲1,199.0	▲22.9	▲233.9	▼(68.3)	▼***	▲***	▲105.5
Unit net income or (loss) (fn2).....	▲1,333.6	▲26.9	▲250.2	▼(69.9)	▼***	▲***	▲110.4
COGS/sales (fn1).....	▼(30.6)	▼(0.3)	▼(11.8)	▲12.0	▲7.9	▼(38.4)	▼(7.8)
Operating income or (loss)/sales (fn1).....	▲31.8	▲0.3	▲12.2	▼(12.3)	▼(8.4)	▲40.0	▲8.1
Net income or (loss)/sales (fn1).....	▲32.1	▲0.5	▲12.2	▼(12.3)	▼(8.4)	▲40.2	▲8.6
Capital expenditures.....	▲201.1	▲77.8	▼(20.5)	▲34.6	▲44.3	▲9.7	▼(42.4)
Research and development expenses.....	▼***	▼***	▲***	▲***	▼***	▼***	▲***
Net assets.....	▲73.7	▲15.1	▲13.3	▼(2.8)	▲2.1	▲34.2	NA

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series, with import values being reported on a landed, (normal) duty-paid basis.

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). Zeros, null values, and undefined calculations are suppressed and shown as "----". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

SUMMARY DATA COMPILED FROM THE PREVIOUS PROCEEDINGS

Table C-1

Hot-rolled steel: Summary data concerning the U.S. merchant market, 2013-15, January to March 2015, and January to March 2016

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2013	Calendar year 2014	2015	January to March 2015	2016	2013-15	Calendar year 2013-14	2014-15	Jan-Mar 2015-16
U.S. consumption quantity:									
Amount.....	29,281,161	32,235,402	27,185,638	6,985,645	6,707,216	(7.2)	10.1	(15.7)	(4.0)
Producers' share (fn1).....	86.5	79.8	78.6	74.6	83.1	(7.9)	(6.7)	(1.2)	8.6
Importers' share (fn1):									
Australia.....	***	***	***	***	***	***	***	***	***
Brazil.....	***	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Netherlands.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
United Kingdom.....	***	***	***	***	***	***	***	***	***
Subject sources.....	6.0	9.9	13.2	17.0	8.5	7.2	3.9	3.3	(8.5)
Canada.....	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	7.5	10.4	8.2	8.4	8.4	0.7	2.8	(2.2)	(0.1)
Total imports.....	13.5	20.2	21.4	25.4	16.9	7.9	6.7	1.2	(8.6)
U.S. consumption value:									
Amount.....	18,386,329	21,173,755	13,788,041	4,154,727	2,800,376	(25.0)	15.2	(34.9)	(32.6)
Producers' share (fn1).....	86.4	80.5	78.1	74.4	82.5	(8.3)	(5.9)	(2.4)	8.1
Importers' share (fn1):									
Australia.....	***	***	***	***	***	***	***	***	***
Brazil.....	***	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Netherlands.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
United Kingdom.....	***	***	***	***	***	***	***	***	***
Subject sources.....	5.8	9.1	12.9	16.4	8.1	7.1	3.3	3.8	(8.3)
Canada.....	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	7.8	10.4	9.0	9.2	9.4	1.1	2.5	(1.4)	0.2
Total imports.....	13.6	19.5	21.9	25.6	17.5	8.3	5.9	2.4	(8.1)
U.S. imports from									
Australia:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Brazil:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Japan:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Netherlands:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
United Kingdom:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	1,747,157	3,178,238	3,587,950	1,187,698	570,906	105.4	81.9	12.9	(51.9)
Value.....	1,061,662	1,930,681	1,779,259	681,289	227,154	67.6	81.9	(7.8)	(66.7)
Unit value.....	608	607	496	574	398	(18.4)	(0.0)	(18.4)	(30.6)
Ending inventory quantity.....	172,154	335,959	576,444	452,082	364,839	234.8	95.2	71.6	(19.3)
Canada:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject:									
Quantity.....	2,203,485	3,336,994	2,228,196	589,767	560,163	1.1	51.4	(33.2)	(5.0)
Value.....	1,437,184	2,193,772	1,234,892	383,028	263,678	(14.1)	52.6	(43.7)	(31.2)
Unit value.....	652	657	554	649	471	(15.0)	0.8	(15.7)	(27.5)
Ending inventory quantity.....	222,922	179,027	53,015	149,434	30,050	(76.2)	(19.7)	(70.4)	(79.9)
Total imports:									
Quantity.....	3,950,642	6,515,232	5,816,146	1,777,466	1,131,068	47.2	64.9	(10.7)	(36.4)
Value.....	2,498,846	4,124,454	3,014,150	1,064,317	490,832	20.6	65.1	(26.9)	(53.9)
Unit value.....	633	633	518	599	434	(18.1)	0.1	(18.1)	(27.5)
Ending inventory quantity.....	395,076	514,986	629,459	601,516	394,889	59.3	30.4	22.2	(34.4)

Table continued on next page.

Table C-1

Hot-rolled steel: Summary data concerning the U.S. merchant market, 2013-15, January to March 2015, and January to March 2016

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to March			Calendar year		Jan-Mar	
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
Average capacity quantity.....	80,446,610	80,452,921	80,466,076	20,126,372	19,652,301	0.0	0.0	0.0	(2.4)
Production quantity.....	61,752,475	62,434,819	54,731,937	13,134,389	14,586,269	(11.4)	1.1	(12.3)	11.1
Capacity utilization (fn1).....	76.8	77.6	68.0	65.3	74.2	(8.7)	0.8	(9.6)	9.0
U.S. commercial shipments:									
Quantity.....	25,330,519	25,720,170	21,369,492	5,208,179	5,576,148	(15.6)	1.5	(16.9)	7.1
Value.....	15,887,483	17,049,301	10,773,891	3,090,410	2,309,544	(32.2)	7.3	(36.8)	(25.3)
Unit value.....	\$627.21	\$662.88	\$504.17	\$593.38	\$414.18	(19.6)	5.7	(23.9)	(30.2)
Net sales:									
Quantity.....	25,076,666	25,222,095	21,011,442	5,084,325	5,511,009	(16.2)	0.6	(16.7)	8.4
Value.....	15,781,279	16,732,490	10,958,457	3,031,248	2,320,077	(30.6)	6.0	(34.5)	(23.5)
Unit value.....	\$629.32	\$663.41	\$521.55	\$596.19	\$420.99	(17.1)	5.4	(21.4)	(29.4)
Cost of goods sold (COGS).....	14,515,259	15,135,312	11,172,003	3,010,975	2,237,928	(23.0)	4.3	(26.2)	(25.7)
Gross profit or (loss).....	1,266,020	1,597,178	(213,546)	20,273	82,149	(116.9)	26.2	(113.4)	305.2
SG&A expenses.....	486,609	488,478	442,885	121,849	96,074	(9.0)	0.4	(9.3)	(21.2)
Operating income or (loss).....	779,411	1,108,700	(656,431)	(101,576)	(13,925)	(184.2)	42.2	(159.2)	(86.3)
Net income or (loss).....	563,560	984,037	(850,747)	(175,165)	(38,603)	(251.0)	74.6	(186.5)	(78.0)
Unit COGS.....	\$578.84	\$600.08	\$531.71	\$592.21	\$406.08	(8.1)	3.7	(11.4)	(31.4)
Unit SG&A expenses.....	\$19.40	\$19.37	\$21.08	\$23.97	\$17.43	8.6	(0.2)	8.8	(27.3)
Unit operating income or (loss).....	\$31.08	\$43.96	(\$31.24)	(\$19.98)	(\$2.53)	(200.5)	41.4	(171.1)	(87.4)
Unit net income or (loss).....	\$22.47	\$39.01	(\$40.49)	(\$34.45)	(\$7.00)	(280.2)	73.6	(203.8)	(79.7)
COGS/sales (fn1).....	92.0	90.5	101.9	99.3	96.5	10.0	(1.5)	11.5	(2.9)
Operating income or (loss)/sales (fn1).....	4.9	6.6	(6.0)	(3.4)	(0.6)	(10.9)	1.7	(12.6)	2.8
Net income or (loss)/sales (fn1).....	3.6	5.9	(7.8)	(5.8)	(1.7)	(11.3)	2.3	(13.6)	4.1

fn1.--Reported data are in percent and period changes are in percentage points.

Source: Compiled from data submitted in response to Commission questionnaires and official import statistics.

Table C-2

Hot-rolled steel: Summary data concerning the U.S. market, 2013-15, January to March 2015, and January to March 2016

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2013	Calendar year 2014	2015	January to March 2015	January to March 2016	2013-15	Calendar year 2013-14	2014-15	Jan-Mar 2015-16
U.S. consumption quantity:									
Amount.....	64,568,598	67,841,174	60,047,172	14,938,637	15,505,322	(7.0)	5.1	(11.5)	3.8
Producers' share (fn1).....	93.9	90.4	90.3	88.1	92.7	(3.6)	(3.5)	(0.1)	4.6
Importers' share (fn1):									
Australia.....	***	***	***	***	***	***	***	***	***
Brazil.....	***	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Netherlands.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
United Kingdom.....	***	***	***	***	***	***	***	***	***
Subject sources.....	2.7	4.7	6.0	8.0	3.7	3.3	2.0	1.3	(4.3)
Canada.....	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	3.4	4.9	3.7	3.9	3.6	0.3	1.5	(1.2)	(0.3)
Total imports.....	6.1	9.6	9.7	11.9	7.3	3.6	3.5	0.1	(4.6)
U.S. consumption value:									
Amount.....	40,173,549	44,245,776	30,461,111	8,843,201	6,561,442	(24.2)	10.1	(31.2)	(25.8)
Producers' share (fn1).....	93.8	90.7	90.1	88.0	92.5	(3.7)	(3.1)	(0.6)	4.6
Importers' share (fn1):									
Australia.....	***	***	***	***	***	***	***	***	***
Brazil.....	***	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Netherlands.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
United Kingdom.....	***	***	***	***	***	***	***	***	***
Subject sources.....	2.6	4.4	5.8	7.7	3.5	3.2	1.7	1.5	(4.2)
Canada.....	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	3.6	5.0	4.1	4.3	4.0	0.5	1.4	(0.9)	(0.3)
Total imports.....	6.2	9.3	9.9	12.0	7.5	3.7	3.1	0.6	(4.6)
U.S. imports from:									
Australia:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Brazil:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Japan:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Netherlands:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
United Kingdom:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	1,747,157	3,178,238	3,587,950	1,187,698	570,906	105.4	81.9	12.9	(51.9)
Value.....	1,061,662	1,930,681	1,779,259	681,289	227,154	67.6	81.9	(7.8)	(66.7)
Unit value.....	608	607	496	574	398	(18.4)	(0.0)	(18.4)	(30.6)
Ending inventory quantity.....	172,154	335,959	576,444	452,082	364,839	234.8	95.2	71.6	(19.3)
Canada:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject:									
Quantity.....	2,203,485	3,336,994	2,228,196	589,767	560,163	1.1	51.4	(33.2)	(5.0)
Value.....	1,437,184	2,193,772	1,234,892	383,028	263,678	(14.1)	52.6	(43.7)	(31.2)
Unit value.....	652	657	554	649	471	(15.0)	0.8	(15.7)	(27.5)
Ending inventory quantity.....	222,922	179,027	53,015	149,434	30,050	(76.2)	(19.7)	(70.4)	(79.9)
Total imports:									
Quantity.....	3,950,642	6,515,232	5,816,146	1,777,466	1,131,068	47.2	64.9	(10.7)	(36.4)
Value.....	2,498,846	4,124,454	3,014,150	1,064,317	490,832	20.6	65.1	(26.9)	(53.9)
Unit value.....	633	633	518	599	434	(18.1)	0.1	(18.1)	(27.5)
Ending inventory quantity.....	395,076	514,986	629,459	601,516	394,889	59.3	30.4	22.2	(34.4)

Table continued on next page.

Table C-2

Hot-rolled steel: Summary data concerning the U.S. market, 2013-15, January to March 2015, and January to March 2016

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to March			2013-15	Calendar year		Jan-Mar 2015-16
	2013	2014	2015	2015	2016		2013-14	2014-15	
Average capacity quantity.....	80,446,610	80,452,921	80,466,076	20,126,372	19,652,301	0.0	0.0	0.0	(2.4)
Production quantity.....	61,752,475	62,434,819	54,731,937	13,134,389	14,586,269	(11.4)	1.1	(12.3)	11.1
Capacity utilization (fn1).....	76.8	77.6	68.0	65.3	74.2	(8.7)	0.8	(9.6)	9.0
U.S. shipments:									
Quantity.....	60,617,956	61,325,942	54,231,026	13,161,171	14,374,254	(10.5)	1.2	(11.6)	9.2
Value.....	37,674,703	40,121,322	27,446,961	7,778,884	6,070,610	(27.1)	6.5	(31.6)	(22.0)
Unit value.....	\$621.51	\$654.23	\$506.11	\$591.05	\$422.33	(18.6)	5.3	(22.6)	(28.5)
Export shipments:									
Quantity.....	1,101,258	975,674	718,169	144,322	215,013	(34.8)	(11.4)	(26.4)	49.0
Value.....	722,701	694,426	430,057	95,846	118,745	(40.5)	(3.9)	(38.1)	23.9
Unit value.....	\$656.25	\$711.74	\$598.82	\$664.11	\$552.27	(8.8)	8.5	(15.9)	(16.8)
Ending inventory quantity.....	1,681,909	1,805,537	1,588,277	1,634,432	1,585,280	(5.6)	7.4	(12.0)	(3.0)
Inventories/total shipments (fn1).....	2.7	2.9	2.9	3.1	2.7	0.2	0.2	(0.0)	(11.5)
Production workers.....	17,937	18,456	18,408	18,466	15,960	2.6	2.9	(0.3)	(13.6)
Hours worked (1,000s).....	41,576	42,878	41,372	10,973	9,191	(0.5)	3.1	(3.5)	(16.2)
Wages paid (\$1,000).....	1,538,353	1,644,360	1,606,038	415,769	366,910	4.4	6.9	(2.3)	(11.8)
Hourly wages (dollars).....	\$37.00	\$38.35	\$38.82	\$37.89	\$39.92	4.9	3.6	1.2	5.4
Productivity (short tons per hour).....	1.5	1.5	1.3	1.2	1.6	(10.9)	(2.0)	(9.1)	32.6
Unit labor costs.....	\$24.91	\$26.34	\$29.34	\$31.65	\$25.15	17.8	5.7	11.4	(20.5)
Net sales:									
Quantity.....	59,613,123	59,980,251	52,999,285	12,858,792	14,046,433	(11.1)	0.6	(11.6)	9.2
Value.....	37,170,941	39,323,031	27,261,339	7,628,874	5,994,066	(26.7)	5.8	(30.7)	(21.4)
Unit value.....	\$623.54	\$655.60	\$514.37	\$593.28	\$426.73	(17.5)	5.1	(21.5)	(28.1)
Cost of goods sold (COGS).....	34,397,194	35,783,278	28,052,084	7,628,061	5,843,158	(18.4)	4.0	(21.6)	(23.4)
Gross profit or (loss).....	2,773,747	3,539,753	(790,745)	813	150,908	(128.5)	27.6	(122.3)	18,461.9
SG&A expenses.....	1,080,368	1,274,161	1,128,437	313,034	255,893	4.4	17.9	(11.4)	(18.3)
Operating income or (loss).....	1,693,379	2,265,592	(1,919,182)	(312,221)	(104,985)	(213.3)	33.8	(184.7)	(66.4)
Net income or (loss).....	1,291,112	2,004,428	(2,497,037)	(558,152)	(159,787)	(293.4)	55.2	(224.6)	(71.4)
Capital expenditures.....	706,238	677,365	560,286	137,661	125,886	(20.7)	(4.1)	(17.3)	(8.6)
Unit COGS.....	\$577.01	\$596.58	\$529.29	\$593.22	\$415.99	(8.3)	3.4	(11.3)	(29.9)
Unit SG&A expenses.....	\$18.12	\$21.24	\$21.29	\$24.34	\$18.22	17.5	17.2	0.2	(25.2)
Unit operating income or (loss).....	\$28.41	\$37.77	(\$36.21)	(\$24.28)	(\$7.47)	(227.5)	33.0	(195.9)	(69.2)
Unit net income or (loss).....	\$21.66	\$33.42	(\$47.11)	(\$43.41)	(\$11.38)	(317.5)	54.3	(241.0)	(73.8)
COGS/sales (fn1).....	92.5	91.0	102.9	100.0	97.5	10.4	(1.5)	11.9	(2.5)
Operating income or (loss)/sales (fn1).....	4.6	5.8	(7.0)	(4.1)	(1.8)	(11.6)	1.2	(12.8)	2.3
Net income or (loss)/sales (fn1).....	3.5	5.1	(9.2)	(7.3)	(2.7)	(12.6)	1.6	(14.3)	4.7

fn1.--Reported data are in percent and period changes are in percentage points.

Source: Compiled from data submitted in response to Commission questionnaires and official import statistics.

Table C-1
Hot-rolled steel: Summary data concerning the total U.S. market, 2005-10

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)

Item	Reported data						Period changes					
	2005	2006	2007	2008	2009	2010	2005-10	2005-06	2006-07	2007-08	2008-09	2009-10
U.S. consumption quantity:												
Amount	65,860,369	71,625,604	63,674,080	59,636,710	40,402,675	56,090,768	-14.8	8.8	-11.1	-6.3	-32.3	38.8
Producers' share (1)	94.1	91.0	94.7	93.9	94.4	94.5	0.4	-3.1	3.7	-0.8	0.4	0.1
Importers' share (1):												
Brazil	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-0.0	-0.0	0.0	0.0
Japan	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Russia	0.5	1.1	0.2	0.1	0.0	0.2	-0.2	0.6	-0.9	-0.1	-0.1	0.2
Subtotal	0.5	1.1	0.2	0.2	0.0	0.3	-0.2	0.7	-0.9	-0.1	-0.1	0.2
All other sources	5.4	7.9	5.0	5.9	5.6	5.3	-0.1	2.5	-2.9	0.9	-0.3	-0.3
Total imports	5.9	9.0	5.3	6.1	5.6	5.5	-0.4	3.1	-3.7	0.8	-0.4	-0.1
U.S. consumption value:												
Amount	34,776,996	39,556,451	34,770,938	45,600,856	21,174,462	33,801,040	-2.8	13.7	-12.1	31.1	-53.6	59.6
Producers' share (1)	93.9	91.5	94.7	93.7	94.3	94.3	0.4	-2.4	3.2	-1.1	0.6	0.1
Importers' share (1):												
Brazil	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-0.0	-0.0	0.0	0.0
Japan	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	-0.0
Russia	0.5	1.0	0.2	0.2	0.0	0.2	-0.3	0.6	-0.8	-0.0	-0.2	0.2
Subtotal	0.5	1.1	0.2	0.2	0.1	0.3	-0.2	0.6	-0.8	-0.0	-0.1	0.2
All other sources	5.6	7.4	5.0	6.1	5.7	5.4	-0.2	1.8	-2.4	1.1	-0.5	-0.3
Total imports	6.1	8.5	5.3	6.3	5.7	5.7	-0.4	2.4	-3.2	1.1	-0.6	-0.1
U.S. imports from:												
Brazil:												
Quantity	0	2,237	50	46	148	512	(2)	(2)	-97.7	-8.7	221.9	245.9
Value	0	1,856	37	48	128	402	(2)	(2)	-98.0	30.4	165.3	214.5
Unit value	----	\$830	\$733	\$1,047	\$863	\$785	(2)	(2)	-11.7	42.8	-17.6	-9.1
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
Japan:												
Quantity	5,009	11,795	15,504	15,577	9,053	15,033	200.1	135.5	31.4	0.5	-41.9	66.1
Value	3,911	8,549	10,263	13,666	10,897	14,636	274.2	118.6	20.1	33.2	-20.3	34.3
Unit value	\$781	\$725	\$662	\$877	\$1,204	\$974	24.7	-7.2	-8.7	32.5	37.2	-19.1
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
Russia:												
Quantity	299,275	789,288	136,293	76,425	1,708	125,079	-58.2	163.7	-82.7	-43.9	-97.8	7,222.1
Value	169,124	411,375	69,061	72,989	1,751	69,708	-58.8	143.2	-83.2	5.7	-97.6	3,880.3
Unit value	\$565	\$521	\$507	\$955	\$1,025	\$557	-1.4	-7.8	-2.8	88.5	7.3	-45.6
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal:												
Quantity	304,284	803,320	151,847	92,048	10,909	140,624	-53.8	164.0	-81.1	-39.4	-88.1	1,189.0
Value	173,035	421,780	79,361	86,703	12,776	84,745	-51.0	143.8	-81.2	9.3	-85.3	563.3
Unit value	\$569	\$525	\$523	\$942	\$1,171	\$603	6.0	-7.7	-0.5	80.2	24.3	-48.5
Ending inventory quantity	10,381	20,596	9,595	31,423	5,317	12,870	24.0	98.4	-53.4	227.5	-83.1	142.1
All other sources:												
Quantity	3,564,545	5,639,254	3,196,799	3,532,867	2,263,178	2,955,493	-17.1	58.2	-43.3	10.5	-35.9	30.6
Value	1,948,688	2,937,894	1,752,308	2,799,480	1,203,403	1,828,647	-6.2	50.8	-40.4	59.8	-57.0	52.0
Unit value	\$547	\$521	\$548	\$792	\$532	\$619	13.2	-4.7	5.2	44.6	-32.9	16.4
Ending inventory quantity	137,535	121,753	47,962	281,431	116,272	94,568	-31.2	-11.5	-60.6	486.8	-58.7	-18.7
All sources:												
Quantity	3,868,829	6,442,574	3,348,646	3,624,915	2,274,087	3,096,118	-20.0	66.5	-48.0	8.3	-37.3	36.1
Value	2,121,722	3,359,674	1,831,669	2,886,183	1,216,179	1,913,392	-9.8	58.3	-45.5	57.6	-57.9	57.3
Unit value	\$548	\$521	\$547	\$796	\$535	\$618	12.7	-4.9	4.9	45.6	-32.8	15.6
Ending inventory quantity	147,916	142,349	57,557	312,854	121,589	107,438	-27.4	-3.8	-59.6	443.6	-61.1	-11.6
U.S. producers:												
Average capacity quantity	81,533,511	82,208,701	82,201,768	81,842,235	78,225,675	79,679,215	-2.3	0.8	-0.0	-0.4	-4.4	1.9
Production quantity	62,859,112	65,890,974	61,878,281	56,497,372	39,635,900	54,913,361	-12.6	4.8	-6.1	-8.7	-29.8	38.5
Capacity utilization (1)	77.1	80.2	75.3	69.0	50.7	68.9	-8.2	3.1	-4.9	-6.2	-18.4	18.2
U.S. shipments:												
Quantity	61,991,540	65,183,030	60,325,434	56,011,795	38,128,588	52,994,650	-14.5	5.1	-7.5	-7.2	-31.9	39.0
Value	32,655,274	36,196,777	32,939,269	42,714,673	19,958,283	31,887,648	-2.4	10.8	-9.0	29.7	-53.3	59.8
Unit value	\$527	\$555	\$546	\$763	\$523	\$602	14.2	5.4	-1.7	39.7	-31.4	15.0
Export shipments:												
Quantity	1,084,187	756,886	1,462,893	1,353,996	1,155,035	1,653,241	52.5	-30.2	93.3	-7.4	-14.7	43.1
Value	595,336	451,987	796,552	1,144,536	581,216	1,004,170	68.7	-24.1	76.2	43.7	-49.2	72.8
Unit value	\$549	\$597	\$545	\$845	\$503	\$607	10.6	8.8	-8.8	55.2	-40.5	20.7
Ending inventory quantity	1,809,058	1,759,945	1,849,851	1,000,610	1,352,124	1,617,837	-10.6	-2.7	5.1	-45.9	35.1	19.7
Inventories/total shipments (1)	2.9	2.7	3.0	1.7	3.4	3.0	0.1	-0.2	0.3	-1.2	1.7	-0.5
Production workers	23,757	22,968	23,384	24,599	20,187	21,682	-8.7	-3.3	1.8	5.2	-17.9	7.4
Hours worked (1,000s)	55,396	52,337	51,768	51,573	38,130	47,358	-14.5	-5.5	-1.1	-0.4	-26.1	24.2
Wages paid (\$1,000s)	1,580,898	1,627,286	1,688,018	1,743,741	1,209,585	1,540,481	-2.6	2.9	3.7	3.3	-30.6	27.4
Hourly wages	\$28.54	\$31.09	\$32.61	\$33.81	\$31.72	\$32.53	14.0	8.9	4.9	3.7	-6.2	2.5
Productivity (tons/1,000 hours)	1,134.7	1,259.0	1,195.3	1,095.5	1,039.5	1,159.5	2.2	10.9	-5.1	-8.3	-5.1	11.5
Unit labor costs	\$25.15	\$24.70	\$27.28	\$30.86	\$30.52	\$28.05	11.5	-1.8	10.5	13.1	-1.1	-8.1
Net sales:												
Quantity	61,217,248	64,467,613	60,308,179	56,681,495	38,665,824	53,701,466	-12.3	5.3	-6.5	-6.0	-31.8	38.9
Value	32,838,165	36,284,259	33,163,647	43,492,778	20,467,750	32,440,446	-1.2	10.5	-8.6	31.1	-52.9	58.5
Unit value	\$536	\$563	\$550	\$767	\$529	\$604	12.6	4.9	-2.3	39.5	-31.0	14.1
Cost of goods sold (COGS)	26,727,626	28,836,551	29,328,706	36,666,888	22,222,065	30,772,148	15.1	7.9	1.7	25.0	-39.4	38.5
Gross profit or (loss)	6,110,539	7,447,708	3,834,941	6,825,890	(1,754,315)	1,668,298	-72.7	21.9	-48.5	78.0	(3)	(3)
SG&A expenses	880,886	887,239	775,461	785,364	567,477	909,717	3.3	0.7	-12.6	1.3	(27)	60.3
Operating income or (loss)	5,229,653	6,560,469	3,059,480	6,040,526	(2,321,792)	758,581	-85.5	25.4	-53.4	97.4	(3)	(3)
Capital expenditures	***	***	***	***	***	***	***	***	***	***	***	***
Unit COGS	\$437	\$447	\$486	\$647	\$575	\$573	31.2	2.5	8.7	33.0	-11.2	-0.3
Unit SG&A expenses	\$14	\$14	\$13	\$14	\$15	\$17	17.7	-4.4	-6.6	7.8	5.9	15.4
Unit operating income or (loss)	\$85	\$102	\$51	\$107	(\$60)	\$14	-83.5	19.1	-50.1	110.1	(3)	(3)
COGS/sales (1)	81.4	79.5	88.4	84.3	108.6	94.9	13.5	-1.9	9.0	-4.1	24.3	-13.7
Operating income or (loss)/sales (1)	15.9	18.1	9.2	13.9	(11.3)	2.3	-13.6	2.2	-8.9	4.7	-25.2	13.7

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Not applicable.
(3) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

Table C-1
Hot-rolled steel: Summary data concerning the total U.S. market, 1999-2004

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)

Item	Reported data						Period changes					
	1999	2000	2001	2002	2003	2004	1999-2004	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004
U.S. consumption quantity:												
Amount	73,064,292	74,000,452	63,309,100	67,319,017	66,794,467	73,173,003	0.1	1.3	-14.4	6.3	-0.8	9.5
Producers' share (1)	91.5	90.2	95.3	93.0	95.9	92.9	1.4	-1.3	5.0	-2.3	2.9	-3.0
Importers' share (1):												
Brazil	0.1	0.2	0.0	0.0	0.0	0.0	-0.1	0.1	-0.2	-0.0	-0.0	0.0
Japan	0.1	0.0	0.0	0.0	0.0	0.0	-0.1	-0.1	-0.0	-0.0	0.0	0.0
Russia	0.0	0.2	0.0	0.2	0.0	1.2	1.2	0.2	-0.2	0.2	-0.2	1.2
Subtotal	0.2	0.5	0.0	0.2	0.1	1.3	1.1	0.3	-0.5	0.2	-0.2	1.2
All other sources	8.4	9.3	4.7	6.8	4.1	5.8	-2.5	0.9	-4.6	2.0	-2.7	1.8
Total imports	8.5	9.8	4.7	7.0	4.1	7.1	-1.4	1.3	-5.0	2.3	-2.9	3.0
U.S. consumption value:												
Amount	20,909,279	22,313,862	16,598,543	20,979,612	20,174,538	38,586,924	84.5	6.7	-25.6	26.4	-3.8	91.3
Producers' share (1)	92.0	90.2	95.0	93.0	95.4	93.1	1.0	-1.8	4.8	-2.0	2.4	-2.3
Importers' share (1):												
Brazil	0.1	0.2	0.0	0.0	0.0	0.0	-0.1	0.2	-0.2	-0.0	-0.0	0.0
Japan	0.1	0.0	0.0	0.0	0.1	0.0	-0.1	-0.1	-0.0	-0.0	0.0	-0.0
Russia	0.0	0.2	0.0	0.2	0.1	1.2	1.2	0.2	-0.2	0.2	-0.2	1.2
Subtotal	0.2	0.5	0.1	0.3	0.1	1.3	1.1	0.3	-0.5	0.2	-0.2	1.2
All other sources	7.8	9.3	4.9	6.7	4.5	5.6	-2.1	1.5	-4.4	1.8	-2.2	1.2
Total imports	8.0	9.8	5.0	7.0	4.6	6.9	-1.0	1.8	-4.8	2.0	-2.4	2.3
U.S. imports from:												
Brazil:												
Quantity	49,809	158,565	2,587	383	53	2,978	-94.0	218.3	-98.4	-85.2	-86.1	5,509.6
Value	11,442	51,679	972	268	32	1,393	-87.8	351.7	-98.1	-72.5	-88.1	4,287.2
Unit value	\$230	\$326	\$376	\$700	\$598	\$468	103.6	41.9	15.3	86.1	-14.5	-21.8
Ending inventory quantity	***	***	***	0	0	0	***	***	***	***	(2)	(2)
Japan:												
Quantity	61,798	17,109	6,872	6,372	10,838	16,086	-74.0	-72.3	-59.8	-7.3	70.1	48.4
Value	22,958	10,566	6,136	7,244	13,385	16,451	-28.3	-54.0	-41.9	18.1	84.8	22.9
Unit value	\$371	\$618	\$893	\$1,137	\$1,235	\$1,023	175.3	66.2	44.6	27.3	8.6	-17.2
Ending inventory quantity	***	***	***	0	0	0	***	***	***	***	(2)	(2)
Russia:												
Quantity	14,612	183,236	5,845	160,712	32,485	904,101	6,087.3	1,154.0	-96.8	2,649.6	-79.8	2,683.1
Value	3,096	54,130	1,670	52,268	10,951	477,902	15,336.0	1,648.4	-96.9	3,029.6	-79.0	4,263.9
Unit value	\$212	\$295	\$286	\$325	\$337	\$529	149.5	39.4	-3.3	13.8	3.7	56.8
Ending inventory quantity	***	***	***	31,826	3,939	10,084	***	***	***	***	-87.6	156.0
Subtotal:												
Quantity	126,219	358,910	15,303	167,466	43,376	923,164	631.4	184.4	-95.7	994.3	-74.1	2,028.3
Value	37,496	116,376	8,779	59,779	24,368	495,746	1,222.1	210.4	-92.5	581.0	-59.2	1,934.4
Unit value	\$297	\$324	\$574	\$357	\$562	\$537	80.8	9.1	76.9	-37.8	57.4	-4.4
Ending inventory quantity	400	4,825	167	31,826	3,939	10,084	2,421.0	1,106.3	-96.5	18,957.5	-87.6	156.0
All other sources:												
Quantity	6,107,058	6,884,190	2,988,797	4,555,184	2,707,705	4,270,579	-30.1	12.7	-56.6	52.4	-40.6	57.7
Value	1,628,159	2,072,340	818,356	1,411,112	903,410	2,178,142	33.8	27.3	-60.5	72.4	-36.0	141.1
Unit value	\$267	\$301	\$274	\$310	\$334	\$510	91.3	13.9	-9.0	13.1	7.7	52.9
Ending inventory quantity	39,844	54,001	12,616	75,027	268	15,983	-59.9	35.5	-76.6	494.7	-99.6	5,683.8
All sources:												
Quantity	6,233,277	7,243,100	3,004,100	4,722,650	2,751,082	5,193,743	-16.7	16.2	-58.5	57.2	-41.7	88.8
Value	1,665,654	2,188,717	827,134	1,470,891	927,778	2,673,888	60.5	31.4	-62.2	77.8	-36.9	188.2
Unit value	\$267	\$302	\$275	\$311	\$337	\$515	92.7	13.1	-8.9	13.1	8.3	52.7
Ending inventory quantity	40,244	58,826	12,783	106,853	4,207	26,067	-35.2	48.2	-78.3	735.9	-96.1	519.6
U.S. producers:												
Average capacity quantity	79,753,478	78,628,005	75,720,188	71,225,171	78,490,049	79,113,331	-0.8	-1.4	-3.7	-5.9	10.2	0.8
Production quantity	67,105,961	67,386,943	60,766,642	63,349,150	65,192,980	68,229,669	1.7	0.4	-9.8	4.2	2.9	4.7
Capacity utilization (1)	84.1	85.7	80.3	88.9	83.1	86.2	2.1	1.6	-5.5	8.7	-5.9	3.2
U.S. shipments:												
Quantity	66,831,015	66,757,352	60,305,000	62,596,367	64,043,385	67,979,260	1.7	-0.1	-9.7	3.8	2.3	6.1
Value	19,243,625	20,125,145	15,771,409	19,508,721	19,246,760	35,913,036	86.6	4.6	-21.6	23.7	-1.3	86.6
Unit value	\$288	\$301	\$262	\$312	\$301	\$528	83.5	4.7	-13.2	19.2	-3.6	75.8
Export shipments:												
Quantity	381,123	629,677	439,741	491,594	1,486,803	685,931	80.0	65.2	-30.2	11.8	202.4	-53.9
Value	127,527	210,190	132,840	166,699	433,813	374,873	194.0	64.8	-36.8	25.5	160.1	-13.5
Unit value	\$335	\$334	\$302	\$339	\$292	\$547	63.3	-0.2	-9.5	12.3	-14.0	87.4
Ending inventory quantity	2,171,160	2,200,050	2,377,183	1,857,701	1,668,456	1,846,384	-15.0	1.3	8.1	-21.9	-10.2	10.7
Inventories/total shipments (1)	3.2	3.3	3.9	2.9	2.5	2.7	-0.5	0.0	0.6	-1.0	-0.4	0.1
Production workers	30,598	30,052	25,403	22,837	22,863	21,480	-29.8	-1.8	-15.5	-10.1	0.1	-6.0
Hours worked (1,000s)	70,140	68,518	53,641	49,046	48,875	48,143	-31.4	-2.3	-21.7	-8.6	-0.3	-1.5
Wages paid (\$1,000s)	1,719,492	1,718,745	1,347,716	1,271,385	1,420,795	1,456,957	-15.3	-0.0	-21.6	-5.7	11.8	2.5
Hourly wages	\$24.52	\$25.08	\$25.12	\$25.92	\$29.07	\$30.26	23.4	2.3	0.2	3.2	12.1	4.1
Productivity (tons/1,000 hours)	\$30.7	\$54.8	\$102.8	\$124.9	\$129.1	\$137.8	48.1	2.6	15.5	13.3	3.8	6.3
Unit labor costs	\$26.34	\$26.27	\$22.78	\$20.74	\$22.41	\$21.96	-16.6	-0.3	-13.3	-9.0	8.0	-2.0
Net sales:												
Quantity	65,011,396	65,064,855	59,137,139	61,457,255	63,767,589	66,638,302	2.5	0.1	-9.1	3.9	3.8	4.5
Value	18,686,036	19,615,006	15,497,237	19,072,702	19,102,195	34,823,477	86.4	5.0	-21.0	23.1	0.2	82.3
Unit value	\$287	\$301	\$262	\$310	\$300	\$523	81.8	4.9	-13.1	18.4	-3.5	74.4
Cost of goods sold (COGS)	18,874,219	19,370,550	17,727,263	17,936,959	19,352,199	25,428,123	34.7	2.6	-8.5	1.2	7.9	31.4
Gross profit or (loss)	(188,183)	244,456	(2,230,026)	1,135,743	(250,004)	9,395,354	(3)	(3)	(3)	(3)	(3)	(3)
SG&A expenses	1,051,745	1,065,627	1,443,380	1,492,586	1,453,050	1,886,866	79.4	1.3	35.4	3.4	-2.6	29.9
Operating income or (loss)	(1,239,928)	(821,171)	(3,673,406)	(356,843)	(1,703,054)	7,508,488	(3)	33.8	-347.3	90.3	-377.3	(3)
Capital expenditures	486,548	771,588	434,026	254,276	263,449	517,851	6.4	58.6	-43.7	-41.4	3.6	96.6
Unit COGS	\$290	\$298	\$300	\$292	\$303	\$382	31.4	2.5	0.7	-2.6	4.0	25.7
Unit SG&A expenses	\$16	\$16	\$24	\$24	\$23	\$28	75.0	1.2	49.0	-0.5	-6.2	24.3
Unit operating income or (loss)	(\$19)	(\$13)	(\$62)	(\$6)	(\$27)	\$113	(3)	33.8	-392.2	90.7	-360.0	(3)
COGS/sales (1)	101.0	98.8	114.4	94.0	101.3	73.0	-28.0	-2.3	15.6	-20.3	7.3	-28.3
Operating income or (loss)/sales (1)	(6.6)	(4.2)	(23.7)	(1.9)	(8.9)	21.6	28.2	2.4	-19.5	21.8	-7.0	30.5

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Not applicable.
(3) Undefined.

Note.—Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

Table C-1
 Certain hot-rolled steel products: Summary data concerning the U.S. market, 1996-98

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton;
 period changes=percent, except where noted)

Item	Reported data			Period changes		
	1996	1997	1998	1996-98	1996-97	1997-98
U.S. consumption quantity:						
Amount	68,498,545	70,981,304	75,251,116	9.9	3.6	6.0
Producers' share (1)	92.3	90.8	84.8	-7.5	-1.5	-6.0
Importers' share (1):						
Brazil	0.4	0.6	0.6	0.2	0.2	-0.0
Japan	0.4	0.8	3.6	3.2	0.4	2.8
Russia	1.2	2.8	5.1	3.9	1.6	2.3
Subtotal	2.0	4.2	9.3	7.3	2.3	5.0
Other sources	5.7	5.0	5.9	0.2	-0.7	0.9
Total imports	7.7	9.2	15.2	7.5	1.5	6.0
U.S. consumption value:						
Amount	21,309,772	22,045,266	22,245,254	4.4	3.5	0.9
Producers' share (1)	91.8	90.3	85.3	-6.5	-1.5	-5.0
Importers' share (1):						
Brazil	0.4	0.6	0.6	0.2	0.2	-0.0
Japan	0.5	0.9	3.6	3.1	0.5	2.7
Russia	1.0	2.6	4.2	3.1	1.5	1.6
Subtotal	1.9	4.1	8.4	6.4	2.2	4.2
Other sources	6.3	5.5	6.3	0.0	-0.8	0.8
Total imports	8.2	9.7	14.7	6.5	1.5	5.0
U.S. imports from:						
Brazil:						
Quantity	254,166	436,685	451,462	77.6	71.8	3.4
Value	83,585	140,581	133,442	59.6	68.2	-5.1
Unit value	\$328.86	\$321.93	\$295.58	-10.1	-2.1	-8.2
Ending inventory quantity	24,870	20,063	24,017	-3.4	-19.3	19.7
Japan:						
Quantity	240,976	548,822	2,684,756	1,014.1	127.8	389.2
Value	103,780	208,400	801,295	672.1	100.8	284.5
Unit value	\$430.66	\$379.72	\$298.46	-30.7	-11.8	-21.4
Ending inventory quantity	5,635	15,695	158,638	2,715.2	178.5	910.8
Russia:						
Quantity	847,764	2,016,018	3,843,641	353.4	137.8	90.7
Value	222,710	564,866	923,303	314.6	153.6	63.5
Unit value	\$262.70	\$280.19	\$240.22	-8.6	6.7	-14.3
Ending inventory quantity	71,620	106,812	309,062	331.5	49.1	189.4
Subtotal:						
Quantity	1,342,905	3,001,525	6,979,859	419.8	123.5	132.5
Value	410,075	913,847	1,858,040	353.1	122.8	103.3
Unit value	\$305.36	\$304.46	\$266.20	-12.8	-0.3	-12.6
Ending inventory quantity	102,125	142,570	491,717	381.5	39.6	244.9
Other sources:						
Quantity	3,905,460	3,519,507	4,428,038	13.4	-9.9	25.8
Value	1,342,387	1,223,035	1,411,701	5.2	-8.9	15.4
Unit value	\$343.72	\$347.50	\$318.81	-7.2	1.1	-8.3
Ending inventory quantity	39,327	35,534	106,143	169.9	-9.6	198.7
All sources:						
Quantity	5,248,366	6,521,032	11,407,896	117.4	24.2	74.9
Value	1,752,462	2,136,882	3,269,741	86.6	21.9	53.0
Unit value	\$333.91	\$327.69	\$286.62	-14.2	-1.9	-12.5
Ending inventory quantity	141,452	178,104	597,860	322.7	25.9	235.7

Table continued on next page.

Table C-1--Continued

Certain hot-rolled steel products: Summary data concerning the U.S. market, 1996-98

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)

Item	Reported data			Period changes		
	1996	1997	1998	1996-98	1996-97	1997-98
U.S. producers':						
Average capacity quantity	67,334,504	70,028,075	73,544,818	9.2	4.0	5.0
Production quantity	63,646,185	64,851,934	64,373,004	1.1	1.9	-0.7
Capacity utilization (1)	94.5	92.6	87.5	-7.0	-1.9	-5.1
U.S. shipments:						
Quantity	63,250,179	64,460,272	63,843,220	0.9	1.9	-1.0
Value	19,557,310	19,908,384	18,975,513	-3.0	1.8	-4.7
Unit value	\$309.21	\$308.85	\$297.22	-3.9	-0.1	-3.8
Export shipments:						
Quantity	321,628	295,757	169,935	-47.2	-8.0	-42.5
Value	98,392	100,419	56,663	-42.4	2.1	-43.6
Unit value	\$305.92	\$339.53	\$333.44	9.0	11.0	-1.8
Ending inventory quantity	2,571,136	2,604,164	2,771,350	7.8	1.3	6.4
Inventories/total shipments (1)	4.0	4.0	4.3	0.3	-0.0	0.3
Production workers	33,965	33,518	32,885	-3.2	-1.3	-1.9
Hours worked (1,000s)	73,597	71,634	68,574	-6.8	-2.7	-4.3
Wages paid (\$1,000s)	1,695,944	1,728,447	1,677,417	-1.1	1.9	-3.0
Hourly wages	\$23.04	\$24.13	\$24.46	6.2	4.7	1.4
Productivity (tons per 1,000 hours)	864.8	905.3	938.7	8.6	4.7	3.7
Unit labor costs	\$26.65	\$26.65	\$26.06	-2.2	0.0	-2.2
Net sales:						
Quantity	63,417,605	64,363,248	63,717,428	0.5	1.5	-1.0
Value	21,790,830	22,619,412	21,341,169	-2.1	3.8	-5.7
Unit value	\$343.61	\$351.43	\$334.93	-2.5	2.3	-4.7
Cost of goods sold (COGS)	20,416,429	20,361,604	19,794,103	-3.0	-0.3	-2.8
Gross profit or (loss)	1,374,401	2,257,808	1,547,066	12.6	64.3	-31.5
SG&A expenses	943,570	1,007,956	986,607	4.6	6.8	-2.1
Operating income or (loss)	430,831	1,249,852	560,459	30.1	190.1	-55.2
Capital expenditures	1,667,891	907,505	714,806	-57.1	-45.6	-21.2
Unit COGS	\$321.94	\$316.35	\$310.65	-3.5	-1.7	-1.8
Unit SG&A expenses	\$14.88	\$15.66	\$15.48	4.1	5.3	-1.1
Unit operating income or (loss)	\$6.79	\$19.42	\$8.80	29.5	185.8	-54.7
COGS/sales (1)	93.7	90.0	92.8	-0.9	-3.7	2.7
Operating income or (loss)/ sales (1)	2.0	5.5	2.6	0.6	3.5	-2.9

(1) "Reported data" are in percent and "period changes" are in percentage points.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis.

Note.--U.S. shipment values and unit values are calculated based on shipment values reported by U.S. producers. However, net sales values and unit values reflect adjustments after revaluing company transfers at market value for those firms which reported distinctly different unit prices for trade sales and company transfers. The following tabulation presents staff's estimates of U.S. shipment values and unit values based on similar adjustments.

U.S. consumption value	23,462,428	24,753,911	24,658,499	5.1	5.5	-0.4
U.S. producers' share of U.S.						
consumption value (percent)	92.5	91.4	86.7	-5.8	-1.2	-4.6
Value of U.S. producers' shipments	21,709,966	22,617,029	21,388,758	-1.5	4.2	-5.4
Unit value of U.S. producers' shipments	\$343.24	\$350.87	\$335.02	-2.4	2.2	-4.5

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

APPENDIX D

EFFECTS OF ORDERS AND LIKELY EFFECTS OF REVOCATION

Table D-1

Hot-rolled steel: Firms' narratives on the impact of the order(s) and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
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Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Foreign producers	*** <i>Continued on next page.</i>

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Foreign producers	<i>Continued from previous page</i> ***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

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

APPENDIX E

DATA ACCOMPANYING FIGURES IN PARTS II AND V

Table E-1**Light weight vehicle sales: autos and light trucks, monthly, seasonally adjusted at annual rates**

Light weight vehicle sales in millions of units

Date	Light weight vehicle sales
January 2016	17.6
February 2016	17.6
March 2016	16.8
April 2016	17.2
May 2016	17.3
June 2016	17.3
July 2016	17.7
August 2016	17.5
September 2016	17.6
October 2016	17.6
November 2016	17.4
December 2016	17.9
January 2017	17.3
February 2017	17.4
March 2017	16.6
April 2017	16.8
May 2017	16.8
June 2017	16.8
July 2017	16.8
August 2017	16.6
September 2017	17.9
October 2017	17.9
November 2017	17.5
December 2017	17.3
January 2018	17.1
February 2018	17.2
March 2018	17.1
April 2018	17.2
May 2018	17.2
June 2018	17.2
July 2018	17.0
August 2018	16.9
September 2018	17.3
October 2018	17.6
November 2018	17.4
December 2018	17.5
January 2019	16.7
February 2019	16.7
March 2019	17.1
April 2019	16.4
May 2019	17.3
June 2019	17.3
July 2019	17.0
August 2019	17.1
September 2019	17.2
October 2019	16.7
November 2019	17.1

Table continued.

Table E-1 Continued**Light weight vehicle sales: autos and light trucks, monthly, seasonally adjusted at annual rates**

Light weight vehicle sales in millions of units

Date	Light weight vehicle sales
December 2019	16.9
January 2020	16.9
February 2020	16.9
March 2020	11.2
April 2020	8.6
May 2020	12.1
June 2020	13.1
July 2020	14.7
August 2020	15.2
September 2020	16.3
October 2020	16.4
November 2020	15.9
December 2020	16.3
January 2021	16.8
February 2021	15.9
March 2021	17.6
April 2021	18.3
May 2021	16.9
June 2021	15.5
July 2021	14.7
August 2021	13.1
September 2021	12.3
October 2021	13.0
November 2021	13.0
December 2021	12.5
January 2022	15.0
February 2022	14.0
March 2022	13.4
April 2022	14.5
May 2022	12.8
June 2022	13.0
July 2022	13.3
August 2022	13.2

Source: U.S. Bureau of Economic Analysis, Light Weight Vehicle Sales: Autos and Light Trucks (ALTSALES), retrieved from FRED, Federal Reserve Bank of St. Louis, available at <https://fred.stlouisfed.org/series/ALTSALES>, retrieved October 10, 2022.

Table E-2**U.S. construction spending: Total construction spending, monthly, seasonally adjusted at annual rates**

Construction spending in billions of dollars.

Date	Construction spending
January 2016	1,171,352
February 2016	1,181,683
March 2016	1,200,627
April 2016	1,198,571
May 2016	1,203,495
June 2016	1,226,695
July 2016	1,225,886
August 2016	1,231,616
September 2016	1,240,908
October 2016	1,250,370
November 2016	1,275,898
December 2016	1,280,619
January 2017	1,253,266
February 2017	1,276,334
March 2017	1,271,940
April 2017	1,271,219
May 2017	1,285,109
June 2017	1,277,748
July 2017	1,277,071
August 2017	1,274,859
September 2017	1,281,382
October 2017	1,282,298
November 2017	1,305,629
December 2017	1,313,472
January 2018	1,335,174
February 2018	1,355,642
March 2018	1,345,261
April 2018	1,356,953
May 2018	1,364,892
June 2018	1,346,265
July 2018	1,338,377
August 2018	1,339,536
September 2018	1,325,585
October 2018	1,308,508
November 2018	1,296,961
December 2018	1,287,899
January 2019	1,294,398
February 2019	1,312,418
March 2019	1,323,764
April 2019	1,358,075
May 2019	1,367,893
June 2019	1,386,880
July 2019	1,412,995
August 2019	1,424,952
September 2019	1,434,950
October 2019	1,436,789
November 2019	1,459,790

Table continued.

Table E-2 Continued**U.S. construction spending: Total construction spending, monthly, seasonally adjusted at annual rates**

Construction spending in billions of dollars.

Date	Construction spending
December 2019	1,463,531
January 2020	1,489,988
February 2020	1,501,841
March 2020	1,508,887
April 2020	1,466,175
May 2020	1,461,910
June 2020	1,463,182
July 2020	1,474,982
August 2020	1,486,856
September 2020	1,505,074
October 2020	1,525,872
November 2020	1,542,987
December 2020	1,566,367
January 2021	1,583,380
February 2021	1,569,822
March 2021	1,600,520
April 2021	1,608,488
May 2021	1,621,942
June 2021	1,627,985
July 2021	1,637,329
August 2021	1,641,600
September 2021	1,632,860
October 2021	1,644,332
November 2021	1,665,191
December 2021	1,681,044
January 2022	1,726,585
February 2022	1,753,123
March 2022	1,768,168
April 2022	1,780,890
May 2022	1,793,778
June 2022	1,803,791
July 2022	1,793,514
August 2022	1,781,278

Source: U.S. Census Bureau, Total Construction Spending: Total Construction in the United States (TTLCONS), retrieved from FRED, Federal Reserve Bank of St. Louis, available at <https://fred.stlouisfed.org/series/TTLCONS>, retrieved September 23, 2022.

Figure E-3

Seasonally adjusted annual rate, by quarter

Value in trillions of chained 2012 dollars.

Period	Real GDP
2016 Q1	17,565
2016 Q2	17,619
2016 Q3	17,724
2016 Q4	17,813
2017 Q1	17,897
2017 Q2	17,997
2017 Q3	18,126
2017 Q4	18,297
2018 Q1	18,436
2018 Q2	18,590
2018 Q3	18,680
2018 Q4	18,721
2019 Q1	18,833
2019 Q2	18,983
2019 Q3	19,113
2019 Q4	19,202
2020 Q1	18,952
2020 Q2	17,258
2020 Q3	18,561
2020 Q4	18,768
2021 Q1	19,056
2021 Q2	19,368
2021 Q3	19,479
2021 Q4	19,728
2022 Q1	19,924
2022 Q2	19,895

Source: U.S. Bureau of Economic Analysis, Real Gross Domestic Product (GDPC1), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/GDPC1>, October 10, 2022.

Table E-4**Raw material costs: Producer price indexes of iron ore in the United States, monthly, January 2016-August 2022**

Month	2016	2017	2018	2019	2020	2021	2022
January	112.1	118.7	121.0	141.1	145.2	153.5	186.7
February	111.1	120.2	122.5	141.8	145.2	153.5	188.7
March	110.0	120.2	122.5	141.8	145.2	153.5	190.7
April	122.1	132.7	133.8	143.1	145.0	154.4	190.1
May	128.4	140.4	138.7	143.1	145.0	173.4	192.1
June	134.1	141.7	143.8	145.4	145.0	175.9	203.9
July	133.9	138.6	142.4	145.4	148.1	183.1	212.0
August	131.8	132.2	141.7	146.5	148.1	184.7	212.0
September	130.8	132.9	139.5	144.7	148.1	187.6	---
October	123.3	131.9	139.5	144.7	149.3	187.6	---
November	119.8	130.6	139.5	145.2	150.0	189.6	---
December	119.0	126.3	139.5	145.2	152.1	187.6	---

Table continued.

Table E-4 Continued**Raw material costs: Producer price indexes of coal in the United States, monthly, January 2016-August 2022**

Month	2016	2017	2018	2019	2020	2021	2022
January	189.6	204.5	201.0	205.2	193.1	189.4	232.9
February	187.7	200.1	202.2	203.0	192.8	188.9	232.3
March	193.1	199.9	203.1	203.9	192.4	189.5	243.5
April	192.0	202.2	202.1	203.6	193.3	192.7	282.8
May	198.5	199.1	204.6	201.5	192.8	192.7	286.7
June	198.7	198.0	202.3	203.2	192.5	193.4	305.8
July	192.3	197.3	202.6	203.0	190.9	194.0	318.0
August	190.2	197.8	201.5	202.6	190.4	193.3	311.6
September	190.2	199.0	202.3	201.6	191.8	196.8	---
October	192.2	198.9	204.1	203.5	191.9	192.6	---
November	195.7	199.7	202.9	198.6	188.8	194.0	---
December	196.0	199.6	203.9	199.7	190.1	194.4	---

Table continued.

Table E-4 Continued**Raw material costs: Producer price indexes of steel scrap in the United States, monthly, January 2016-August 2022**

Month	2016	2017	2018	2019	2020	2021	2022
January	255.7	435.7	497.3	476.9	428.5	655.5	689.4
February	258.1	426.0	512.8	468.9	398.0	604.9	687.4
March	285.5	462.1	535.7	494.9	402.9	653.9	858.6
April	345.9	437.8	562.7	474.4	354.1	632.2	859.2
May	391.4	434.6	554.1	443.7	372.9	659.0	756.6
June	370.8	432.6	548.4	399.3	379.5	725.5	669.1
July	355.5	433.3	538.8	382.6	357.9	740.1	593.6
August	348.2	454.4	512.2	410.5	375.5	727.2	563.0
September	324.2	463.2	490.7	365.4	421.2	694.6	---
October	295.7	432.2	496.8	321.6	422.6	691.6	---
November	328.8	419.5	515.9	340.8	429.5	752.6	---
December	382.3	453.1	516.8	381.2	536.1	739.1	---

Source: U.S. Bureau of Labor Statistics via St. Louis FRED, retrieved October 10, 2022.

Table E-5**Raw materials costs: Producer price index, industrial electric power in the United States, monthly, January 2016-August 2022**

Month	Industrial Electric Power	Indexed
January 2016	171.0	100.0
February 2016	170.2	99.5
March 2016	170.4	99.6
April 2016	168.6	98.6
May 2016	171.8	100.5
June 2016	183.2	107.1
July 2016	188.3	110.1
August 2016	189.2	110.6
September 2016	189.9	111.1
October 2016	179.2	104.8
November 2016	176.2	103.0
December 2016	176.5	103.2
January 2017	193.8	113.3
February 2017	194.7	113.9
March 2017	195.9	114.6
April 2017	196.0	114.6
May 2017	198.2	115.9
June 2017	209.8	122.7
July 2017	211.8	123.9
August 2017	209.9	122.7
September 2017	208.1	121.7
October 2017	199.6	116.7
November 2017	197.9	115.7
December 2017	198.4	116.0
January 2018	203.5	119.0
February 2018	205.0	119.9
March 2018	201.4	117.8
April 2018	198.6	116.1
May 2018	201.6	117.9
June 2018	213.3	124.7
July 2018	216.3	126.5
August 2018	216.2	126.4
September 2018	213.5	124.9
October 2018	206.1	120.5
November 2018	200.7	117.4
December 2018	201.4	117.8

Table continued.

Table E-5 Continued**Raw materials costs: Producer price index, industrial electric power in the United States, monthly, January 2016-August 2022**

Month	Industrial Electric Power	Adjusted
January 2019	204.7	119.7
February 2019	203.9	119.2
March 2019	201.9	118.1
April 2019	199.5	116.7
May 2019	201.5	117.8
June 2019	209.5	122.5
July 2019	211.7	123.8
August 2019	214.9	125.7
September 2019	212.6	124.3
October 2019	193.4	113.1
November 2019	192.4	112.5
December 2019	194.3	113.6
January 2020	194.6	113.8
February 2020	195.8	114.5
March 2020	194.9	114.0
April 2020	194.7	113.9
May 2020	194.6	113.8
June 2020	209.2	122.3
July 2020	211.9	123.9
August 2020	211.9	123.9
September 2020	214.1	125.2
October 2020	197.6	115.6
November 2020	194.9	114.0
December 2020	194.6	113.8
January 2021	196.1	114.7
February 2021	196.6	115.0
March 2021	211.6	123.7
April 2021	198.1	115.8
May 2021	199.9	116.9
June 2021	217.1	127.0
July 2021	221.2	129.4
August 2021	222.6	130.2
September 2021	220.0	128.6
October 2021	213.3	124.8
November 2021	211.9	123.9
December 2021	210.1	122.9

Table continued.

Table E-5 Continued

Raw materials costs: Producer price index, industrial electric power in the United States, monthly, January 2016-August 2022

Month	Industrial Electric Power	Adjusted
January 2022	220.0	128.7
February 2022	225.0	131.6
March 2022	221.4	129.5
April 20212	219.8	128.5
May 2022	223.8	130.9
June 2022	237.5	138.9
July 2022	246.8	144.3
August 2022	249.7	146.0

Source: U.S. Bureau of Labor Statistics via St. Louis FRED, retrieved October 10, 2022.

Table E-5 Continued

Hot-rolled steel: Purchaser names, purchaser responses on supplier negotiations, and 2021 quantities purchased

Purchaser	Response	Quantity Purchased
***	***	***
***	***	***
***	***	***
***	***	***

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

APPENDIX F

U.S. IMPORTS SUBJECT TO CHAPTER 99 PROVISIONS

Table F-1
Hot-rolled steel: U.S. imports from Australia, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	107,843	10,210	2,993
All duty statuses	Quantity	107,843	10,210	2,993
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-1 Continued
Hot-rolled steel: U.S. imports from Australia, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	2,241	25	---
All duty statuses	Quantity	2,241	25	---
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	---
All duty statuses	Share	100.0	100.0	---

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table F-2
Hot-rolled steel: U.S. imports from Brazil, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	13,441	36	11
All duty statuses	Quantity	13,441	36	11
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-2 Continued
Hot-rolled steel: U.S. imports from Brazil, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	336	---	---
All duty statuses	Quantity	336	---	---
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	---	---
All duty statuses	Share	100.0	---	---

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau. Brazil is subject to a quota and is therefore recorded as not being subject to chapter 99 duty rate provisions.

Table F-3
Hot-rolled steel: U.S. imports from Japan, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	223,045
Subject to chapter 99 provisions, not dutied	Quantity	---	---	4,535
Subject to chapter 99 provisions	Quantity	---	---	227,580
Not subject to chapter 99 provisions	Quantity	139,153	251,929	60,138
All duty statuses	Quantity	139,153	251,929	287,718
Subject to chapter 99 provisions, dutied	Share	---	---	77.5
Subject to chapter 99 provisions, not dutied	Share	---	---	1.6
Subject to chapter 99 provisions	Share	---	---	79.1
Not subject to chapter 99 provisions	Share	100.0	100.0	20.9
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-3 Continued
Hot-rolled steel: U.S. imports from Japan, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	132,519	103,099	219,760
Subject to chapter 99 provisions, not dutied	Quantity	17,582	15,147	36,119
Subject to chapter 99 provisions	Quantity	150,101	118,246	255,879
Not subject to chapter 99 provisions	Quantity	14	---	20,195
All duty statuses	Quantity	150,115	118,246	276,074
Subject to chapter 99 provisions, dutied	Share	88.3	87.2	79.6
Subject to chapter 99 provisions, not dutied	Share	11.7	12.8	13.1
Subject to chapter 99 provisions	Share	100.0	100.0	92.7
Not subject to chapter 99 provisions	Share	0.0	---	7.3
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table F-4
Hot-rolled steel: U.S. imports from the Netherlands, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	54,807
Subject to chapter 99 provisions, not dutied	Quantity	---	---	96
Subject to chapter 99 provisions	Quantity	---	---	54,903
Not subject to chapter 99 provisions	Quantity	179,497	116,642	44,784
All duty statuses	Quantity	179,497	116,642	99,687
Subject to chapter 99 provisions, dutied	Share	---	---	55.0
Subject to chapter 99 provisions, not dutied	Share	---	---	0.1
Subject to chapter 99 provisions	Share	---	---	55.1
Not subject to chapter 99 provisions	Share	100.0	100.0	44.9
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-4 Continued
Hot-rolled steel: U.S. imports from the Netherlands, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	36,072	26,012	27,770
Subject to chapter 99 provisions, not dutied	Quantity	206	42	7,861
Subject to chapter 99 provisions	Quantity	36,279	26,054	35,631
Not subject to chapter 99 provisions	Quantity	65,761	54,948	81,875
All duty statuses	Quantity	102,040	81,002	117,507
Subject to chapter 99 provisions, dutied	Share	35.4	32.1	23.6
Subject to chapter 99 provisions, not dutied	Share	0.2	0.1	6.7
Subject to chapter 99 provisions	Share	35.6	32.2	30.3
Not subject to chapter 99 provisions	Share	64.4	67.8	69.7
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table F-5
Hot-rolled steel: U.S. imports from Russia, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	---	6,777	---
All duty statuses	Quantity	---	6,777	---
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	---	100.0	---
All duty statuses	Share	---	100.0	---

Table continued.

Table F-5 Continued
Hot-rolled steel: U.S. imports from Russia, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	---	---	4
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	4
Not subject to chapter 99 provisions	Quantity	---	---	---
All duty statuses	Quantity	---	---	4
Subject to chapter 99 provisions, dutied	Share	---	---	100.0
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	100.0
Not subject to chapter 99 provisions	Share	---	---	---
All duty statuses	Share	---	---	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table F-6
Hot-rolled steel: U.S. imports from South Korea, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	2
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	2
Not subject to chapter 99 provisions	Quantity	1,002,631	237,408	526,226
All duty statuses	Quantity	1,002,631	237,408	526,228
Subject to chapter 99 provisions, dutied	Share	---	---	0.0
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	0.0
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-6 Continued
Hot-rolled steel: U.S. imports from South Korea, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	435,198	419,500	510,697
All duty statuses	Quantity	435,198	419,500	510,697
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau. South Korea is subject to a quota and is therefore recorded as not being subject to chapter 99 duty rate provisions.

Table F-7
Hot-rolled steel: U.S. imports from Turkey, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	100,492
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	100,492
Not subject to chapter 99 provisions	Quantity	216,601	105,847	49,385
All duty statuses	Quantity	216,601	105,847	149,876
Subject to chapter 99 provisions, dutied	Share	---	---	67.0
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	67.0
Not subject to chapter 99 provisions	Share	100.0	100.0	33.0
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-7 Continued
Hot-rolled steel: U.S. imports from Turkey, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	23,012	889	194,609
Subject to chapter 99 provisions, not dutied	Quantity	185	153	817
Subject to chapter 99 provisions	Quantity	23,197	1,042	195,426
Not subject to chapter 99 provisions	Quantity	---	---	59,948
All duty statuses	Quantity	23,197	1,042	255,373
Subject to chapter 99 provisions, dutied	Share	99.2	85.4	76.2
Subject to chapter 99 provisions, not dutied	Share	0.8	14.6	0.3
Subject to chapter 99 provisions	Share	100.0	100.0	76.5
Not subject to chapter 99 provisions	Share	---	---	23.5
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table F-8
Hot-rolled steel: U.S. imports from the United Kingdom, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2016	2017	2018
Subject to chapter 99 provisions, dutied	Quantity	---	---	1
Subject to chapter 99 provisions, not dutied	Quantity	---	---	3
Subject to chapter 99 provisions	Quantity	---	---	4
Not subject to chapter 99 provisions	Quantity	293	611	10
All duty statuses	Quantity	293	611	14
Subject to chapter 99 provisions, dutied	Share	---	---	7.6
Subject to chapter 99 provisions, not dutied	Share	---	---	23.0
Subject to chapter 99 provisions	Share	---	---	30.6
Not subject to chapter 99 provisions	Share	100.0	100.0	69.4
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table F-8 Continued.
Hot-rolled steel: U.S. imports from the United Kingdom, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2019	2020	2021
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	24	95	13
Subject to chapter 99 provisions	Quantity	24	95	13
Not subject to chapter 99 provisions	Quantity	5	---	22
All duty statuses	Quantity	30	95	35
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	82.0	100.0	37.8
Subject to chapter 99 provisions	Share	82.0	100.0	37.8
Not subject to chapter 99 provisions	Share	18.0	---	62.2
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed August 11th, 2022. Imports are based on the imports for consumption data series.

Note: Shares 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 "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

APPENDIX G

FIRM-SPECIFIC FINANCIAL DATA

Table G-1
Hot-rolled steel: Firm-by-firm commercial sales quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm commercial sales quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm internal consumption quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm internal consumption quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm transfer sales to related firms quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm transfer sales to related firms quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm total net sales quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	54,532,392	57,251,819	58,388,899

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm total net sales quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	56,468,508	49,237,991	54,853,499	14,032,209	11,842,603

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm commercial sales value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm commercial sales value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm internal consumption value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm internal consumption value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm total net sales value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	27,355,191	33,959,669	44,129,236

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm total net sales value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	35,874,950	26,336,135	66,329,880	11,586,668	14,789,689

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm cost of goods sold, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	24,422,395	30,218,804	34,070,499

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm cost of goods sold, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	31,990,096	25,562,704	38,910,236	8,631,700	9,867,210

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm gross profit or (loss), by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	2,932,796	3,740,865	10,058,737

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm gross profit or (loss), by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	3,884,854	773,431	27,419,644	2,954,968	4,922,479

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm selling, general and administrative (SG&A) expenses, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	950,086	1,182,790	1,348,344

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm selling, general and administrative (SG&A) expenses, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	1,213,894	1,032,098	1,512,272	324,357	359,866

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm operating income or (loss), by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	1,982,710	2,558,075	8,710,393

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm operating income or (loss), by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	2,670,960	(258,667)	25,907,372	2,630,611	4,562,613

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm net income or (loss), by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	1,775,463	2,365,484	8,449,534

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm net income or (loss), by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	2,457,405	(420,313)	25,602,930	2,538,543	4,506,648

Table continued.

Table G-1 Continued**Hot-rolled steel: Firm-by-firm ratio of cost of goods sold to net sales value, by period**

Ratio in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	89.3	89.0	77.2

Table continued.

Table G-1 Continued**Hot-rolled steel: Firm-by-firm ratio of cost of goods sold to net sales value, by period**

Ratio in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	89.2	97.1	58.7	74.5	66.7

Table continued.

Table G-1 Continued**Hot-rolled steel: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period**

Ratio in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	10.7	11.0	22.8

Table continued.

Table G-1 Continued**Hot-rolled steel: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period**

Ratio in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	10.8	2.9	41.3	25.5	33.3

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm ratio of SG&A expenses to net sales value, by period

Ratio in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	3.5	3.5	3.1

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm ratio of SG&A expenses to net sales value, by period

Ratio in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	3.4	3.9	2.3	2.8	2.4

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm ratio of operating income or (loss) to net sales value, by period

Ratio in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	7.2	7.5	19.7

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm ratio of operating income or (loss) to net sales value, by period

Ratio in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	7.4	(1.0)	39.1	22.7	30.8

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm ratio of net income or (loss) to net sales value, by period

Ratio in percent

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	6.5	7.0	19.1

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm ratio of net income or (loss) to net sales value, by period

Ratio in percent

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	6.8	(1.6)	38.6	21.9	30.5

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit commercial sales value, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit commercial sales value, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit internal consumption value, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit internal consumption value, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit transfer sales to related firms value, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit transfer sales to related firms value, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit total net sales value, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	502	593	756

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit total net sales value, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	635	535	1,209	826	1,249

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit total raw materials cost, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	296	370	418

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit total raw materials cost, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	393	361	518	445	590

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit direct labor cost, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	39	38	39

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit direct labor cost, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2021
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	40	40	45	41	55

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit other factory costs, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	113	120	126

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit other factory costs, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	133	118	147	129	188

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit COGS, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	448	528	584

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit COGS, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	567	519	709	615	833

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit gross profit or (loss), by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	54	65	172

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit gross profit or (loss), by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	69	16	500	211	416

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit SG&A expenses, by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	17	21	23

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit SG&A expenses, by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	21	21	28	23	30

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit operating income or (loss), by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	36	45	149

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit operating income or (loss), by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	47	(5)	472	187	385

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit net income or (loss), by period

Unit value in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	33	41	145

Table continued.

Table G-1 Continued
Hot-rolled steel: Firm-by-firm unit net income or (loss), by period

Unit value in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	44	(9)	467	181	381

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

Note: ***.

APPENDIX H

U.S. PRODUCERS' U.S. SHIPMENTS TO END USERS AND

FOREIGN PRODUCERS' TOTAL SHIPMENTS

BY SHIPMENT TYPE

Table H-1 and figure H-1 present data on U.S. producers' U.S. shipments to end users and foreign producers' total shipments in 2021 to end users by sector.

Table H-1
Hot-rolled steel: U.S. producers' U.S. shipments to end users and foreign producers' total shipments, by sector, 2021

Quantity in short tons

Producer location	Tubular goods	Auto/ transportation	Construction / structural	Appliances / machinery	Other end uses/sectors	All sectors
U.S. producers	***	***	***	***	***	***
Australia	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Japan	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***
Russia	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
United Kingdom	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***
Combined U.S. and subject producers	***	***	***	***	***	***

Table continued.

Table H-1 Continued

Hot-rolled steel: U.S. producers' U.S. shipments to end users and foreign producers' total shipments, by sector, 2021

Share across in percent

Producer location	Tubular goods	Auto/ transportation	Construction/ structural	Appliances / machinery	Other end uses/sectors	All sectors
U.S. producers	***	***	***	***	***	***
Australia	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Japan	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***
Russia	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
United Kingdom	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***
Combined U.S. and subject producers	100.0	100.0	100.0	100.0	100.0	100.0

Table continued.

Table H-1 Continued

Hot-rolled steel: U.S. producers' U.S. shipments to end users and foreign producers' total shipments, by sector, 2021

Share down in percent

Producer location	Tubular goods	Auto/ transportation	Construction/ structural	Appliances/ machinery	Other end uses/sectors	All sectors
U.S. producers	***	***	***	***	***	***
Australia	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Japan	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***
Russia	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
United Kingdom	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***
Combined U.S. and subject producers	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" 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 "---".

Figure H-1
Hot-rolled steel: U.S. producers' U.S. shipments to end users and foreign producers' total shipments, by sector, 2021

* * * * *

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

APPENDIX J

U.S. PRODUCERS' U.S. SHIPMENTS BY SHIPMENT TYPE

Table J-1
Hot-rolled steel: U.S. producers' U.S. shipments, by type and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; shares in percent

Item	Measure	2016	2017	2018
Commercial U.S. shipments	Quantity	21,532,891	24,085,658	24,618,766
Internal consumption	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
U.S. shipments	Quantity	***	***	***
Commercial U.S. shipments	Value	10,767,925	14,449,753	18,964,501
Internal consumption	Value	***	***	***
Transfers to related firms	Value	***	***	***
U.S. shipments	Value	***	***	***
Commercial U.S. shipments	Unit value	500	600	770
Internal consumption	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
U.S. shipments	Unit value	***	***	***
Commercial U.S. shipments	Share of quantity	40.2	43.1	43.0
Internal consumption	Share of quantity	***	***	***
Transfers to related firms	Share of quantity	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	40.1	43.3	43.6
Internal consumption	Share of value	***	***	***
Transfers to related firms	Share of value	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0

Table continued.

Table J-1 Continued
Hot-rolled steel: U.S. producers' U.S. shipments, by type and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; shares in percent

Item	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
Commercial U.S. shipments	Quantity	23,602,400	19,548,818	20,995,298	5,205,317	4,356,752
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	15,083,884	10,432,369	26,336,568	4,384,430	5,712,159
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	639	534	1,254	842	1,311
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	42.7	40.7	39.1	37.9	37.6
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	42.8	40.4	40.1	38.4	39.1
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table J-2
Hot-rolled steel: Firm-by-firm commercial shipments quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	21,532,891	24,085,658	24,618,766

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm commercial shipments quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	23,602,400	19,548,818	20,995,298	5,205,317	4,356,752

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm internal consumption quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm internal consumption quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms quantity, by period

Quantity in short tons

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms quantity, by period

Quantity in short tons

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm commercial sales value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	10,767,925	14,449,753	18,964,501

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm commercial sales value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	15,083,884	10,432,369	26,336,568	4,384,430	5,712,159

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm internal consumption value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm internal consumption value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms value, by period

Value in 1,000 dollars

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms value, by period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm commercial shipments unit value, by period

Unit values in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	500	600	770

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm commercial shipments unit value, by period

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	639	534	1,254	842	1,311

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm internal consumption unit value, by period

Unit values in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm internal consumption unit value, by period

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms unit value, by period

Unit values in dollars per short ton

Firm	2016	2017	2018
AM/NS Calvert	***	***	***
Big River Steel	***	***	***
Cleveland-Cliffs	***	***	***
CSI	***	***	***
EVRAZ	***	***	***
NLMK USA	***	***	***
North Star Bluescope	***	***	***
Nucor	***	***	***
SDI	***	***	***
SSAB	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table J-2 Continued
Hot-rolled steel: Firm-by-firm transfers to related firms unit value, by period

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
AM/NS Calvert	***	***	***	***	***
Big River Steel	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
CSI	***	***	***	***	***
EVRAZ	***	***	***	***	***
NLMK USA	***	***	***	***	***
North Star Bluescope	***	***	***	***	***
Nucor	***	***	***	***	***
SDI	***	***	***	***	***
SSAB	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

APPENDIX K

U.S. PRODUCERS' COMMERCIAL U.S. SHIPMENTS AND U.S. IMPORTS

Table K-1
Hot-rolled steel: U.S. producers' commercial U.S. shipments and U.S. imports based on quantity,
by source and period

Quantity in short tons; shares in percent

Source	Measure	2016	2017	2018
U.S. producers	Quantity	21,532,891	24,085,658	24,618,766
Australia	Quantity	107,843	10,210	2,993
Brazil	Quantity	13,441	36	11
Japan	Quantity	***	***	***
Netherlands	Quantity	***	***	***
Russia	Quantity	---	6,777	---
South Korea	Quantity	***	***	***
Turkey, subject	Quantity	***	***	***
United Kingdom	Quantity	***	***	***
Subject sources	Quantity	1,523,225	761,450	1,056,388
Turkey, nonsubject	Quantity	***	***	***
All other sources	Quantity	***	***	***
Nonsubject sources	Quantity	2,467,284	2,623,784	2,917,675
All import sources	Quantity	3,990,509	3,385,235	3,974,062
All sources	Quantity	25,523,400	27,470,893	28,592,828
U.S. producers	Share of quantity	84.4	87.7	86.1
Australia	Share of quantity	0.4	0.0	0.0
Brazil	Share of quantity	0.1	0.0	0.0
Japan	Share of quantity	***	***	***
Netherlands	Share of quantity	***	***	***
Russia	Share of quantity	---	0.0	---
South Korea	Share of quantity	***	***	***
Turkey, subject	Share of quantity	***	***	***
United Kingdom	Share of quantity	***	***	***
Subject sources	Share of quantity	6.0	2.8	3.7
Turkey, nonsubject	Share of quantity	***	***	***
All other sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	9.7	9.6	10.2
All import sources	Share of quantity	15.6	12.3	13.9
All sources	Share of quantity	100.0	100.0	100.0

Table continued.

Table K-1 Continued**Hot-rolled steel: U.S. producers' commercial U.S. shipments and U.S. imports based on quantity, by source and period**

Quantity in short tons; shares in percent

Source	Measure	2019	2020	2021	Jan-Mar 2021	Jan-Mar 2022
U.S. producers	Quantity	23,602,400	19,548,818	20,995,298	5,205,317	4,356,752
Australia	Quantity	2,241	25	---	---	---
Brazil	Quantity	336	---	---	---	8
Japan	Quantity	***	***	***	***	***
Netherlands	Quantity	***	***	***	***	***
Russia	Quantity	---	---	4	---	---
South Korea	Quantity	***	***	***	***	***
Turkey, subject	Quantity	***	***	***	***	***
United Kingdom	Quantity	***	***	***	***	***
Subject sources	Quantity	783,222	677,379	1,014,193	240,104	226,477
Turkey, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	2,009,243	1,678,843	3,043,078	542,167	725,554
All import sources	Quantity	2,792,466	2,356,222	4,057,272	782,270	952,030
All sources	Quantity	26,394,866	21,905,040	25,052,570	5,987,587	5,308,782
U.S. producers	Share of quantity	89.4	89.2	83.8	86.9	82.1
Australia	Share of quantity	0.0	0.0	---	---	---
Brazil	Share of quantity	0.0	---	---	---	0.0
Japan	Share of quantity	***	***	***	***	***
Netherlands	Share of quantity	***	***	***	***	***
Russia	Share of quantity	---	---	0.0	---	---
South Korea	Share of quantity	***	***	***	***	***
Turkey, subject	Share of quantity	***	***	***	***	***
United Kingdom	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	3.0	3.1	4.0	4.0	4.3
Turkey, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	7.6	7.7	12.1	9.1	13.7
All import sources	Share of quantity	10.6	10.8	16.2	13.1	17.9
All sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

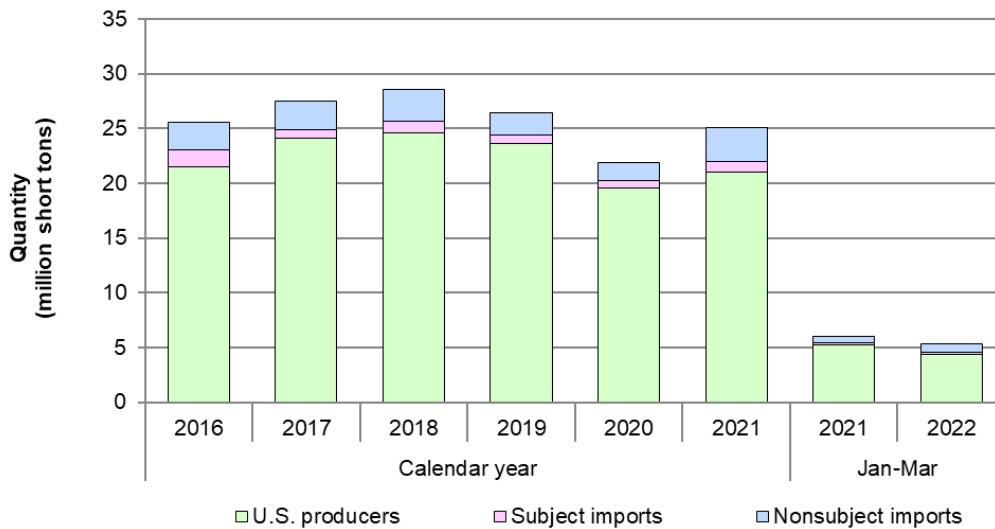
Table continued.

Table K-1 Continued

Hot-rolled steel: U.S. producers' commercial U.S. shipments and U.S. imports based on quantity, by source and period

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S. import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series.

Figure K-1
Hot-rolled steel: U.S. producers' commercial U.S. shipments and U.S. imports based on quantity, by source and period



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0030, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, 7211.19.7590, accessed July 19th, 2022. U.S. import data are based on official U.S import statistics for non-alloy hot-rolled steel, plus data compiled from responses to Commission questionnaires for imports of micro-alloy hot-rolled steel, with the exception of data for Turkey, which is based on foreign producers' reported export to the United States for the Turkey subject category (imports from firms other than Colakoglu and its related firms) and on U.S. importers' reported U.S. imports for the Turkey nonsubject category (imports from Colakoglu and its related firms). Both official U.S. import statistics and data from the Commission's U.S. importers' questionnaire are based on the imports for consumption data series.

APPENDIX L

SCOPE OF THE ORDER FOR RUSSIA

Commerce's scope¹

In the current proceeding, Commerce has defined the scope with respect to Russia as follows:

For the purposes of this antidumping duty order, "hot-rolled steel" means certain hot-rolled flat-rolled carbon-quality steel products of a rectangular shape, of a width of 0.5 inch or greater, neither clad, plated, nor coated with metal and whether or not painted, varnished, or coated with plastics or other non-metallic substances, in coils (whether or not in successively superimposed layers) regardless of thickness, and in straight lengths, of a thickness less than 4.75 mm and of a width measuring at least 10 times the thickness. Universal mill plate (i.e., flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm and of a thickness of not less than 4 mm, not in coils and without patterns in relief) of a thickness not less than 4.0 mm is not included within the scope of this order. Specifically subject to the scope of this order are vacuum degassed, fully stabilized (commonly referred to as interstitial-free (IF)) steels, high strength low alloy (HSLA) steels, and the substrate for motor lamination steels. IF steels are recognized as low carbon steels with micro-alloying levels of elements such as titanium and/or niobium added to stabilize carbon and nitrogen elements. HSLA steels are recognized as steels with micro-alloying levels of elements such as chromium, copper, niobium, titanium, vanadium, and molybdenum. The substrate for motor lamination steels contains micro-alloying levels of elements such as silicon and aluminum.

Steel products subject to the scope of this order, regardless of definitions in the Harmonized Tariff Schedule of the United States (HTSUS), are products in which: (1) Iron predominates, by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

*1.80 Percent of manganese, or
1.50 percent of silicon, or
1.00 percent of copper, or
0.50 percent of aluminum, or
1.25 percent of chromium, or
0.30 percent of cobalt, or
0.40 percent of lead, or
1.25 percent of nickel, or*

¹ Commerce Issues and Decision Memorandum for the Expedited Sunset Review of the Antidumping Duty Order on Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from the Russian Federation, December 15, 2021.

*0.30 percent of tungsten, or
0.012 percent of boron, or
0.10 percent of molybdenum, or
0.10 percent of niobium, or
0.41 percent of titanium, or
0.15 percent of vanadium, or
0.15 percent of zirconium.*

All products that meet the physical and chemical description provided above are within the scope of this order unless otherwise excluded. The following products, by way of example, are outside and/or specifically excluded from the scope of this order:

- *Alloy hot-rolled steel products in which at least one of the chemical elements exceeds those listed above (including e.g., ASTM specifications A543, A387, A514, A517, and A506).*
- *SAE/AISI grades of series 2300 and higher.*
- *Ball bearing steels, as defined in the HTSUS.²*
- *Tool steels, as defined in the HTSUS.³*

² As defined in Additional U.S. Note 1(h) Chapter 72 of the HTSUS Revision 5. Ball bearing steels are defined as steels which contain, in addition to iron, each of the following elements by weight in the amount specified: (i) Not less than 0.95 nor more than 1.13 percent of carbon; (ii) not less than 0.22 nor more than 0.48 percent of manganese; (iii) none, or not more than 0.03 percent of sulfur; (iv) none, or not more than 0.03 percent of phosphorus; (v) not less than 0.18 nor more than 0.37 percent of silicon; (vi) not less than 1.25 nor more than 1.65 percent of chromium; (vii) none, or not more than 0.28 percent of nickel; (viii) none, or not more than 0.38 percent of copper; and (ix) none, or not more than 0.09 percent of molybdenum.

³ As defined in Additional U.S. Note 1(e) Chapter 72 of the HTSUS Revision 5. Tool steels are defined as steels which contain the following combinations of elements in the quantity by weight respectively indicated: (i) More than 1.2 percent carbon and more than 10.5 percent chromium; or (ii) not less than 0.3 percent carbon and 1.25 percent or more but less than 10.5 percent chromium; or (iii) not less than 0.85 percent carbon and 1 percent to 1.8 percent, inclusive, manganese; or (iv) 0.9 percent to 1.2 percent, inclusive, chromium and 0.9 percent to 1.4 percent, inclusive, molybdenum; or (v) not less than 0.5 percent carbon and not less than 3.5 percent molybdenum; or (vi) not less than 0.5 percent carbon and not less than 5.5 percent tungsten.

- Silico-manganese (as defined in the HTSUS⁴) or silicon electrical steel with a silicon level exceeding 1.50 percent.

- ASTM specifications A710 and A736.

- USS Abrasion-resistant steels (USS AR 400, USS AR 500).

- Hot-rolled steel coil which meets the following chemical, physical and mechanical specifications:

C	Mn	P	S	Si	Cr	Cu	Ni
0.10- 0.14%	0.90% Max	0.025% Max	0.005% Max	0.30- 0.50%	0.50- 0.70%	0.20- 0.40%	0.20% Max

Width = 44.80 inches maximum; Thickness = 0.063–0.198 inches; Yield Strength = 50,000 ksi minimum; Tensile Strength = 70,000–88,000 psi.

- Hot-rolled steel coil which meets the following chemical, physical and mechanical specifications:

C	Mn	P	S	Si	Cr	Cu	Ni	Mo
0.10- 0.16%	0.70- 0.90%	0.025% Max	0.006% Max	0.30- 0.50%	0.50- 0.70%	0.25% Max	0.20% Max	0.21% Max

Width = 44.80 inches maximum; Thickness = 0.350 inches maximum; Yield Strength = 80,000 ksi minimum; Tensile Strength = 105,000 psi Aim.

- Hot-rolled steel coil which meets the following chemical, physical and mechanical specifications:

C	Mn	P	S	Si	Cr	Cu	Ni	V(wt.)	Cb
0.10- 0.14%	1.30- 1.80%	0.025 % Max	0.005 % Max	0.30- 0.50%	0.50- 0.70%	0.20- 0.40% Max	0.20% Max	0.10% Max	0.08% Max

Width = 44.80 inches maximum; Thickness = 0.350 inches maximum; Yield Strength = 80,000 ksi minimum; Tensile Strength = 105,000 psi Aim.

- Hot-rolled steel coil which meets the following chemical, physical and mechanical specifications:

⁴ As defined in Subheading Note 1(e) Chapter 72 of the HTSUS Revision 5. Silico-manganese steel is defined as steels containing by weight: (i) Not more than 0.7 percent of carbon; (ii) 0.5 percent or more but not more than 1.9 percent of manganese, and (iii) 0.6 percent or more but not more than 2.3 percent of silicon.

C	Mn	P	S	Si	Cr	Cu	Ni	Nb	Ca	Al
0.15% Max	1.40% Max	0.025 % Max	0.010 % Max	0.50%	1.00% Max	0.50% Max	0.20% Max	0.005 % Max	Treated	0.01- 0.07%

Width = 39.37 inches; Thickness = 0.181 inches maximum; Yield Strength = 70,000 psi minimum for thicknesses ≤0.148 inches and 65,000 psi minimum for thicknesses >0.148 inches; Tensile Strength = 80,000 psi minimum.

- *Hot-rolled dual phase steel, phase-hardened, primarily with a ferritic-martensitic microstructure, contains 0.9 percent up to and including 1.5 percent silicon by weight, further characterized by either (i) tensile strength between 540 N/mm² and 640 N/mm² and an elongation percentage ≥26 percent for thicknesses of 2mm and above, or (ii) a tensile strength between 590 N/mm² and 690 N/mm² and an elongation percentage 25 percent for thicknesses of 2mm and above.*

- *Hot-rolled bearing quality steel, SAE grade 1050, in coils, with an inclusion rating of 1.0 maximum per ASTM E 45, Method A, with excellent surface quality and chemistry restrictions as follows: 0.012 percent maximum phosphorus, 0.015 percent maximum sulfur, and 0.20 percent maximum residuals including 0.15 percent maximum chromium.*

- *Grade ASTM A570–50 hot-rolled steel sheet in coils or cut lengths, width of 74 inches (nominal, within ASTM tolerances), thickness of 11 gauge (0.119 inches nominal), mill edge and skin passed, with a minimum copper content of 0.20 percent.*

The covered merchandise is classified in the HTSUS at subheadings: 7208.10.15.00, 7208.10.30.00, 7208.10.60.00, 7208.25.30.00, 7208.25.60.00, 7208.26.00.30, 7208.26.00.60, 7208.27.00.30, 7208.27.00.60, 7208.36.00.30, 7208.36.00.60, 7208.37.00.30, 7208.37.00.60, 7208.38.00.15, 7208.38.00.30, 7208.38.00.90, 7208.39.00.15, 7208.39.00.30, 7208.39.00.90, 7208.40.60.30, 7208.40.60.60, 7208.53.00.00, 7208.54.00.00, 7208.90.00.00, 7210.70.30.00, 7210.90.90.00, 7211.14.00.30, 7211.14.00.90, 7211.19.15.00, 7211.19.20.00, 7211.19.30.00, 7211.19.45.00, 7211.19.60.00, 7211.19.75.30, 7211.19.75.60, 7211.19.75.90, 7212.40.10.00, 7212.40.50.00, 7212.50.00.00. Certain hot-rolled flat-rolled carbon-quality steel covered include: Vacuum degassed, fully stabilized; high strength low alloy; and the substrate for motor lamination steel may also enter under the following tariff numbers: 7225.11.00.00, 7225.19.00.00, 7225.30.30.50, 7225.30.70.00, 7225.40.70.00, 7225.99.00.90, 7226.11.10.00, 7226.11.90.30, 7226.11.90.60, 7226.19.10.00, 7226.19.90.00, 7226.91.50.00, 7226.91.70.00, 7226.91.80.00, and 7226.99.00.00. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the covered merchandise is dispositive.

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