

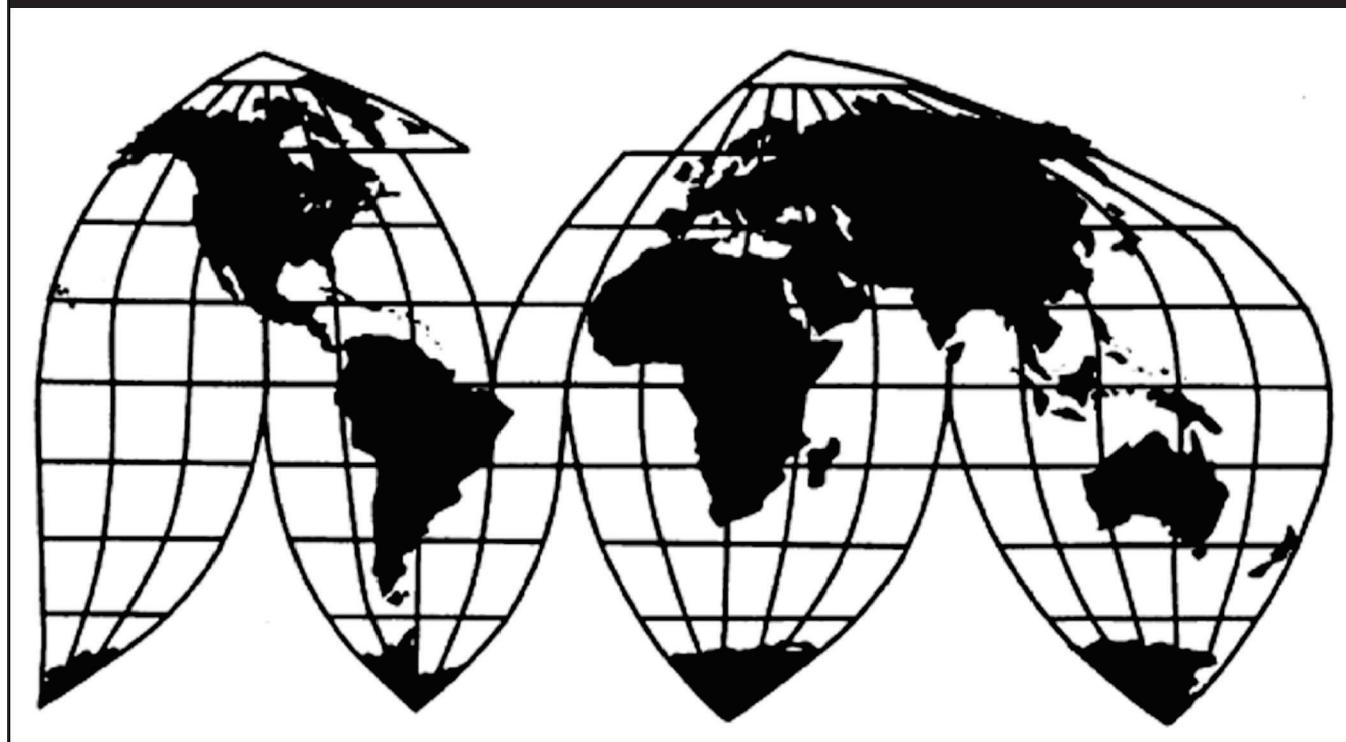
Cast Iron Soil Pipe Fittings from China

Investigation Nos. 701-TA-583 and 731-TA-1381 (Review)

Publication 5484

December 2023

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Mark Brininstool, Industry Analyst

Meagan Reid, Industry Analyst

James Horne, Economist

Sarah Kramer, Attorney

Kristina Lara, Supervisory Investigator

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

U.S. International Trade Commission

Washington, DC 20436

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CONTENTS

	Page
Determinations	1
Views of the Commission	3
Information obtained in these reviews	I-1
Background	I-1
Responses to the Commission's notice of institution.....	I-2
Individual responses	I-2
Party comments on adequacy	I-2
The original investigations	I-3
Previous and related investigations.....	I-3
Commerce's five-year reviews.....	I-5
The product.....	I-5
Commerce's scope.....	I-5
U.S. tariff treatment.....	I-6
Description and uses.....	I-7
Manufacturing process	I-7
The industry in the United States	I-9
U.S. producers.....	I-11
Recent developments	I-12
U.S. producers' trade and financial data	I-13
Definitions of the domestic like product and domestic industry	I-14
U.S. importers	I-14
U.S. imports.....	I-15
Apparent U.S. consumption and market shares.....	I-16
The industry in China	I-17
Producers in China	I-17
Recent developments	I-17
Exports	I-18
Third-country trade actions	I-18
The global market	I-18

Appendixes

A.	<i>Federal Register</i> notices.....	A-1
B.	Company-specific data.....	B-1
C.	Summary data compiled in prior proceeding.....	C-1
D.	Purchaser questionnaire responses	D-1

Note: Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-583 and 731-TA-1381 (Review)

Cast Iron Soil Pipe Fittings from China

DETERMINATIONS

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 antidumping and countervailing duty orders on cast iron soil pipe fittings from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on July 3, 2023 (88 FR 42753) and determined on October 6, 2023 that it would conduct expedited reviews (88 FR 75308, November 2, 2023).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping and countervailing duty orders on cast iron soil pipe fittings (“CISP fittings”) from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

The Original Investigations. On July 13, 2017, the Cast Iron Soil Pipe Institute (“CISPI”) filed antidumping and countervailing duty petitions on behalf of itself and its individual members, domestic producers of CISP fittings.¹ In July 2018, the U.S. Department of Commerce (“Commerce”) determined that imports of CISP fittings were being subsidized by the government of China and sold at less-than-fair-value (“LTFV”).² In August 2018, the Commission found that a domestic industry was materially injured by reason of imports of CISP fittings, excluding drain bodies, from China that were sold at LTFV and subsidized by the government of China.³ On August 28, 2018, Commerce issued antidumping and countervailing duty orders on CISP fittings from China.⁴

The Current Reviews. On July 3, 2023, the Commission instituted these first five-year reviews of the orders on CISP fittings.⁵ On August 2, 2023, CISPI filed a response to the notice of institution, on behalf of itself and its individual members, U.S. producers Charlotte Pipe &

¹ Confidential Report, Memorandum INV-VV-082 (Sept. 25, 2023) (“CR”), Public Report, *Cast Iron Soil Pipe Fittings from China*, Inv. Nos. 701-TA-583 and 731-TA-1381 (Review), USITC Pub. 5484 (Dec. 2023) (“PR”) at I-3.

² CR/PR at I-3.

³ *Cast Iron Soil Pipe Fittings from China*, Inv. Nos. 701-TA-583 and 731-TA-1381 (Final), USITC Pub. 4812 at 3 (Aug. 2018) (“Original Determinations”). The Commission also made a negative critical circumstances determination. *Id.* at 30-31.

⁴ *Cast Iron Soil Pipe Fittings From the People's Republic of China: Countervailing Duty Order*, 83 Fed. Reg. 44566 (Aug. 31, 2018); *Cast Iron Soil Pipe Fittings From the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 83 Fed. Reg. 44570 (Aug. 31, 2018).

⁵ *Cast Iron Soil Pipe Fittings From China; Institution of Five-Year Reviews*, 88 Fed. Reg. 42753 (July 3, 2023). In accordance with section 751(c) of the Tariff Act, Commerce also published a notice of initiation of a five-year review of the antidumping and countervailing duty orders on the same date. *Initiation of Five-Year (Sunset) Reviews*, 88 Fed. Reg. 42688 (July 3, 2023).

Foundry and McWane, Inc. ("domestic interested party").⁶ No respondent interested party responded to the notice of institution or participated in these reviews. On October 6, 2023, the Commission determined that the domestic interested party group response to its notice of institution was adequate, and that the respondent interested party group response was inadequate.⁷ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews pursuant to section 751(c)(3) of the Tariff Act.⁸ The domestic interested party filed comments with the Commission pursuant to 19 C.F.R. § 207.61(d) regarding the determinations that the Commission should reach.⁹

The U.S. industry data in these reviews are based on information supplied by the domestic interested party in its response to the notice of institution, estimated to have accounted for 100.0 percent of domestic production of CISP fittings in 2022.¹⁰ U.S. import data and related information are based on Commerce's official import statistics.¹¹ Foreign industry data are based on information from the original investigations, information submitted by the domestic interested party in these expedited reviews, and publicly available information compiled by the Commission.¹² Additionally, two firms, ***, identified by the domestic interested party as top U.S. purchasers of CISP fittings, responded to the Commission's adequacy phase questionnaire.¹³

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."¹⁴ The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and

⁶ Petitioner's Response to the Notice of Institution of the Five-Year Review, EDIS Doc. No. 801457 (Aug. 2, 2023) ("Domestic Interested Party's Response").

⁷ Explanation of Commission Determination on Adequacy, EDIS Doc. No. 2056458 (Oct. 17, 2023).

⁸ Explanation of Commission Determination on Adequacy.

⁹ Domestic Industry's Final Comments, EDIS No. 809530 (Nov. 30, 2023).

¹⁰ CR/PR at Table I-2.

¹¹ CR/PR at Tables I-6, I-7. Import data are compiled from official Commerce statistics for HTS statistical reporting number 7307.11.0045. *Id.*

¹² CR/PR at Tables I-8, I-9.

¹³ CR/PR at D-3. Purchaser questionnaires were sent to the five largest purchasers of CISP fittings, as identified by the domestic interested party. *Id.*

¹⁴ 19 U.S.C. § 1677(4)(A).

uses with, the article subject to an investigation under this subtitle.”¹⁵ 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.¹⁶

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

The merchandise covered by the scope of this order is cast iron soil pipe fittings, finished and unfinished, regardless of industry or proprietary specifications, and regardless of size. Cast iron soil pipe fittings are nonmalleable iron castings of various designs and sizes, including, but not limited to, bends, tees, wyes, traps, drains (other than drain bodies), and other common or special fittings, with or without side inlets.

Cast iron soil pipe fittings are classified by two major types—hubless and hub and spigot. Hubless cast iron soil pipe fittings are manufactured without a hub, generally in compliance with Cast Iron Soil Pipe Institute (CISPI) specification 301 and/or American Society for Testing and Materials (ASTM) specification A888. Hub and spigot pipe fittings have hubs into which the spigot (plain end) or the pipe or fitting is inserted. Cast iron soil pipe fittings are generally distinguished from other types of nonmalleable cast iron fittings by the manner in which they are connected to cast iron soil pipe and other fittings.

Excluded from the scope are all drain bodies. Drain bodies are normally classified in subheading 7326.90.86.88 of the Harmonized Tariff Schedule of the United States (HTSUS). The cast iron soil pipe fittings subject to the scope of this order are normally classified in subheading 7307.11.0045 of the HTSUS: Cast fittings or nonmalleable cast iron for cast iron soil pipe. They may also be entered under HTSUS 7324.19.0000 and 7307.92.3010.

¹⁵ 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁶ *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).

The HTSUS subheadings and specifications are provided for convenience and customs purposes only; the written description of the scope of this order is dispositive.¹⁷

CISP fittings are iron castings typically used to connect or plug cast iron soil pipes, primarily in the sanitary and storm drain, waste, and vent (“DWV”) piping of buildings.¹⁸ CISP fittings are manufactured by melting scrap iron, steel scrap, and alloys in a cupola furnace¹⁹ and casting²⁰ the molten metal into the desired shapes.²¹

CISP fittings and pipes that connect with the fittings generally come in two forms: hubless (or no-hub) and hub and spigot.²² Hubless fittings are joined to a pipe or another fitting using a coupling that fits over the ends.²³ The joint is then sealed by tightening the coupling.²⁴ Hub and spigot fittings have hubs into which the spigot of the pipe or another fitting is inserted.²⁵ The joint is then sealed with a compression gasket²⁶ or lead and oakum.²⁷ Hubless fittings are produced to CISPI 301 and ASTM A888 standards, and hub and spigot fittings are produced to ASTM A74 standard.²⁸ Hub and spigot fittings meet the CISPI 301 standard in all

¹⁷ CR/PR at I-5-I-6; *see also Cast Iron Soil Pipe Fittings From the People’s Republic of China: Countervailing Duty Order*, 83 Fed. Reg. 44566 (Aug. 31, 2018); *Cast Iron Soil Pipe Fittings From the People’s Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 83 Fed. Reg. 44570 (Aug. 31, 2018).

As discussed below, drain bodies were included in the scope of the original investigations and were found by the Commission to be a separate domestic like product. Because the Commission made negative determinations of material injury with respect to drain bodies, Commerce excluded these products from the scope of the orders. CR/PR at I-6 n.15; *see also Cast Iron Soil Pipe Fittings From the People’s Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 83 Fed. Reg. 44570 (Aug. 31, 2018).

¹⁸ CR/PR at I-7.

¹⁹ Electric melting equipment can be used as well, but the cupola furnace is the primary production method. CR/PR at I-9 n.25.

²⁰ Casting is the process of pouring molten metal into a mold and allowing it to solidify. CR/PR at I-9 n.26.

²¹ CR/PR at I-9.

²² CR/PR at I-8.

²³ CR/PR at I-8.

²⁴ CR/PR at I-8.

²⁵ CR/PR at I-8.

²⁶ A compression gasket is made of rubber or another material and fits between the inside of the hub and the outside of the spigot to create a seal. CR/PR at I-8 n.21.

²⁷ CR/PR at I-8. Oakum is made from vegetable fiber, cotton, or hemp, and is packed into the joint between the hub and spigot. CR/PR at I-8 n.22.

²⁸ CR/PR at I-8.

aspects other than product dimensions and shapes.²⁹

In the original investigations, the Commission defined two domestic like products: drain bodies and CISP fittings excluding drain bodies.³⁰ After considering that drain bodies were included in the scope as then defined by Commerce,³¹ the Commission found that drain bodies were a separate domestic like product from other CISP fittings because drain bodies had different standards for different applications and placements within DMW systems, different channels of distribution, limited interchangeability due to different applications within the DWV system, and differing producer and customer perceptions as compared to other CISP fittings.³² The Commission made negative determinations with respect to drain bodies,³³ and Commerce therefore excluded them from the scope of the orders.³⁴

In these first five-year reviews, the record does not contain any new information suggesting that the pertinent product characteristics and uses of CISP fittings have changed since the original investigations.³⁵ The domestic interested party argues that the Commission should adopt the domestic like product definition from the original investigations.³⁶ Accordingly, we define the domestic like product as CISP fittings, coextensive with Commerce's scope.

B. Domestic Industry

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."³⁷ 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.

In the original investigations, the Commission defined two domestic industries

²⁹ CR/PR at I-8.

³⁰ Original Determinations, USITC Pub. 4812 at 8.

³¹ Original Determinations, USITC Pub. 4812 at 8-9.

³² Original Determinations, USITC Pub. 4812 at 9-15.

³³ Original Determinations, USITC Pub. 4812 at 32-38.

³⁴ *Cast Iron Soil Pipe Fittings from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Order*, 83 Fed. Reg. 44570 (Aug. 31, 2018).

³⁵ See CR/PR at I-7 to I-10.

³⁶ See Domestic Interested Party's Response at 27.

³⁷ 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.

corresponding to (1) all U.S. producers of CISP fittings other than drain bodies, with the exception of one producer that was excluded pursuant to the related parties provision;³⁸ and (2) all U.S. producers of drain bodies.³⁹

In these first five-year reviews, the domestic interested party argues that the Commission should adopt the domestic industry definition from the original investigations.⁴⁰ There are no related parties or other domestic industry issues in these reviews.⁴¹ Accordingly, consistent with our definition of the domestic like product, we again define the domestic industry as all U.S. producers of CISP fittings.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”⁴² 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 elimination of its restraining effects on volumes and prices of imports.”⁴³ Thus, the likelihood

³⁸ Original Determinations, USITC Pub. 4812 at 16. The Commission found that the firm in question had imported a *** amount of CISP fittings and that its production was *** in 2015 and 2016 and had ceased entirely in 2017. *Id.*; Confidential Opinion in *Cast Iron Soil Pipe Fittings from China*, Inv. Nos. 701-TA-583 and 731-TA-1381 (Final), EDIS Doc. No. 654009 (Aug. 27, 2018) (“Confidential Original Determinations”) at 22-23.

³⁹ Original Determinations, USITC Pub. 4812 at 16.

⁴⁰ Domestic Interested Party’s Response at 27.

⁴¹ See Domestic Interested Party’s Response at Exhibit 1.

⁴² 19 U.S.C. § 1675a(a).

⁴³ 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.

standard is prospective in nature.⁴⁴ 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.⁴⁵

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.”⁴⁶ 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.”⁴⁷

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.”⁴⁸ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce

⁴⁴ 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.

⁴⁵ 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’”).

⁴⁶ 19 U.S.C. § 1675a(a)(5).

⁴⁷ 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.*

⁴⁸ 19 U.S.C. § 1675a(a)(1).

regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁴⁹ 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.⁵⁰

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.⁵¹ 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.⁵²

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.⁵³

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

⁴⁹ 19 U.S.C. § 1675a(a)(1). Commerce has made no duty absorption findings concerning CISP fittings from China. *Issues and Decision Memorandum* at 4, Case No. A-570-062, EDIS Doc. No. 809550 (Oct. 31, 2023).

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

⁵¹ 19 U.S.C. § 1675a(a)(2).

⁵² 19 U.S.C. § 1675a(a)(2)(A-D).

⁵³ 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.

capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁵⁴ 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.⁵⁵

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the CISP fittings industry in China. There also is limited information on the CISP fittings market in the United States during the period of review (“POR”). Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations, and the limited new information on the record in these five-year reviews.

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.”⁵⁶ The following conditions of competition inform our determinations.

1. Demand Conditions

The Original Investigations. The Commission observed that demand for CISP fittings is a function of spending on public construction, private non-residential construction, and larger private residential buildings.⁵⁷ The Commission further found that, during the period of investigation (“POI”), U.S. construction value generally increased.⁵⁸ Additionally, most responding market participants reported that demand for CISP fittings either increased or did

⁵⁴ 19 U.S.C. § 1675a(a)(4).

⁵⁵ 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.

⁵⁶ 19 U.S.C. § 1675a(a)(4).

⁵⁷ Original Determinations, USITC Pub. 4812 at 20.

⁵⁸ Original Determinations, USITC Pub. 4812 at 20.

not change.⁵⁹ Apparent U.S. consumption rose overall from *** short tons in 2015 to *** short tons in 2017.⁶⁰

The Current Reviews. The information available indicates demand for CISP fittings continues to be driven by demand for construction, particularly of residential, commercial, industrial, and public buildings.⁶¹ The domestic interested party asserts that, although U.S. spending on construction has trended upward overall since the original investigations, Deloitte forecasts that nonresidential construction would remain weak in the second half of 2023 while the American Institute of Architects forecasts that commercial construction spending will likely fall in 2024.⁶² According to surveys of North American foundries taken by the American Foundry Society in 2023, the overall casting industry's outlook also became more pessimistic between the first and second quarters of 2023, with an increasing number of responding foundries anticipating weakening demand through the end of the year.⁶³ Responding purchaser *** reported that *** and that it ***.⁶⁴

Apparent U.S. consumption of CISP fittings was *** short tons in 2022, *** short tons in 2017.⁶⁵

2. Supply Conditions

The Original Investigations. The domestic industry was the largest source of supply in the U.S. market over the POI, accounting for *** percent of apparent U.S. consumption in 2017.⁶⁶ Subject imports were the second largest source of CISP fittings in 2017, accounting for *** percent of apparent U.S. consumption.⁶⁷ Nonsubject imports' market share was minimal, ranging between *** percent and *** percent throughout the POI.⁶⁸

⁵⁹ Original Determinations, USITC Pub. 4812 at 20.

⁶⁰ Confidential Original Determinations at 29.

⁶¹ Domestic Interested Party's Response at 7.

⁶² Domestic Interested Party's Response at 7-8, Exhibits 3-4.

⁶³ Domestic Interested Party's Response at 8-9, Exhibit 7.

⁶⁴ CR/PR at D-3. Additionally, plastic fittings can be used in some of the same applications as CISP fittings, but CISP fittings tend to be used in commercial buildings, while plastic fittings tend to be used in residential buildings. Confidential Report, Memorandum INV-QQ-085 (July 23, 2018), EDIS Doc. No. 650967, at II-15-II-16, Public Report, *Cast Iron Soil Pipe Fittings from China*, Inv. Nos. 701-TA-583 and 731-TA-1381 (Final), USITC Pub. 4812 (Aug. 2018) ("PR") at II-10.

Responding purchaser *** stated that ***. *Id.*

⁶⁵ CR/PR at Table I-7.

⁶⁶ Confidential Original Determinations at 30.

⁶⁷ Confidential Original Determinations at 30.

⁶⁸ Confidential Original Determinations at 30.

The Current Reviews. The domestic industry was the largest source of CISP fittings in the U.S. market in 2022, accounting for *** percent of apparent U.S. consumption that year.⁶⁹ The domestic interested party claims that the domestic industry's ability to supply CISP fittings has remained strong.⁷⁰ In May 2020, Charlotte Pipe announced plans to relocate its Charlotte, North Carolina foundry, to a new foundry, reportedly requiring an investment of \$460 million.⁷¹ In March 2022, McWane closed its foundry in Oakland, California and relocated those operations to its foundry in Tyler, Texas.⁷² The domestic industry's production capacity was larger in 2022, at *** short tons, than it was in 2017 at the end of the POI, at *** short tons.⁷³

Subject imports were the smallest source of CISP fittings in the U.S. market in 2022, accounting for *** percent of apparent U.S. consumption that year.⁷⁴ While acknowledging that imports of Chinese CISP fittings have declined since the POI,⁷⁵ the domestic interested party claims that the Chinese construction sector is "{d}eteriorating," and that, consequently, Chinese CISP fittings producers will increasingly need to turn to export markets to maintain sales volumes.⁷⁶ The domestic interested party also asserts that Chinese metalcasting capacity increased between 2018 and 2020.⁷⁷

Nonsubject imports were the second largest source of CISP fittings in the U.S. market in 2022, accounting for *** percent of apparent U.S. consumption that year.⁷⁸ The largest sources of nonsubject imports that year were India, Malaysia, and Canada.⁷⁹

3. Substitutability and Other Conditions

The Original Investigations. The Commission found that there was a high degree of physical interchangeability between subject imports and the domestic like product, while recognizing that factors such as domestic industry trademarks, sales conditions (such as rebates and loyalty incentive programs), domestic procurement requirements, and building plans may have limited the degree to which subject imports and domestically produced products could be

⁶⁹ CR/PR at Table I-7.

⁷⁰ Domestic Interested Party's Response at 10.

⁷¹ CR/PR at Table I-4; Domestic Interested Party's Response at 11.

⁷² CR/PR at Table I-4; Domestic Interested Party's Response at 11.

⁷³ CR/PR at Table I-5.

⁷⁴ CR/PR at Table I-7.

⁷⁵ Domestic Interested Party's Response at 14.

⁷⁶ Domestic Interested Party's Response at 16-17.

⁷⁷ Domestic Interested Party's Response at 15.

⁷⁸ CR/PR at Table I-7.

⁷⁹ CR/PR at Table I-6.

used interchangeably.⁸⁰ The Commission observed, however, that the vast majority of U.S. producers, purchasers, and importers reported that subject imports and domestically produced CISP fittings were always or frequently interchangeable.⁸¹ The Commission found that price was an important purchasing factor, as it was the factor that responding purchasers most frequently cited among their top three purchasing factors and one that most responding purchasers rated as very important.⁸²

The Commission also found that CISP fittings were typically sold from inventory and that a majority of domestically produced CISP fittings were sold on the spot market, while noting that large amounts were also sold through supplier-specific programs that incentivized purchasers into exclusivity agreements with rebates.⁸³ Finally, the Commission observed that although various anticompetitive allegations were made against the domestic industry, including an investigation by the Federal Trade Commission and a price-fixing lawsuit by purchasers prior to the POI, the majority of responding importers and purchasers reported that these various proceedings had no effect on their respective firms or the market, and the majority of responding firms reported experiencing no supply constraints.⁸⁴

The Current Reviews. The record of these reviews contains no new information indicating that the degree of substitutability between the domestic like product and subject imports or the importance of price has changed since the original investigations.⁸⁵ The domestic interested party contends that the U.S. market for CISP fittings remains price sensitive and that CISP fittings continues to be a highly substitutable product that is produced to common industry standards.⁸⁶ Accordingly, we again find a high degree of physical interchangeability between subject imports and the domestic like product, although factors such as domestic industry trademarks, sales conditions (such as rebates and loyalty incentive programs), domestic procurement requirements, and building plans may limit the degree to which subject imports and domestically produced products can be used interchangeably. We also find that price remains an important factor in purchasing decisions.

Effective September 24, 2018, CISP fittings from China became subject to an additional

⁸⁰ Original Determinations, USITC Pub. 4812 at 22.

⁸¹ Original Determinations, USITC Pub. 4812 at 22.

⁸² Original Determinations, USITC Pub. 4812 at 22.

⁸³ Original Determinations, USITC Pub. 4812 at 22-23.

⁸⁴ Original Determinations, USITC Pub. 4812 at 22-23.

⁸⁵ See Domestic Interested Party's Response at 11; see generally CR/PR.

⁸⁶ Domestic Interested Party's Response at 23.

10 percent *ad valorem* duty under section 301 of the Trade Act of 1974.⁸⁷ On May 10, 2019, the duty was increased to 25 percent *ad valorem*.⁸⁸

C. Likely Volume of Subject Imports

The Original Investigations. The Commission found that the volume of subject imports and the increase in that volume was significant in both absolute terms and relative to consumption in the United States.⁸⁹ China was the only significant non-domestic source of CISP fittings in the U.S. market during the POI.⁹⁰ The Commission found that subject import volume had increased irregularly from *** short tons in 2015 to *** short tons in 2017, for an overall increase of *** percent during the POI, and was *** short tons in January-March 2018 (“interim 2018”) compared to *** short tons in January-March 2017 (“interim 2017”).⁹¹ Subject imports’ share of apparent U.S. consumption had also increased irregularly, from *** percent in 2015 to *** percent in 2017, and was *** percent in interim 2018 compared to *** percent in interim 2017.⁹² The Commission observed that the decline in subject imports in interim 2018 compared to interim 2017 appeared to be due at least in part to the pendency of the investigations.⁹³

The Current Reviews. Subject import volume declined sharply during the POR under the disciplining effects of the orders.⁹⁴ The absolute volume of subject imports decreased from 1,897 short tons in 2018, to 1,284 short tons in 2019, 277 short tons in 2020, and 267 short tons in 2021, before increasing to 290 short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year.⁹⁵

The record in these five-year reviews contains limited information on the subject industry in China. The information available, however, indicates that subject producers have the ability and incentive to increase their exports of CISP fittings to the U.S. market to

⁸⁷ CR/PR at I-6.

⁸⁸ CR/PR at I-6. CISP fittings are not subject to additional duties or quotas under section 232 of the Trade Expansion Act of 1962, as amended. *Id.* CISP fittings from China have not been subject to any known trade actions in third country markets. CR/PR at I-18.

⁸⁹ Original Determinations, USITC Pub. 4812 at 24.

⁹⁰ Original Determinations, USITC Pub. 4812 at 23.

⁹¹ Confidential Original Determinations at 34.

⁹² Confidential Original Determinations at 34.

⁹³ Original Determinations, USITC Pub. 4812 at 24.

⁹⁴ See CR/PR at Tables I-6, I-7.

⁹⁵ CR/PR at Tables I-6, I-7. Subject imports from China based on official import statistics may be understated given that Customs and Border Protection (“CBP”) made affirmative determinations in several investigations under the Enforce and Protect Act (“EAPA”) that Chinese-origin CISP fittings had been transshipped through Cambodia during the 2020-2022 period. *Id.* at Table I-6 Note. Nonsubject imports from Cambodia were 188 short tons in 2020, 23 short tons in 2021, and zero short tons in 2022. *Id.*

significant levels if the orders were revoked.

The subject industry is a large producer and exporter of subject merchandise. The domestic interested party has identified 22 possible producers of CISP fittings in China.⁹⁶ According to a Department of Energy (“DOE”) market research study, China’s metalcasting industry, including subject producers, increased production by 6 percent during the 2018-2020 period while the metalcasting industry in the rest of the world declined.⁹⁷ This same study shows that China’s total gray and ductile iron casting capacity was 37.05 million metric tons in 2020, nearly half of the world total and nearly five times the U.S. capacity of 7.6 million tons.⁹⁸

The information available also indicates that the subject industry remains a large exporter. According to Global Trade Atlas (“GTA”) data concerning non-malleable cast iron tube or pipe fittings, a category including CISP fittings and out-of-scope products, the Chinese industry exported 333,541 short tons of such merchandise in 2022, making China the world’s largest exporter of such merchandise that year.⁹⁹

The U.S. market also remains attractive to subject producers. Subject imports maintained a presence in the U.S. market throughout the period of review, accounting for *** percent of apparent U.S. consumption in 2022, thereby retaining distribution networks and customers in the U.S. market.¹⁰⁰ Furthermore, GTA data show that Chinese producers exported 88,791 short tons of non-malleable cast iron tube or pipe fittings (including CISP fittings and out-of-scope products) to the United States in 2022, making the United States the top destination market for exports of such merchandise from China that year.¹⁰¹

Chinese producers have also demonstrated their continued interest in the U.S. market since the imposition of the orders through transshipment efforts. As previously noted, CBP made affirmative determinations in several EAPA investigations throughout the 2020-2022 period that Chinese CISP fittings were being transshipped through Cambodia.¹⁰² In 2023, CBP initiated EAPA investigations into Chinese-origin CISP fittings allegedly being transshipped through India and Malaysia.¹⁰³ Attempts to circumvent the orders reflect the subject producers’ continued interest in serving the U.S. market.

⁹⁶CR/PR at I-17; Domestic Interested Party’s Response at Exhibit 26.

⁹⁷ Domestic Interested Party’s Response at 15, Exhibit 11.

⁹⁸ Domestic Interested Party’s Response at 15, Exhibit 11.

⁹⁹ CR/PR at Tables I-8, I-9.

¹⁰⁰ CR/PR at Table I-7.

¹⁰¹ CR/PR at Table I-8.

¹⁰² CR/PR at Table I-6; Domestic Interested Party’s Response at 17-22.

¹⁰³ CR/PR at Table I-6; Domestic Interested Party’s Response at 20-21.

Further enhancing the attractiveness of the U.S. market to subject producers, the information available indicates that the Chinese construction sector is currently experiencing declining market conditions, which would encourage subject producers to increase exports as a means of maintaining their production.¹⁰⁴ The domestic interested party asserts that the Chinese property market has collapsed,¹⁰⁵ and that this collapse will in turn reduce construction activity in China and thus Chinese demand for CISP fittings.¹⁰⁶ Additionally, a report from Atradius N.V. assessed the outlook for Chinese metal producers as “{b}leak,” noted that the profitability in the Chinese metals industry fell 34 percent in the first half of 2022, and observed that “subdued demand and late payment from downstream sectors like construction” affected the metals sector’s profitability.¹⁰⁷

Given the foregoing, including the significant and increasing volume of subject imports during the original investigations, the large size of the metalcasting industry in China and the large volume of China’s exports of non-malleable cast iron tube or pipe fittings, and the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.¹⁰⁸

D. Likely Price Effects

The Original Investigations. The Commission found widespread underselling by subject imports.¹⁰⁹ Specifically, the Commission found that subject imports undersold the domestic like product in 66 of 78 quarterly price comparisons, corresponding to reported subject import sales

¹⁰⁴ Domestic Interested Party’s Response at 16, Exhibit 16.

¹⁰⁵ Domestic Interested Party’s Response at 16, Exhibit 12. The domestic interested party notes that in 2023, Fitch Ratings labeled the outlook on the Chinese construction sector as “{d}eteriorating.” *Id.* at 16, Exhibit 16.

¹⁰⁶ Domestic Interested Party’s Response at 16.

¹⁰⁷ Domestic Interested Party’s Response at 17, Exhibit 18.

¹⁰⁸ Although subject imports from China are currently subject to a 25 percent *ad valorem* duty under Section 301, neither the domestic interested party nor the responding purchasers indicated that this duty would prevent subject imports from entering the U.S. market at significant levels if the orders were revoked. *See generally* Domestic interested Party’s Response; CR/PR at D-3-D-4. Given this, as well as the size and exports of the metalcasting industry in China, the continued presence of subject imports throughout the POR, and the attractiveness of the U.S. market, we find that the section 301 duties would not likely prevent subject imports from increasing to significant levels if the orders were revoked.

The record of these expedited reviews does not contain information concerning product shifting or inventories of the subject merchandise. CISP fittings from China are not subject to any known antidumping or countervailing duty measures in third country markets. *Id.* at I-18.

¹⁰⁹ Original Determinations, USITC Pub. 4812 at 25.

of 4.4 million pounds (compared to 290,221 pounds of subject imports reported in quarters of overselling), at underselling margins ranging from 0.2 to 29.1 percent.¹¹⁰ The Commission further found that 11 of the 12 responding purchasers who reported purchasing subject imports instead of the domestic like product during the POI reported that subject import prices were lower.¹¹¹ Given the high degree of physical interchangeability and the importance of price in purchasing decisions, the Commission found that subject import underselling was significant.¹¹²

The Commission also found that subject imports depressed domestic prices to a significant degree.¹¹³ As the Commission explained, prices for all domestic pricing products fell during the POI, along with the domestic industry's net sales average unit values ("AUVs"), and 6 of 25 responding purchasers reported that U.S. producers reduced prices to compete with the subject imports.¹¹⁴ The Commission found that demand, which was strong in 2015 and 2016 and increased during the POI, and the domestic industry's unit cost of goods sold, which also increased, could not explain the consistent declines in domestic prices.¹¹⁵

The Current Reviews. As discussed in section III.B.3 above, we continue to find that there is a high degree of physical interchangeability between subject imports and the domestic like product, and that price remains an important factor in purchasing decisions.

The record in these expedited reviews does not contain recent product-specific pricing information. Based on the high degree of physical interchangeability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that the likely significant volume of subject imports would likely undersell the domestic like product to a significant degree, as during the original investigations, as a means of gaining market share. Absent the discipline of the orders, the likely significant volume of low-priced subject imports would force the domestic industry to lower prices or forgo needed price increases, or else lose sales and market share to subject imports. Consequently, we find that if the orders were to be revoked, subject imports would likely have significant price effects.

E. Likely Impact

The Original Investigations. The Commission found that, while apparent U.S. consumption increased overall during the POI, the domestic industry's financial indicators

¹¹⁰ Original Determinations, USITC Pub. 4812 at 25.

¹¹¹ Original Determinations, USITC Pub. 4812 at 25.

¹¹² Original Determinations, USITC Pub. 4812 at 25.

¹¹³ Original Determinations, USITC Pub. 4812 at 25.

¹¹⁴ Original Determinations, USITC Pub. 4812 at 25.

¹¹⁵ Original Determinations, USITC Pub. 4812 at 26.

deteriorated.¹¹⁶ The Commission observed that over the POI, low-priced subject imports of CISP fittings gained market share and depressed prices for the domestic like product to a significant degree, even as demand increased overall.¹¹⁷ Additionally, from 2016 to 2017, during a period of slowing demand but increasing costs, domestic producers were only able to regain lost market share by continuing to lower their prices to compete with the low prices of subject imports.¹¹⁸

In its non-attribution analysis, the Commission found that, because apparent U.S. consumption increased overall, the declines in the domestic industry's condition could not be explained by declines in consumption.¹¹⁹ The Commission further found that nonsubject imports had only a minimal and consistently declining presence in the U.S. market, and thus could not explain the market share shifts between the domestic product and subject imports.¹²⁰ The Commission concluded that subject imports had a significant adverse impact on the domestic industry.^{121 122}

The Current Reviews. The record in these five-year reviews contains limited information concerning the domestic industry's performance since the original investigations. The information available indicates that the domestic industry's financial performance in 2022 was generally stronger than its performance in the last year examined in the original investigations. The domestic industry's capacity in 2022, at *** short tons, was higher than that in 2017, but its production, at *** short tons, and capacity utilization, at *** percent, were lower.¹²³

The AUV of the domestic industry's U.S. shipments was higher in 2022, at \$*** per short

¹¹⁶ Original Determinations, USITC Pub. 4812 at 27-28.

¹¹⁷ Original Determinations, USITC Pub. 4812 at 28.

¹¹⁸ Original Determinations, USITC Pub. 4812 at 28.

¹¹⁹ Original Determinations, USITC Pub. 4812 at 28.

¹²⁰ Original Determinations, USITC Pub. 4812 at 28-29.

¹²¹ Original Determinations, USITC Pub. 4812 at 29.

¹²² The Commission rejected a respondent's claim that *** explained the financial state of the domestic industry. Confidential Original Determinations at 42 n.174. The Commission acknowledged that the domestic industry's costs increased over the POI; however, it found that that increase did not explain the price reductions that the domestic industry was compelled to make due to low-priced subject imports. *Id.* The Commission further explained that *** did not have an impact on the operating income of the domestic industry. *Id.*

The Commission also rejected respondents' claim that the industry's declining performance resulted from domestic producer ***, finding that most responding importers and purchasers reported experiencing no supply constraints. *Id.*

¹²³ CR/PR at Table I-5. Domestic producers' capacity was *** short tons, production was *** short tons, and capacity utilization was *** percent in 2017. *Id.*

ton, than in 2017.¹²⁴ Although the domestic industry's U.S. shipments by volume were lower in 2022 than in 2017, at *** short tons, they were *** higher by value, at \$***.¹²⁵ The domestic industry's *** percent share of apparent U.S. consumption in 2022 was also higher than in 2017.¹²⁶

The domestic industry's net sales value was higher in 2022 than in 2017, at \$***, and its COGS-to-net-sales ratio was lower, at *** percent, which caused the industry's operating income as a share of net sales to be higher, at *** percent.¹²⁷ The domestic industry's gross profit, at \$***, and operating income, at \$***, were also higher in 2022 than in 2017.¹²⁸ The limited information on the record is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available, we find that revocation of the orders would likely result in a significant volume of subject imports that would likely undersell the domestic like product to a significant degree. Given the high degree of physical interchangeability between subject imports and the domestic like product and the importance of price to purchasers, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices or forgo needed price increases in order to maintain their sales, thereby depressing or suppressing prices for the domestic like product to a significant degree. The likely significant volume of subject imports and their likely price effects would negatively affect the domestic industry's capacity, production, capacity utilization, shipments, and market share, which would in turn negatively impact the industry's profitability and employment. Consequently, we conclude that if the orders were revoked, subject imports would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Although nonsubject import volume has increased since the

¹²⁴ CR/PR at Table I-5. U.S. producers' AUV was \$*** per short ton in 2017. *Id.*

¹²⁵ CR/PR at Table I-5. Domestic shipments were *** short tons worth \$*** in 2017. *Id.*

¹²⁶ CR/PR at Table I-7. The domestic industry's share of apparent U.S. consumption was *** percent in 2017. *Id.*

¹²⁷ CR/PR at Table I-5. In 2017, the domestic industry's net sales value was \$***, its COGS-to-net-sales ratio was *** percent, and its operating income as a share of net sales was *** percent. *Id.*

¹²⁸ CR/PR at Table I-5. The domestic industry's gross profit was \$*** and its operating income was \$*** in 2017. *Id.* The domestic industry's operating income in 2022 has not rebounded to 2015 and 2016 levels. *Id.*

original investigations, from *** short tons in 2017 to 1,878 short tons in 2022,¹²⁹ the record provides no indication that the presence of nonsubject imports, which accounted for *** percent of apparent U.S. consumption in 2022,¹³⁰ would prevent subject imports from significantly increasing their presence in the U.S. market after revocation. Given that the domestic industry accounted for *** percent of apparent U.S. consumption in 2022 and would compete with subject imports on the basis of price, the significant volume of low-priced subject imports that we have found likely after revocation would likely take market share from the domestic industry and/or force domestic producers to either lower prices or forgo price increases to retain market share.¹³¹ Consequently, any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports.

We also recognize that apparent U.S. consumption of CISP fittings was *** percent lower in 2022 than in 2017 (the terminal year of the original investigations).¹³² As discussed in section III.B.1 above, the domestic interested party states that the casting industry outlook became pessimistic in the first half of 2023 and that economic forecasts project a decline in the construction sector in 2024.¹³³ Given the high degree of physical interchangeability between subject imports and the domestic like product and the importance of price to purchasers, declining demand would not prevent low-priced subject imports from China from significantly increasing their presence in the U.S. market after revocation of the orders, but rather would exacerbate the likely adverse impact of subject imports on the domestic industry in a smaller U.S. market.

In sum, we conclude that if the orders were revoked, subject imports of CISP fittings from China would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

IV. Conclusion

For the above reasons, we determine that revocation of the antidumping and countervailing duty orders on CISP fittings from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

¹²⁹ CR/PR at Table I-7.

¹³⁰ CR/PR at Table I-7.

¹³¹ CR/PR at Table I-7.

¹³² *Derived from* CR/PR at Table I-7.

¹³³ Domestic Interested Party Response at 16-17, Exhibit 13, Exhibit 14.

Information obtained in these reviews

Background

On July 3, 2023, the U.S. International Trade Commission (“Commission”) 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 antidumping and countervailing duty orders on cast iron soil pipe fittings (“CISP fittings”) from China would likely lead to the continuation or recurrence of material injury to a domestic industry.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.³ ⁴ Table I-1 presents information relating to the background and schedule of this proceeding:

Table I-1
CISP fittings: Information relating to the background and schedule of this proceeding

Effective date	Action
July 3, 2023	Notice of initiation by Commerce (88 FR 42688, July 3, 2023)
July 3, 2023	Notice of institution by Commission (88 FR 42753, July 3, 2023)
October 6, 2023	Commission’s vote on adequacy
November 6, 2023	Commerce’s results of its expedited reviews (88 FR 76172, November 6, 2023)
December 21, 2023	Commission’s determinations and views

¹ 19 U.S.C. 1675(c).

² 88 FR 42753, July 3, 2023. 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. 88 FR 42688, July 3, 2023. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

³ As part of their response to the notice of institution, interested parties were requested to provide company-specific information. That information is presented in app. B. Summary data compiled in the original investigations are presented in app. C.

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of Cast Iron Soil Pipe Institute (“CISPI”) and its two individual members⁵ (collectively referred to herein as “domestic interested parties”). CISPI is a U.S. trade association whose members produce CISP fittings and account for all known U.S. production of CISP fittings.⁶

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table I-2.

Table I-2

CISP fittings: Summary of responses to the Commission’s notice of institution

Interested party	Type	Number of firms	Coverage
U.S. producer	Domestic	2	100%
U.S. trade association	Domestic	1	100%

Note: The U.S. producer and trade association coverage figures presented are the domestic interested parties’ estimates of their share of total U.S. production of CISP fittings during 2022. Domestic interested parties’ response to the notice of institution, August 2, 2023, pp. 25-26 and exh. 1.

Party comments on adequacy

The Commission received party comments from CISPI on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews. CISPI requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on CISP fittings.⁷

⁵ The members of CISPI are as Charlotte Pipe & Foundry, Charlotte, North Carolina; McWane, Inc., Birmingham, Alabama.

⁶ Domestic interested parties’ response to the notice of institution, August 2, 2023, pp. 25-26.

⁷ Domestic interested parties’ comments on adequacy, September 14, 2023, p. 2.

The original investigations

The original investigations resulted from petitions filed on July 13, 2017, with Commerce and the Commission by CISPI, Mundelein, Illinois.⁸ On July 11, 2018, Commerce determined that imports of CISP fittings from China were being subsidized by the government of China.⁹ On July 17, 2018, Commerce determined that imports of CISP fittings from China were being sold at less-than-fair-value (“LTFV”).¹⁰ The Commission determined on August 22, 2018, that the domestic industry was materially injured by reason of LTFV and subsidized imports of CISP fittings from China.¹¹ On August 28, 2018, Commerce issued its antidumping and countervailing duty orders with the final weighted-average dumping margins ranging from 33.67 to 360.39 percent and net subsidy rates ranging from 7.37 to 133.94 percent.¹²

Previous and related investigations

The Commission has conducted one previous import relief investigation on CISP fittings and several investigations covering various forms of cast iron pipe and cast iron soil pipe, as presented in table I-3.

⁸ Cast Iron Soil Pipe Fittings from China, Inv. Nos. 701-TA-583 and 731-TA-1381 (Final), USITC Publication 4812, August 2018 (“Original publication”), p. I-1.

⁹ 83 FR 32075, July 11, 2018.

¹⁰ 83 FR 33205, July 17, 2018.

¹¹ 83 FR 43899, August 28, 2018. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on China.

¹² 83 FR 44570 and 83 FR 44566, August 31, 2018.

Table I-3**CISP fittings: Previous and related Commission proceedings and current status**

Date	Number	Country	Product	ITC original determination	Current status
1972	AA1921-100	Poland	Cast iron soil pipe fittings	Negative	---
1977	TA-201-26	Global	Malleable cast iron pipe and tube fittings	Negative	---
1984	701-TA-221	Brazil	Cast iron pipe fittings	Negative	---
1984	701-TA-222	India	Cast iron pipe fittings	Terminated	---
1984	731-TA-278	Brazil	Malleable cast iron pipe fittings	Affirmative	Order revoked after first review, 2000
1984	731-TA-279	Korea	Malleable cast iron pipe fittings	Affirmative	Order revoked after termination of second review, 2005
1984	731-TA-280	Taiwan	Malleable cast iron pipe fittings	Affirmative	Order revoked after first review, 2000
1984	731-TA-281	Taiwan	Non-malleable cast iron pipe fittings	ITA Negative	--
1985	731-TA-347	Japan	Cast iron pipe fittings	Affirmative	Order revoked after termination of second review, 2005
1985	731-TA-348	Thailand	Cast iron pipe fittings	Affirmative	Order revoked after first review, 2000
2003	731-TA-990	China	Non-malleable cast iron pipe fittings	Affirmative	Order continued after third review, 2019
2003	731-TA-1021	China	Malleable iron pipe fittings	Affirmative	Order continued after third review, 2019
2019	701-TA-597	China	Cast iron soil pipe	Affirmative	Order in place
2019	731-TA-1407	China	Cast iron soil pipe	Affirmative	Order in place

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.

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of CISP fittings from China with the intent of issuing the final results of these reviews based on the facts available not later than October 31, 2023.¹³ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx>. Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of CISP fittings from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise covered by the scope of this order is cast iron soil pipe fittings, finished and unfinished, regardless of industry or proprietary specifications, and regardless of size. Cast iron soil pipe fittings are nonmalleable iron castings of various designs and sizes, including, but not limited to, bends, tees, wyes, traps, drains (other than drain bodies), and other common or special fittings, with or without side inlets. Cast iron soil pipe fittings are classified into two major types—hubless and hub and spigot. Hubless cast iron soil pipe fittings are manufactured without a hub, generally in compliance with Cast Iron Soil Pipe Institute (CISPI) specification 301 and/or American Society for Testing and Materials (ASTM) specification A888. Hub and spigot pipe fittings have hubs into which the spigot (plain end) of the pipe or fitting is inserted. Cast iron soil pipe fittings are generally distinguished from other types of nonmalleable

¹³ Letter from Jill E. Pollack, Senior Director, Office VII, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, August 22, 2023.

cast iron fittings by the manner in which they are connected to cast iron soil pipe and other fittings. Excluded from this scope are all drain bodies. Drain bodies are normally classified in subheading 7326.90.86.88 of the Harmonized Tariff Schedule of the United States (HTSUS). The cast iron soil pipe fittings subject to the scope of this order are normally classified in subheading 7307.11.0045 of the HTSUS: Cast fittings of nonmalleable cast iron for cast iron soil pipe. They may also be entered under HTSUS 7324.29.0000 and 7307.92.3010. The HTSUS subheadings and specifications are provided for convenience and customs purposes only; the written description of the scope of this order is dispositive.^{14 15}

U.S. tariff treatment

CISP fittings are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 7307.11.0045. The general rate of duty is 4.8 percent *ad valorem* for HTS subheading 7307.11.00.¹⁶ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection (“CBP”).

Effective September 24, 2018, CISP fittings originating in China (imported under HTS statistical reporting number 7307.11.0045) were subject to an additional 10 percent *ad valorem* duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for CISP fittings was increased to 25 percent.¹⁷

¹⁴ 83 FR 44566 and 83 FR 44570, August 31, 2018.

¹⁵ Drain bodies were included in the scope of the original investigations and were found by the Commission to be a separate domestic like product. Because the Commission made a negative determination of material injury with respect to drain bodies, Commerce excluded these from the scope of the orders. 83 FR 44570, August 31, 2018.

¹⁶ The merchandise subject to these reviews may also be imported under the following HTS statistical reporting numbers: 7324.29.0000 and 7307.92.3010. The general rate of duty is free for HTS subheadings 7324.29.00 and 7307.92.30. USITC, HTS (2023) Basic Revision 10, Publication 5451, July 2023, p. 73-20, 73-40, and 73-22.

¹⁷ 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e)–20(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2023) Revision 10, Publication 5451, July 2023, pp. 99-III-28–99-III-52, 99-III-301. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

Description and uses¹⁸

CISP fittings are iron castings used for connecting or plugging cast iron soil pipe, primarily in sanitary and storm drain piping, waste piping, and vent piping systems of buildings, and are intended for gravity flow non-pressure applications. The scope of these orders includes non-malleable finished and unfinished CISP fittings, regardless of industry or proprietary specifications. CISP fittings are produced in various designs and sizes, consisting of bends, tees, wyes, traps, drains (other than drain bodies), and other common or special fittings, with or without side inlets.¹⁹ Figure I-1 displays examples of subject cast iron soil pipe fitting products. Finished CISP fittings are coated, while unfinished CISP fittings are uncoated. The coating is generally an asphaltic or black paint coating, but epoxy-coated CISP fittings are also available.²⁰ The coatings provide a smooth, glossy, hard but not brittle finish that is free of blisters and blemishes.

Figure I-1

CISP fittings: Images of CISP fittings



Source: Ferguson plc, https://www.ferguson.com/category/pipe-fittings/cast-iron-fittings-flanges/?customsort=sku_sales_i%20desc&prefn1=sku_brand_s&prefv1=Tyler%2BPipe, (Accessed September 13, 2023).

The material from which CISP fittings are made, cast iron, is an alloy primarily composed of iron, carbon, and silicon. The carbon content of cast iron is greater than 2 percent, while steel contains less than 2 percent carbon. In comparison with steel, the carbon and silicon content of cast iron gives it characteristics that are beneficial to casting, such as a lower melting

¹⁸ Unless otherwise noted, this information is based on the original publication, pp. I-10–I-12.

¹⁹ A side inlet is an opening in a fitting that is typically perpendicular to the run (the direction of the flow) of the piping system.

²⁰ In the original investigations, one importer, NewAge Casting (“NewAge”), was known to sell epoxy-coated CISP fittings. Domestic producers only reported offering asphaltic or black paint coating to the U.S. market.

temperature, more fluidity in a molten state, less reactivity with molding materials, and less change in volume during the conversion from a liquid to a solid.

The scope of these orders contains only non-malleable cast iron, which includes gray iron and ductile iron. Gray iron contains interconnected graphite flakes which form during solidification of the iron and ductile iron contains graphite that occurs as spheroids owing to the addition of a small amount of magnesium to the molten iron. Malleable cast iron, which is not included in the scope of these investigations, contains graphite which occurs as irregularly shaped nodules of graphite as a result of heat treatment after the castings are formed. The form in which the graphite occurs in the cast iron determines a range of properties in the cast iron. Malleable cast iron is not used to produce CISP fittings and does not meet CISPI or ASTM standards for CISP fittings.

CISP fittings are classified as either hub and spigot fittings or hubless fittings. Hub and spigot fittings have hubs into which the spigot (plain end) of the pipe or of another fitting is inserted. The joint is sealed with a compression gasket²¹ or lead and oakum.²² Hubless fittings are manufactured without a hub and are joined to pipe or another fitting using a hubless coupling that fits over the ends of the pipe and fittings and is tightened to seal the joint. Hubless fittings are produced to CISPI 301 and ASTM A888 standards and hub and spigot fittings are produced to ASTM A74 standards. Hub and spigot fittings meet the CISPI 301 standard in all aspects other than product dimensions and shapes.

²¹ A compression gasket is made of rubber or another material and fits in between the inside of the hub and the outside of the spigot to create a seal.

²² Oakum is made from vegetable fiber, cotton, or hemp, and is packed into the joint between the hub and spigot. Molten lead is then poured into the joint and allowed to solidify and the joint is caulked with a caulking iron to seal the joint.

Manufacturing process²³

CISP fittings are manufactured by melting scrap iron, steel scrap,²⁴ and alloys in a cupola furnace²⁵ and casting²⁶ the metal into the desired shapes.²⁷ The first step in producing CISP fittings is to screen all scrap metal for radiation and to remove any contaminated materials. The scrap metal is then transferred to a storage area until it is time to melt the metal in the cupola furnace.

In a vertically erected, cylindrical cupola furnace, an initial layer of coke is ignited and then the scrap and alloys, coke, and limestone (which helps remove coke ash and other impurities) are loaded in alternating layers. Generally, the raw material inputs consist of eight to ten parts of metal by weight to one part of coke. Alloys added to the melt include ferrosilicon, and silicon carbide, among others, although alloys only account for 1 or 2 percent of the total volume of metal. Tuyeres²⁸ inject combustion air or blast air heated up to 1,200 degrees Fahrenheit, and as the initial inputs are reduced, additional scrap, coke, and limestone are added to the furnace, resulting in a melting process that is usually continuous. The molten metal is discharged through a taphole near the bottom of the furnace and is either stored in a holding furnace or is taken directly to the casting area in refractory-lined ladles.

The molten metal from the cupola furnace is cast into the desired CISP fitting shape using either sand molds or permanent metal molds. When using sand molds, the molten iron is poured from a ladle into the sand molds which contain sand cores. Both types of mold are produced on site. The molds provide the exterior shape of the fitting while the cores are used to produce the hollow space inside the fitting. The molten iron cools inside the mold until it solidifies, at which point the castings are removed from the molds and moved to a grate, where sand from the used molds and cores is collected and the fittings are allowed to further cool in the open air. Once fully cool, the castings are still covered with a small amount of sand that must be removed. The sand from the used molds and cores is then recycled.

²³ Unless otherwise noted, this information is based on Investigation Nos. 701-TA-583 and 731-TA-1381 (Final): Cast Iron Soil Pipe Fittings from China, Confidential Report, INV-QQ-085, July 23, 2018, as revised in INV-QQ-086, July 25, 2018, and as supplemented in INV-QQ-087, August 1, 2018 (“Original confidential report”), pp. I-16–I-18.

²⁴ ***.

²⁵ Electric melting equipment can be used as well, but the cupola furnace is the primary production method.

²⁶ Casting is the process of pouring molten metal into a mold and allowing it to solidify.

²⁷ Chinese manufacturers reportedly use a high percentage of pig iron in the production of CISP fittings owing to the lack of availability of scrap iron and steel scrap.

²⁸ Tuyeres are nozzles through which hot combustion air or blast air is directed into the furnace.

When permanent metal molds are used, the interior of a reusable, two-piece, water- or air-cooled metal mold is coated with soot from burning acetylene to prevent the mold from chilling the molten iron and to prevent the casting from sticking to the mold. A ladle pours the molten iron into the molds which are water- or air-cooled and contain sand cores and the metal is allowed to solidify. The fittings are then removed from the mold to finish cooling and to be cleaned. The used molds are cleaned and reused.

Cleaning the fittings after they are removed from the molds involves removing not only sand, but imperfections such as gates, fins, and risers. This is accomplished using such methods as shot blast, tumbling machines, reamers, and grinding equipment. After the fittings are cleaned, they are inspected and tested before they receive any finishing they might need, including asphaltic, black paint, and epoxy finishes. Domestic producers generally finish CISP fittings by dipping them into a bath of asphaltic coating material. Alternatively, in the original investigations, one domestic producer reported using “e-coating” to finish a small amount of its CISP production²⁹ and one foreign producer reported using an epoxy finish which is applied to CISP fittings using a proprietary process. The coatings provide a smooth, glossy, hard but not brittle finish that is free of blisters and blemishes. The epoxy coating reportedly also provides additional protection against corrosion.³⁰

²⁹ ***.

³⁰ *** In the original investigations, NewAge claimed that its epoxy-coated CISP fittings can resist pH levels of 2 to 12, while traditionally coated CISP fittings can resist pH levels of only 4.3 and above. In the original investigations, the Cast Iron Soil Pipe Institute claimed that 95% of the soils in the United States are not corrosive to cast iron and that, in soils which may cause corrosion, a loose wrap of polyethylene film can be used to protect CISP fittings coated with asphaltic coating and black paint coating.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from three firms, which accounted for approximately all U.S. production of CISP fittings other than drain bodies in the United States during 2017.³¹

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of two known and currently operating U.S. producers of CISP fittings. The two firms providing U.S. industry data in response to the Commission's notice of institution believe they accounted for 100 percent of production of CISP fittings in the United States during 2022.³²

³¹ The three U.S. producers were Charlotte, McWane, and Zurn Industries ("Zurn"). ***. Original publication, pp. 16 and III-1; Final Consolidated Report and Views, EDIS Doc. 802623, pp. 22-23

³² Domestic interested parties' response to the notice of institution, August 2, 2023, p. 26 and exh. 1.

Recent developments

Table I-4 presents events in the U.S. industry since the Commission's original investigation.³³

Table I-4
CISP fittings: Developments in the U.S. industry

Item	Firm	Event
Plant relocation	Charlotte Pipe	In May 2020, Charlotte Pipe announced plans to relocate its Charlotte, NC foundry to a 428-acre property in Oakboro, NC. The new greenfield foundry reportedly was expected to require an investment of at least \$325 million and was expected to start full operations in August 2023. Charlotte Pipe manufactures cast iron and plastic pipes and fittings.
Plant relocation	McWane	In March 2022, McWane announced that it would close its AB&I Foundry in Oakland, CA and relocate those operations to Tyler, TX.

Source: "Charlotte Pipe and Foundry to build new state-of-the-art plant," Charlotte Pipe and Foundry Company, May 12, 2020, https://www.charlottepipe.com/Documents/PressReleases/NewFoundry_PressRelease.pdf. "SPIRIT OF STANLY: Charlotte Pipe looks to future of operations in Oakboro," The Stanly News & Press, March 26, 2023, <https://www.thesnaponline.com/2023/03/26/spirit-of-stanly-charlotte-pipe-looks-to-future-of-operations-in-oakboro/>. "Our Locations," Charlotte Pipe and Foundry Company, no date, accessed August 22, 2023, https://careers.charlottepipe.com/content/location/?locale=en_US. "AB&I Foundry: After announcing permanent closure, owners file plans to redevelop East Oakland site," The Oaklandside, March 29, 2022, <https://oaklandside.org/2022/03/29/abi-foundry-after-announcing-permanent-closure-owners-file-plans-to-redevelop-east-oakland-site/#:~:text=Earlier%20this%20month%2C%20McWane%20announced,facility%20in%20Tyler%2C%20Texas.>

³³ For recent developments, in tariff treatment, please see "U.S. tariff treatment" section.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews.³⁴ Table I-5 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and in the domestic interested parties' response to the notice of institution in the current reviews.

Table I-5

CISP fittings: Trade and financial data submitted by U.S. producers, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio is in percent

Item	Measure	2015	2016	2017	2022
Capacity	Quantity	***	***	***	***
Production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
U.S. shipments	Quantity	***	***	***	***
U.S. shipments	Value	***	***	***	***
U.S. shipments	Unit value	***	***	***	***
Net sales	Value	***	***	***	***
COGS	Value	***	***	***	***
COGS to net sales	Ratio	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***
SG&A expenses	Value	***	***	***	***
Operating income or (loss)	Value	***	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***

Source: For the years 2015-17, data are compiled using data submitted in the Commission's original investigations. For the year 2022, data are compiled using data submitted by the domestic interested parties. Domestic interested parties' response to the notice of institution, August 2, 2023, exh 1 and supplemental response, September 22, 2023, exh 1.

Note: Because the Commission made a negative determination of material injury with respect to drain bodies and excluded U.S. producer *** from the domestic industry, table SUPPLEMENT-2 was used to present data for the years 2015-17, which excludes U.S. producer *** data and includes all CISP fittings except drain bodies.

Note: *** Domestic interested parties' response to the notice of institution, August 2, 2023, exh. 1.

Note: For a discussion of data coverage, please see "U.S. producers" section.

³⁴ Individual company trade and financial data are presented in app. B.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.³⁵ In its original affirmative determinations, the Commission defined the Domestic Like Product as all cast iron soil pipe fittings, except drain bodies.³⁶

The Domestic Industry is the U.S. producers as a whole of the Domestic Like Product, or those producers whose collective output of the Domestic Like Product constitutes a major proportion of the total domestic production of the product. In its original affirmative determinations, the Commission defined the Domestic Industry as all U.S. producers of cast iron soil pipe fittings, except drain bodies. The Commission excluded one domestic producer from the Domestic Industry under the related parties provision.³⁷

U.S. importers

During the final phase of the original investigations, the Commission received 15 usable U.S. importer questionnaires, representing over 100 percent of U.S. imports from China in 2017 under HTS statistical reporting number 7307.11.0045.³⁸ Import data presented in the original investigations are based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission’s notice of institution, the domestic interested parties provided a list of 23 potential U.S. importers of CISP fittings.³⁹

³⁵ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

³⁶ 88 FR 42753, July 3, 2023.

³⁷ 88 FR 42753, July 3, 2023.

³⁸ Original publication, p. IV-1.

³⁹ Domestic interested parties’ response to the notice of institution, August 2, 2023, exh. 25.

U.S. imports

Table I-6 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2022 imports by quantity).

Table I-6
CISP fittings from China: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

U.S. imports from	Measure	2018	2019	2020	2021	2022
China	Quantity	1,897	1,284	277	267	290
India	Quantity	187	1,212	942	1,461	1,150
Malaysia	Quantity	--	--	330	661	516
Canada	Quantity	114	138	174	83	100
Cambodia	Quantity	--	22	188	23	--
All other sources	Quantity	32	70	71	21	113
Nonsubject sources	Quantity	334	1,437	1,705	2,250	1,878
All import sources	Quantity	2,230	2,720	1,983	2,516	2,168
China	Value	2,998	2,194	632	580	894
India	Value	272	2,019	1,829	2,911	2,981
Malaysia	Value	--	--	460	985	890
Canada	Value	433	679	898	394	783
Cambodia	Value	--	28	289	44	--
All other sources	Value	101	223	248	124	794
Nonsubject sources	Value	805	2,949	3,724	4,458	5,448
All import sources	Value	3,803	5,143	4,356	5,038	6,342
China	Unit value	1,581	1,709	2,279	2,174	3,084
India	Unit value	1,451	1,665	1,941	1,993	2,593
Malaysia	Unit value	--	--	1,394	1,490	1,726
Canada	Unit value	3,777	5,117	5,163	4,726	7,799
Cambodia	Unit Value	--	1,280	1,537	1,864	--
All other sources	Unit value	3,156	3,186	3,493	5,905	7,027
Nonsubject sources	Unit value	2,414	2,053	2,184	1,982	2,901
All import sources	Unit value	1,705	1,890	2,197	2,002	2,925

Source: Compiled from official Commerce statistics for HTS statistical reporting number 7307.11.0045, accessed August 2, 2023. Zeroes are suppressed and shown as "---". Because of rounding, figure may not add to total shown.

Note: CBP has made affirmative determinations in a number of Enforce and Protect Act investigations throughout 2020-2022 that Chinese-origin CISP fittings were being transshipped through Cambodia. In 2023, CBP initiated EAPA investigations into Chinese-origin CISP fittings being transshipped through India and Malaysia. Domestic interested parties' response to the notice of institution, August 2, 2023, pp.18-22. Therefore, imports from China are likely understated during 2020-22.

Apparent U.S. consumption and market shares

Table I-7 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table I-7
CISP fittings: Apparent U.S. consumption and market shares, by source and period

Quantity in short tons; value in 1,000 dollars; shares in percent

Source	Measure	2015	2016	2017	2022
U.S. producers	Quantity	***	***	***	***
China	Quantity	***	***	***	290
Nonsubject sources	Quantity	***	***	***	1,878
All import sources	Quantity	***	***	***	2,168
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	***	***	***	***
China	Value	***	***	***	894
Nonsubject sources	Value	***	***	***	5,448
All import sources	Value	***	***	***	6,342
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
China	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
China	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2015-17, data are compiled using data submitted in the Commission's original investigations (table SUPPLEMENT-2, which excludes U.S. producer *** data and includes all CISP fittings except drain bodies). For the year 2022, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 7307.11.0045, accessed August 2, 2023.

Note: For the years 2015-17, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports. U.S. producers' and U.S. importers' U.S. shipments do not sum to apparent U.S. consumption for the years 2015 and 2016 because table SUPPLEMENT-2 excludes *** U.S. shipments in the U.S. producers' shipments presented, but includes *** U.S. shipments in the apparent U.S. consumption presented.

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer questionnaires from twelve firms, which accounted for approximately *** percent of CISP fittings exports from China to the United States during 2017. Of the responding firms, five reported production of CISP fittings, accounting for at least *** percent of production of CISP fittings in China during 2017.⁴⁰

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 22 possible producers of CISP fittings in China.⁴¹

Recent developments

There were no major developments in the Chinese industry since the imposition of the orders identified by interested parties in the proceeding and no relevant information from outside sources was found.

⁴⁰ Original confidential report, pp. VII-3 – VII-4.

⁴¹ Domestic interested parties' response to the notice of institution, August 2, 2023, exh. 26.

Exports

Table I-8 presents export data for non-malleable cast iron tube or pipe fittings, a category that includes CISP fittings and out-of-scope products, from China (by export destination in descending order of quantity for 2022).

Table I-8
Non-malleable cast iron tube or pipe fittings: Quantity of exports from China, by destination and period

Quantity in short tons

Destination market	2018	2019	2020	2021	2022
United States	141,628	110,279	99,270	101,322	88,791
South Korea	13,476	17,511	17,202	17,309	18,476
Taiwan	10,292	12,108	13,524	12,064	16,009
Hong Kong	12,670	10,747	11,446	16,229	15,238
Canada	11,043	11,100	11,067	13,576	14,578
Spain	10,345	12,297	11,194	10,923	11,592
Australia	9,836	10,129	10,577	11,091	10,622
Belgium	5,723	7,572	6,442	7,491	8,804
Japan	9,484	11,546	8,665	7,481	8,082
Singapore	5,872	8,103	3,717	6,105	7,844
All other markets	124,949	137,982	131,213	135,932	133,506
All markets	355,319	349,375	324,318	339,523	333,541

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7307.11, accessed August 21, 2023. These data may be overstated as HS subheading 7307.11 may contain products outside the scope of these reviews.

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

Third-country trade actions

Based on available information, CISP fittings from China have not been subject to other antidumping or countervailing duty investigations outside the United States.

The global market

Table I-9 presents global export data for non-malleable cast iron tube or pipe fittings, a category that includes CISP fittings and out-of-scope products by source in descending order of quantity for 2022.

Table I-9
Non-malleable cast iron tube or pipe fittings: Quantity of global exports by country and period

Quantity in short tons

Exporting country	2018	2019	2020	2021	2022
China	355,319	349,375	324,318	339,523	333,541
India	26,981	26,170	19,089	52,127	76,961
Malaysia	998	1,883	3,496	4,666	9,355
Netherlands	6,196	7,926	7,848	10,458	9,284
United Kingdom	7,615	7,624	6,537	7,518	7,509
Italy	10,858	9,841	6,255	6,500	6,969
France	4,176	4,061	3,894	5,274	4,637
Germany	4,743	3,920	4,115	4,247	4,351
Brazil	3,306	4,510	3,296	3,772	3,880
United States	3,660	3,805	2,757	2,711	3,347
All other exporters	38,441	42,363	37,998	31,997	21,705
All exporters	462,292	461,478	419,601	468,793	481,540

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7307.11, accessed August 21, 2023. These data may be overstated as HS subheading 7307.11 may contain products outside the scope of these reviews.

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

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
88 FR 42688, July 3, 2023	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-07-03/pdf/2023-14104.pdf
88 FR 42756, July 3, 2023	<i>Cast Iron Soil Pipe Fittings From China; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-07-03/pdf/2023-13850.pdf

APPENDIX B
COMPANY-SPECIFIC DATA

* * * * *

APPENDIX C
SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Split like product: All fittings except drain bodies excluding related party

Table SUPPLEMENT-2

Other CISP fittings: Summary data concerning the U.S. market, excluding one U.S. producer *, 2015-17, January to March 2017, and January to March 2018**

(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			Comparison years			Jan-Mar
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):.....									
Included firms.....	***	***	***	***	***	***	***	***	***
Excluded firms.....	***	***	***	***	***	***	***	***	***
All U.S. producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):.....									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):.....									
Included firms.....	***	***	***	***	***	***	***	***	***
Excluded firms.....	***	***	***	***	***	***	***	***	***
All U.S. producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):.....									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. imports from:									
China:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. This table presents data on split like product, all other CISP fittings except drain bodies ("other CISP fittings") which are a subset of Commerce's scope. These data exclude the domestic operations of ***.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 7307.11.0045, accessed June 8, 2018.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties and they provided contact information for the following five firms as top purchasers of CISP fittings: ***. Purchaser questionnaires were sent to these five firms. Two firms, **, provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for cast iron soil pipe fittings that have occurred in the United States or in the market for cast iron soil pipe fittings from China since January 1, 2018?

Purchaser	Yes / No	Changes that have occurred
***	***	***
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for cast iron soil pipe fittings in the United States or in the market for cast iron soil pipe fittings in China within a reasonably foreseeable time?

Purchaser	Yes / No	Anticipated changes
***	***	***
***	***	***

