

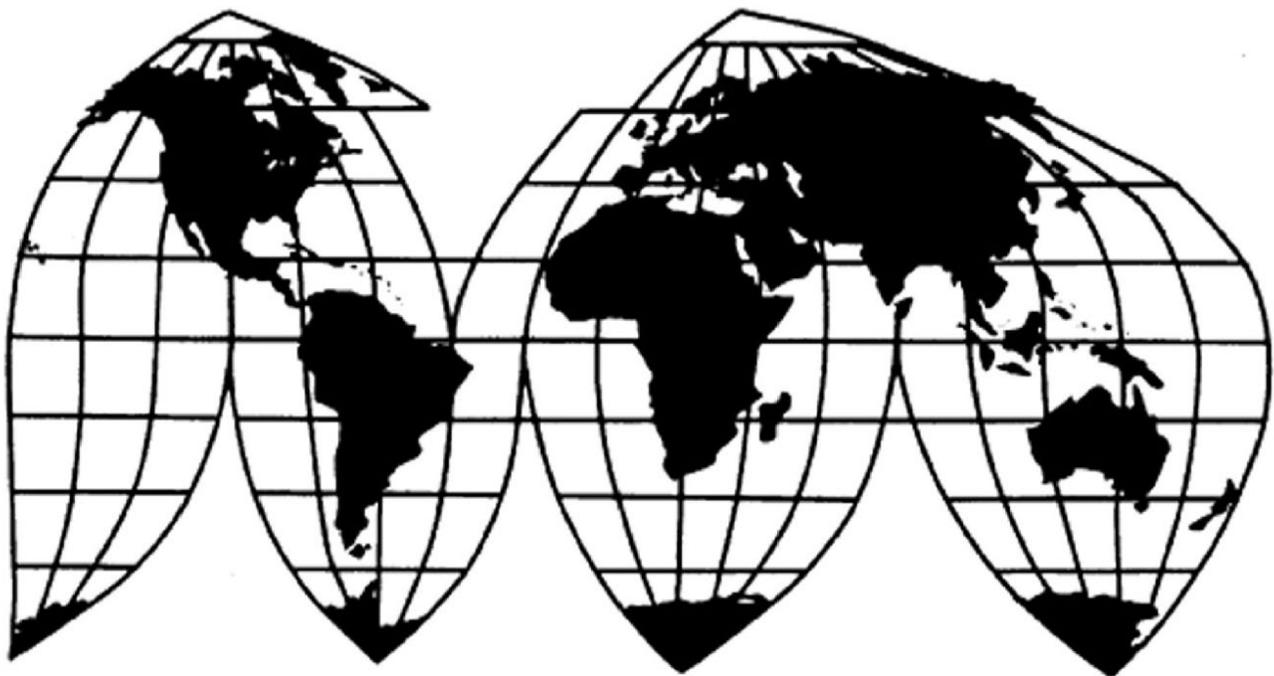
Strontium Chromate from Austria and France

Investigation Nos. 731-TA-1422–1423 (Review)

Publication 5605

April 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets (***) in confidential reports and is deleted and replaced with asterisks (***) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-1422–1423 (Review)

Strontium Chromate from Austria and France

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 duty orders on strontium chromate from Austria and France would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on October 1, 2024 (89 FR 79947) and determined on January 6, 2025 that it would conduct expedited reviews (90 FR 8141, January 24, 2025).

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 duty orders on Strontium Chromate from Austria and France would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original investigations: The original investigations resulted from petitions filed on September 5, 2018, with the Department of Commerce (“Commerce”) and the Commission by Lumimove Inc., d.b.a. WPC Technologies (“WPC”), a domestic producer of strontium chromate.¹ On October 8, 2019, Commerce determined that imports of strontium chromate from Austria and France were being sold at less than fair value (“LTFV”).² The Commission determined on November 21, 2019, that the domestic industry was materially injured by reason of LTFV imports of strontium chromate from Austria and France.³ On November 27, 2019, Commerce issued antidumping duty orders on strontium chromate from Austria and France.⁴

Current Reviews: On October 1, 2024, the Commission instituted these first five-year reviews.⁵ It received one response to the notice of institution from WPC.⁶ No respondent interested party responded to the notice of institution or participated in these reviews. On January 6, 2025, the Commission determined that the domestic interested party group response to its notice of institution was adequate and that the respondent interested party group responses were inadequate.⁷ The Commission did not find any circumstances that would

¹ *Strontium Chromate from Austria and France*, Inv. Nos. 731-TA-1422-1423 (Final), USITC Pub. 4992 (Nov. 2019) at 3 (“*Original Determinations*”).

² *Strontium Chromate from Austria: Final Affirmative Determination of Sales at Less Than Fair Value*, 84 Fed. Reg. 53676 (Oct. 8, 2019); *Strontium Chromate from France: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 84 Fed. Reg. 53678 (Oct. 8, 2019).

³ *Strontium Chromate from Austria and France*, 84 Fed. Reg. 65173 (Nov. 26, 2019).

⁴ *Strontium Chromate from Austria and France: Antidumping Duty Orders*, 84 Fed. Reg. 65349 (Nov. 27, 2019).

⁵ *Strontium Chromate from Austria and France; Institution of Five-Year Reviews*, 89 Fed. Reg. 79947 (Oct. 1, 2024).

⁶ WPC Response to the Notice of Institution, EDIS Doc. 836110 (Oct. 31, 2024) (“WPC Response”) at 1.

⁷ Explanation of Commission Determination on Adequacy, EDIS Doc. 841117 (Jan. 15, 2025).

warrant conducting full reviews and thus determined that it would conduct expedited reviews.⁸ On March 13, 2025, WPC filed comments with the Commission pursuant to Commission rule 207.62(d) arguing that the Commission should reach affirmative determinations.⁹

U.S. industry data are based on information submitted by WPC in its response to the notice of institution, which is estimated to have accounted for all domestic production of strontium chromate in 2023.¹⁰ U.S. import data and related information are based on Commerce’s official import statistics.¹¹ Foreign industry data and related information are based on information from the original investigations, as well as information submitted by WPC in these reviews and publicly available information, such as Global Trade Atlas (“GTA”) data, gathered by the Commission.¹² One U.S. purchaser of strontium chromate, ***, 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 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

⁸ Explanation of Commission Determination on Adequacy, EDIS Doc. 841117 (Jan. 15, 2025).

⁹ Domestic Industry’s Final Comments, EDIS Doc. 845796 (March 13, 2025) (“WPC Final Comments”).

¹⁰ WPC Response at 2; Confidential Report, INV-WW-154, EDIS Doc. 839690 (Dec. 19, 2024) (“CR”); *Strontium Chromate from Austria and France*, Inv. Nos. 731-TA-1422-1423 (Review), USITC Pub. 5605 (April 2025) (“PR”), at 1.8.

¹¹ CR/PR at Tables 1.5-1.6. Official import statistics are based on HTS statistical reporting number 2841.50.9100, which may contain out-of-scope products and thus overstate subject import volume. *Id.* at 1.11.

¹² CR/PR at 1.15-1.18. GTA data is based on HS subheading 2841.50, which is a basket category that may contain products outside the scope of these reviews. *Id.* at 1.15.

¹³ CR/PR at D.3.

¹⁴ 19 U.S.C. § 1677(4)(A).

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).

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 these orders is strontium chromate, regardless of form (including but not limited to, powder (sometimes known as granular), dispersions (sometimes known as paste), or in any solution). The chemical formula for strontium chromate is SrCrO₄ and the Chemical Abstracts Service (CAS) registry number is 7789-06-2.

Strontium chromate that has been blended with another product or products is included in the scope if the resulting mix contains 15 percent or more of strontium chromate by total formula weight. Products with which strontium chromate may be blended include, but are not limited to, water and solvents such as Aromatic 100 Methyl Amyl Ketone (MAK)/2-Heptanone, Acetone, Glycol Ether EB, Naphtha Leicht, and Xylene. Subject merchandise includes strontium chromate that has been processed in a third country into a product that otherwise would be within the scope of these *Orders* if processed in the country of manufacture of the in-scope strontium chromate.¹⁷

Strontium chromate is a chemical compound that is a yellow powder or granular solid that is insoluble in water.¹⁸ Its chemical formula is SrCrO₄.¹⁹ Strontium chromate is produced through a chemical reaction and several following processing steps to yield the final powder.²⁰

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).

¹⁷ *Strontium Chromate from Austria and France: Final Results of the First Expedited Sunset Reviews of the Antidumping Duty Orders*, 90 Fed. Reg. 8182 (Jan. 27, 2025) (“*Final Results*”) and accompanying *Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders on Strontium Chromate from Austria and France* (“*Issues and Decision Memorandum*”), A-433-813, A-427-830 (Sunset Reviews), EDIS Doc. 845140 (Jan. 21, 2025) at 2.

¹⁸ CR/PR at 1.4.

¹⁹ CR/PR at 1.3.

²⁰ CR/PR at 1.7.

The reaction portion involves a strontium source, typically strontium carbonate (SrCO_3), and a chromate source, usually sodium dichromate ($\text{Na}_2\text{Cr}_2\text{O}_7$), which are mixed together to precipitate strontium chromate.²¹ The strontium chromate is then dried, milled, and packaged into sacks.²² Strontium chromate powder can be combined with various solvents to make a paste (or dispersion) form of the product.²³ Strontium chromate is a very effective corrosion inhibitor, and is widely used as a corrosion-resistant pigment in paints and coatings for the protection of steel, aluminum, and alloys.²⁴ Reported end uses include industrial coatings, anticorrosive paints, primers, and specialty seals for the aerospace and non-aerospace industries.²⁵

In the original investigations, the Commission defined a single domestic like product consisting of all strontium chromate, coextensive with the scope. As the Commission explained, both the powder and paste forms of strontium chromate have the same basic chemical composition and anticorrosive properties, are used as an anticorrosive in paint and coating applications, and are generally interchangeable. The Commission also found that both forms of strontium chromate overlapped in terms of production processes, channels of distribution, and customer and producer perceptions, and were priced within a reasonable range of one another.²⁶ To the extent that there were differences between some powders and pastes, the Commission found that there did not appear to be a clear dividing line between the two.²⁷

In the current reviews, WPC does not contest the Commission's definition of the domestic like product from the original investigations.²⁸ The record does not contain any new information suggesting that the pertinent product characteristics and uses of strontium chromate have changed since the original investigations so as to warrant revisiting the Commission's domestic like product definition. Consequently, we again define a single

²¹ CR/PR at 1.7.

²² CR/PR at 1.7.

²³ CR/PR at 1.4.

²⁴ CR/PR at 1.4-1.5.

²⁵ CR/PR at 1.4.

²⁶ *Original Determinations*, USITC Pub. 4992, at 6-7. While WPC used a toller for converting strontium chromate powder into paste during the POI, the Commission noted WPC's stated intention to resume production of the paste by ***. *Confidential Views of the Commission*, EDIS Doc. 838059, at 7-8 ("*Confidential Original Determinations*").

²⁷ *Original Determinations*, USITC Pub. 4992, at 6-7.

²⁸ WPC Response at 18.

domestic like product consisting of all strontium chromate, 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."²⁹ 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, there were two domestic industry issues. The first was whether ***, a toller that converted strontium chromate sourced from WPC into paste, engaged in sufficient production-related activity to be considered a member of the domestic industry.³⁰ The second was whether appropriate circumstances existed to exclude WPC from the domestic industry pursuant to the related parties provision of the statute, as an importer of subject merchandise.³¹

With respect to the first issue, the Commission concluded that *** did not engage in sufficient production-related activities to be considered a domestic producer.³² While recognizing that *** capital investments were not insignificant, its conversion operations involved some technical expertise, and its value added was *** percent, the Commission found that its conversion operations required far less capital investment, technical expertise, and employees than WPC's production of strontium chromate powder.³³

With respect to the second issue, the Commission determined that appropriate circumstances did not exist to exclude WPC from the domestic industry because WPC was the sole U.S. producer, no party had argued for its exclusion, and the *** volume of WPC's imports relative to its domestic production indicated that its principal interest lied in domestic production.³⁴ Thus, the Commission defined the domestic industry to include all U.S. producers of strontium chromate.³⁵

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

³⁰ *Confidential Original Determinations* at 9.

³¹ *Original Determinations*, USITC Pub. 4992, at 7-8.

³² *Confidential Original Determinations* at 10-15.

³³ *Confidential Original Determinations* at 13.

³⁴ *Confidential Original Determinations* at 16-17.

³⁵ *Confidential Original Determinations* at 17.

In the current reviews, WPC does not contest the definition of the domestic industry from the original investigations. There are no related parties or other domestic industry issues in these reviews.³⁶ Accordingly, consistent with our definition of the domestic like product, we define the domestic industry as consisting of all U.S. producers of strontium chromate.

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.³⁷

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.³⁸ The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not

³⁶ As mentioned above, the Commission determined that WPC was a related party in its original determinations due to WPC's importation of subject imports during the POI. During the period of review ("POR"), WPC reports that it did not import subject merchandise, and it further states that it is not related to any importers or exporters of subject merchandise. WPC Response at 14-18, Exhibit 1. However, even if we were to find that WPC is still a related party, the record would again support finding that appropriate circumstances do not exist to exclude WPC from the domestic industry because WPC is the sole producer of the domestic like product.

³⁷ 19 U.S.C. § 1675a(a)(7).

³⁸ 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

B. Prior Proceedings and Arguments of the Parties

Original Investigations: In the original investigations, the Commission cumulated subject imports from Austria and France for its material injury analysis. The Commission found that subject imports from each subject country and the domestic like product were fungible with each other, sold in similar channels of distribution and geographic markets, and simultaneously present in the U.S. market. With respect to fungibility, the Commission concluded that market participants generally perceived products from the different sources to be interchangeable and comparable across purchasing factors.³⁹ It also found that there was substantial overlap in U.S. shipments of strontium chromate powder between and among subject imports from each source and the domestic like product.⁴⁰ While recognizing that there were some differences in channels of distribution, the Commission found that the domestic like product and subject imports from each source were primarily shipped to, and competed for, sales to end users for non-aerospace applications throughout the POI.⁴¹ Accordingly, the Commission found a reasonable overlap of competition between and among the domestic like product and imports from Austria and France.⁴²

Current Reviews: WPC argues that the Commission should again cumulate subject imports from Austria and France because the same conditions that led the Commission to cumulate subject imports in the original investigations continue to prevail.⁴³

C. Analysis

In these reviews, the statutory threshold for cumulation is satisfied as all reviews were instituted on the same day: October 1, 2024.⁴⁴ In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a

³⁹ *Original Determinations*, USITC Pub. 4992, at 16.

⁴⁰ *Original Determinations*, USITC Pub. 4992, at 16.

⁴¹ *Original Determinations*, USITC Pub. 4992, at 16.

⁴² *Original Determinations*, USITC Pub. 4992, at 14-16.

⁴³ WPC Response at 6-7.

⁴⁴ *Strontium Chromate From Austria and France; Institution of Five-Year Reviews*, 89 Fed. Reg. 79947 (Oct. 1, 2024).

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

1. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁴⁵ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁴⁶ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record, we do not find that subject imports from Austria or France are likely to have no discernible adverse impact on the domestic industry in the event of revocation of the respective antidumping duty orders.

Austria. In the original investigations, the volume of subject imports from Austria increased from *** pounds in 2016, to *** pounds in 2017, and *** pounds in 2018, and was *** pounds in January-June 2019 (“interim 2019”) compared to *** pounds in January-June 2018 (“interim 2018”).⁴⁷ Their share of apparent U.S. consumption increased from *** percent in 2016, to *** percent in 2017, and *** percent in 2018, and was *** percent in interim 2019 compared to *** percent in interim 2018.⁴⁸

The Commission received a foreign producer/exporter questionnaire response from one firm, Habich, which accounted for all known U.S. imports of strontium chromate from Austria in 2018.⁴⁹ While Habich’s capacity was constant at *** pounds throughout the period of investigation (“POI”), its production increased from *** pounds in 2016, to *** pounds in 2017, before declining to *** pounds in 2018, and was *** pounds in interim 2019 compared to ***

⁴⁵ 19 U.S.C. § 1675a(a)(7).

⁴⁶ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁴⁷ CR/PR at Table C-1.

⁴⁸ CR/PR at Table C-1.

⁴⁹ *Original Determinations*, USITC Pub. 4992, at VII-3.

pounds in interim 2018.⁵⁰ Habich's capacity utilization increased from *** percent in 2016, to *** percent in 2017, before declining to *** percent in 2018, and was *** percent in interim 2019, compared to *** percent in interim 2018.⁵¹ Its exports to the United States increased from *** pounds in 2016, to *** in 2017, and *** in 2018, and were *** in interim 2019 compared to *** in interim 2018.⁵² Habich's exports accounted for *** percent of its total shipments throughout the POI.⁵³

In the current reviews, there is limited information on the strontium chromate industry in Austria. Although no subject producer in Austria responded to the notice of institution, the domestic interested party identified one possible producer of strontium chromate in Austria.⁵⁴ During the POR, subject imports from Austria increased from 716,000 pounds in 2019, to 736,000 pounds in 2020, and 818,000 pounds in 2021, before declining to 726,000 pounds in 2022, and 656,000 pounds in 2023.⁵⁵ In 2023, subject imports from Austria accounted for *** percent of apparent U.S. consumption by quantity.⁵⁶

The information available indicates that the subject industry in Austria remains large and a leading exporter. WPC claims that the subject industry's capacity has not declined since the original investigations.⁵⁷ GTA data for other chromates and dichromates, a category that includes strontium chromate and out-of-scope products, indicate that exports of such merchandise from Austria declined irregularly from 4.1 million pounds in 2019 to 2.8 million pounds in 2023, and that the United States was the largest destination market for such exports throughout the period.⁵⁸

During the original investigations, the average purchase costs of subject imports were lower than the average sales prices for the domestically produced product in all 35 quarterly comparisons,⁵⁹ accounting for *** pounds of strontium chromate imported directly from

⁵⁰ Confidential Original Investigations Staff Report, INV-RR-107, 108 (Oct. 22, 2019), EDIS Doc. 838053 ("Confidential Original Investigations Staff Report"), at Table VII-2.

⁵¹ Confidential Original Investigations Staff Report, at Table VII.2.

⁵² Confidential Original Investigations Staff Report, at Table VII-2.

⁵³ Confidential Original Investigations Staff Report, at Table VII.2.

⁵⁴ CR/PR at 1.14; WPC Response at 15.

⁵⁵ CR/PR at Table 1.5.

⁵⁶ CR/PR at Table 1.6.

⁵⁷ WPC Response at 9-10.

⁵⁸ CR/PR at Table 1.7.

⁵⁹ The Commission recognized that import purchase cost data may not reflect the total cost of importing. Consequently, the questionnaires also requested that importers provide additional estimated costs above the landed duty paid ("LDP") value associated with their importing activities, and (Continued...)

Austria by end users.⁶⁰ No pricing data for subject imports from Austria were obtained in the current reviews.

Based on the record, including the significant and increasing volume and market share of subject imports from Austria in the original investigations, the continued presence of subject imports from Austria in the U.S. market, the size of the Austrian industry and its substantial exports of strontium chromate, and the low purchase costs of subject imports from Austria in the original investigations, we do not find that subject imports from Austria would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were to be revoked.

France. In the original investigations, the volume of subject imports from France decreased from *** pounds in 2016, to *** pounds in 2017, before increasing to *** pounds in 2018, and was *** in interim 2019 compared to *** in interim 2018.⁶¹ Their share of apparent U.S. consumption decreased from *** percent in 2016, to *** percent in 2017, and *** percent in 2018, and was *** percent in interim 2019 compared to *** in interim 2018.⁶²

The Commission received a foreign producer/exporter questionnaire response from one firm, SNCZ, which accounted for all known U.S. imports of strontium chromate from France in 2018.⁶³ While SNCZ's capacity remained *** pounds throughout the POI,⁶⁴ its production decreased from *** pounds in 2016, to *** pounds in 2017, and to *** pounds in 2018, and was *** pounds in interim 2019 compared to *** pounds in interim 2018. SNCZ's capacity utilization decreased from *** percent in 2016, to *** percent in 2017, and *** percent in 2018, and was *** percent in interim 2019, compared to *** percent in interim 2018.⁶⁵ Its

reported additional costs ranged between *** and *** percent of the LDP value. In addition, importers reported an estimated margin saved by directly importing strontium chromate ranging from *** percent to *** percent, for an average of *** percent of the LDP value. The Commission noted that the average differential between import purchase costs and prices for the domestic like product is *** percent and therefore found that the differential between purchase cost data for subject imports and prices for the domestic like product indicated that subject imports were generally priced lower than the domestic like product. *Confidential Original Determinations*, at 37-38.

⁶⁰ *Confidential Original Determinations*, at 38. The Commission found that the volume of subject imports reported in the purchase cost data was significantly larger than the volume reported in the pricing data. *Id.* The pricing data showed that subject imports from Austria undersold the domestic like product in 13 of 39 quarterly comparisons. Confidential Original Investigations Staff Report, at Table V-10.

⁶¹ CR/PR at 1.13, Tables 1.6, C-1

⁶² Confidential Original Investigations Staff Report, at Table IV-9.

⁶³ *Original Determinations*, USITC Pub. 4992, at I.5.

⁶⁴ Confidential Original Investigations Staff Report, at Table VII-5.

⁶⁵ Confidential Original Investigations Staff Report, at Table VII-5.

exports to the United States decreased from *** pounds in 2016, to *** in 2017, before increasing to *** in 2018, and were *** pounds in interim 2019, compared to *** in interim 2018.⁶⁶ SNCZ's exports as a share of its total shipments decreased from *** percent of total shipments in 2016, to *** percent in 2017, and *** percent in 2018, and were *** percent in interim 2019, compared to *** percent in interim 2018.⁶⁷

In the current reviews, there is limited information on the strontium chromate industry in France. During the POR, subject imports from France decreased from 36,000 pounds in 2019, to 27,000 pounds in 2020, and 18,000 pounds in 2021, before increasing to 52,000 pounds in 2022, and then decreasing to 31,000 pounds in 2023.⁶⁸ In 2023, subject imports from France accounted for *** percent of apparent U.S. consumption by quantity.⁶⁹ Although no subject producer in France responded to the notice of institution, the domestic interested party identified one possible producer of strontium chromate in France.⁷⁰

The information available indicates that the subject industry in France continues to export subject merchandise. GTA data for other chromates and dichromates, a category that includes strontium chromate and out-of-scope products, indicate that exports of such products from France declined irregularly from 110,000 pounds in 2019 to 28,000 pounds in 2023.⁷¹

During the original investigations, subject imports from France undersold the domestic like product in 1 of 28 quarterly comparisons.⁷² No pricing data for subject imports from France were obtained in the current reviews.

Based on the record, including the significant volume and market share of subject imports from France in the original investigations, the continued presence of subject imports from France in the U.S. market, and the subject industry's continued exportation of subject merchandise, we do not find that subject imports from France would likely have no discernible adverse impact on the domestic industry if the antidumping duty orders covering these imports were to be revoked.

⁶⁶ Confidential Original Investigations Staff Report, at Table VII-5.

⁶⁷ Confidential Original Investigations Staff Report, at Table VII-5.

⁶⁸ CR/PR at Table 1.5.

⁶⁹ CR/PR at Table 1.6.

⁷⁰ CR/PR at 1.16.

⁷¹ CR/PR at Table 1.8.

⁷² Confidential Original Investigations Staff Report, at Table V-10. Purchase cost data were reported only for subject imports from Austria. *Id.* at V.11.

D. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.⁷³ Only a “reasonable overlap” of competition is required.⁷⁴ In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.⁷⁵

Fungibility. In the original investigations, the Commission found that subject imports from each subject country were fungible with the domestic like product and each other.⁷⁶ The Commission also found that market participants generally perceived products from these sources to be interchangeable and comparable across purchasing factors.⁷⁷ It also observed that there was substantial overlap in U.S. shipments of strontium chromate powder between and among subject imports from both sources and the domestic like product.⁷⁸

In the current reviews, there is no new information in the record indicating that the fungibility between and among subject imports from Austria and France and the domestic like product has changed since the original investigations. WPC contends that the subject imports from Austria and France are likely to compete with each other and the domestic like product in

⁷³ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

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

⁷⁵ *See generally, Cheflin Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

⁷⁶ *Original Determinations*, USITC Pub. 4992, at 16.

⁷⁷ *Original Determinations*, USITC Pub. 4992, at 16.

⁷⁸ *Original Determinations*, USITC Pub. 4992, at 14, 16.

the U.S. market after revocation,⁷⁹ claiming that the market conditions found by the Commission in the original investigations continue to persist.⁸⁰

Channels of Distribution. In the original investigations, the Commission found that, although there were some differences in channels of distribution, the record showed that the domestic like product and subject imports from each source were primarily shipped to, and competed for sales to, end users for non-aerospace applications throughout the POI.⁸¹

There is no new information in the record in these reviews to indicate that the channels of distribution have changed since the original investigations or are likely to do so upon revocation.

Geographic Overlap. In the original investigations, the Commission found that strontium chromate from all sources was sold in overlapping geographic regions.⁸²

In the current reviews, subject imports from Austria entered through the northern border of entry in 2019 and 2022, and the northern and eastern borders of entry in 2020, 2021, and 2023.⁸³ Subject imports from France entered through northern, eastern, and western borders of entry from 2019 through 2023, and also entered through the southern border of entry in 2023.⁸⁴ In the original investigations, the Commission found that the domestic like product was sold in *** regions of the contiguous United States except the *** region,⁸⁵ and WPC maintains that the same conditions of competition continue to exist during the current POR.⁸⁶

Simultaneous Presence in Market. In the original investigations, the Commission found that the domestic like product and subject imports from Austria were present in the U.S. market in each month of the 42-month POI, while subject imports from France were present in the U.S. market in 32 months of the period.⁸⁷

⁷⁹ WPC response at 7.

⁸⁰ WPC response at 7.

⁸¹ *Original Determinations*, USITC Pub. 4992, at 16.

⁸² *Original Determinations*, USITC Pub. 4992, at 15-16.

⁸³ CR/PR at 1.12.

⁸⁴ CR/PR at 1.12.

⁸⁵ *Confidential Original Determinations* at 22.

⁸⁶ WPC Response at 7.

⁸⁷ *Original Determinations*, USITC Pub. 4992, at 16.

In the current reviews, subject imports from Austria were reported in all 60 months of the 2019-2023 period, while subject imports from France were reported in 26 months of the period.⁸⁸ The domestic like product was also present in the U.S. market throughout the POR.⁸⁹

Conclusion. The record of these expedited reviews contains limited information concerning subject imports in the U.S. market during the POR. The record contains no information suggesting a change in the considerations that led the Commission in the original investigations to conclude that there was a reasonable overlap of competition between and among subject imports from Austria and France and the domestic like product. In light of this, and absent any contrary argument, we find that there would likely be a reasonable overlap of competition among subject imports from Austria and France and between the domestic like product and subject imports from each source if the orders were revoked.

E. Likely Conditions of Competition

In determining whether to exercise our discretion to cumulate subject imports, we assess whether the subject imports from Austria and France are likely to compete under similar or different conditions in the U.S. market after revocation of the orders. The record in these expedited reviews contains limited current information about the U.S. market for strontium chromate and the strontium chromate industries in Austria and France. Based on the information available, and in the absence of any argument to the contrary, we do not find any likely significant difference in conditions of competition that would warrant not cumulating subject imports from both countries.

F. Conclusion

In sum, we determine that subject imports of strontium chromate from Austria and France, considered individually, would not likely have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition among subject imports from Austria and France and between the subject imports from each subject country and the domestic like product. Finally, we find that subject imports from Austria and France are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from Austria and France for purposes of our analysis in these reviews.

⁸⁸ CR/PR at 1.12.

⁸⁹ CR/PR at Table 1.6.

IV. Revocation of the Antidumping 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 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 duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”⁹⁰ 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.”⁹¹ Thus, the likelihood standard is prospective in nature.⁹² 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.⁹³

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

⁹⁰ 19 U.S.C. § 1675a(a).

⁹¹ 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.

⁹² 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.

⁹³ 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’”).

time.”⁹⁴ 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.”⁹⁵

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.”⁹⁶ 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 regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁹⁷ 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.⁹⁸

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.⁹⁹ 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

⁹⁴ 19 U.S.C. § 1675a(a)(5).

⁹⁵ 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.*

⁹⁶ 19 U.S.C. § 1675a(a)(1).

⁹⁷ 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings with respect to strontium chromate from Austria and France. *Final Results*, 90 Fed. Reg. 8182 and accompanying *Issues and Decision Memorandum*, A-433-813, A-427-830 (Sunset Reviews), EDIS Doc. 845140 (Jan. 21, 2025) at 3-4.

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

⁹⁹ 19 U.S.C. § 1675a(a)(2).

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.¹⁰⁰

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.¹⁰¹

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.¹⁰² 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.¹⁰³

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the strontium chromate industries in Austria and France. There also is limited information on the strontium chromate market in

¹⁰⁰ 19 U.S.C. § 1675a(a)(2)(A-D).

¹⁰¹ 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.

¹⁰² 19 U.S.C. § 1675a(a)(4).

¹⁰³ 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.

the United States during the POR. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigation, and the limited new information on the record in these first 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.”¹⁰⁴ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. In the original investigations, the Commission found that strontium chromate demand depended on the demand for U.S.-produced paint and coating products in which it was used, and that demand had increased in the sectors in which strontium chromate was used during the POI.¹⁰⁵ While WPC reported that U.S. demand for strontium chromate had *** since January 1, 2016,¹⁰⁶ responding importers and purchasers provided mixed responses, with a majority reporting that U.S. demand for strontium chromate either fluctuated or had not changed since January 1, 2016.¹⁰⁷ Apparent U.S. consumption of strontium chromate increased irregularly from *** pounds in 2016 to *** pounds in 2018, but was *** percent lower in interim 2019, at *** pounds, than in interim 2018, at *** pounds.¹⁰⁸

Current Reviews. The information available in the current reviews indicates that the drivers of strontium chromate demand in the U.S. market have not changed. U.S. demand for strontium chromate continues to depend on the demand for U.S.-produced paint and coating products in which it is used, including industrial coatings, anti-corrosive paints, primers, and specialty sealants for both the aerospace and non-aerospace industries.¹⁰⁹ Although WPC contends that demand for strontium chromate remained steady during the POR, apparent U.S. consumption was *** pounds in 2023, which was lower than in 2018 at *** pounds.¹¹⁰

¹⁰⁴ 19 U.S.C. § 1675a(a)(4).

¹⁰⁵ *Original Determinations*, USITC Pub. 4992, at 19.

¹⁰⁶ *Confidential Original Determinations* at 29.

¹⁰⁷ *Original Determinations*, USITC Pub. 4992, at 20.

¹⁰⁸ *Confidential Original Determinations* at 29.

¹⁰⁹ WPC Response at 18.

¹¹⁰ WPC Response at 18; CR/PR at Table 1.6. Responding purchaser *** reports that there ***. It also reports that it *** CR/PR at D.3.

2. Supply Conditions

Original Investigations. In the original investigations, the Commission noted that the domestic industry and cumulated subject imports were the two main sources of supply to the U.S. market during the POI.¹¹¹ The domestic industry's share of apparent U.S. consumption declined from *** percent in 2016 to *** percent in 2017 and 2018.¹¹² The domestic industry's share of apparent U.S. consumption was higher in interim 2019, at *** percent, than in interim 2018, at *** percent.¹¹³

The Commission found that WPC, the sole domestic producer, had closed its former plant in Milwaukee, Wisconsin, in June 2015, with plans to commence operations at its new facility in Oak Creek, Wisconsin, within six months, but that permitting issues had delayed operations at the new facility until March 2016.¹¹⁴ Due to the permitting delay, WPC imported strontium chromate from Austria to supplement its inventories and certain purchasers reported experiencing supply constraints, including the largest purchaser, ***, which reported having to use alternate sources of strontium chromate.¹¹⁵

Cumulated subject imports were the largest source of supply to the U.S. market throughout the POI.¹¹⁶ Cumulated subject imports' share of apparent U.S. consumption increased from *** percent in 2016 to *** percent in 2017 and 2018.¹¹⁷ Cumulated subject imports' share of apparent U.S. consumption was lower in interim 2019, at *** percent, than in interim 2018, at *** percent.¹¹⁸

Finally, the Commission explained that nonsubject imports had a very small presence in the U.S. market during the POI.¹¹⁹ Nonsubject imports' share of apparent U.S. consumption was *** percent in 2016, and no such imports were present in the U.S. market for the remainder of the POI. *** was the only reported nonsubject source of imports of strontium chromate.¹²⁰

Current Review. In 2023, the majority of apparent U.S. consumption was satisfied by the domestic industry, followed by subject imports and nonsubject imports.¹²¹

¹¹¹ *Original Determinations*, USITC Pub. 4992, at 20.

¹¹² *Confidential Original Determinations* at 29.

¹¹³ *Confidential Original Determinations* at 29.

¹¹⁴ *Original Determinations*, USITC Pub. 4992, at 20-21.

¹¹⁵ *Confidential Original Determinations* at 30.

¹¹⁶ *Confidential Original Determinations* at 30-31.

¹¹⁷ *Confidential Original Determinations* at 31.

¹¹⁸ *Confidential Original Determinations* at 31.

¹¹⁹ *Confidential Original Determinations* at 31.

¹²⁰ *Confidential Original Determinations* at 31.

¹²¹ CR/PR at Table 1.7.

The domestic industry accounted for *** percent of apparent U.S. consumption in 2023.¹²² According to WPC, it remains the only domestic producer of strontium chromate.¹²³ WPC reportedly increased its capacity during the POR due to ***, modernized production lines, and the hiring of additional employees.¹²⁴

Cumulated subject imports accounted for *** percent of apparent U.S. consumption in 2023, while nonsubject imports accounted for *** percent of apparent U.S. consumption that year.¹²⁵

3. Substitutability and Other Conditions

Original Investigations. In the original investigations, the Commission found that there was a high degree of substitutability between domestically produced strontium chromate and subject imports and that price was an important factor in purchasing decisions.¹²⁶ As the Commission explained, most purchasers reported that the domestic like product was comparable to subject imports from both subject countries with respect to all 15 comparison factors, including all five factors the majority of purchasers considered very important.¹²⁷ The Commission also noted that WPC and the vast majority of responding U.S. importers and purchasers reported that the domestic like product and subject imports from both subject countries were “always” or “frequently” interchangeable, and that the vast majority of responding purchasers reported that the domestic like product and subject imports “always” met minimum quality specifications.¹²⁸

Regarding price, the Commission explained that responding purchasers ranked price among their top three purchasing factors more frequently than any other factor.¹²⁹ In addition, the Commission found that price was among the factors that the majority of purchasers regarded as very important, and that three of 10 responding purchasers, including the largest purchaser, ***, reported that they “always” or “usually” purchase strontium chromate offered at the lowest price.¹³⁰

¹²² CR/PR at Table 1.6.

¹²³ WPC Response at 18.

¹²⁴ CR/PR at Table 1.3; WPC Supplemental Response, EDIS Doc. 837313 (Nov. 15, 2024), at 3.

¹²⁵ CR/PR at Table 1.6. Responding purchaser *** reports that there ***. It also reports that it ***. CR/PR at D.3.

¹²⁶ *Original Determinations*, USITC Pub. 4992, at 21.

¹²⁷ *Original Determinations*, USITC Pub. 4992, at 21.

¹²⁸ *Original Determinations*, USITC Pub. 4992, at 21-22.

¹²⁹ *Original Determinations*, USITC Pub. 4992, at 22.

¹³⁰ *Confidential Original Determinations* at 32-33.

Finally, the Commission found that strontium chromate is a known human carcinogen and that substitutes are very limited due to its superior anti-corrosion attributes and are reportedly significantly more expensive. Due to environmental and human health concerns, the European Union (“EU”) had determined to phase out the use of strontium chromate under the Regulation Concerning the Registration, Evaluation, Authorization, and Restriction of Chemicals (“REACH”) by January 22, 2019, unless authorization for particular uses was granted by the European Chemicals Agency (“ECHA”). Such authorization had been requested by the aerospace industry, but that request remained pending at the time of the investigations.¹³¹

Current Reviews. The record in these reviews contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price in purchasing decisions has changed since the original investigations.¹³² WPC contends that there remains a high degree of substitutability between domestically produced strontium chromate and subject imports and that price remains an important factor in purchasing decisions.¹³³ Accordingly, we again find that there is a high degree of substitutability between the domestic like product and subject imports, and that price remains an important factor in purchasing decisions.

The information available indicates that the implementation of restrictions on strontium chromate by REACH has caused a decline in EU demand for strontium chromate and that the number of European producers of chromium pigments, as a general category of chemicals, has decreased since the REACH regulation was implemented. Although ECHA has been unable to process the REACH applications for chromium VI compounds due to the higher than anticipated number of applications, there remains a small aerospace market for strontium chromate in the EU.¹³⁴

C. Likely Volume of Subject Imports

Original Investigations. In the original investigations, the Commission found that the volume of cumulated subject imports and the increase in that volume were significant in

¹³¹ *Original Determinations*, USITC Pub. 4992, at 23.

¹³² As noted in the original investigations, the aerospace industry requested authorization from the European Chemicals Agency to use strontium chromate. *Original Determinations*, USITC Pub. 4992, at 23. The record indicates that there continues to be a small market for strontium chromate in the EU aerospace industry, as there are currently no viable alternatives that can adequately replicate strontium chromate’s function in that industry. CR/PR at 1.5, 1.6.

¹³³ WPC Response at 11.

¹³⁴ CR/PR at 1.6.

absolute terms and relative to U.S. consumption and production.¹³⁵ Cumulated subject imports increased from *** pounds in 2016 to *** pounds in 2017 and *** pounds in 2018, a level *** percent above that of 2016.¹³⁶ They were *** percent lower in interim 2019, at *** pounds, than in interim 2018, at *** pounds.¹³⁷ As a share of apparent U.S. consumption, cumulated subject imports increased from *** percent in 2016 to *** percent in 2017 and 2018, an increase of *** percentage points at the expense of the domestic industry, whose market share had declined *** percentage points over the same period.¹³⁸ Finally, cumulated subject imports as a share of U.S. production increased irregularly from *** percent in 2016 to *** percent in 2018.¹³⁹

Current Reviews. The information available indicates that the orders restrained the volume of cumulated subject imports. Cumulated subject imports declined irregularly during the POR, increasing from 752,000 pounds in 2019 to 763,000 pounds in 2020 and 836,000 pounds in 2021, before declining to 778,000 pounds in 2022 and 687,000 pounds in 2023.¹⁴⁰ Cumulated subject imports accounted for *** percent of apparent U.S. consumption in 2023, compared to *** percent in 2018.¹⁴¹

The record in these expedited reviews contains limited information on the subject industries in Austria and France. Nonetheless, the information available indicates that subject producers have the ability and incentive to export significant volumes of subject merchandise to the U.S. market if the orders were revoked. WPC identified one possible producer of strontium chromate in Austria and one possible producer of strontium chromate in France.¹⁴²

There is no information on the record indicating that the subject industries have reduced their capacity since the original investigations, when responding subject producers reported capacity of *** pounds in 2018, including excess capacity of *** pounds.¹⁴³ According to WPC, subject producers have not reduced their capacity even as strontium chromate demand in the EU has declined, and have no incentive to do so given the substantial environmental cleanup costs that capacity reductions would entail.¹⁴⁴

¹³⁵ *Original Determinations*, USITC Pub. 4992, at 24.

¹³⁶ *Confidential Original Determinations* at 35.

¹³⁷ *Confidential Original Determinations* at 35.

¹³⁸ *Confidential Original Determinations* at 35.

¹³⁹ *Confidential Original Determinations* at 36.

¹⁴⁰ CR/PR at Table 1.5.

¹⁴¹ CR/PR at Table 1.6.

¹⁴² WPC Response at 15-16.

¹⁴³ Confidential Original Investigations Staff Report, at Table VII-8.

¹⁴⁴ WPC Response at 9-10.

The information available indicates that the subject producers in Austria remain large exporters, while the subject producers in Austria and France continue to export subject merchandise. According to GTA data concerning other chromates and dichromates, a category that includes strontium chromate and out-of-scope products, in 2023, Austrian exports of other chromates and dichromates were 2.8 million pounds and French exports were 28,000 pounds.¹⁴⁵ The data indicate that Austria was the world's largest exporter of such merchandise throughout the POR.¹⁴⁶

The information available also indicates that the U.S. market remains attractive to subject producers. Cumulated subject imports maintained a substantial presence in the U.S. market throughout the POR while under the restraining effect of the orders, accounting for *** percent of apparent U.S. consumption in 2023, thereby retaining customers and distribution networks.¹⁴⁷ Furthermore, the greatly reduced demand for strontium chromate in the EU market after the product was largely phased out under REACH, as discussed in section IV.B.3 above, makes the U.S. market attractive to the subject producers if the orders were revoked.

Given the foregoing, including the significant and increasing volume and market share of cumulated subject imports in the original investigations, the continued presence of cumulated subject imports in the U.S. market during the POR, the subject industries' continued exportation of subject merchandise, and the attractiveness of the U.S. market to subject producers, we find that the volume of cumulated subject imports would likely be significant, both in absolute terms and relative to U.S. consumption and production, if the orders were revoked.¹⁴⁸

D. Likely Price Effects

Original Investigations. In the original investigations, the Commission found that subject imports significantly undersold the domestic like product and depressed and suppressed domestic prices to a significant degree.¹⁴⁹ Although pricing data showed that subject imports undersold the domestic like product in 14 of 67 quarterly price comparisons, with underselling margins that ranged from *** percent to *** percent, the Commission explained that the

¹⁴⁵ CR/PR at Tables 1.7, 1.8.

¹⁴⁶ CR/PR at Table 1.9.

¹⁴⁷ CR/PR at 1.11-1.13.

¹⁴⁸ The information available indicates that strontium chromate from France and Austria has not been subject to other antidumping or countervailing duty investigations outside the United States. CR/PR at 1.17. The record of these expedited reviews contains no information on inventories of subject merchandise or the ability of subject producers to shift production from other products.

¹⁴⁹ *Confidential Original Determinations* at 39.

volume of subject imports reported in the import purchase cost data was significantly larger than the volume reported in the pricing data.¹⁵⁰ The Commission also found that the average purchase costs of subject imports from Austria, which accounted for *** pounds of strontium chromate imported directly from Austria by end users,¹⁵¹ were lower than domestic prices in all 35 quarterly comparisons with an average cost-price differential of *** percent.¹⁵² The Commission also noted that of the six responding purchasers that reported purchasing subject imports instead of the domestic like product, five reported that subject import prices were lower and two reported that price was a primary reason they switched to subject imports.¹⁵³ Based on these considerations, as well as the high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, the Commission found that subject import underselling was significant.¹⁵⁴

The Commission found that cumulated subject imports depressed domestic prices to a significant degree.¹⁵⁵ As the Commission explained, domestic prices declined over the POI with respect to two of the three pricing products, including the highest-volume pricing product, while apparent U.S. consumption increased and the volume of low-priced subject imports increased.¹⁵⁶

The Commission also found that cumulated subject imports suppressed domestic prices to a significant degree. Despite the *** percent increase in apparent U.S. consumption from 2016 to 2018, the Commission explained, the domestic industry's net sales average unit values declined while its unit raw material costs increased, causing the industry's cost of goods sold to net sales ratio to increase from *** percent in 2016 to *** percent in 2018.¹⁵⁷

Current Reviews. The record in these expedited reviews does not contain new product-specific pricing information.

¹⁵⁰ *Confidential Original Determinations* at 37.

¹⁵¹ *Confidential Original Determinations* at 38.

¹⁵² *Confidential Original Determinations* at 38. As discussed above, the Commission noted that reported additional costs were below the *** percent average differential between import purchase costs and prices for the domestic like product, and estimated cost savings were generally above that differential, which indicated that subject imports were generally priced lower than the domestic like product. *Confidential Original Determinations* at 37-39.

¹⁵³ *Confidential Original Determinations* at 39.

¹⁵⁴ *Original Determinations*, USITC Pub. 4992, at 27.

¹⁵⁵ *Original Determinations*, USITC Pub. 4992, at 28.

¹⁵⁶ *Original Determinations*, USITC Pub. 4992, at 27.

¹⁵⁷ *Confidential Original Determinations* at 41.

Based on the available information, including the high degree of substitutability between the domestic like product and subject imports, the importance of price in purchasing decisions, and the attractiveness of the U.S. market to subject producers, we find that if the orders were revoked, the likely significant volume of cumulated subject imports would likely undersell the domestic like product to a significant degree as a means of gaining market share, as in the original investigations.¹⁵⁸ Absent the discipline of the orders, the significant volumes of low-priced cumulated subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or restrain price increases that might be necessary to cover any increasing costs, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, significant volumes of cumulated subject imports would likely have significant price effects.

E. Likely Impact¹⁵⁹

Original Investigations. In the original investigations, the Commission found that a significant and increasing volume of subject imports significantly undersold the domestic like product, taking sales and market share from the domestic industry. It also found that the low priced subject imports caused domestic prices for strontium chromate to decline and prevented the domestic industry from increasing prices to sufficiently recover its rising costs.¹⁶⁰ The Commission concluded that subject imports therefore caused the domestic industry's production, U.S. shipments, revenues, and profits to be lower than they would have been otherwise throughout the full years of the POI.¹⁶¹ While recognizing that some of the domestic industry's indicators had improved in interim 2019 compared to interim 2018, the Commission attributed these improvements to the decline in cumulated subject imports after the filing of the petitions, lending further support to the conclusion that cumulated subject imports had a significant adverse impact on the domestic industry during the 2016-2018 period.¹⁶²

¹⁵⁸ WPC argues that subject import prices have increased under the disciplining effect of the orders and are therefore likely to decline after revocation. WPC response at 11. Based on official import statistics for HTSUS 2841.50.91.00 submitted by WPC, the average unit value of subject imports from Austria increased from \$3.55 per kilogram in 2018 to \$5.07 per kilogram in 2023, an increase of 42.8 percent, while the average unit value of subject imports from France increased from \$3.94 per kilogram in 2018 to \$8.67 per kilogram in 2023, an increase of 120.1 percent. *Id.* at 11, Exhibit 2.

¹⁵⁹ In its expedited reviews of the antidumping duty orders, Commerce determined that revocation of the orders would likely result in the continuation or recurrence of dumping with margins of up to 25.90 percent for Austria and 32.16 percent for France. *Final Results*, 90 Fed. Reg. at 8183.

¹⁶⁰ *Original Determinations*, USITC Pub. 4992, at 31.

¹⁶¹ *Original Determinations*, USITC Pub. 4992, at 31.

¹⁶² *Original Determinations*, USITC Pub. 4992, at 31-32.

The Commission also considered whether there were other factors that may have impacted the domestic industry during the POI. It found that neither increasing apparent U.S. consumption nor the very small presence of nonsubject imports during the period could explain the domestic industry's performance.¹⁶³ The Commission also found that any disruption in supply caused by WPC's production shutdown and restart in 2016 could not explain the adverse price effects caused by low-priced subject imports, particularly when a majority of responding purchasers rated domestic and subject strontium chromate as comparable with respect to availability and reliability of supply.¹⁶⁴

Current Reviews. The record in these expedited reviews contains limited information concerning the domestic industry's performance since the original investigations. The available information indicates that the domestic industry's performance has improved by nearly every measure since 2018, the last year examined in the original investigations.¹⁶⁵ In 2023, the domestic industry's capacity was *** pounds, its production was *** pounds, and its U.S. commercial shipments were *** pounds – all higher than in 2018.¹⁶⁶ The domestic industry's capacity utilization rate in 2023, however, was lower than in 2018, at *** percent.¹⁶⁷ The industry's share of apparent U.S. consumption in 2023, at *** percent, was higher than in 2018.¹⁶⁸ The industry's net sales value was also higher in 2023, at \$***, than in 2018, while its operating ***, at ***, and its ratio of operating income to net sales, at *** percent, were worse than in 2018.¹⁶⁹

We find that the industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders. Despite the antidumping duty orders being in place, the industry operated at a *** percent capacity utilization rate in 2023, and its operating income and operating income to net sales ratios remained *** that year.

Based on the information available in these reviews, we find that revocation of the orders would likely result in a significant increase in cumulated subject import volume that would likely undersell the domestic like product to a significant degree. Given the high degree

¹⁶³ *Original Determinations*, USITC Pub. 4992, at 32.

¹⁶⁴ *Original Determinations*, USITC Pub. 4992, at 32.

¹⁶⁵ CR/PR at Table 1.4.

¹⁶⁶ CR/PR at Table 1.4. In 2018, the domestic industry's capacity was *** pounds, its production was *** pounds, and its U.S. shipments were *** pounds. *Id.*

¹⁶⁷ CR/PR at Table 1.4. In 2018, the domestic industry's capacity utilization rate was *** percent. *Id.*

¹⁶⁸ CR/PR at Table 1.6. The industry's share of U.S. consumption was *** percent in 2018. *Id.*

¹⁶⁹ CR/PR at Table 1.4. In 2018, the industry's net sales were \$***, it operated at a *** of \$***, and its ratio of operating income to net sales was *** percent. *Id.*

of substitutability between the domestic like product and subject imports and the importance of price to purchasers, significant volumes of low-priced cumulated subject imports would likely capture sales and market share from the domestic industry and/or significantly depress or suppress prices for the domestic like product. The likely significant volume of cumulated subject imports and their adverse price effects would likely have a significant adverse impact on the domestic industry's production, shipments, sales, market share, and revenues, which in turn would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. The volume of nonsubject imports increased irregularly during the POR from 21,000 pounds in 2019 to 55,000 pounds in 2023,¹⁷⁰ and accounted for *** percent of apparent U.S. consumption in 2023.¹⁷¹ The record provides no indication that the presence of nonsubject imports would prevent cumulated subject imports from entering the U.S. market in significant quantities or adversely affecting domestic prices after revocation of the orders. Given that the domestic industry accounted for *** percent of apparent U.S. consumption in 2023, as well as the high degree of substitutability of strontium chromate, regardless of source, and the importance of price to purchasing decisions, the presence of nonsubject imports in the U.S. market would likely not prevent the significant increase in low-priced cumulated subject imports that is likely after revocation from taking market share from the domestic industry, as well as from nonsubject imports, or from forcing domestic producers to lower their prices or forgo price increases in order to retain market share. For these reasons, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to cumulated subject imports and that nonsubject imports would not prevent cumulated subject imports from having a significant impact on the domestic industry.

We recognize that apparent U.S. consumption was *** percent lower in 2023 than in 2018.¹⁷² Notwithstanding this decline, both WPC and responding purchaser *** reported that demand has *** since the original investigations.¹⁷³ To the extent that demand is weak or declines, the significant volume of low-priced cumulated subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry.

¹⁷⁰ CR/PR at Table 1.5.

¹⁷¹ CR/PR at Table 1.6.

¹⁷² CR/PR at Table 1.6. Apparent U.S. consumption was *** pounds in 2023 compared to *** pounds in 2018. *Id.*

¹⁷³ CR/PR at D.3; WPC Response at 18.

In sum, we conclude that if the antidumping duty orders on strontium chromate from Austria and France were revoked, cumulated subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

For the foregoing reasons, we determine that revocation of the antidumping duty orders on strontium chromate from Austria and France would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Information obtained in these reviews

Background

On October 1, 2024, 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 antidumping duty orders on strontium chromate from Austria and France 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 1.1 presents information relating to the background and schedule of this proceeding:

Table 1.1 Strontium chromate: Information relating to the background and schedule of this proceeding

Effective date	Action
October 1, 2024	Notice of initiation by Commerce (89 FR 79892, October 1, 2024)
October 1, 2024	Notice of institution by Commission (89 FR 79947, October 1, 2024)
January 6, 2025	Commission’s vote on adequacy
January 27, 2025	Commerce’s results of its expedited reviews (90 FR 8182, January 27, 2025)
April 4, 2025	Commission’s determinations and views

The original investigations

The original investigations resulted from petitions filed on September 5, 2018, with Commerce and the Commission by Lumimove Inc., d.b.a. WPC Technologies (“WPC”), Oak

¹ 19 U.S.C. 1675(c).

² 89 FR 79947, October 1, 2024. 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 duty orders. 89 FR 79892, October 1, 2024. 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. Information regarding responses to the notice of institution 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.

Creek, Wisconsin.⁵ On October 8, 2019, Commerce determined that imports of strontium chromate from Austria and France were being sold at less than fair value (“LTFV”).⁶ The Commission determined on November 21, 2019, that the domestic industry was materially injured by reason of LTFV imports of strontium chromate from Austria and France.⁷ On November 27, 2019, Commerce issued its antidumping duty orders with final weighted-average dumping margins of 25.90 percent for strontium chromate from Austria and 32.16 percent for strontium chromate from France.⁸

Previous and related investigations

Strontium chromate has not been the subject of any prior related antidumping or countervailing duty investigations in the United States.

Commerce’s five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of strontium chromate from Austria and France with the intent of issuing the final results of these reviews based on the facts available not later than January 29, 2025.⁹ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission’s Electronic Document Information System (“EDIS”). 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 duty orders on imports of strontium chromate from Austria and France are noted in the sections titled “The original investigations” and “U.S. imports,” if applicable.

⁵ Strontium Chromate from Austria and France, USITC Publication 4992, November 2019 (“Original publication”), p. 1.1.

⁶ 84 FR 53676 and 84 FR 53678, October 8, 2019.

⁷ 84 FR 65173, November 26, 2019.

⁸ 84 FR 65349, November 27, 2019.

⁹ Letter from Alex Villanueva, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, December 2, 2024.

The product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise covered by these orders is strontium chromate, regardless of form (including but not limited to, powder (sometimes known as granular), dispersions (sometimes known as paste), or in any solution). The chemical formula for strontium chromate is SrCrO₄ and the Chemical Abstracts Service (CAS) registry number is 7789-06-2.

Strontium chromate that has been blended with another product or products is included in the scope if the resulting mix contains 15 percent or more of strontium chromate by total formula weight. Products with which strontium chromate may be blended include, but are not limited to, water and solvents such as Aromatic 100 Methyl Amyl Ketone (MAK)/2-Heptanone, Acetone, Glycol Ether EB, Naphtha Leicht, and Xylene. Subject merchandise includes strontium chromate that has been processed in a third country into a product that otherwise would be within the scope of these orders if processed in the country of manufacture of the in-scope strontium chromate.¹⁰

U.S. tariff treatment

Strontium chromate is currently imported under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting number 2841.50.9100 (if imported as a powder) or statistical reporting number 3212.90.0050 (if imported as a dispersion). The general rate of duty is 3.1 percent ad valorem for both HTS subheading 2841.50.91 and HTS subheading 3212.90.00.¹¹ Effective September 24, 2018, strontium chromate originating in China, a nonsubject country, was subject to an additional 10 percent ad valorem duty under section 301

¹⁰ 84 FR 65349, November 27, 2019.

¹¹ Statistical reporting numbers 2841.50.9100 and 3212.90.0050 may contain other products outside the scope of these reviews. USITC, HTS (2024) Basic Revision 10, USITC Publication 5569, November 2024, pp. 28.26, 32.19.

of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for strontium chromate was increased to 25 percent.¹²

Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Description and uses¹³

The imported product subject to these reviews is strontium chromate, available as either a powder or a dispersion.¹⁴ Strontium chromate is a yellow powder that is ground to a particle size of 25–50 micrometers. The compound is a salt, composed of positively charged strontium ions (Sr^{2+}) and negatively charged chromate ions (CrO_4^{2-}) in equal proportion. Commercially available strontium chromate powder exhibits pH values between 7–9 and conductivity of 700–1,700 microsiemens per centimeter ($\mu\text{S}/\text{cm}$) under standard test conditions.¹⁵ Commercial dispersions of strontium chromate are mixtures of the powder and one of a number of potential solvents.¹⁶

The primary end use of strontium chromate, both powder and dispersions, is in corrosion protection coatings for metal surfaces such as aluminum and stainless steel.¹⁷ A substantial market is the aerospace industry, where it is used in areas at risk of corrosion. The anti-corrosive behavior of strontium chromate pigments arises from the chromate ion's

¹² 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) to 20(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 10, USITC Publication 5569, November 2024, pp. 99.III.28 to 99.III.52, 99.III.318. 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).

¹³ Unless otherwise noted, this information is based on Original publication, pp. 1.8 to 1.11.

¹⁴ Chemical formula SrCrO_4 , Chemical Abstracts Service (CAS) number 7789-06-2, Color Index Pigment Yellow 32. During the original investigations, the term “dispersion” was used interchangeably with “paste” by industry and in the report. The core product is the powdered form of strontium chromate, and dispersions are created using that powder.

¹⁵ Chromate coatings are electrically conductive and help maintain an electrically conductive metal surface. Non-conductive metal surfaces can cause grounding issues on electronic equipment. However, delineations of strontium chromate based on specific conductivities is reportedly not a primary concern of consumers.

¹⁶ Representative examples from WPC include, but are not limited to, glycol ether EB (CAS number 111-76-2), naphtha leicht (CAS number 64742-95-6), and xylene.

¹⁷ During the original investigations, WPC sold both powder and dispersion forms based on the needs of the customer, although demand was higher for the powder.

chemical properties.¹⁸ When a failure occurs in the coating, such as a scratch or chip, the chromate ion leaches into the gap and reduces to chromium(III) oxide (Cr_2O_3), which forms a protective layer over the exposed metal. Alternative anti-corrosion systems have been developed, but according to the Petitioner during the original investigations, they do not match the performance of strontium chromate.

The chromium atom exists in the hexavalent oxidation state in this compound, and it is, therefore, classified as a Group A human carcinogen when exposed through inhalation. Some customers have been reported to prefer dispersions to reduce the risk for workers who might otherwise be exposed to dust. Environmental and human health concerns have led to regulatory controls on strontium chromate in the European Union under the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) program enacted in 2006. Habich and SNCZ both registered for strontium chromate in 2008, allowing these companies to continue to sell strontium chromate in the European Union at the onset of the REACH program.

¹⁸ Industry standards for strontium chromate pigments are detailed in ASTM D1649-01(2012) Standard Specification for Strontium Chromate Pigment; ASTM D1845-86(2014) Standard Test Methods for Chemical Analysis of Strontium Chromate Pigment; and ISO 2040:1972 Strontium Chromate Pigments for Paints.

Table 1.2 presents the timeline of the REACH regulation of strontium chromate usage in the European Union. Strontium chromate was added to the Candidate List of Substances of Very High Concern for Authorization in 2011, due to its carcinogenicity and potential environmental impact, and it was thus targeted as such for long-term replacement. It was found to meet the criteria for classification under Annex XIV of the REACH regulation in 2014, placing it on the Authorisation List. As it is on the Authorisation List, strontium chromate cannot be placed on the market after a defined sunset date in 2019 unless authorization by the European Chemicals Agency (ECHA) is granted. Application for authorization has been made by the aerospace sector because there are no viable alternatives that can adequately replicate its function for that industry, despite continued research into other chemicals. As of this report, ECHA still has been unable to process the REACH applications for chromium VI compounds due to the higher than anticipated number of applications.¹⁹

Table 1.2 Strontium chromate: Timeline of REACH regulation of strontium chromate usage in the European Union

Action	Date
Added to the Candidate List of Substances of Very High Concern for Authorization	June 20, 2011
Placed on the Authorisation List	August 14, 2014
Last date sold in EU without specific authorization (sunset)	January 22, 2019
Decision to be made by REACH committee on the restriction	Q4 2026 or Q1 2027

Source: European Chemicals Agency, “Candidate List of Substances of Very High Concern for Authorisation,” <https://echa.europa.eu/candidate-list-table/-/dislist/details/0b0236e1807da708>, retrieved November 22, 2024; Commission Regulation (EU) No 895/2014 of 14 August 2014; European Chemicals Agency, “Authorisation List,” <https://echa.europa.eu/authorisation-list>, retrieved November 22, 2024; European Commission, “REACH Authorisation Decisions,” September 26, 2019, p. 18.

The number of European producers of chromium pigments, as a general category of chemicals, has decreased since the REACH regulation was implemented. The implementation of restrictions on strontium chromate by REACH has reportedly led to decreased demand within the European Union, with only a small aerospace market remaining.

¹⁹ Risk & Policy Analysts, “EU REACH Chromates Restriction Factsheet,” <https://rpald.co.uk/wp-content/uploads/2024/06/RPA-chromates-restriction-factsheet-FULL.pdf>, retrieved November 22, 2024.

Manufacturing process²⁰

The manufacture of strontium chromate is based on a one-step chemical reaction and several following processing steps to yield the final powder. The reaction portion involves a strontium source, typically strontium carbonate (SrCO_3), and a chromate source, usually sodium dichromate ($\text{Na}_2\text{Cr}_2\text{O}_7$), which are mixed together to precipitate strontium chromate.²¹ The United States does not produce strontium carbonate, importing it primarily from Mexico and Germany.²² There is some domestic production of sodium dichromate, which is derived from imported chromite ore. The strontium chromate is then dried, milled, and packaged into sacks ranging from 50 to 1,000 pounds. While the precise production method and equipment used will vary by manufacturer, the overall production methods are the same and the product is reportedly substitutable between petitioner and respondents.²³

Processing powder into dispersions requires additional equipment, which is not necessarily co-located with powder production. During the original investigations, all of WPC's strontium chromate dispersions were processed under a toll arrangement. Respondent SNCZ does not produce strontium chromate dispersions at all. The blending process to create the dispersion requires an explosion-proof, high-speed dispenser that is analogous to a large blender.²⁴ A portion of the solvent is first added to the dispenser and stirred at low speed while strontium chromate powder is added. Additional solvent is added to reach the final volume along with an additive to keep the powder suspended. Customers may prefer receiving dispersions because they are easier to handle and pose less risk to workers because they do not create hazardous dust.

²⁰ Unless otherwise noted, this information is based on Original publication, pp. I.11 to I.12.

²¹ Precipitate here means that the strontium chromate becomes a solid material floating in solution rather than being dissolved (e.g., the difference between sand and sugar when placed in water). Strontium chloride (SrCl_2) is an alternative strontium source, while chromium trioxide (CrO_3) and sodium chromate (Na_2CrO_4) are alternative chromium sources. The chromium content of the product, measured as CrO_3 equivalent concentration, ranges from 40 to 50 percent.

²² The United States does not produce the parent ore, Celestite, either, which is imported from Mexico.

²³ During the original investigations, WPC reported utilizing a proprietary manufacturing process based on the general steps described here. Respondents agreed that there are slight differences due to proprietary methods that are unique to each company. Products are not always substitutable within the aerospace industry, as each supplier of strontium chromate must be "spec'd-in" for a given application before it can be used by a consumer.

²⁴ The vessel is typically constructed of stainless steel or other non-magnetic material, and is grounded to prevent static discharge.

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 *** firms, petitioner WPC and ***. Staff believed that these responses accounted for all of production of strontium chromate in its basic powder form in the United States during 2018.²⁵

In response to the Commission’s notice of institution in these current reviews, domestic interested party WPC reported that it was the only known and currently operating U.S. producer of strontium chromate and is not affiliated with any other companies involved in the production, import, purchase, or sale of strontium chromate. Thus, WPC, providing U.S. industry data in response to the Commission’s notice of institution, accounted for 100 percent of production of strontium chromate in the United States during 2023.²⁶

Recent developments

Table 1.3 presents events in the U.S. industry since the Commission’s original investigations.

Table 1.3 Strontium chromate: Developments in the U.S. industry

Item	Firm	Event
Capacity expansion	WPC	WPC reports that, during the period of review, it was able to increase production capacity due to *** and modernization of existing production lines.

Source: Domestic interested party’s supplemental response to the notice of institution, p. 3.

²⁵ Original publication, p. 3.1.

²⁶ Domestic interested party’s response to the notice of institution, October 31, 2024, p. 1.

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. Table 1.4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

Table 1.4 Strontium chromate: Trade and financial data submitted by U.S. producers, by period

Quantity in 1,000 dry pounds; value in 1,000 dollars; unit value in dollars per dry pound; ratio in percent

Item	Measure	2016	2017	2018	2023
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 2016 to 2018, data are compiled using data submitted in the Commission's original investigations. For the year 2023, data are compiled using data submitted by the domestic interested party. Domestic interested party's response to the notice of institution, October 31, 2024, exh. 1.

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

Note: The domestic industry reports that SG&A expenses have increased since the orders were issued due to (1) WPC increasing the number of production workers, (2) WPC's hiring of additional staff for quality control, distribution, and accounting, (3) increased wages by *** percent, and (4) *** utility, insurance, and health costs since the original investigations. Domestic interested party's supplemental response to the notice of institution, p. 2.

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.²⁷

In its original determinations, the Commission defined a single domestic like product consisting of all strontium chromate, coextensive with Commerce’s scope and defined the domestic industry as all U.S. producers of strontium chromate.²⁸

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from eight firms, which accounted for virtually all U.S. imports of strontium chromate from Austria and France during 2018.²⁹ 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 party provided a list of four potential U.S. importers of strontium chromate.³⁰

²⁷ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

²⁸ 89 FR 79947, October 1, 2024.

²⁹ Original publication, p. 4.1.

³⁰ Domestic interested party’s response to the notice of institution, October 31, 2024, exh. 1.

U.S. imports

Table 1.5 presents the quantity, value, and unit value of U.S. imports from Austria and France as well as the other top sources of U.S. imports (shown in descending order of 2023 imports by quantity).

Table 1.5 Strontium chromate: U.S. imports, by source and period

Quantity in 1,000 dry pounds; value in 1,000 dollars; unit value in dollars per dry pound

U.S. imports from	Measure	2019	2020	2021	2022	2023
Austria	Quantity	716	736	818	726	656
France	Quantity	36	27	18	52	31
Subject sources	Quantity	752	763	836	778	687
China	Quantity	3	0	—	2	41
Colombia	Quantity	11	13	2	3	4
All other sources	Quantity	6	5	2	3	10
Nonsubject sources	Quantity	21	18	4	8	55
All import sources	Quantity	773	781	840	786	742
Austria	Value	4,560	5,176	5,248	6,550	6,033
France	Value	311	226	177	791	481
Subject sources	Value	4,871	5,402	5,426	7,340	6,514
China	Value	68	3	—	75	206
Colombia	Value	97	90	19	29	44
All other sources	Value	54	34	17	42	232
Nonsubject sources	Value	219	126	36	146	482
All import sources	Value	5,090	5,528	5,461	7,486	6,996
Austria	Unit value	6.37	7.04	6.41	9.02	9.19
France	Unit value	8.58	8.32	9.80	15.14	15.73
Subject sources	Unit value	6.48	7.08	6.49	9.43	9.48
China	Unit value	20.43	1632.33	—	33.86	4.99
Colombia	Unit value	8.63	7.17	8.43	10.60	10.03
All other sources	Unit value	8.44	6.37	9.18	14.96	24.36
Nonsubject sources	Unit value	10.43	7.08	8.78	18.79	8.72
All import sources	Unit value	6.58	7.08	6.50	9.52	9.43

Source: Compiled from official Commerce statistics for HTS statistical reporting number 2841.50.9100, accessed November 11, 2024. These data may be overstated as HTS statistical reporting number 2841.50.9100 may contain products outside the scope of these reviews.

Note: Quantities and values less than 500 pounds are shown as "0". Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Note: Variation in import data is due to low import volumes reported under HTS statistical reporting number 2841.50.9100. Out of scope imports, or imports that were improperly classified under this HTS statistical reporting number, will have a more sizable effect on the overall data.

Note: Because of rounding, figure may not add to total shown.

Cumulation considerations³¹

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.³²

Imports from Austria were reported in 60 of the 60 months between 2019 and 2023. Imports from France were reported in 26 of the 60 months between 2019 and 2023.

All imports from Austria entered through northern and eastern borders of entry in all years from 2019 through 2023, with the exception of 2019 and 2022 where all imports were entered through only northern borders of entry. Imports of strontium chromate from Austria in 2023 were entered through the same northern border of entry (Chicago, Illinois) and eastern border of entry (New York, New York and Boston, Massachusetts).

All imports from France entered through northern, eastern, and western borders of entry in all years from 2019 through 2023. In 2023, imports from France were also entered through southern borders of entry. Imports of strontium chromate from France in 2023 were entered through the same northern border of entry (Cleveland, Ohio), the same eastern border of entry (Charleston, South Carolina), the same western border of entry (Los Angeles, California), and the same southern border of entry (Houston-Galveston, Texas).

³¹ Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting number 2841.50.9100.

³² In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

Apparent U.S. consumption and market shares

Table 1.6 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.6 Strontium chromate: Apparent U.S. consumption and market shares, by source and period

Quantity in 1,000 dry pounds; value in 1,000 dollars; shares in percent

Source	Measure	2016	2017	2018	2023
U.S. producers	Quantity	***	***	***	***
Austria	Quantity	***	***	***	656
France	Quantity	***	***	***	31
Subject sources	Quantity	***	***	***	687
Nonsubject sources	Quantity	***	***	***	55
All import sources	Quantity	***	***	***	742
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	***	***	***	***
Austria	Value	***	***	***	6,003
France	Value	***	***	***	481
Subject sources	Value	***	***	***	6,514
Nonsubject sources	Value	***	***	***	482
All import sources	Value	***	***	***	6,996
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
Austria	Share of quantity	***	***	***	***
France	Share of quantity	***	***	***	***
Subject sources	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
Austria	Share of value	***	***	***	***
France	Share of value	***	***	***	***
Subject sources	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2016 to 2018, data are compiled using data submitted in the Commission's original investigations. For the year 2023, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 2841.50.9100, accessed November 11, 2024.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "—".

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 2016, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports.

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

The industry in Austria

Producers in Austria

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, Habich GmbH, which accounted for approximately *** percent of production of strontium chromate in Austria during 2018, and approximately 100 percent of strontium chromate exports from Austria to the United States during 2018.³³

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party identified one possible producer of strontium chromate in Austria.^{34 35}

Recent developments

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

³³ Original confidential report, p. 7.3.

³⁴ Domestic interested party’s response to the notice of institution, October 31, 2024, exh. 1.

³⁵ WPC reports that, to the best of its knowledge, Habich GmbH has not experienced a change in its capacity since the orders were imposed. Domestic interested party’s response to the notice of institution, October 31, 2024, p. 18.

Exports

Table 1.7 presents export data for “Other Chromates and Dichromates,” a category that includes strontium chromate and out-of-scope products, from Austria (by export destination in descending order of quantity for 2023).

Table 1.7 Other chromates and dichromates: Quantity of exports from Austria, by destination and period

Quantity in 1,000 pounds

Destination market	2019	2020	2021	2022	2023
United States	2,864	2,943	3,273	2,904	2,625
Brazil	49	21	42	66	42
China	437	516	433	119	33
Malaysia	40	87	46	23	31
France	33	26	43	40	25
Taiwan	33	13	106	26	20
United Kingdom	11	—	—	5	10
Germany	7	3	2	3	4
Czech Republic	1	15	0	5	2
Turkey	5	22	19	37	2
All other markets	605	500	362	353	0
All markets	4,084	4,145	4,325	3,582	2,794

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 2841.50, accessed November 20, 2024. Import statistics from Austria (constructed exports) under HS subheadings 2841.50 as reported by various national statistical authorities. These data may be overstated as HS subheading 2841.50 may contain products outside the scope of these reviews.

Note: Quantities less than 500 pounds are shown as “0”. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

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

The industry in France

Producers in France

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, Société Nouvelle des Couleurs Zinciques, which accounted for all known production of strontium chromate in France during 2018, and all known strontium chromate exports from France to the United States during 2018.³⁶

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party identified one possible producer of strontium chromate in France.^{37 38}

Recent developments

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

³⁶ Original confidential report, p. 7.8.

³⁷ Domestic interested party's response to the notice of institution, October 31, 2024, exh. 1.

³⁸ WPC reports that, to the best of its knowledge, SNCZ has not experienced a change in its capacity since the orders were imposed. Domestic interested party's response to the notice of institution, October 31, 2024, p. 18.

Exports

Table 1.8 presents export data for “Other Chromates and Dichromates,” a category that includes strontium chromate and out-of-scope products, from France (by export destination in descending order of quantity for 2023).

Table 1.8 Other chromates and dichromates: Quantity of exports from France, by destination and period.

Quantity in 1,000 pounds

Destination market	2019	2020	2021	2022	2023
Taiwan	8	5	15	0	11
Italy	9	4	3	2	5
Germany	3	2	4	2	2
Spain	2	1	3	2	2
New Zealand	5	2	5	1	2
Belgium	0	0	1	0	1
United Kingdom	6	6	2	11	1
South Africa	0	—	1	—	1
Morocco	0	0	1	0	1
Indonesia	62	—	1	—	1
All other markets	15	11	7	20	2
All markets	110	30	42	38	28

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 2841.50, accessed November 20, 2024. These data may be overstated as HS subheading 2841.50 may contain products outside the scope of these reviews.

Note: Quantities less than 500 pounds are shown as “0”. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

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

Third-country trade actions

Based on available information, strontium chromate from France and Austria has not been subject to other antidumping or countervailing duty investigations outside the United States.

The global market

Production of strontium chromate in nonsubject countries appears to be limited. Nonsubject producers of strontium chromate may include companies located in China, Japan, and South Korea.³⁹ In the original investigations, WPC reported that strontium chromate produced in nonsubject countries was inferior in quality to that produced by the petitioner or respondents.⁴⁰

Table 1.9 presents global export data for “Other Chromates and Dichromates,” a category that includes strontium chromate and out-of-scope products (by source in descending order of quantity for 2023). Global trade in this HS category declined by 5.8 million pounds (38.2 percent) from 2019 to 2023.

Table 1.9 Other Chromates and Dichromates: Quantity of global exports by country and period

Quantity in 1,000 pounds

Exporting country	2019	2020	2021	2022	2023
Austria	4,084	4,145	4,325	3,582	2,794
China	1,974	1,628	1,834	1,878	2,649
India	376	562	1,376	1,408	1,156
United States	1,708	917	929	1,491	1,069
Chile	622	791	268	1,074	622
South Korea	1,419	1,291	869	532	361
Japan	750	305	415	136	177
Taiwan	104	96	219	81	156
Kazakhstan	1,418	579	624	818	153
Colombia	29	31	81	33	63
All other exporters	2,793	1,938	681	374	243
All exporters	15,277	12,283	11,621	11,408	9,443

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 2841.50, accessed November 20, 2024. Import statistics from Austria (constructed exports) under HS subheadings 2841.50 as reported by various national statistical authorities. These data may be overstated as HS subheading 2841.50 may contain products outside the scope of these reviews.

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

³⁹ While not an exhaustive list, Chongqing Yuanhe Fine Chemical Company in China, Kikuchi Color and Chemical Corporation in Japan, and Sambo Fine Chemicals Manufacturing Company in South Korea appear to produce strontium chromate. https://yuanhesales.en.made-in-china.com/product-catalog/Inorganic-Pigment-1.html?pv_id=1ie49q6mc7e2&faw_id=1ie49s7jqf2e, accessed December 2, 2024; <https://kikuchicolor.lookchem.com/products/CasNo-7789-06-2-Strontium-chromate-1650313.html>, accessed December 2, 2024; <https://www.chemnet.com/South-KoreaSuppliers/19040/Strontium-Chromate--662929.html>, accessed December 2, 2024.

⁴⁰ Hearing transcript, p. 40 (St. John).

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
89 FR 79947 October 1, 2024	Strontium Chromate From Austria and France; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2024-10-01/pdf/2024-22441.pdf
89 FR 79892 October 1, 2024	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2024-10-01/pdf/2024-22492.pdf

APPENDIX B
RESPONSES TO THE NOTICE OF INSTITUTION

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 Lumimove Inc. d/b/a WPC Technologies (“WPC”), a domestic producer of strontium chromate (referred to herein as “domestic interested party”).

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 B-1.

Table B.1 Strontium chromate: Summary of responses to the Commission’s notice of institution

Interested party type	Number	Coverage
U.S. producer	1	100%

Note: The U.S. producer coverage figure presented is the domestic interested party’s estimate of its share of total U.S. production of strontium chromate during 2023. Domestic interested party’s response to the notice of institution, October 31, 2024, p. 14.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from WPC. WPC requests that the Commission conduct expedited reviews of the antidumping duty orders on strontium chromate.¹

¹ Domestic interested party’s comments on adequacy, December 11, 2024, p. 2.

Company-specific information

Table B.2 Strontium chromate: Response checklist for U.S. producers

Yes = provided response; no = did not provide a response; NA = not available; not known = information was not known

Item	Lumimove Inc. d/b/a WPC Technologies
Nature of operation	Yes
Statement of intent to participate	Yes
Statement of likely effects of revoking the order	Yes
U.S. producer list	Yes
U.S. importer/foreign producer list	Yes
List of 3-5 leading purchasers	Yes
List of sources for national/regional prices	Not known
Trade/financial data	Yes
Changes in supply/demand	Yes
Complete response	Yes

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-1

Strontium chromate: Summary data concerning the U.S. market, 2016-18, January to June 2018, and January to June 2019

(Quantity=1,000 dry pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per dry pound; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to June		Comparison years			Jan-Jun
	2016	2017		2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Importers' share (fn1):									
Austria.....	***	***	***	***	***	▲***	▲***	▲***	▼***
France.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	***	***
All import sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Austria.....	***	***	***	***	***	▲***	▲***	▼***	▼***
France.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	***	***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. shipments of imports from:									
Austria:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
France									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources:									
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.....	***	***	***	***	***	▼***	▼***	▲***	▲***

Table continued.

Table C-1--Continued

Strontium chromate: Summary data concerning the U.S. market, 2016-18, January to June 2018, and January to June 2019

(Quantity=1,000 dry pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per dry pound; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
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 (dry pounds per hour).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit labor costs.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit COGS.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

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 it provided contact information for the following five firms as top purchasers of strontium chromate: ***. Purchaser questionnaires were sent to these five firms and one firm (***) submitted a response to the Commission’s request for information.

1. Have there been any significant changes in the supply and demand conditions for strontium chromate that have occurred in the United States or in the market for strontium chromate in Austria and/or France since November 27, 2019?

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

2. Do you anticipate any significant changes in the supply and demand conditions for strontium chromate in the United States or in the market for strontium chromate in Austria and/or France within a reasonably foreseeable time?

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

