

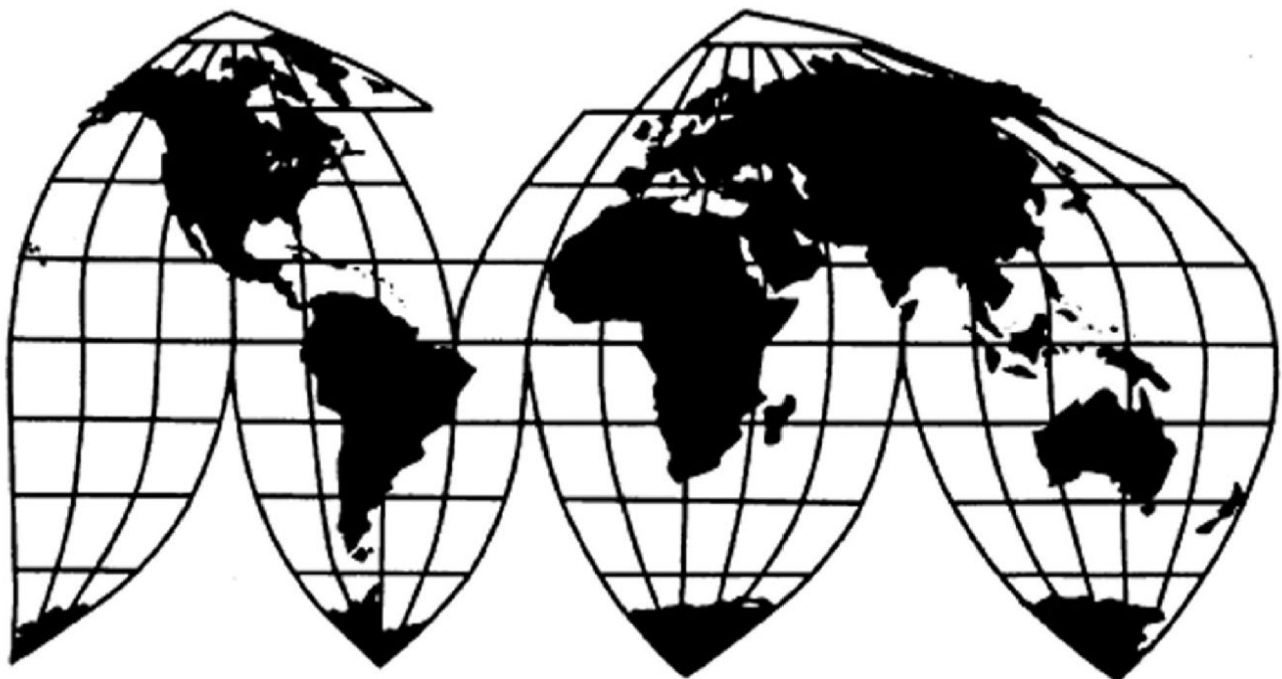
Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey

Investigation Nos. 701-TA-593–596 and 731-TA-1401–1406 (Review)

Publication 5609

April 2025

U.S. International Trade Commission



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Note.—Information that would reveal confidential operations of individual firms may not be published.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. 701-TA-593-596 and 731-TA-1401-1406 (Review)

Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey

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 countervailing duty orders on large diameter welded pipe from China, India, South Korea, and Turkey and the antidumping duty orders on large diameter welded pipe from Canada, China, Greece, India, South Korea, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

The Commission made affirmative determinations with respect to the countervailing duty orders covering large diameter welded line pipe from India and South Korea and the antidumping duty orders covering large diameter welded line pipe from Canada, China, Greece, India, South Korea, and Turkey. The Commission also made affirmative determinations with respect to the countervailing duty orders covering large diameter welded structural pipe from China, South Korea, and Turkey and the antidumping duty orders covering large diameter welded structural pipe from Canada, China, South Korea, and Turkey.

BACKGROUND

The Commission instituted these reviews on February 1, 2024 (89 FR 6543) and determined on May 6, 2024 that it would conduct full reviews (89 FR 46160, May 28, 2024). Notice of the scheduling of the Commission’s reviews and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the

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

Federal Register on August 13, 2024 (89 FR 65932). The Commission conducted its hearing on February 25, 2025. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty orders on large diameter welded carbon and alloy steel line pipe (“LDW line pipe”) from India and South Korea, the antidumping duty orders on LDW line pipe from Canada, China, Greece, India, South Korea, and Turkey, the countervailing duty orders on large diameter welded carbon and alloy steel structural pipe (“LDW structural pipe”) from China, South Korea, and Turkey, and the antidumping duty orders on LDW structural pipe from Canada, China, South Korea, and Turkey would be likely to lead to continuation or recurrence of material injury to pertinent industries in the United States within a reasonably foreseeable time.

I. Background

Original Investigations. On January 17, 2018, the Commission received a petition filed on behalf of nine domestic producers,¹ alleging that an industry in the United States was materially injured and threatened with material injury by reason of imports of less-than-fair-value (“LTFV”) large diameter welded carbon and alloy steel pipe (“LDWP”) from Canada, China, Greece, India, South Korea,² and Turkey; and by reason of imports of LDWP subsidized by the governments of China, India, South Korea, and Turkey.³ The investigations became staggered when the U.S. Department of Commerce (“Commerce”) issued only its aligned final countervailing duty and antidumping duty determinations regarding subject imports of LDWP from China and India, thereby necessitating earlier final Commission determinations in the investigations regarding China and India.⁴ In January 2019, the Commission determined that an industry in the United States was materially injured by reason of imports of LDW line pipe from

¹ The petitioners were American Cast Iron Pipe Company, Berg Steel Pipe Corp./Berg Spiral Pipe Corp., Dura-Bond Industries, Skyline Steel, Stupp Corporation, Greens Bayou Pipe Mill LP, JSW Steel (USA) Inc., Trinity Products LLC, and Welspun Tubular LLC. *Large Diameter Welded Pipe from China and India*, Inv. Nos. 701-TA-593-594 & 731-TA-1402, 1404 (Final), USITC Pub. 4859 at 10 (Jan. 2019) (“*Original Leading Determinations*”) at 4.

² For consistency, we use “South Korea” throughout, including where in prior proceedings “Korea” was used.

³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 3-4; *Large Diameter Welded Pipe from Canada, Greece, Korea, and Turkey*, Inv. Nos. 701-TA-595-596 & 731-TA-1401, 1403, 1405-1406 (Final), USITC Pub. 4883 (Apr. 2019) (“*Original Trailing Determinations*”) at 6. The investigations became staggered when Commerce initially issued only its aligned final countervailing duty and antidumping duty determinations regarding LDWP imports from China and India, thereby necessitating earlier final Commission determinations in the investigations regarding China and India. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 4 n.4.

⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 4 n.4.

India found by Commerce to be sold in the United States at less than fair value and subsidized by the government of India, and threatened with material injury by reason of imports of LDW line pipe from China that are sold in the United States at less than fair value.⁵ ⁶ The Commission further determined that an industry in the United States was materially injured by reason of imports of LDW structural pipe from China found by Commerce to be sold in the United States at less than fair value and subsidized by the government of China.⁷ On March 6, 2019, Commerce issued antidumping and countervailing duty orders on LDW line and structural pipe from China, and on LDW line pipe from India.⁸

In April 2019, with respect to the trailing investigations, the Commission determined that an industry in the United States was materially injured by reason of imports of LDW line

⁵ Commissioner Broadbent dissenting. See *Separate and Dissenting Views of Commissioner Meredith M. Broadbent, Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 81.

In brief, the Commission defined three domestic like products in its original determinations: LDW line pipe, LDW structural pipe, and large diameter welded stainless steel pipe (“stainless steel LDW pipe”). See *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019); *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 7 (adopting “the findings and analyses from {the Commission’s} final determinations and views concerning subject imports from China and India with respect to the issue{ } of domestic like product”). The Commission ultimately issued negative determinations with respect to stainless steel LDW pipe from all subject countries, so only LDW line pipe and LDW structural pipe are relevant for the current reviews. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 80; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 28; *accord Notice of Institution*, 89 Fed. Reg. at 6543-44.

Commissioner Kearns issued separate views, in which he defined LDW line pipe and LDW structural pipe as a single domestic like product and the domestic industry as all U.S. producers of the single like product, including Evraz Oregon. However, like the Commission’s majority, he made affirmative determinations with respect to the orders that are now under review. See *Separate Views of Commissioner Jason E. Kearns, Original Trailing Determinations*, USITC Pub. 4859 (Jan. 2019).

⁶ The Commission found that imports of LDW line pipe from China that are subsidized by the government of China were negligible and terminated that investigation with respect to LDW line pipe. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 3.

⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 3. The Commission found that imports of LDW structural pipe from India that are sold in the United States at less than fair value and subsidized by the government of India were negligible and terminated those investigations with respect to LDW structural pipe. *Id.* at 3-4.

The Commission also determined that an industry in the United States was not materially injured or threatened with material injury by reason of imports of large diameter welded stainless steel pipe (“stainless steel LDW pipe”) from China and India sold in the United States at less than fair value and subsidized by the governments of China and India. *Id.* at 4.

⁸ *Large Diameter Welded Pipe From the People’s Republic of China: Antidumping Duty Order*, 84 Fed. Reg. 8083 (Mar. 6, 2019); *Large Diameter Welded Pipe From India: Antidumping Duty Order*, 84 Fed. Reg. 8079 (Mar. 6, 2019); *Large Diameter Welded Pipe From the People’s Republic of China: Countervailing Duty Order*, 84 Fed. Reg. 8075 (Mar. 6, 2019); *Large Diameter Welded Pipe From India: Countervailing Duty Order*, 84 Fed. Reg. 8085 (Mar. 6, 2019).

pipe from Canada, South Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the government of South Korea, and threatened with material injury by reason of imports of LDW line pipe from Greece found by Commerce to be sold in the United States at less than fair value.⁹ The Commission further determined that an industry in the United States was materially injured by reason of imports of LDW structural pipe from Canada, South Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the governments of Korea and Turkey.¹⁰ On May 2, 2019, Commerce issued antidumping duty orders on imports of LDW line and structural pipe from Canada, South Korea, and Turkey, and LDW line pipe from Greece, and issued countervailing duty orders on imports of LDW line and structural pipe from South Korea and Turkey.¹¹

Current Reviews. The Commission instituted these reviews on February 1, 2024.¹² The American Line Pipe Producers Association Trade Committee (“ALPPA”), an association of U.S. producers of large diameter welded pipe (“LDWP”), herein referred to as “Domestic

⁹ *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 5. The Commission found that imports of LDW line pipe from Turkey that are subsidized by the government of Turkey were negligible and terminated that investigation with respect to LDW line pipe. It also found that imports of LDW structural pipe from Greece that are sold in the United States at less than fair value were negligible and terminated that investigation with respect to LDW structural pipe. *Id.* The original trailing determinations adopted the conclusions and reasoning set out in the original leading determinations. *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 7 (as supplemented and further explained). Any subsequent citations to the leading determinations as to the conclusions and reasoning in the original leading determinations accordingly apply also to the original trailing determinations.

Commissioner Broadbent did not participate in the determinations regarding subject imports from Canada, Greece, Korea, and Turkey. *Id.* at 5 n.1.

¹⁰ The Commission also determined that an industry in the United States was not materially injured or threatened with material injury by reason of imports of stainless steel LDW pipe from Canada and South Korea found by Commerce to be sold in the United States at less than fair value and subsidized by the government of South Korea. It found that imports of stainless steel LDW pipe from Greece and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the government of Turkey were negligible and terminated those investigations with respect to stainless steel LDW pipe. *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 5.

¹¹ *Large Diameter Welded Pipe from the Republic of Korea: Amended Final Affirmative Antidumping Determination and Antidumping Duty Order*, 84 Fed. Reg. 18767 (May 2, 2019); *Large Diameter Welded Pipe from the Republic of Korea: Countervailing Duty Order*, 84 Fed. Reg. 18773 (May 2, 2019); *Large Diameter Welded Pipe from the Republic of Turkey: Amended Final Affirmative Antidumping Duty Determination and Antidumping Duty Order*, 84 Fed. Reg. 18799 (May 2, 2019); *Large Diameter Welded Pipe from the Republic of Turkey: Countervailing Duty Order*, 84 Fed. Reg. 18771 (May 2, 2019); *Large Diameter Welded Pipe from Canada: Antidumping Duty Order*, 84 Fed. Reg. 18775 (May 2, 2019); *Large Diameter Welded Pipe from Greece: Amended Final Affirmative Antidumping Determination and Antidumping Duty Order*, 84 Fed. Reg. 18769 (May 2, 2019).

¹² *Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey: Institution of Five-Year Reviews*, 89 Fed. Reg. 6543 (Feb. 1, 2024).

Producers,”¹³ Corinth Pipeworks Pipe Industry S.A., a producer and exporter of LDWP in Greece, and CPW America Co., a U.S. importer of subject merchandise (collectively, “CPW”), and Evraz Inc. NA Canada (“Evraz” or “Evraz Canada”), a producer and exporter of LDWP in Canada and U.S. importer of subject merchandise responded to the Commission’s notice of institution. No respondent interested parties submitted a response with respect to the orders on LDWP from China, India, South Korea, or Turkey.¹⁴ On May 6, 2024, the Commission found that the domestic interested party group responses and the respondent interested party group responses regarding Canada and Greece were adequate, and determined to conduct full reviews of the orders with respect to Canada and Greece. The Commission also found that the respondent interested party group responses from China, India, South Korea, and Turkey were inadequate, but determined to conduct full reviews of the orders on imports from those countries in order to promote administrative efficiency in light of its determinations to conduct full reviews of the orders with respect to Canada and Greece.¹⁵

The Commission received prehearing and posthearing briefs and final comments filed on behalf of the ALPPA. Representatives of the ALPPA appeared at the hearing, accompanied by counsel. The Commission also received prehearing and posthearing briefs and final comments filed on behalf of Evraz and CPW, representatives of which also appeared at the hearing, accompanied by counsel.

Data/Response Coverage. As described in more detail in Part III below, these reviews involve two separate domestic like products, LDW line pipe and LDW structural pipe, and the corresponding domestic industries. U.S. industry data are based on the questionnaire responses of nine U.S. producers of LDW line pipe, accounting for the vast majority of domestic LDW line pipe production in 2023,¹⁶ and nine U.S. producers of LDW structural pipe, accounting for the vast majority of domestic LDW structural pipe production in 2023.¹⁷ U.S. import data and related information are based on official Commerce import statistics and the questionnaire responses of 15 importers of LDWP. With respect to LDW line pipe, imports from these firms

¹³ The ALPPA’s individual members are American Cast Iron Pipe Company; Berg Pipe Panama City Corp./Berg Pipe Mobile Corp. (“Berg”); Dura-Bond Industries; Skyline Steel (“Skyline”); Stupp Corporation; Trinity Products, LLC; and Welspun Global Trade LLC (“Welspun”). *ALPPA Trade Committee’s Substantive Response to Notice of Institution*, EDIS Doc. 815426 (Mar. 4, 2024) at 1-2.

¹⁴ Confidential Report, Memorandum INV-XX-032 (Mar. 26, 2025) *as modified by* Memorandum INV-XX-036 (Apr. 2, 2025) and Memorandum INV-XX-040 (Apr. 7, 2025) (“CR”) at LDWP 1.1, n.4; *Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey*, Inv. Nos. 701-TA-593-596 and 731-TA-1401-1406 (Review), USITC Publication 5609 (Apr. 2025) (“PR”) at LDWP 1.1, n.4.

¹⁵ *Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey; Notice of Commission Determination To Conduct Full Five-Year Reviews*, 89 Fed. Reg 46160 (May 28, 2024).

¹⁶ CR/PR at LP 3.1 and n.1.

¹⁷ CR/PR at SP 3.1.

accounted for an estimated *** percent of total U.S. imports and *** percent of subject imports in 2023.¹⁸ With respect to LDW structural pipe, imports from these firms accounted for approximately one-third of subject, nonsubject, and total imports in 2023.¹⁹ Additionally, the Commission received usable questionnaire responses from 34 U.S. purchasers of LDW line pipe and 15 U.S. purchasers of LDW structural pipe.²⁰

Data and related information concerning the LDW line pipe and LDW structural pipe industries in subject countries are based on industry research data, public export data, and the foreign producer questionnaire responses of firms in Canada, Greece, and South Korea.²¹ The Commission received a questionnaire response from two producer/exporters in Canada, Evraz and Pipe and Piling Supplies Ltd. (“Pipe and Piling”), that accounted for all known LDW line pipe and structural pipe production in Canada in 2023. It received a questionnaire response from one producer/exporter in Greece, Corinth, that accounted for nearly all LDW line pipe production in Greece in 2023.²² It also received a response from one firm in South Korea, EEW Korea Co., LTD. (“EEW”), that accounted for a substantial share of LDW line pipe and structural pipe production in South Korea in 2023.²³ The Commission did not receive questionnaire responses from any producers/exporters of subject merchandise in China, India, or Turkey.²⁴

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.”²⁵ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and

¹⁸ CR/PR at LP 4.1.

¹⁹ CR/PR at SP 4.1.

²⁰ CR/PR at LP 1.6 and SP 1.6.

²¹ CR/PR at LDWP 1.19.

²² CR/PR at LP 4.53.

²³ See CR/PR at LDWP 1.20.

²⁴ Borusan Birlesik Boru Fabrikaları Sanayi ve Ticaret A.S., (“Borusan”), a producer of LDWP in Turkey, submitted a foreign producer questionnaire. However, Borusan’s exports to the United States are excluded from the antidumping and countervailing duty orders on Turkey for both LDW line pipe and LDW structural pipe as a result of Commerce’s determinations that its dumping margins and subsidy rates were *de minimis*. CR/PR at LDWP 1.19 n.26, LP 4.2, SP 4.2; *Large Diameter Welded Pipe from the Republic of Turkey: Notice of Court Decision Not in Harmony With Amended Final Determination in the Less-Than-Fair-Value Investigation; Notice of Amended Final Determination Pursuant to Court Decision; and Notice of Revocation of Antidumping Duty Order, in Part*, 85 Fed Reg. 35262 (June 9, 2020). Borusan’s LDWP exports to the United States are, therefore, nonsubject merchandise.

²⁵ 19 U.S.C. § 1677(4)(A).

uses with, the article subject to an investigation under this subtitle.”²⁶ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²⁷

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

Canada (AD) and China (AD). The merchandise covered by this order is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.²⁸

²⁶ 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).

²⁷ 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).

²⁸ *Large Diameter Welded Pipe From the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Final Results of the Expedited First Sunset Reviews of the* (Continued...)

China (CVD). The merchandise covered by this order is welded carbon and alloy steel structural pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded structural pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded structural pipe may be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded structural pipe may be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded structural pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All structural pipe meeting the physical description set forth above, including any dual- or multiple-certified/stenciled pipe with an ASTM (or comparable) welded structural pipe certification/stencil, is covered by the scope of this order.

Subject merchandise also includes large diameter welded structural pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded structural pipe.

Excluded from the scope of this order is line pipe which is suitable for transporting oil, gas, slurry, steam, or other fluids, liquids, or gases, and is normally produced to American Petroleum Institute (API) specification 5L or equivalent foreign specifications grades and/or standards or to proprietary specifications, grades and/or standards.²⁹

Turkey (AD). The merchandise covered by this order is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to,

Antidumping Duty Orders, 89 Fed. Reg. 48558 (June 7, 2024); *Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye* (May 31, 2024).

²⁹ *Large Diameter Welded Pipe from the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 89 Fed. Reg. 48381 (June 6, 2024); *Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Large Diameter Welded Pipe from the People's Republic of China* (May 31, 2024).

piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope are any products covered by the existing antidumping duty order on welded line pipe from the Republic of Turkey. *See Welded Line Pipe from the Republic of Korea and the Republic of Turkey: Antidumping Duty Orders*, 80 FR 75056 (December 1, 2015).³⁰

Turkey (CVD). The merchandise covered by this order is welded carbon and alloy steel structural pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded structural pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded structural pipe may be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded structural pipe may be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded structural pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All structural pipe meeting the physical description set forth above,

³⁰ *Large Diameter Welded Pipe From the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders*, 89 Fed. Reg. 48558 (June 7, 2024); *Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye* (May 31, 2024).

including any dual- or multiple-certified/stenciled pipe with an ASTM (or comparable) welded structural pipe certification/stencil, is covered by the scope of this order.

Subject merchandise also includes large diameter welded structural pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded structural pipe.

Excluded from the scope of this order is line pipe which is suitable for transporting oil, gas, slurry, steam, or other fluids, liquids, or gases, and is normally produced to American Petroleum Institute (API) specification 5L or equivalent foreign specifications grades and/or standards or to proprietary specifications, grades and/or standards. Also excluded from the scope are any products covered by the existing countervailing duty order on welded line pipe from the Republic of Turkey. *See Welded Line Pipe from the Republic of Turkey: Countervailing Duty Order*, 80 FR 75054 (December 1, 2015).³¹

Commerce's scope with respect to the orders on imports from South Korea are defined to exclude LDWP in certain combinations of grades, outside diameter, and wall thicknesses, resulting from changed circumstances reviews:³²

South Korea (AD). The merchandise covered by the Order is carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic

³¹ *Large Diameter Welded Pipe from the Republic of Türkiye: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 89 Fed. Reg. 48561 (June 7, 2024); *Decision Memorandum for Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Large Diameter Welded Pipe from the Republic of Türkiye* (May 31, 2024).

³² *See Issues and Decision Memorandum for the Final Results of the Administrative Review of the Antidumping Duty Order on Large Diameter Welded Pipe from the Republic of Korea; 2022-2023* (Dec. 6, 2024); *Large Diameter Welded Pipe from the Republic of Korea: Final Results of Antidumping and Countervailing Duty Changed Circumstances Reviews*, 85 Fed. Reg. 51679 (Aug. 21, 2020).

specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope are any products covered by the existing antidumping duty order on welded line pipe from the Republic of Korea. *See Welded Line Pipe from the Republic of Korea and the Republic of Turkey: Antidumping Duty Orders*, 80 FR 75056 (December 1, 2015).

Also excluded is large diameter welded pipe in the following combinations of grades, outside diameters, and wall thicknesses:

- Grade X60, X65, or X70, 18 inches outside diameter, 0.688 inches or greater wall thickness;
- Grade X60, X65, or X70, 20 inches outside diameter, 0.688 inches or greater wall thickness;
- Grade X60, X65, X70, or X80, 22 inches outside diameter, 0.750 inches or greater wall thickness; and
- Grade X60, X65, or X70, 24 inches outside diameter, 0.750 inches or greater wall thickness.³³

South Korea (CVD). The merchandise covered by this Order is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and

³³ *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries* (Mar. 21, 2025).

Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of the Order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the Order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Also excluded from the scope is large diameter welded pipe in the following combinations of grades, outside diameters, and wall thicknesses:

- Grade X60, X65, or X70, 18 inches outside diameter, 0.688 inches or greater wall thickness;
- Grade X60, X65, or X70, 20 inches outside diameter, 0.688 inches or greater wall thickness;
- Grade X60, X65, X70, or X80, 22 inches outside diameter, 0.750 inches or greater wall thickness; and
- Grade X60, X65, or X70, 24 inches outside diameter, 0.750 inches or greater wall thickness.³⁴

Finally, Commerce's scope with respect to the orders on imports from Greece and India are defined to exclude LDW structural pipe, as well as LDW line pipe in certain combinations of grades, outside diameter, and wall thicknesses, also resulting from changed circumstances reviews:³⁵

Greece (AD) and India (AD and CVD). The merchandise covered by these orders is welded carbon and alloy steel line pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded line pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases.

Large diameter welded line pipe is used to transport oil, gas, or natural gas liquids and is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded line pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades

³⁴ *Issues and Decision Memorandum for the Final Results of the Expedited Sunset Review of the Countervailing Duty Order on Large Diameter Welded Pipe from the Republic of Korea* (May 15, 2024).

³⁵ *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the Republic of Korea: Correction to the Scope of the Order in the Decision Memorandum*

and/or standards, or can be non-graded material. All line pipe meeting the physical description set forth above, including any dual- or multiple-certified/stenciled pipe with an API (or comparable) welded line pipe certification/stencil, is covered by the scope of the Orders.

Subject merchandise also includes large diameter welded line pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the Orders if performed in the country of manufacture of the in-scope large diameter welded line pipe.

Excluded from the scope of the Orders is structural pipe, which is produced only to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, or comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards. Also excluded is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe. Also excluded is large diameter welded pipe in the following combinations of grades, outside diameters, and wall thicknesses:

- Grade X60, X65, or X70, 18 inches outside diameter, 0.688 inches or greater wall thickness;
- Grade X60, X65, or X70, 20 inches outside diameter, 0.688 inches or greater wall thickness;
- Grade X60, X65, X70, or X80, 22 inches outside diameter, 0.750 inches or greater wall thickness; and
- Grade X60, X65, or X70, 24 inches outside diameter, 0.750 inches or greater wall thickness.³⁶

Most LDWP is produced to American Petroleum Institute (“API”) standards as LDW line pipe or American Society for Testing and Materials (“ASTM”) standards as LDW structural pipe.³⁷ LDW line pipe is primarily used for the conveyance of oil and gas in a pipeline.³⁸ LDW structural pipe is used as structural support or for load-bearing purposes. Its structural applications include piling, structural supports, sign poles, bollards, columns, and fencing.³⁹

³⁶ *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People’s Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries* (Mar. 21, 2025); 85 Fed. Reg. 26390 (May 6, 2020); 85 Fed. Reg. 37424 (June 22, 2020); *Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Large Diameter Welded Pipe from India* (May 15, 2024); 89 Fed. Reg. 44961 (May 22, 2024).

³⁷ CR/PR at LP 1.23 to LP 1.24, SP 1.18 to SP 1.19.

³⁸ CR/PR at LP 1.19, LP 1.22, and LP 1.23; SP, 1.14 and SP 1.19.

³⁹ CR/PR at LDWP 1.32.

1. The Original Investigations

In the original investigations, the Commission defined LDW line pipe and LDW structural pipe as separate domestic like products, finding a clear dividing line between the two types of LDWP.⁴⁰ The Commission found that LDW line pipe and LDW structural pipe differed significantly with respect to four domestic like product factors: physical characteristics and uses, channels of distribution, customer/producer perceptions, and price.⁴¹ With respect to physical characteristics and uses, the Commission found that LDW line pipe and LDW structural pipe are produced to different specifications using differing steel grades corresponding to their distinct end uses, with LDW line pipe used to convey liquids such as oil and gas, and LDW structural pipe used for support in construction projects and as piling.⁴² The Commission found that LDW structural pipe and LDW line pipe were sold to end users for specific projects, with little overlap between purchasers and a much higher portion of LDW structural pipe sold to distributors.⁴³ The Commission also found that LDW structural pipe and LDW line pipe are perceived by producers and customers as separate products because of their different specifications and intended uses, and that LDW line pipe is typically priced higher than LDW structural pipe.⁴⁴

The Commission acknowledged that the factors of interchangeability and manufacturing facilities, processes, and employees could arguably support defining LDW line pipe and LDW structural pipe as a single domestic like product.⁴⁵ However, it found that any interchangeability between the two products is one way, as LDW structural pipe is never

⁴⁰ The Commission also defined stainless steel LDW pipe as a separate, third domestic like product, but ultimately issued negative determinations with respect to stainless steel LDW pipe from all subject countries. Accordingly, only LDW line pipe and LDW structural pipe are relevant for the current reviews. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 11, 80; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 28.

As noted above, Commissioner Kearns found that LDW line pipe and LDW structural pipe were a single domestic like product in the original investigations. He observed a significant overlap in the producers of LDW line pipe and LDW structural pipe; that it was fairly easy for domestic producers to shift from producing LDW line pipe to LDW structural pipe; and that there was not a clear distinction between LDW line pipe production and LDW structural pipe production, as there were many cases of producers not knowing which product they were producing until production had finished. Commissioner Kearns also found that the record indicated that the price differential between LDW line pipe and LDW structural pipe shrunk during the POI, which suggested a growing competitive overlap between the two products. See Separate Views of Commissioner Jason E. Kearns, *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 97-104.

⁴¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 15.

⁴² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 13.

⁴³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 13.

⁴⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 14-15.

⁴⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 15.

substituted for LDW line pipe.⁴⁶ It also found that the overlap in terms of manufacturing facilities and employees largely resulted from the downgrading of LDW line pipe to LDW structural pipe, a market feature that, in the Commission's view, highlighted a distinction between LDW line and LDW structural pipe rather than the absence of a clear dividing line, given that the LDW structural pipe can no longer qualify as LDW line pipe once downgraded.⁴⁷ In addition, the majority of domestically produced LDW structural pipe sold in the U.S. market was produced-to-order rather than sourced from downgraded LDW line pipe.⁴⁸ The Commission accordingly found that, on balance, the evidence indicated that LDW line pipe and LDW structural pipe were separate domestic like products.⁴⁹

2. The Current Reviews

In the current reviews, Domestic Producers contend that LDW line pipe and LDW structural pipe are, and always have been, a single domestic like product.⁵⁰ However, because of what they characterize as "the unique circumstances of this case," they argue that the Commission should define the domestic like product in these reviews so as to consider only the likely impact of revocation of the orders currently in place.⁵¹

Evrz and Corinth contend that the Commission should continue to define separate domestic like products. In their view, the record indicates that the factors upon which the Commission based its original like product determination have not changed.⁵² They also assert that any divergence from the domestic like product definitions adopted in the original investigations would complicate the analysis in these reviews.⁵³

Evrz also contends that there would be no legal basis for the Commission to find a single domestic like product in these reviews without information on LDW structural pipe imported from Greece and India.⁵⁴

The record does not indicate that the pertinent characteristics and uses of domestically produced LDW line pipe and LDW structural pipe have significantly changed since the original investigations so as to warrant revisiting the domestic like product definitions. Consequently,

⁴⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 15.

⁴⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 15.

⁴⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 13.

⁴⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 15.

⁵⁰ ALPPA Posthearing Br. at Exh. 1, pp. 82-86.

⁵¹ ALPPA Posthearing Br. at Exh. 1, p. 86.

⁵² CPW Prehearing Br. at 4; Evraz Posthearing Br. at Appendix, p. 18.

⁵³ See ALPPA Posthearing Br. at Exh. 1, p. 86.

⁵⁴ Evraz Posthearing Br. at Appendix, pp. 17-22.

we again define LDW line pipe and LDW structural pipe as two separate domestic like products.⁵⁵

B. Domestic Industry and Related Parties

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁵⁶ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from a domestic industry pursuant to section 771(4)(B) of the Tariff Act.⁵⁷ This provision allows the Commission, if appropriate circumstances exist, to exclude from a domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁵⁸ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.⁵⁹

⁵⁵ Commissioner Kearns believes that there is no new information on the record of these reviews that would warrant a reconsideration of his or the majority’s domestic like product determinations from the original investigations. Because the Commission is to consider whether the record indicates any reason to revisit its prior finding, and he has found no reason to do so, he joins in defining two separate domestic like products for the purpose of these reviews. Moreover, in his view, whether the Commission defines a single domestic like product or two separate domestic like products, the outcome of the Commission’s determinations in these reviews would be the same.

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

⁵⁷ See 19 U.S.C. § 1677(4)(B).

⁵⁸ See *Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int’l Trade 1992), *aff’d without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int’l Trade 1989), *aff’d mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int’l Trade 1987).

⁵⁹ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
 - (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
 - (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
 - (4) the ratio of import shipments to U.S. production for the imported product; and
- (Continued...)

1. The Original Investigations

In the original investigations, the Commission found that four domestic producers – Evraz Inc. NA d/b/a Evraz Oregon Steel Tubular (“Evraz Oregon”), Jindal Tubular USA, LLC, Skyline, and Welspun – qualified as related parties because they were related to exporters or U.S. imports of subject merchandise.⁶⁰ The Commission found that appropriate circumstances existed to exclude Evraz Oregon as a related party from both the LDW line pipe and LDW structural pipe domestic industry definitions because its primary interest was the importation of subject merchandise rather than domestic production.⁶¹ It also found that appropriate circumstances did not exist to exclude Jindal Tubular USA, LLC, Skyline, or Welspun from either the LDW line pipe or LDW structural pipe industries.⁶² The Commission therefore defined two domestic industries that included all domestic producers of LDW line pipe and LDW structural pipe, with the exception of Evraz Oregon.⁶³

2. The Current Reviews

Arguments of the Parties. Domestic Producers argue that the Commission should define the LDW line pipe industry as all producers of LDW line pipe and the LDW structural pipe industry as all producers of LDW structural pipe.⁶⁴ Respondents do not address the issue of the appropriate domestic industry definitions.

Analysis. In these reviews, Evraz Oregon and Welspun potentially qualify for exclusion as related parties through their affiliations with subject producers and exporters; Welspun also imported subject merchandise during the POR.⁶⁵ Jindal Tubular, USA LLC, and Jindal Pipe, USA

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int’l Trade 2015), *aff’d*, 879 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁶⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 16.

⁶¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 17.

⁶² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 17-19.

⁶³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 17. As noted previously, the Commission defined a third domestic like product, stainless steel LDW pipe, but ultimately issued negative determinations with respect to stainless steel LDW pipe from all subject countries.

⁶⁴ ALPPA Prehearing Br. at 6-7.

⁶⁵ CR/PR at Tables LP 3.10, LP 3.12.

Inc. (“Jindal”)⁶⁶ may qualify as a related party through their affiliation with a subject producer.⁶⁷ We discuss below whether appropriate circumstances exist to exclude them from the domestic industry.

Evrax Oregon. Evrax Oregon is related to Evrax Canada, a subject foreign producer and exporter and U.S. importer of LDWP from Canada, through common control.⁶⁸ Evrax Oregon was a domestic producer of LDW line pipe and LDW structural pipe during the original investigations. During the POR, however, it ceased production of LDW line pipe in 2020, and

⁶⁶ Jindal consists of two domestic entities, Jindal Pipe USA, Inc, and Jindal Tubular, USA LLC, that share common ownership and management, but ***. Data from these two entities are largely combined for this analysis. CR/PR at LP 1.1 n.2.

⁶⁷ CR/PR at Tables LP 1.2, LP 3.17. While domestic producer *** did not itself import subject merchandise, and is not related to any exporter or U.S. importer of subject merchandise, it reported purchasing subject merchandise from *** during the POR. *Id.* A domestic producer that does not itself import subject merchandise or does not share a corporate affiliation with an importer may nonetheless be subject to the related parties provision if it controls a purchaser of large volumes of subject imports. See SAA at 858. The Commission has found such control to exist, for example, where the domestic producer's purchases were responsible for a predominant proportion of an importer's subject imports and the importer's subject imports were substantial. See, e.g., *Iron Construction Castings from Brazil, Canada, and China*, Inv. Nos. 701-TA-248, 731-TA-262-263, 265 (Fourth Review), USITC Pub. 4655 at 11 (Dec. 2016); *Chlorinated Isocyanurates from China and Spain*, Inv. Nos. 731-TA-1082-1083 (Second Review), USITC Pub. 4646 at 12 (Nov. 2016).

Because *** did not provide an importers' questionnaire response, there is no information on the record concerning whether *** accounted for a predominant proportion of *** subject imports.

However, even if *** were subject to exclusion under the related parties provision, appropriate circumstances do not exist to exclude it from the domestic industry. *** was the *** producer of LDW structural pipe throughout the POR, with its share of domestic production ranging from *** percent during that time. CR/PR at Table SP 3.5. It *** continuation of the orders. CR/PR at Table SP 1.1. Its purchases of subject imports decreased irregularly during the POR, declining from *** short tons in 2018 to *** short tons in 2019 before increasing to *** short tons in 2020 and then decreasing to *** for the rest of the POR. CR/PR at SP 3.16 & Table SP 3.10. In the years that it purchased subject imports, its purchases as a share of its production ranged from *** percent to *** percent. Given this, along with the fact that it *** importing subject merchandise *** indicates that its primary interest is in domestic production. *** explained that ***. CR/PR at SP 3.16. Accordingly, the current record does not indicate that *** purchases benefited its domestic production operations in such a way that would skew industry data.

While Commissioner Kearns joins the above finding, he believes that the Commission inappropriately limits the discretion Congress gave to it by focusing on whether *** accounted for a predominant share of *** subject imports, as other factors may be informative of the firm's related party status. Thus, when a U.S. producer is purchasing subject imports, his view is that it is better to begin by determining whether exclusion of the firm would be appropriate in the first place, assuming the party were found to be related.

⁶⁸ CR/PR at LP 3.18, SP 3.1 n.1. ***. Evrax Oregon's U.S. Producer Questionnaire at I-4 – 1-6.

produced no LDW structural pipe.⁶⁹ Evraz Oregon ***.⁷⁰ Evraz Canada reported LDW line pipe imports from Canada into the United States totaling *** short tons in 2018 (the equivalent of *** percent of Evraz Oregon's domestic production of LDW line pipe that year), *** short tons in 2019 (the equivalent of *** percent of Evraz Oregon's domestic production), and *** short tons in 2020 (the equivalent of *** percent of Evraz Oregon's domestic production).⁷¹

While Evraz Oregon did not import subject merchandise from Evraz Canada, the *** and *** together with Evraz Canada's efforts to sell into the U.S. market suggest a degree of coordination between Evraz Oregon and Evraz Canada. However, in the absence of any argument for exclusion or record information indicating that Evraz Oregon was shielded from subject import competition or otherwise benefitted from its affiliation with Evraz Canada such that its inclusion in the domestic industry would skew industry data, we find that appropriate circumstances do not exist to exclude Evraz Oregon as a related party from the LDW line pipe industry.

Jindal. Jindal is a domestic producer of LDW line pipe and LDW structural pipe. It may qualify as a related party through its affiliation with Jindal Saw Ltd., a producer of LDWP in India. Jindal's questionnaire indicates that ***.⁷² Because Jindal Saw Ltd. did not provide a foreign producers' questionnaire response, the record also contains no information on whether Jindal Saw Ltd. exported subject merchandise to the United States, as would be necessary for Jindal to qualify as a related party by virtue of the affiliation. Even if Jindal were to qualify as a related party, we find that appropriate circumstances do not exist to exclude Jindal from the domestic industry. Jindal accounted for *** percent of domestic production of LDW line pipe and *** percent of domestic production of LDW structural pipe in 2023, making it the *** largest domestic producer of LDW line pipe and the *** largest domestic producer of LDW structural pipe that year.⁷³ It takes ***.⁷⁴ Neither Jindal nor any affiliated firms imported subject merchandise during the POR. Further, the record does not indicate that Jindal was shielded from subject import competition or otherwise benefitted from its relationship with Jindal Saw Ltd. in such a way as to skew industry data.⁷⁵ In light of these considerations, and in

⁶⁹ CR/PR at LDWP 1.6 n.19. Evraz Oregon ceased production of LDW line pipe at its Portland, Oregon facility in 2020, and ***. CR/PR at LP 1.1 n.2.

⁷⁰ *** at I-3a and I-3b.

⁷¹ CR/PR at Table LP 3.10.

⁷² CR/PR at Table LP 1.2; U.S. Producer Questionnaire of *** at I-4 – I-6.

⁷³ CR/PR at Tables LP 1.1, SP 1.1.

⁷⁴ *** U.S. Producer Questionnaires at 1-3a – 1-3b.

⁷⁵ Jindal Tubular USA, LLC's financial performance was *** for both LDW line pipe and LDW structural pipe during the POR. It reported *** in *** calendar years for LDW line pipe, and *** calendar years in which it reported LDW structural pipe production. *Compare* *** U.S. Producer Questionnaire at VI-1a and VII-1a with CR/PR at Table C.1.

the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude Jindal from either the LDW line pipe or LDW structural pipe industries.

Welspun. Welspun was one of the *** domestic producers of LDW line pipe during the period of review (“POR”) and accounted for the *** share of domestic LDW line pipe production in 2023, at *** percent.⁷⁶ It is wholly owned by a producer and exporter of subject merchandise in India, Welspun Corp. Ltd.⁷⁷ Welspun imported LDW line pipe from ***, equivalent to *** percent of its domestic production that year.⁷⁸ It imported ***.⁷⁹

Given that Welspun only imported subject merchandise in ***, when its ratio of subject imports to domestic production was *** low, its primary interest would appear to be in domestic production. Nor is there any information on the record indicating that Welspun was shielded from subject import competition or otherwise benefitted from its affiliation with Welspun Corp. Ltd. While there is some indication that Welspun’s imports of subject merchandise may have benefitted its domestic production operations to the extent that its sales of subject imports facilitated sales of its domestically produced LDWP that it would not otherwise have made, given that Welspun’s imports were very small relative to its domestic production and the domestic industry as a whole, we do not find that any such benefit would be significant to skew industry data. For these reasons, and in the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude Welspun from the LDW line pipe domestic industry as a related party.

In sum, we find that appropriate circumstances do not exist to exclude any domestic producer from the domestic LDW line pipe and LDW structural pipe industries. We therefore define two domestic industries consisting of all domestic producers of LDW line pipe and all domestic producers of LDW structural pipe.

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

⁷⁶ CR/PR at Tables LP 1.1, LP 3.6. It did not report any LDW structural pipe production. *Id.* at Tables SP 3.1, SP 3.6.

⁷⁷ CR/PR at Tables LP 1.2, LP 3.10.

⁷⁸ CR/PR at Table LP 3.12.

⁷⁹ CR/PR at LP 3.20 n.12.

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.⁸⁰

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁸¹ The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

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.⁸² 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.⁸³ 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.

B. LDW Line Pipe

1. The Original Investigations

In the original investigations, the Commission considered cumulation separately for each domestic like product and for present material injury and threat of material injury.⁸⁴

⁸⁰ 19 U.S.C. § 1675a(a)(7).

⁸¹ 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).

⁸² 19 U.S.C. § 1675a(a)(7).

⁸³ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁸⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 26, 51.

Adding further complexity, the Commission's negligibility findings resulted in different groups of subject countries being eligible for cumulation for not only its separate analyses of present material injury and threat of material injury, but also depending on whether the analyses were conducted in the leading or trailing investigations.⁸⁵

LDW Line Pipe – Cumulation for Present Material Injury (India). The Commission cumulated subject imports from each subject country eligible for cumulation (Canada, Greece, India, Korea, and Turkey) for its analysis of material injury by reason of subject imports of LDW line pipe from India.⁸⁶ The Commission found that LDW line pipe from each subject country eligible for cumulation and the domestic like product were fungible based on their high degree substitutability, as LDW line pipe was generally produced to the same API standards, regardless of source, and generally overlapped in terms of product sizes and specifications.⁸⁷ It found that imports of LDW line pipe from each of these five subject countries and the domestic like product were sold in similar channels of distribution and geographic markets, and had been simultaneously present in the U.S. market. It therefore found that there was a reasonable overlap of competition between and among domestically produced LDW line pipe and imports of LDW line pipe from Canada, Greece, India, South Korea, and Turkey.⁸⁸

LDW Line Pipe – Cumulation for Threat (China). The Commission found that subject imports of LDW line pipe from China were negligible in the antidumping duty investigation for purposes of present material injury, but not for purposes of its threat of material injury analysis. Therefore, subject imports from Canada, Greece, India, South Korea, and Turkey were eligible for discretionary cumulation with dumped subject imports from China for the Commission's threat analysis. The Commission found a likely reasonable overlap of competition between and among the domestic like product and subject imports from all six subject countries based on the same considerations that led it to cumulate subject imports of LDW line pipe from Canada, Greece, India, South Korea, and Turkey for purposes of present material injury. The Commission also found no differences in likely conditions of competition that would warrant not cumulating subject imports from any subject country.⁸⁹ The Commission therefore exercised its discretion to cumulate subject imports from all sources for its analysis of threat of material injury by reason of dumped subject imports from China.⁹⁰

LDW Line Pipe – Cumulation for Present Material Injury (Canada, South Korea, and Turkey). The Commission's cumulation analysis for imports of LDW line pipe in its trailing

⁸⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 26, 51; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 16, 22.

⁸⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29.

⁸⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 27-28.

⁸⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 27-29.

⁸⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 52-53.

⁹⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 54.

investigations differed from the corresponding analyses in the leading investigations because the Commission found LDW line pipe imports from Greece (antidumping) and Turkey (countervailing duty) were negligible for purposes of present material injury and thus ineligible for cumulation.⁹¹ The Commission adopted and incorporated by reference its cumulation analyses with respect to LDW line pipe in the leading investigations, as modified by the exclusion of LDW line pipe from Greece and Turkey from those analyses. It found a reasonable overlap of competition between and among subject imports from Canada, India, South Korea, and Turkey and the domestic like product because LDW line pipe from each of these sources was fungible, sold in similar channels of distribution and geographic markets, and was simultaneously present in the U.S. market.⁹²

LDW Line Pipe – Cumulation for Threat (Greece). Having found subject imports of LDW line pipe from China (countervailing duty) and Turkey (countervailing duty) negligible for purposes of threat and terminating those investigations, the Commission considered whether to exercise its discretion to cumulate subject imports from Canada, China (antidumping), Greece, India, South Korea, and Turkey (antidumping) for purposes of its threat analysis of subject imports from Greece. Citing its finding from the leading investigations that there was a reasonable overlap of competition between and among subject imports of LDW line pipe from all six subject countries and the domestic like product and noting that the same six countries were eligible for cumulation in the trailing investigations, the Commission found that there was no information in the record to suggest that the reasonable overlap in competition found in the leading investigations would not continue into the imminent future and adopted its findings and analysis with respect to cumulation for threat in the leading investigations, as modified by the exclusion of imports of LDW line pipe from and Turkey (countervailing duty), for its analysis of threat of material injury with respect to subject imports from Greece.⁹³

2. The Arguments of the Parties in the Current Reviews

a. Domestic Producers' Arguments

Domestic Producers argue that the Commission should cumulate imports from all subject countries. They contend that subject imports from each subject country are not likely to have no discernible adverse impact on the domestic industry,⁹⁴ that there would likely be a reasonable overlap of competition between and among subject imports from each country and

⁹¹ *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 16.

⁹² *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 16-17.

⁹³ *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 22.

⁹⁴ ALPPA Prehearing Br. at 19-24.

the domestic like product, and that the subject imports from each country are likely to compete under similar conditions of competition if the orders are revoked.⁹⁵

b. Respondents' Arguments

Evrast argues that the Commission should not cumulate subject imports from Canada because their volume is likely to remain at minimal levels for the foreseeable future, and would thus have no discernible adverse impact after revocation.⁹⁶ In its view, a significant development since the original investigations is that Evrast's Canadian capacity has greatly declined.⁹⁷ In addition, Evrast contends that market conditions and structural issues unique to its business would restrain subject imports from Canada if the orders were revoked.⁹⁸ Further, Evrast argues that subject imports from Canada compete under different conditions of competition than subject imports from other sources because they are burdened by structural disadvantages as well as tariffs under section 232 of the Trade Expansion Act of 1962, as amended ("Section 232").⁹⁹

CPW argues that the behavior of subject imports from Greece during the original investigations, the presence of Section 232 tariffs, and the Greek industry's declining capacity and production, suggest that subject imports from Greece are likely to have no discernible adverse impact on the domestic industry if the order were revoked.¹⁰⁰ CPW argues that the LDW line pipe industry in Greece experienced declining capacity and production during the POR and will increasingly utilize its remaining production capacity to serve third country markets, which continue to grow.¹⁰¹ According to CPW, subject imports from Greece are also unlikely to have an impact on the U.S. industry because CPW's products and manufacturing processes are highly specialized.¹⁰² In this regard, it claims to primarily produce a range of products for use in critical applications such as offshore pipeline and in certain grade/size combinations that are not produced in the United States,¹⁰³ such that any impact of subject imports from Greece on the domestic industry after revocation would be limited by a lack of competitive overlap.

CPW also contends that decumulation of subject imports from Greece is warranted based on the distinct conditions of competition under which they would likely compete after

⁹⁵ ALPPA Prehearing Br. at 10-17, 25.

⁹⁶ Evrast Prehearing Br. at 12.

⁹⁷ Evrast Posthearing Br. at 6.

⁹⁸ Evrast Prehearing Br. at 9-11.

⁹⁹ Evrast Prehearing Br. at 13, 14. *See also* CR/PR at LDWP 1.41 and LDWP 1.42.

¹⁰⁰ CPW Prehearing Br. at 15.

¹⁰¹ CPW Prehearing Br. at 16-17.

¹⁰² CPW Prehearing Br. at 21.

¹⁰³ CPW Prehearing Br. at 21.

revocation, given that such imports entered in low levels while subject to a distinct Section 232 tariff-rate quota (“TRQ”) regime during the POR, and that the recently updated Section 232 measures do not provide any exemptions for products not produced in the United States. Thus, CPW argues that its ability to export to the United States has been severely restricted, and it would therefore face competitive conditions distinct from those facing U.S. producers.¹⁰⁴

3. Analysis — LDW Line Pipe

a. Likelihood of No Discernible Adverse Impact

Canada. In the original investigations, the quantity of subject LDW line pipe imports from Canada irregularly decreased during the January 2015 to June 2018 period of investigation (“POI”). They decreased from 324,081 short tons in 2015 to 57,112 short tons in 2016 before increasing to 161,169 short tons in 2017, for an overall decrease of 50.3 percent; the quantity was higher in January to June 2018 (“interim 2018”) (96,783 short tons) than in January to June 2017 (“interim 2017”) (71,846 short tons).¹⁰⁵ The share of apparent U.S. consumption accounted for by subject imports from Canada irregularly decreased by 3.3 percentage points from 2015 to 2017, decreasing from 11.3 percent in 2015 to 2.9 percent in 2016, before increasing to 8.0 percent in 2017; it was higher in interim 2018 (10.9 percent) than in interim 2017 (5.1 percent).¹⁰⁶

In the original investigations, the Commission received a foreign producer’s questionnaire response from Evraz, which accounted for *** percent of LDWP production in Canada and *** exports of LDWP to the United States in 2017.¹⁰⁷ Evraz reported that its capacity decreased from *** short tons in 2015 to *** short tons in 2017; and was lower in interim 2018 (*** short tons) than in interim 2017 (*** short tons).¹⁰⁸ Its reported production decreased from *** short tons in 2015 to *** short tons in 2016 and *** short tons in 2017; it was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).¹⁰⁹ From 2015 to 2017, its exports as a share of its total shipments ranged from *** percent to *** percent,

¹⁰⁴ CPW Prehearing Br. at 33-34.

¹⁰⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table ALT C-2.

¹⁰⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table ALT C-2.

¹⁰⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-2; Confidential Report INV-QQ-137 (Nov. 26, 2018) (EDIS Doc. 818620) (“Original Confidential Report”) at VII-3.

¹⁰⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-2; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

¹⁰⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-2; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

while its exports to the United States as a share of total shipments ranged from *** percent to *** percent.¹¹⁰

In these reviews, the volume of subject imports from Canada decreased by 99.9 percent from 2018 to 2023, decreasing from 261,992 short tons in 2018 to 244,475 short tons in 2019; 26,548 short tons in 2020; 21,787 short tons in 2021; 138 short tons in 2022; and 200 short tons in 2023; their volume was higher in January to September 2024 (“interim 2024”) (1,444 short tons) than in January to September 2023 (“interim 2023”) (80 short tons).¹¹¹ The share of apparent U.S. consumption accounted for by subject imports from Canada declined from *** percent in 2018 to *** percent in 2019, *** percent in 2020, 4.5 in 2021, and less than 0.05 percent in 2022 and 2023; it was 0.2 percent in interim 2024 compared with less than 0.05 percent in interim 2023.¹¹²

The Commission again received a questionnaire response from Evraz in these reviews, accounting for all LDW line pipe production in Canada in 2023.¹¹³ Evraz reported that its practical LDW line pipe production capacity decreased substantially during the review period, first declining from *** short tons in 2018 to *** short tons in 2019, increasing to *** short tons in 2020, then decreasing to *** short tons in 2021, increasing to *** short tons in 2022, and then decreasing to *** in 2023. It reported practical production capacity of *** short tons in interim 2024, compared to *** capacity in interim 2023.¹¹⁴ Evraz attributes its reported capacity declines to ***.¹¹⁵

Evraz reported producing LDW structural pipe and other products on the same equipment and machinery used to produced LDW line pipe.¹¹⁶ Its installed overall capacity was substantially higher than its reported practical capacity, reflecting its ability to shift production between LDW line pipe and other products, as well as the ***. Evraz’s installed overall capacity decreased from *** short tons in 2018 and 2019 to *** short tons beginning in 2023. It was *** short tons in interim 2023 and interim 2024.¹¹⁷ Its installed overall capacity utilization rates decreased irregularly during the POR, initially fluctuating within a narrow range, *** percent in 2018, *** percent in 2019, and *** percent in 2020, before falling substantially later in the POR coinciding with the ***, *** percent in 2021, *** percent in 2022, *** percent in 2023; it was essentially flat between interim periods at *** percent in interim 2023 and *** percent in

¹¹⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-2; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

¹¹¹ CR/PR at Table ALT C.1.

¹¹² CR/PR at Table ALT C.1.

¹¹³ CR/PR at LP 4.36.

¹¹⁴ CR/PR at Tables LP 4.12, LP 4.14.

¹¹⁵ CR/PR at Tables LP 4.10, LP 4.11. Evraz reports turning off ***. *Id.*

¹¹⁶ CR/PR at Table LP 4.11; Evraz’s Foreign Producer Questionnaire at II-3a.

¹¹⁷ CR/PR at Table LP 4.12.

interim 2024.¹¹⁸ It reported production of such other products on shared equipment totaling *** short tons in 2018; *** short tons in 2019; *** short tons in 2020; *** short tons in 2021; *** short tons in 2022; and *** short tons in 2023; such reported production totaled *** short tons in interim 2023 and *** short tons in interim 2024.¹¹⁹ As a share of all production on shared equipment and machinery, Evraz's production of out-of-scope merchandise accounted for between *** and *** percent of overall production, depending on the year.¹²⁰

*** of Evraz's reported LDW line pipe exports during the POR were shipped to the United States.¹²¹ Its exports as a share of total shipments decreased from *** percent in 2018 to *** percent in 2019 and *** percent in 2020 before increasing to *** percent in 2021. It did not report any LDW line pipe exports after 2021.¹²²

In the original investigations, bid quotes for subject imports from Canada were lower than domestic producers' bids in 15 of 32 instances, with an average underbidding margin of 10.4 percent.¹²³ In these reviews, the Commission collected pricing data showing that subject imports from Canada undersold the domestic like product in 5 of 22 quarterly comparisons, involving *** short tons with underselling margins ranging from *** percent to *** percent and averaging *** percent.¹²⁴ The Commission also collected data from purchasers regarding bidding events. Subject imports from Canada participated in bidding for 5 of the 369 projects U.S. purchasers issued for bid.¹²⁵

Effective March 12, 2025, LDWP originating in Canada became subject to an additional 25 percent *ad valorem* duty under Section 232. In addition, effective March 4, 2025, all LDW line pipe and certain LDW structural pipe became subject to an additional 10 percent *ad valorem* duty under the International Emergency Economic Powers Act ("IEEPA") while LDW structural pipe originating in Canada imported under HTS subheading 7305.39 became subject to an additional 25 percent *ad valorem* duty under IEEPA, as such pipe is not designated as

¹¹⁸ CR/PR at Table LP 4.12.

¹¹⁹ CR/PR at Table LP 4.15.

¹²⁰ See CR/PR at Table LP 4.18.

¹²¹ See CR/PR at Table LP 4.19.

¹²² CR/PR at Table LP 4.14.

¹²³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4.

¹²⁴ CR/PR at Table LP 5.11.

¹²⁵ CR/PR at Table LP 5.23. Purchasers were asked to supply details regarding their five largest projects for which bids were received from suppliers of both domestically produced product subject imports. Purchasers provided detail regarding 18 of these bidding events, five of which included a bid from ***. Bids supplying LDW line pipe from Canada were not the lowest price option in any of the five events, and won none of the events. In three events, the product from *** was reported to be "not the best overall option" and in two events, one purchaser reported the cost was too high. However, in two of the bidding events, ***. *Id.* at LP 5.24 and App. E.

energy or energy resources.¹²⁶ Effective March 7, 2025, only products originating in Canada that do not enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) are subject to the additional *ad valorem* duty under IEEPA.¹²⁷

Based on the factors discussed above, including the significant volume of subject imports from Canada during the original investigations, the large share of the U.S. market held by subject imports from Canada during the original investigations, the continued presence of subject imports from Canada in the U.S. market during the POR, including the large volume of imports in 2018 and 2019, its capability for product-shifting and the substantial available installed overall capacity, the fact that the United States is the main export market for subject merchandise from Canada, and the underbidding by subject imports from Canada in the original investigations, we find that subject imports from Canada would not likely have no discernible adverse impact on the domestic industry if the order were revoked.

We are not persuaded that the decline in Evraz’s production capacity would prevent the volume of subject imports from Canada from exceeding minimal levels. As discussed above, Evraz’s reported practical capacity severely declined during the POR from a high of *** short tons in 2018 to *** in 2023 and interim 2023 before increasing to *** short tons in interim 2024.¹²⁸ Its production closely tracked its capacity, declining from *** short tons in 2018 to *** in 2023 and interim 2023, then increasing to *** short tons in interim 2024.¹²⁹ However, its installed overall capacity remained at *** short tons from 2020 through interim 2024, reflecting that its production facility in Regina has been largely idled since 2020, but not permanently shuttered, like the Camrose facility. Evraz demonstrated that it will ***. Although it reports that the other four mills in Regina ***, and that it would take at ***, it nevertheless estimates that it could commence commercial production there in the first quarter of 2026.¹³⁰ Further, at least some of any such additional commercial production is likely to be directed to the U.S. market, given the relatively higher prices in the United States compared to the Canadian market.¹³¹ We therefore find that Evraz could resume production of LDWP, either at its Regina HSAW facility or by engaging its overall installed capacity, at levels that would be likely to have

¹²⁶ CR/PR at LDWP 1.41-42.

¹²⁷ CR/PR at LDWP 1.41-42.

¹²⁸ CR/PR at Table LP 4.12.

¹²⁹ CR/PR at Table LP 4.12.

¹³⁰ Evraz Posthearing Br. at 6.

¹³¹ CR/PR at Table LP 4.14.

a discernible adverse impact on the domestic industry in the reasonably foreseeable future.¹³²

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Finally, in our view, the record does not indicate that the additional 25 percent *ad valorem* duty applicable to LDW line pipe imported from Canada under Section 232 and the additional 10 percent *ad valorem* duty applicable under IEEPA, both of which were announced and effective subsequent to the POR, would likely prevent subject imports from having a discernible adverse impact in the reasonably foreseeable future.¹³⁴ When LDW line pipe from Canada first became subject to Section 232 duties from June 1, 2018 to May 21, 2019,¹³⁵ the

¹³² For the reasons discussed in section III.B.3.c, below, we are unpersuaded by Evraz's arguments that its high cost structure and the alleged stigma of its affiliation with Russia render it unable to compete in the U.S. market; that Evraz's home market is likely to consume most of its available supply; and that any material volumes of shipments to the United States would only occur in a period of both high domestic demand and low availability of domestic supply and therefore not cause a discernible adverse impact. *See, e.g.*, Evraz Prehearing Br. at 9-11.

¹³³ Evraz has also argued that the absence of any correlation between subject imports from Canada and the U.S. industry's performance during the POR demonstrates that no adverse impact is likely if the order were revoked. Evraz Posthearing Br. at 14-16. We are unpersuaded by this argument. As an initial matter, subject imports were under the discipline of the order during the POR. Further, in 2019, the first full year after imposition of the orders, subject imports from Canada were higher than in subsequent years, but subject imports from all other sources had receded from 2018 levels, which enabled the domestic industry to gain market share and improve its performance. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2; CR/PR at Table ALT C-1. Accordingly, we do not find this indicative of a likely lack of adverse impact if the order were revoked. We further observe that, in the original investigations, while the domestic industry's relatively strong performance in 2015 and 2019 did coincide with large volumes of subject imports from Canada, 2015 was a period of high demand, as indicated by the peak in apparent domestic consumption, and therefore a stronger performance by the domestic industry would not be unexpected and does not demonstrate that subject imports from Canada would have no discernible adverse impact if the order were revoked.

The record also lacks support for Evraz's contention that any material volumes of shipments to the United States in the foreseeable future would only occur in a period of high demand and low availability of domestic supply. Evraz underbid domestic producers during both the POI and POR, and as discussed above, has significant excess capacity that it could use to increase its production and shipments of subject merchandise. Accordingly, as in the original investigations when subject imports from Canada accounted for a substantial share of the U.S. market (11.3 percent in 2015, 2.9 percent in 2016, 8.0 percent in 2017, and 10.9 percent in interim 2018), Evraz likely would again ship volumes of lower priced subject imports to the U.S. market that would compete with the domestic like product and likely have a discernible adverse impact on the domestic industry, regardless of demand or availability trends. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹³⁴ We note that only products originating in Canada that do not enter with duty free treatment under the USMCA are subject to the additional *ad valorem* duty under IEEPA. CR/PR at LDWP 1.41-42.

¹³⁵ *Adjusting Imports of Steel Into the United States*, Proclamation 9740, 83 Fed. Reg. 20683 (May 7, 2018); *Adjusting Imports of Steel Into the United States*, Proclamation 9894, 84 Fed. Reg. 23987 (May 23, 2019); Domestic Producer's Posthearing Br. at Exh. 1, pp. 50-52.

measure did not prevent such imports from entering the U.S. market, as they totaled 354,633 short tons from June 2018 through April 2019.¹³⁶ Given that subject imports from Canada were present in the U.S. market during the POR with the Section 232 measures in place and the mixed responses of market participants on the effects of Section 232 duties generally during that period,¹³⁷ as well as the uncertainties (*e.g.*, duration) with the IEEPA tariff that was announced and effective subsequent to the review period, we do not find that the record in these reviews indicates that the Section 232 and IEEPA measures applicable to Canada would likely prevent subject imports from entering the United States at levels that would not be likely to have no discernible adverse impact in the reasonably foreseeable future absent the restraining effect of the order.

China. In the original investigations, subject LDW line pipe imports from China declined from 34,013 short tons in 2015 to 12,263 short tons in 2016 before increasing to 14,442 short tons in 2017, an overall decline of 57.5 percent; they were lower in interim 2018 (3,829 short tons) than in interim 2017 (9,704 short tons).¹³⁸ The share of apparent U.S. consumption accounted for by subject imports from China declined from 1.2 percent in 2015 to 0.6 percent in 2016 before increasing to 0.7 percent in 2017, for an overall decline of 0.5 percent; it was lower in interim 2018 (0.4 percent) than in interim 2017 (1.1 percent).¹³⁹

During the POR, the quantity of subject LDW line pipe imports from China was 4,651 short tons in 2018, 165 short tons in 2020, 1,534 short tons in 2021, 141 short tons in 2022, and 233 short tons in 2023, and was 4,235 short tons in interim 2024 compared to 233 short tons in interim 2023.¹⁴⁰ As a share of apparent U.S. consumption, subject imports from China were *** percent in 2018, *** percent in 2021, and 0.5 percent in interim 2024; they accounted for less than 0.05 percent in all other periods.¹⁴¹

The Commission did not receive a questionnaire response from any foreign producers/exporters in China in the original investigations or in these reviews.¹⁴² Therefore, the record contains limited new information concerning the LDW line pipe industry in China. Based on information submitted by Domestic Producers, the subject industry in China has increased its production capacity since the original investigations.¹⁴³ According to GTA data, total Chinese exports of welded line pipe greater than 16 inches in diameter, which includes LDW line pipe

¹³⁶ *Calculated from* CR/PR at Table SP 4.6.

¹³⁷ As discussed below in Section IV.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

¹³⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹³⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁴⁰ CR/PR at ALT Table C.1. There were no subject imports from China in 2019. *Id.*

¹⁴¹ CR/PR at ALT Table C.1.

¹⁴² CR/PR at LP 4.46.

¹⁴³ ALPPA Prehearing Br. at 20-21.

and out-of-scope products, irregularly increased from 2018 to 2023, declining from 558,733 short tons in 2018 to 539,225 short tons in 2019, and 326,667 short tons in 2020; before increasing to 443,007 short tons in 2021, 532,608 short tons in 2022, and 577,978 short tons in 2023.¹⁴⁴ GTA data also show that China was the world's third largest exporter of welded line pipe greater than 16 inches in diameter.¹⁴⁵ In 2023, the largest export destinations for Chinese exports of welded line pipe greater than 16 inches in diameter were Saudia Arabia, Canada, and Nigeria.¹⁴⁶

In the original investigations, the sole bid using subject imports from China was lower than the domestic producers' bid.¹⁴⁷ In these reviews, the Commission did not receive pricing or bid data regarding subject LDW line pipe from China.

Effective March 2018, LDWP originating in China became subject to an additional 25 percent *ad valorem* duty under Section 232. LDWP originating in China is also subject to an additional 25 percent *ad valorem* duty under section 301 of the Trade Act of 1974, as amended ("Section 301").¹⁴⁸ Effective February 4, 2025, LDWP originating in China became subject to an additional 10 percent *ad valorem* duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent *ad valorem*.¹⁴⁹ Given that subject imports from China have maintained a presence in the U.S. market during the POR with the Section 301 and 232 measures in place, and the responses of market participants on the effects of Section 232 duties generally and the effects of the Section 301 duties during that period were mixed,¹⁵⁰ as well as the uncertainties (*e.g.*, duration) with the IEEPA tariff that was announced and effective subsequent to the POR, we do not find that the record in these reviews indicates that these measures are likely to prevent imports of LDW line pipe from China from reaching levels not likely to have no discernible adverse impact in the reasonably foreseeable future absent the restraining effect of the orders.

Based on the factors discussed above, including the presence of subject imports from China during the original investigations, the continued presence of subject imports from China in the U.S. market during the POR, the information available regarding the Chinese industry's

¹⁴⁴ CR/PR at Table LP 4.17.

¹⁴⁵ CR/PR at Table LP 4.35.

¹⁴⁶ CR/PR at Table LP 4.17.

¹⁴⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4.

¹⁴⁸ CR/PR at LDWP 1.41. Effective September 1, 2019, LDWP originating in China became subject to an additional 15 percent *ad valorem* duty under Section 301 of the Trade Act of 1974. Effective February 14, 2020, the Section 301 duty for LDWP was reduced to 7.5 percent *ad valorem*.¹⁴⁸ Effective September 27, 2024, the Section 301 duty was increased to an additional 25 percent *ad valorem*. *Id.*

¹⁴⁹ CR/PR at LDWP 1.41.

¹⁵⁰ As discussed below in Section IV.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market and the effects of Section 301 duties during the POR were mixed.

capacity and exports, and the instance in which subject imports from China underbid domestic producers in the original investigations, we find that subject imports from China would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Greece. In the original investigations, the quantity of subject imports of LDW line pipe from Greece decreased during the POI from 201,344 short tons in 2015 to 90,802 short tons in 2016 and then to 13,854 short tons in 2017, representing an overall decrease of 93.1 percent; the quantity was higher in interim 2018, when it was 101,607 short tons, than in interim 2017, when it was 2,054 short tons.¹⁵¹ The share of apparent U.S. consumption accounted for by subject imports from Greece during this period decreased by 6.3 percentage points from 2015 to 2017, decreasing from 7.0 percent in 2015 to 4.5 percent in 2016 and to 0.7 percent in 2017; it was higher in interim 2018 (11.4 percent) than in interim 2017 (0.2 percent).¹⁵²

In the original investigations, the Commission received a questionnaire response from CPW, which accounted for all or virtually all LDWP production in Greece and all or virtually all exports of LDWP to the United States in 2017.¹⁵³ CPW reported that its capacity increased from *** short tons in 2015 to *** short tons in 2017, and was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).¹⁵⁴ Its reported production increased from *** short tons in 2015 to *** short tons in 2016 and *** short tons in 2017; production was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).¹⁵⁵ From 2015 to 2017, CPW's exports as a share of its total shipments declined from *** percent in 2015 to *** percent in 2016 and *** percent in 2017, while its exports to the United States as a share of total shipments decreased from *** percent in 2015 to *** percent in 2016 and *** percent in 2017.¹⁵⁶

In these reviews, subject imports from Greece were sporadic, declining from 244,042 short tons in 2018, to 69,221 short tons in 2019, and to zero in 2020, increasing to 5,576 short tons in 2021, and then declining back to zero in 2022 and 2023; they were 10,522 short tons in interim 2024.¹⁵⁷ The share of apparent U.S. consumption accounted for by subject imports

¹⁵¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁵² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁵³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-10; Original Confidential Report, EDIS Doc. 818620 at VII-16.

¹⁵⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-10; Original Confidential Report, EDIS Doc. 818620 at Table VII-10.

¹⁵⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-10; Original Confidential Report, EDIS Doc. 818620 at Table VII-10.

¹⁵⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-10; Original Confidential Report, EDIS Doc. 818620 at Table VII-10.

¹⁵⁷ CR/PR at Table ALT C.1.

from Greece declined irregularly from *** percent in 2018, to *** percent in 2019 and 1.1 percent in 2021; it was 1.1 percent in interim 2024.¹⁵⁸

The Commission received a questionnaire response from CPW, which accounted for all known LDW line pipe production in Greece in 2023.¹⁵⁹ CPW reported that its practical LDW line pipe production capacity decreased irregularly during the review period, declining from *** short tons in 2018 to *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, and then increased to *** short tons in 2022 and *** short tons in 2023. It reported practical production capacity of *** short tons in interim 2024, compared to *** short tons in interim 2023.¹⁶⁰ CPW attributes these ***.¹⁶¹ Its practical capacity utilization rate irregularly declined from 2018 to 2023, declining from *** percent in 2018 to *** percent in 2019, *** in 2020, and *** percent in 2021, increasing to *** percent in 2022, and declining to *** in 2023; it was higher in interim 2024 (*** percent) than in interim 2023 (***).¹⁶²

CPW reported producing LDW structural pipe and other products on the same equipment and machinery used to produce LDW line pipe.¹⁶³ CPW's installed overall capacity remained consistent at *** short tons throughout the entire 2018 to 2023 period, and was *** short tons in interim 2023 and 2024.¹⁶⁴ It reported production of other products (small diameter line pipes under 16 inches in outside diameter ("OD")) on shared equipment totaling *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; such reported production totaled *** short tons in interim 2023 and *** short tons in interim 2024.¹⁶⁵ As a share of all production on shared equipment and machinery, CPW's production of out-of-scope merchandise accounted for between *** and *** percent of overall production, depending on the year.¹⁶⁶

CPW reported that its LDW line pipe exports to the United States decreased from *** short tons in 2018 to *** short tons in 2019 and *** short tons in 2020 before increasing to *** short tons in 2021; it did not export to the U.S. in 2022 and 2023.¹⁶⁷ However, CPW exported the vast majority of its output to other markets throughout the review period. Exports as a share of its total shipments decreased from *** percent in 2018 and 2019 to *** percent in 2020 before increasing to *** percent in 2021 and *** percent in 2022 and decreasing again to

¹⁵⁸ CR/PR at Table ALT C.1.

¹⁵⁹ CR/PR at LP 4.53.

¹⁶⁰ CR/PR at Tables LP 4.22, LP 4.24.

¹⁶¹ CR/PR at LP 4.53, Table LP 4.23.

¹⁶² CR/PR at Table LP 4.22.

¹⁶³ CR/PR at Table LP 4.29.

¹⁶⁴ CR/PR at Table LP 4.22.

¹⁶⁵ CR/PR at Table LP 4.29.

¹⁶⁶ See CR/PR at Table LP 4.29.

¹⁶⁷ CR/PR at Table LP 4.30.

*** percent in 2023; the share reached *** percent in interim 2024, compared to *** percent in interim 2023.¹⁶⁸ It exported *** short tons to third country markets in 2023.¹⁶⁹

In the original investigations, bid quotes from subject imports from Greece were lower than domestic producers' bids in 19 of 28 instances.¹⁷⁰ In these reviews, the Commission collected pricing data showing that subject imports from Greece undersold the domestic like product in 5 of 8 quarterly comparisons, involving 238,499 short tons, with underselling margins ranging from *** to *** percent and averaging *** percent.¹⁷¹ The Commission also collected data from purchasers regarding bidding events. Subject imports from Greece participated in *** of the *** projects that U.S. purchasers issued for bid.¹⁷²

Effective March 12, 2025, LDWP originating in Greece became subject to an additional 25 percent *ad valorem* duty under Section 232.¹⁷³ From June 2018 through December 2021, subject imports from Greece were subject to a 25 percent *ad valorem* duty under Section 232, prior to imposition of the TRQ that was in effect until March 12, 2025. Despite this additional duty, from June 2018 to December 2018, subject imports from Greece totaled 142,435 short tons, and, in 2019, totaled 69,221 short tons.¹⁷⁴ Given that subject imports from Greece were present in the U.S. market during the POR with the Section 232 measures in place and the mixed responses of market participants on the effects of Section 232 duties generally during that period,¹⁷⁵ we do not find that the record in these reviews indicates that these measures are likely to prevent imports of LDW line pipe from Greece from reaching levels not likely to have no discernible adverse impact in the reasonably foreseeable future absent the restraining effect of the orders.

Based on the factors discussed above, including the significant volume of subject imports from Greece during the original investigations, the continued presence of subject

¹⁶⁸ CR/PR at Table LP 4.24.

¹⁶⁹ CR/PR at Table LP 4.28.

¹⁷⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4; Original Confidential Report, EDIS Doc. 818620 at Table V-4.

¹⁷¹ CR/PR at Table LP 5.11.

¹⁷² CR/PR at LP 5.23, Table LP 5.13.

¹⁷³ CR/PR at LDWP 1.42. Effective June 1, 2018, LDWP originating in European Union ("EU") member countries, including Greece, became subject to an additional 25 percent *ad valorem* duty under Section 232. Effective January 1, 2022, LDWP originating in EU member countries became subject to TRQs, under which imports that exceeded the TRQ limits became subject to 25 percent Section 232 duties. Effective March 12, 2025, the TRQs for EU member countries were terminated and LDWP originating in EU member countries became subject to an additional 25 percent *ad valorem* duty under Section 232. *Id.*

¹⁷⁴ *Calculated from* CR/PR at Table LP 4.6.

¹⁷⁵ As discussed below in Section IV.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

imports from Greece in the U.S. market during the POR, the Greek LDW line pipe industry's capacity (including, as discussed below, capacity to produce product types that compete directly with domestically produced LDW line pipe),¹⁷⁶ exports, and export orientation, the underbidding by subject imports from Greece in the original investigations, we find that subject imports from Greece would not likely have no discernible adverse impact on the domestic industry if the order were revoked.

India. In the original investigations, the quantity of subject imports of LDW line pipe from India increased irregularly during the POI, declining from 51,072 short tons in 2015 to 32,693 short tons in 2016, then increasing to 391,976 short tons in 2017, representing an overall increase of 667.5 percent; the quantity was much lower in interim 2018, at 1,492 short tons, than in interim 2017, at 200,292 short tons.¹⁷⁷ The share of apparent U.S. consumption accounted for by subject imports from India during this period increased by 17.6 percentage points overall from 2015 to 2017, decreasing from 1.8 percent in 2015 to 1.6 percent in 2016 then increasing to 19.3 percent in 2017; it was lower in interim 2018 (0.2 percent) than in interim 2017 (21.9 percent).¹⁷⁸

In the original investigations, the Commission received questionnaire responses from Bhushan Steel Limited ("Bhushan"), MAN Industries Inc. ("Man"), and Welspun Corp Limited ("Welspun India"), which accounted for *** of LDWP production in India and *** percent of Indian exports of LDWP to the United States in 2017.¹⁷⁹ The Indian producers reported that their capacity remained at *** short tons from 2015 to 2017 and was *** short tons in interim 2017 and interim 2018.¹⁸⁰ Their reported production increased from *** short tons in 2015 to *** short tons in 2016 and *** short tons in 2017; it was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).¹⁸¹ From 2015 to 2017, their exports as a share of total shipments ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments increased from *** percent in 2015 to *** percent in 2016, and *** percent in 2017.¹⁸²

¹⁷⁶ As explained in more detail below, in sections III.B.3.b and III.B.3.c, we are unpersuaded by CPW's arguments that most LDW line pipe from Greece is produced using a highly specialized LSAW process and that subject imports from Greece are not likely to compete with the domestic like product.

¹⁷⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁷⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁷⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-14; Original Confidential Report, EDIS Doc. 818620 at VII-23.

¹⁸⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-14; Original Confidential Report, EDIS Doc. 818620 at Table VII-14.

¹⁸¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-14; Original Confidential Report, EDIS Doc. 818620 at Table VII-14.

¹⁸² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-14; Original Confidential Report, EDIS Doc. 818620 at Table VII-14.

In these reviews, the volume of subject imports from India increased irregularly during the full years of the review period, declining from 4,657 short tons in 2018 to 18 short tons in 2019, increasing to 7,032 short tons in 2020, declining to 4 short tons in 2021, increasing to 40,848 short tons in 2022, and then declining to 25,008 short tons in 2023, a level 537.0 higher than in 2018; they were much lower in interim 2024 (69 short tons) than in interim 2023 (24,662 short tons).¹⁸³ The share of apparent U.S. consumption accounted for by subject imports from India also increased irregularly during the full years of the POR, declining from *** percent of apparent U.S. consumption in 2018, to less than *** percent in 2019, increasing to *** percent in 2020, declining to less than 0.05 percent in 2021, increasing to 7.0 percent in 2022 and then declining to 1.9 percent in 2023; they were lower in interim 2024 at less than 0.05 percent than in interim 2023 at 3.0 percent.¹⁸⁴

The Commission did not receive a foreign producer questionnaire from any producers of subject merchandise in India.¹⁸⁵ Therefore, the record contains limited new information concerning the LDW line pipe industry in India. Based on information submitted by Domestic Producers, the subject industry in India has increased its production capacity since the original investigations.¹⁸⁶ According to GTA data, total Indian exports of welded line pipe greater than 16 inches in diameter, that includes including LDW line pipe and out-of-scope products, irregularly increased from 2018 to 2023, increasing from 405,885 short tons in 2018, to 486,525 short tons in 2019 and 598,865 short tons in 2020, declining to 320,424 short tons in 2021, and then increasing to 396,465 short tons in 2022, and 758,382 short tons in 2023.¹⁸⁷ GTA data also show that India is the world's second largest exporter of welded line pipe greater than 16 inches in diameter.¹⁸⁸ In 2023 the largest export destinations for welded line pipe greater than 16 inches in diameter were Saudi Arabia, Morocco, and the United Arab Emirates.¹⁸⁹

In the original investigations, bid quotes for subject imports from India were lower than domestic producers' bids in 5 of 8 instances.¹⁹⁰ In these reviews, the Commission did not receive pricing or bid data concerning subject imports from India.

¹⁸³ CR/PR at Table ALT C.1.

¹⁸⁴ CR/PR at Table ALT C.1.

¹⁸⁵ CR/PR at LP 4.66.

¹⁸⁶ ALPPA Prehearing Br. at 22-23; ALPPA Response to the Notice of Institution at 23 and Exhibit 14.

¹⁸⁷ CR/PR at Table LP 4.32.

¹⁸⁸ CR/PR at Table LP 4.48.

¹⁸⁹ CR/PR at Table LP 4.32.

¹⁹⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4; Original Confidential Report, EDIS Doc. 818620 at Table V-4.

Effective March 2018, LDWP originating in India became subject to an additional 25 percent *ad valorem* duty under Section 232.¹⁹¹ Given that subject imports from India have maintained a presence in the U.S. market during the POR with the Section 232 measure in place and the mixed responses of market participants regarding the effects of Section 232 duties generally during that period,¹⁹² we do not find the measure likely to prevent imports of LDW line pipe from India from reaching levels not likely to have no discernible adverse impact absent the restraining effect of the order.

Therefore, based on the foregoing, including the significant volume of subject imports from India during the original investigations, the continued presence of subject imports from India in the U.S. market during the POR, the information available regarding the Indian industry's capacity and exports, and the underbidding by subject imports from India in the original investigations, we find that subject imports from India would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

South Korea. In the original investigations, the quantity of subject imports of LDW line pipe from South Korea irregularly increased, first decreasing from 140,210 short tons in 2015 to 109,009 short tons in 2016 and then increasing to 140,644 short tons in 2017, an overall increase of *** percent; the quantity was higher in interim 2018, at 85,295 short tons, than in interim 2017, at 55,495 short tons.¹⁹³ The share of apparent U.S. consumption accounted for by subject imports from South Korea during this period increased by *** percentage points from 2015 to 2017, increasing from *** percent in 2015 to *** percent in 2016, and *** percent in 2017; it was higher in interim 2018 (*** percent) than in interim 2017 (*** percent).¹⁹⁴

In the original investigations, the Commission received useable questionnaire responses from EEW and Husteel Co. ("Husteel"), which accounted for *** percent of LDWP production in South Korea and *** percent of exports of LDWP to the United States in 2017.¹⁹⁵ The South Korean producers reported that their capacity remained at *** short tons from 2015 to 2017, and *** in interim 2017 and interim 2018.¹⁹⁶ Their reported production decreased from *** short tons in 2015 to *** short tons in 2016, then increased to *** short tons in 2017; reported

¹⁹¹ CR/PR at LDWP 1.42.

¹⁹² As discussed below in Section IV.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

¹⁹³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁹⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

¹⁹⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at VII-31.

¹⁹⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at Table VII-18.

production was higher in interim 2018 (***) short tons) than in interim 2017 (***) short tons).¹⁹⁷ From 2015 to 2017, the industry's exports as a share of its total shipments ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent.¹⁹⁸

In these reviews the volume of subject imports from South Korea fluctuated during the POR, ending the period at a level *** percentage points lower in 2023 than in 2018. Subject import volume increased from *** short tons in 2018 to *** short tons in 2019, then decreased to *** short tons in 2020 and *** short tons in 2021, increased to *** short tons in 2022, and decreased to *** short tons in 2023; it was higher in interim 2024 (***) short tons) than in interim 2023 (***) short tons).¹⁹⁹ The share of apparent U.S. consumption accounted for by subject imports from South Korea increased from *** percent in 2018, to *** percent in 2019, decreased to *** percent in 2020, then increased to *** percent in 2021 and *** percent in 2022, and then decreased to *** percent in 2023; their share was lower in interim 2024, at *** percent, than in interim 2023, at *** percent.²⁰⁰

The Commission received a questionnaire response from EEW, which accounted *** percent of exports of LDW line pipe from South Korea to the United States in 2023.²⁰¹ EEW reported that its practical LDW line pipe production capacity remained steady at *** short tons from 2018 to 2023 and was *** short tons in interim 2023 and interim 2024.²⁰² The practical overall capacity utilization was *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024.²⁰³ EEW did not report any major developments or capacity constraints.²⁰⁴

EEW also reported producing LDW structural pipe and other products on the same equipment and machinery used to produce LDW line pipe.²⁰⁵ EEW's installed overall capacity remained consistent at *** short tons throughout the period and was *** short tons in interim 2023 and interim 2024.²⁰⁶ The installed overall capacity utilization rate was *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and

¹⁹⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at Table VII-18.

¹⁹⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at Table VII-18.

¹⁹⁹ CR/PR at Table ALT C.1.

²⁰⁰ CR/PR at Table ALT C.1.

²⁰¹ CR/PR at LP 4.69.

²⁰² CR/PR at Tables LP 4.34, LP 4.36.

²⁰³ CR/PR at Table LP 4.34.

²⁰⁴ CR/PR at LP 4.71, Table LP 4.35.

²⁰⁵ CR/PR at Table LP 4.41.

²⁰⁶ CR/PR at Table LP 4.34.

*** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024.²⁰⁷ It reported production on shared equipment of other products totaling *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; its reported production of other products totaled *** in interim 2023 and *** in interim 2024.²⁰⁸ As a share of all production on shared equipment and machinery, EEW's production of out-of-scope merchandise accounted for between *** and *** percent of overall production, depending on the year.²⁰⁹

EEW reported that its LDW line pipe exports to the United States decreased intermittently, first increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020, then increasing to *** short tons in 2021 and *** short tons in 2022, before decreasing to *** short tons in 2023.²¹⁰ Its exports as a share of total shipments increased from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, and then decreased to *** percent in 2021, *** percent in 2022, and *** percent in 2023; the share in interim 2024 (*** percent) was higher than in interim 2023 (*** percent).²¹¹

In the original investigations, bid quotes for subject imports from South Korea were lower than domestic producers' bids in 7 of 16 instances.²¹² In these reviews, the Commission collected pricing data showing that subject imports from South Korea undersold the domestic like product in 3 of 4 quarterly comparisons, involving *** short tons, with underselling margins ranging from *** to *** percent and averaging *** percent.²¹³ The Commission also collected data from purchasers regarding bidding events. Subject imports from South Korea participated in *** of the 369 projects U.S. purchasers issued for bid.²¹⁴ Based on additional detail provided by purchasers regarding three bidding events, distributors using subject imports from South Korea won one bid to fulfill a *** order. This bid was the lowest-priced bid submitted.²¹⁵ In the other two events, South Korean imports were priced higher than the winning bid in one and did not meet the required specifications in the other.²¹⁶

Effective June 2018, steel articles, including LDWP, originating in South Korea were subject to annual absolute import quotas under Section 232. Following the termination of the

²⁰⁷ CR/PR at Table LP 4.34.

²⁰⁸ CR/PR at Table LP 4.41.

²⁰⁹ See CR/PR at Table LP 4.41.

²¹⁰ CR/PR at Table LP 4.40.

²¹¹ CR/PR at Table LP 4.36.

²¹² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4; Original Confidential Report, EDIS Doc. 818620 at Table V-4.

²¹³ CR/PR at Table LP 5.11.

²¹⁴ CR/PR at LP 5.23.

²¹⁵ CR/PR at LP 5.24-25.

²¹⁶ CR/PR at LP 5.24-25.

absolute import quotas, effective March 12, 2025, LDWP originating in South Korea became subject to an additional 25 percent *ad valorem* duty under Section 232.²¹⁷ Because subject imports from Korea were only subject to an additional 25 percent *ad valorem* tariff after the end of the POR, the record lacks information on how subject imports from South Korea were impacted by the 25 percent *ad valorem* duty during the POR, and market participants' reports on the effects of Section 232 duties generally during that period are mixed.²¹⁸ Consequently, we do not find that the record in these reviews indicates that the Section 232 measure is likely to prevent imports of LDW line pipe from South Korea from reaching levels not likely to have no discernible adverse impact absent the restraining effect of the orders.

Therefore, based on the foregoing, including the significant volume and increasing market share of subject imports from South Korea during the original investigations; the continued presence of subject imports from South Korea in the U.S. market during the POR; the subject South Korean industry's large capacity, including excess capacity, and exports; the underbidding by subject imports from South Korea in the original investigations; and the underselling in the current reviews, we find that subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Turkey. In the original investigations, the volume of subject imports of LDW line pipe from Turkey decreased from 125,951 short tons in 2015 to 116,311 short tons in 2016 and 45,720 short tons in 2017, representing a decrease of 63.7 percent; the quantity was lower in interim 2018, at 874 short tons, than in interim 2017, at 31,201 short tons.²¹⁹ The share of apparent U.S. consumption accounted for by subject imports from Turkey decreased by 2.1 percentage points from 2015 to 2017, increasing from 4.4 percent in 2015 to 5.8 percent in 2016 and then decreasing to 2.3 percent in 2017; it was lower in interim 2018 (0.1 percent) than in interim 2017 (3.4 percent).²²⁰

In the original investigations, the Commission received useable questionnaire responses from five firms: Umran Celik Boru Sanayi A.S. ("Umran"), Borusan, HDM Celik Boru Sanayi Ve

²¹⁷ CR/PR at LDWP 1.42.

²¹⁸ As discussed below in Section IV.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

²¹⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2. In the original investigations, subject imports from Turkey included LDW line pipe and LDW structural pipe produced by Borusan that was later found in Commerce's remand determinations to be sold at *de minimis* margins (and therefore its imports nonsubject). 85 Fed. Reg. 35262 (June 9, 2020). Borusan's imports into the United States totaled *** short tons in 2015, *** short tons in 2016, and *** in 2017. Borusan's U.S. Importer Questionnaire from the Original Investigations, EDIS Doc. 657865 (Oct. 4, 2018). Therefore, most "subject" imports from Turkey should now be viewed as nonsubject.

²²⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-2.

Ticarar A.S. (“Celik Boru”), Erciyas Celik Boru Sanayi A.S. (“Erciyas”), and Ozbal Celik Boru Sanayi Ve Ticarat A.S. (“Ozbal”), which together accounted for *** percent LDWP production in Turkey and *** percent of exports of LDWP to the United States in 2017.²²¹ These producers reported that their capacity slightly decreased from 2015 to 2017, as it remained almost unchanged from 2015 to 2016, at *** short tons and *** short tons, respectively, then decreased to *** short tons in 2017; it was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).²²² Their reported production decreased from *** short tons in 2015 to *** short tons in 2016 and to *** short tons in 2017; it was lower in interim 2018 (*** short tons) than in interim 2017 (*** short tons).²²³ From 2015 to 2017, their exports as a share of total shipments ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.²²⁴

In these reviews, the volume of subject import from Turkey decreased irregularly by *** percentage points from 2018 to 2023, declining from *** short tons in 2018 to *** short tons in 2019, *** short tons in 2020, and zero in 2021, increasing to *** short tons in 2022, and declining to *** short tons in 2023. Their volume was lower in interim 2024 (*** short tons) than in interim 2023 (*** short tons).²²⁵ The share of apparent U.S. consumption accounted for by subject imports from Turkey was *** percent in 2018, less than *** percent from 2019 to 2020, *** in 2021, *** percent in 2022, and again less than *** percent in 2023; the share was lower in interim 2024, at less than *** percent, than in interim 2023, at *** percent.²²⁶

The Commission did not receive a foreign producer questionnaire from any producers of subject merchandise in Turkey.²²⁷ Therefore, the record contains limited new information concerning the LDW line pipe industry in Turkey. According to GTA data, total Turkish exports of welded line pipe greater than 16 inches in diameter, which includes LDW line pipe and out-of-scope products, irregularly decreased from 2018 to 2023, decreasing from 234,110 short tons in 2018, to 118,321 short tons in 2019, 92,239 short tons in 2020, and 58,632 short tons in 2021, before increasing to 135,126 short tons in 2022, and 196,071 short tons in 2023.²²⁸ GTA data also show that Turkey was the world’s eleventh largest exporter of welded line pipe

²²¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at VII-38.

²²² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at Table VII-23.

²²³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at Table VII-23.

²²⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at Table VII-23.

²²⁵ CR/PR at Table ALT C.1.

²²⁶ CR/PR at Table ALT C.1.

²²⁷ CR/PR at LP 4.83.

²²⁸ CR/PR at Table LP 4.43.

greater than 16 inches in diameter.²²⁹ In 2023, the largest export destinations for welded pipe greater than 16 inches in diameter were Iraq, the United States, and Romania.²³⁰

In the original investigations, although subject imports from Turkey competed in 16 bidding events, all of these bids were submitted by ***.²³¹ In these reviews, the Commission did not receive pricing or bid data concerning subject imports from Turkey.

LDWP originating in Turkey is subject to an additional 25 percent *ad valorem* duty under Section 232.²³² Given that subject imports from Turkey have maintained a presence in the U.S. market during the POR with the Section 232 measure in place, and the mixed responses of market participants regarding the effects of Section 232 duties generally during that period,²³³ we do not find that the measure is likely to prevent imports of LDW line pipe from Turkey from reaching levels not likely to have no discernible adverse impact absent the restraining effect of the orders.

Based on the foregoing, including the presence of subject imports from Turkey in the U.S. market during the POR and the subject Turkish industry's large capacity and exports, we find that subject imports from Turkey would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

b. 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

²²⁹ CR/PR at Table LP 4.48.

²³⁰ CR/PR at Table LP 4.43.

²³¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4.

²³² CR/PR at LDWP 1.42. Effective March 2018, LDWP originating in Turkey became subject to an additional 25 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended. Effective August 2018, the Section 232 duty on LDWP originating in Turkey was increased to 50 percent *ad valorem* but was subsequently reduced to 25 percent *ad valorem*, effective May 2019. *Id.*

²³³ As discussed below in Section IV.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

product.²³⁴ Only a “reasonable overlap” of competition is required.²³⁵ 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.²³⁶

Fungibility. In the original investigations, the Commission found a high degree of substitutability between domestically produced LDW line pipe and subject imports from all six subject sources (Canada, China, Greece, India, South Korea, and Turkey).²³⁷ It also found that there was sufficient overlap in product mix between and among subject imports from each source and the domestic like product to support the finding of a reasonable overlap of competition.²³⁸ The Commission observed that LDW line pipe, regardless of source, was generally produced to the same API standards.²³⁹ The Commission also found that when comparing domestic LDWP to subject LDWP imports from each country, and subject imports from different sources, half or more of responding U.S. producers and importers reported that LDWP from the different sources was always or frequently used interchangeably. It also observed that half or more of the responding purchasers that primarily purchased LDW line pipe indicated that LDWP from subject sources and the domestic product was always or frequently used interchangeably.²⁴⁰

²³⁴ 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).

²³⁵ *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).

²³⁶ *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

²³⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29, 53.

²³⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29.

²³⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 27, 53.

²⁴⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 27, 53.

In these reviews, U.S. producers, importers, and purchasers reported a relatively high degree of interchangeability between LDW line pipe from different subject sources and between subject sources and the domestic like product. All U.S. producers reported that LDW line pipe from all sources is always interchangeable,²⁴¹ and a majority of importers reported that LDW line pipe from all sources is always or frequently interchangeable, with the exception of subject imports from India.²⁴² A majority of responding purchasers also reported that the domestic like product and LDW line pipe from all subject sources are always or frequently interchangeable.²⁴³ With respect to purchasers' comparisons of LDW line pipe from different subject sources, a majority of purchasers reported that subject imports from all sources were always or frequently interchangeable, with the exception of subject imports from Canada compared to subject imports from China.²⁴⁴ No purchasers reported that subject imports from any subject country are never interchangeable with subject imports from another country.²⁴⁵

When asked to compare LDW line pipe from different sources with respect to 22 purchasing factors, a majority or plurality of responding purchasers indicated that U.S.-produced LDW line pipe was comparable with subject imported LDW line pipe in terms of at least 18 of the 22 factors for each subject country except China.²⁴⁶ When asked to assess how often differences other than price were significant for sales of LDW line pipe, all U.S. producers reported that differences other than price are sometimes or never significant when comparing LDW line pipe from different sources,²⁴⁷ and most U.S. importers reported that differences other than price are sometimes or never significant for most country-pair comparisons, but

²⁴¹ CR/PR at LP 2.38.

²⁴² CR/PR at Table LP 2.19. An equal number of importers reported that subject imports from India and the domestic like product were always or frequently interchangeable as reported that they were sometimes or never interchangeable, a plurality of U.S. importers reported that subject imports from India were sometimes interchangeable with subject imports from Canada, and an equal number of importers reported that subject imports from India and China were always or frequently interchangeable as reported that they were sometimes or never interchangeable. *Id.*

²⁴³ CR/PR at Table LP 2.20.

²⁴⁴ CR/PR at Table LP 2.20. Comparing subject imports from Canada with subject imports from China, an equal number of purchasers reported that they were always or frequently interchangeable as reported that they were sometimes or never interchangeable. *Id.*

²⁴⁵ CR/PR at Table LP 2.20.

²⁴⁶ CR/PR at Table LP 2.18. A plurality of purchasers rated U.S.-produced LDW line pipe as superior to LDW line pipe imported from China for all factors except price, for which U.S. product was rated as inferior; and payment terms and availability of weld type, for which for which U.S.-produced product was rated as comparable. *Id.*

²⁴⁷ CR/PR at Table LP 2.21.

always or frequently significant when comparing subject imports from China and Greece.²⁴⁸ The purchasers' responses were more mixed on the question of whether differences other than price were important. They most frequently reported that differences other than price are sometimes important in their purchasing decisions across all country-pair comparisons, and more purchasers indicated that such differences are always important than never important for most of the comparisons.²⁴⁹

As discussed above, CPW argues that it primarily produces specialized products in distinct size/grade combinations that are not manufactured by U.S. producers or other subject producers, thereby limiting the potential for competitive overlap between LDW line pipe from Greece and other sources and demonstrating that LDW line pipe from Greece is not fungible with products from other sources.²⁵⁰ It also argues that it primarily produces LSAW line pipe, whereas U.S. and subject producers in other countries primarily produce HSAW line pipe.²⁵¹ The information in the record, however, indicates that subject imports from Greece are generally fungible with domestically produced LDW line pipe and subject imports from other sources in the U.S. market. A plurality of responding purchasers indicated that subject imports from Greece were always interchangeable with domestically produced line pipe and line pipe from all other subject sources with the exception of Turkey.²⁵² Moreover, no purchasers reported that LDW line pipe from Greece was never interchangeable with U.S.-produced line pipe or line pipe from any other subject source.²⁵³ Furthermore, a majority or plurality of purchasers reported that domestically produced LDW line pipe is comparable to LDW line pipe imported from Greece with respect to 18 of 22 purchasing factors, including product range, project specification, and availability of weld type.²⁵⁴

²⁴⁸ CR/PR at Table LP 2.22. Equal numbers of importers reported that differences other than price were either always or frequently important, or sometimes or never important, with respect to the following country-pair comparisons involving Indian and Chinese origin LDW line pipe: domestically produced LDW line pipe with subject imports from India, subject imports from Canada with subject imports from India, subject imports from Greece with subject imports from India, subject imports from China with subject imports from India, subject imports from China with subject imports from South Korea, and subject imports from China with subject imports from Turkey. *Id.*

²⁴⁹ CR/PR at Table LP 2.23.

²⁵⁰ CPW Prehearing Br. at 26-27.

²⁵¹ CPW Prehearing Br. at 28-29.

²⁵² CR/PR at Table LP 2.20. A plurality of purchasers (five) reported that subject imports from Turkey were sometimes interchangeable with subject imports from Greece, while three reported that they were always interchangeable and three reported that they were frequently interchangeable, and none reported that they were never interchangeable. *Id.*

²⁵³ CR/PR at Table LP 2.20.

²⁵⁴ CR/PR at Table LP 2.18. The only four factors for which a majority or plurality of purchasers did not rate product from the two sources as comparable were availability of >16 inch to ≤24 inch OD (Continued...)

The record also indicates that LDW line pipe from Greece overlapped with the domestic like product and LDW line pipe from other subject sources in terms of outside diameter, production method, and grade, as in the original investigations.²⁵⁵ With respect to outside diameter, *** percent of U.S. shipments of LDW line pipe from Greece were in the >16 inch OD to <=24 inch OD range and *** percent were in the >24 inch to <=48 inch OD pipe range from January 2023 through September 2024, compared with *** percent and *** percent, respectively, for subject imports from all sources in aggregate, and *** percent and *** percent for domestically produced line pipe, respectively.²⁵⁶ With respect to production method, in the current reviews, LSAW line pipe produced in the United States and imported from subject sources, including Greece and South Korea, was sold in the U.S. market from January 2023 to September 2024.²⁵⁷ Likewise, with respect to grade, U.S.-produced line pipe and subject imports from South Korea were sold in the X-70 to X-79 grade range, the *** grade range for which U.S. shipments of LDW line pipe from Greece were reported.²⁵⁸

The record indicates that there are certain thick-walled products that were imported from Greece and other sources but not produced domestically during the POR.²⁵⁹ Although domestic producers are building out the capacity to produce these products, they do not expect this production to come online until 2027.²⁶⁰ Nevertheless, the record does not indicate that

pipe (purchasers evenly divided between rating the domestically produced product as superior or comparable), availability of >48 inch pipe (purchasers evenly divided between rating the domestically produced product as superior or comparable), delivery time (a majority of purchasers rated U.S.-product as superior), and price (plurality rated U.S.-product as inferior). *Id.*

²⁵⁵ During the original investigations, shipments of LDWP from Greece were divided between >16 inch OD to <=24 inch OD pipe range and the >24 inch to <=48 inch OD pipe range in 2017, in approximation with all subject and domestic sources. In 2017, the quantity of LDWP from Greece in the >16 inch to <=24 inch OD range was *** short tons, while the quantity in the >24 inch to <=48 inch OD size range was *** short tons, representing *** percent and *** percent of U.S. shipments. In the same year, *** percent of U.S. shipments from all subject sources and *** percent of domestically produced LDWP were in the >16 inch OD to <=24 inch OD range, while *** percent were in the >24 inch to <=48 inch OD size range (and *** percent were in the >48 inch OD range. *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table IV-7; *Original Confidential Report*, EDIS Doc. 818620 at Table IV-7.

²⁵⁶ CR/PR at Table LP 4.3.

²⁵⁷ CR/PR at Table LP 4.2. From January 2023 to September 2024, *** percent of U.S. producer's LDW line pipe shipments and *** percent of shipments of subject imports from South Korea were LSAW-produced. *Id.*

²⁵⁸ CR/PR at Table LP 4.2. From January 2023 to September 2024, *** percent of U.S. shipments of subject imports from Greece were in the in the X-70 to X-79 range, as were *** percent of U.S. shipments of domestically produced LDW line pipe and *** percent of U.S. shipments of subject imports from South Korea. *Id.*

²⁵⁹ Hearing Tr. at 76 (Norris), 160 (Mentzelopoulos).

²⁶⁰ Hearing Tr. at 121 (Onbasi).

such products account for such a large share of CPW's production that they would significantly limit the fungibility of imports of LDW line pipe from Greece with the domestic like product and imports of LDW line pipe from other subject sources if the orders were revoked. During the original investigations, CPW competed with domestic producers for projects that did not require specialized products,²⁶¹ and its market share rose to *** percent in interim 2018.²⁶² Even accepting that CPW has since shifted its focus to specialized applications such as deepwater pipelines, such that all of its LSAW-produced line pipe was destined for such projects, CPW still produces and ships substantial quantities of LDW line pipe produced using the HSAW and electric resistance welding ("ERW"), which are production methods that are not generally used to produce line pipe for critical applications.²⁶³

We also observe that during the original investigations, only one of CPW's four mills was an LSAW facility, as it also ran two ERW mills and one HSAW mill.²⁶⁴ The record in these reviews does not indicate that its production operations have changed in this regard.²⁶⁵ To the contrary, ***.²⁶⁶ Therefore, we find that if the orders were revoked, there would likely be a sufficient degree of fungibility between and among subject imports from each source, including Greece, and the domestic like product.

Channels of Distribution. In the original investigations, the Commission found that subject LDW line pipe imports and the domestic like product shared the same general channels of distribution. Subject imports from Canada, Greece, India, and Turkey were sold primarily to end users, subject imports from South Korea were sold to end users and distributors, and subject imports from China were primarily sold to end users in 2017.²⁶⁷ Similarly, the domestic like product was primarily sold to end users.²⁶⁸

In these reviews, domestic producers sold between 71.8 percent and 92.6 percent of their LDW line pipe to oil and gas end users, depending on the year, with the remainder sold to distributors.²⁶⁹ Due to the more sporadic nature of sales from subject producers during the

²⁶¹ See *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table F; Original Confidential Report, EDIS Doc. 818620 at Table F.

²⁶² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at C-2.

²⁶³ CR/PR at LDWP 1.45-1.45. In 2023, CPW shipped *** short tons of HSAW-produced product, *** short tons of ERW-produced product, and *** short tons of LSAW-produced product. CPW Foreign Producer Questionnaire at II-17; CR/PR at Table LP 4.27.

²⁶⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at VII-17; Original Confidential Report, EDIS Doc. 818620 at VII-17.

²⁶⁵ CPW's Foreign Producer Questionnaire at II-2a.

²⁶⁶ CR/PR at LP 4.53.

²⁶⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 53-54; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 22.

²⁶⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 22.

²⁶⁹ CR/PR at Table LP 2.2.

POR, the share of subject imports sold to distributors, oil and gas end users, and other end users was more variable. Subject imports from Canada and Greece were sold almost exclusively to oil and gas end users in each year, except that in interim 2024 all subject imports from Greece were sold to other ends users, and in 2020 *** percent of subject imports from Canada were sold to distributors. Subject imports from South Korea and India were sold primarily to distributors.²⁷⁰

CPW's argument that its sales channels, which were almost exclusively to oil and gas end users, differentiate LDW line pipe from Greece is not supported by the record.²⁷¹ U.S. producers consistently sold most of their product to oil and gas end users.²⁷² In addition, subject imports from Canada were primarily sold to oil and gas end users during the POR, including *** percent of U.S. shipments of LDW line pipe from Canada in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021.²⁷³ Furthermore, during the original investigations, subject imports from Canada, Greece, India, and Turkey were primarily sold to oil and gas end users, and subject imports from South Korea and China were also sold to oil and gas end users.²⁷⁴ The record in these reviews does not suggest that the conditions of competition that led importers of subject merchandise from all sources to sell directly to customers in the oil and gas industry have changed since the original investigations. Therefore, if the orders were revoked, subject imports would likely compete in the same channels of distribution as in the original investigations.

Geographic Overlap. In the original investigations, U.S. producers sold LDWP to all regions of the contiguous United States. Subject LDWP imports from all subject countries were sold in the Northeast and Central Southwest, and subject imports from all subject countries except Canada were sold in the Southeast.²⁷⁵

In these reviews, domestic producers reported selling LDW line pipe to all regions in the contiguous United States.²⁷⁶ U.S. importers reported selling subject line pipe from Canada to the Midwest, Southeast, Central Southwest, Mountain, and Pacific Coast regions; subject line pipe from Greece to the Southeast and Central Southwest regions; and subject line pipe from

²⁷⁰ CR/PR at Table LP 2.2. No data were reported regarding the channels of distribution of subject imports from China. *Id.*

²⁷¹ See CPW Prehearing Br. at 30-31.

²⁷² See CR/PR at Table LP 2.2.

²⁷³ CR/PR at Table LP 2.2. There were no shipments of LDW line pipe from Canada in 2022, 2023, or interim 2024. *Id.*

²⁷⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 54; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 22; Original Confidential Report, EDIS Doc. 818620 at Table II-1.

²⁷⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 54; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 22.

²⁷⁶ CR/PR at Table LP 2.3.

South Korea to the Northeast, Central Southwest, and Pacific Coast regions.²⁷⁷ In 2023, subject imports from Canada entered through the Northern border of entry, subject imports from China entered the United States through the Eastern and Western borders of entry, subject imports from India entered through the Northern and Southern borders of entry, subject imports from South Korea entered through all borders of entry, and subject imports from Turkey entered through the Eastern, Southern, and Western borders of entry.²⁷⁸

Simultaneous Presence in Market. In the original investigations, subject imports of LDW line pipe from all six subject countries were present in most months of the POI. The record also indicated that subject producers in Canada, Greece, India, South Korea, and Turkey submitted bids in competition with domestic producers on multiple projects during the POI.²⁷⁹

In these reviews, the domestic like product and subject imports were simultaneously present in the U.S. market during the POR. The domestic like product was present throughout the POR.²⁸⁰ Subject imports from South Korea were reported in all months during this period, subject imports from Canada were reported in the majority of the months (55 of 81), and subject imports from China, Greece, and India were reported intermittently, with decreasing frequency beginning in 2020.²⁸¹ Nevertheless, there is no information on the record indicating that subject imports from each source would not be simultaneously present in the U.S. market after revocation, as they were in the original investigations.

Conclusion. As discussed above, the record indicates that there is a relatively high degree of fungibility between and among subject imports from each source and the domestic like product. Most responding domestic producers, importers, and purchasers reported that LDW line is interchangeable, regardless of the source, and most purchasers reported that domestically produced LDW line pipe is comparable to LDW line pipe from each of the subject sources with respect to most purchasing factors. Contrary to CPW's argument that competitive overlap between LDW line pipe from Greece and other sources is limited, the record indicates that LDW line pipe from Greece overlapped with the domestic like product and imports of LDW line pipe from other subject sources with respect to outside diameter, production process, and grade. The record also indicates that the domestic like product and subject imports from each source continue to be sold through overlapping channels of distribution and geographic

²⁷⁷ CR/PR at Table LP 2.3. No data were reported regarding the geographic markets of sales of subject imports from China, India, or Turkey.

²⁷⁸ CR/PR at Table LP 4.5. No subject imports from Greece were reported in 2023. *Id.*

²⁷⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 54; *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 22.

²⁸⁰ *See, e.g.*, CR/PR at Table LP 1.4.

²⁸¹ *See* CR/PR at Table LP 4.6. Subject imports from China were reported in 31 of 81 months, subject imports from Turkey were reported in 26 of 81 months, subject imports from Greece were reported in 16 of 81 months, and subject imports from India were reported in 22 of 81 months. *Id.*

markets, as in the original investigations, and would likely be simultaneously present in the U.S. market after revocation. Therefore, we find a likely reasonable overlap of competition among subject imports from Canada, China, Greece, India, South Korea, and Turkey and between the domestic like product and subject imports from each source.

c. Likely Conditions of Competition

We also find that the record in these reviews does not indicate that there would likely be significant differences in the conditions of competition between subject imports from Canada, China, Greece, India, South Korea, and Turkey. As discussed in section III.B.3.b, above, the volume of subject imports from each subject country was substantial during the original investigations, and subject imports from each subject country, with the exception of subject imports from Turkey, underbid the domestic like product for projects involving LDW line pipe. The record also indicates that subject imports from Canada, China, Greece, India, South Korea, and Turkey have maintained a presence in the U.S. market during the POR; and that the subject industries of each country generally possess significant production capacity, including excess capacity, and exported significant volumes of LDW line pipe. Except for Canada, the subject countries are all among the largest global exporters of LDW line pipe.²⁸² As discussed in section III.D.2, we have also found that there would likely be a reasonable overlap of competition between and among LDW line pipe imports from each subject country and the domestic like product if the orders were revoked.

We are unpersuaded by respondents' arguments that subject imports from Canada and Greece are likely to compete under different conditions of competition than imports from other subject countries if the orders are revoked.

We disagree that Evraz's allegedly high-cost structure makes subject imports from Canada less competitive in the U.S. market than product from other suppliers. Regardless of whether some of its shipping costs are relatively high,²⁸³ Evraz effectively competed in the U.S. market during the original investigations, winning significant market share and underbidding domestic producers in nearly half of the bidding events that were part of the record.²⁸⁴ The

²⁸² See CR/PR at Table LP 4.48.

²⁸³ Evraz asserts that it faces a transportation cost disadvantage vis-à-vis other foreign suppliers because while it ships over land, other subject producers ship by ocean freight and enter through U.S. ports in Texas and Louisiana near the hub of the U.S. oil and gas industry. It also argues that its operations are further distinguished from suppliers in other subject countries because it is vertically integrated and unionized. Evraz Prehearing Br. at 13-14.

²⁸⁴ As discussed above, the share of apparent U.S. consumption accounted for by subject imports from Canada reached a period high of 10.9 percent in interim 2018 and bid quotes for subject imports from Canada were lower than domestic producers' bids in 15 of 32 instances. See *Original* (Continued...)

record in these reviews does not indicate that the factors comprising Evraz's cost structure have changed since the original investigations.²⁸⁵ And, as discussed above, subject imports from Canada have continued to compete in the U.S. market, maintaining a presence during the POR and continuing to bid at prices that at times were lower than a domestic producer.²⁸⁶

We also disagree that LDW line pipe demand in Canada is likely to consume most of Evraz's available supply such that subject imports from Canada would not compete in the U.S. market if the order were revoked. The relationship between the volume of Evraz's home market shipments and its exports to the United States does not indicate that periods of high home market demand substantially affected its exports to the United States. For example, in 2020, its home market shipments reached their highest levels of the POR, at *** short tons but it still exported *** short tons to the United States even under the restraining effect of the order.²⁸⁷ In addition, Evraz's exports to the United States exceeded its home market shipments in 2015, 2017, and 2018.²⁸⁸ We have previously found that Evraz will likely restart idled facilities as needed to fulfill orders, enabling it to supply purchasers in both countries.²⁸⁹ We further observe that demand in Canada is not so robust as to have prevented Evraz from permanently closing one LDW line pipe facility and idling much of its remaining capacity.

Evraz has also argued that stigma caused by its corporate affiliation with Russia impedes its ability to compete in the U.S. market. As discussed previously, most purchasers viewed subject imports from Canada as always or frequently interchangeable with domestically produced LDW line pipe and subject imports from all other subject sources, and no purchasers indicated that subject imports from Canada were never interchangeable with subject imports from other subject sources or the domestic like product.²⁹⁰ Although some purchasers indicated some aversion to purchasing from Evraz due to its corporate association with Russia,

Leading Determinations, USITC Pub. 4859 (Jan. 2019) at Tables C-2, V-4; Original Confidential Report, EDIS Doc. 818620 at Tables C-2, V-4.

²⁸⁵ See *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 26 (Evraz arguing that its higher average unit values ("AUVs") during the POI reflect vertical integration and shorter lead times; Evraz Prehearing Br. at 4 and Exhibit 2.1 (unionization).

²⁸⁶ We note again that Evraz submitted bids for five projects in the United States since January 2021 and in two of the bidding events ***. CR/PR at LP 5.24 and App. E.

²⁸⁷ CR/PR at Table LP 4.14.

²⁸⁸ CR/PR at Table LP 4.14; *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-3; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

²⁸⁹ As discussed above, Evraz demonstrated that it will ***. Although it reports that the other four mills in Regina ***, and that it would take at ***, it nevertheless estimates that it could commence commercial production there in the first quarter of 2026. See Evraz Posthearing Br. at 6.

²⁹⁰ CR/PR at Table LP 2.20. We note the exception of China, for which an equal number of purchasers indicated that such imports were either always or frequently interchangeable, or sometimes interchangeable with product from Canada. *Id.*

others reduced their purchases from Canada due to other reasons, including the antidumping and countervailing orders and the unavailability of certain pipe sizes, while others reported no change at all in the purchases from Canada.²⁹¹ Moreover, to the extent such stigma exists, it has not prevented subject imports from Canada from maintaining a presence in the U.S. market over the POR and competing for projects since January 2021 and, therefore, does not warrant exercising our discretion not to cumulate subject imports from Canada with imports from the other subject countries.

We are not persuaded that the Section 232 and IEEPA tariffs applicable to LDW line pipe from Canada would likely result in subject imports from Canada competing under different conditions of competition. As discussed above, we have previously found on this record that these measures would not likely prevent subject imports from Canada from entering the United States at levels that would not be likely to have no discernible adverse impact in the reasonably foreseeable future. Given that all subject imports are subject, at a minimum, to the same 25 percent *ad valorem* duty under Section 232,²⁹² we further find that neither the Section 232 duties nor the additional 10 percent *ad valorem* duty applicable under IEEPA would likely cause subject imports from Canada to compete under substantially different conditions of competition from imports from other subject countries if the order were revoked.²⁹³

With respect to subject imports from Greece, we are unpersuaded by CPW's argument that LDW line pipe from Greece is likely to compete under different conditions of competition because U.S. producers do not produce LDW line pipe that would compete with CPW's highly specialized products.²⁹⁴ In section III.B.3.b, above, we found that there would likely be a sufficient degree of fungibility between and among subject imports from each source, including Greece, and the domestic like product for purposes of cumulation if the orders were revoked. We also found that CPW's argument that its sales channels differentiate LDW line pipe from Greece from LDW line pipe from other sources is not supported by the record.²⁹⁵ We are likewise unpersuaded that the subject industry's ability to compete in the U.S. market is severely limited by the Section 232 measures, effective March 2025, such that subject imports from Greece would face competitive conditions distinct from those facing other suppliers of subject merchandise. Although unlike other subject countries it was previously subject to a TRQ that only applied an *ad valorem* tariff of 25 percent to any out of quota volumes, effective March 12, 2025, the revised Section 232 measures apply equally to all subject sources.

²⁹¹ Evraz Final Comments at 13; CR/PR at Tables LP 2.17, 2.28-29.

²⁹² CR/PR at LDWP 1.41-1.42.

²⁹³ We note that only products originating in Canada that do not enter with duty free treatment under the USMCA are subject to the additional *ad valorem* duty under IEEPA. CR/PR at LDWP 1.41-1.42.

²⁹⁴ CPW Prehearing Br. at 21.

²⁹⁵ See CPW Prehearing Br. at 30-31.

Therefore, the record does not indicate that subject imports from Greece are likely to compete under substantially different conditions of competition as LDW line pipe from other subject sources.

Based on the record of these reviews, we do not find differences in the likely conditions of competition that would warrant exercising our discretion to not cumulate subject imports from Canada, China, Greece, India, South Korea, and Turkey.

d. Conclusion

In sum, we determine that subject imports from Canada, China, Greece, India, South Korea, and Turkey, considered individually, are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. We also find that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product if the orders were revoked. Finally, we find that subject imports from each subject country would be likely to compete under similar conditions of competition upon revocation of the orders. Accordingly, we exercise our discretion to cumulate subject imports from Canada, China, Greece, India, South Korea, and Turkey for purposes of our analysis in these reviews with respect to LDW line pipe.

C. LDW Structural Pipe

1. The Original Investigations

LDW Structural Pipe – Cumulation for Present Material Injury (China). In the original investigations, the Commission cumulated imports of LDW structural pipe from China, Canada, South Korea, and Turkey for its analysis of material injury by reason of subject imports of LDW structural pipe from China.²⁹⁶ It found that domestically produced LDW structural pipe and eligible subject imports were fungible, as there was a high degree of substitutability and LDW structural pipe is generally produced in accordance with ASTM standards, regardless of source.²⁹⁷ It found that the domestic like product and eligible subject imports were sold in similar channels of distribution and geographic markets, and were simultaneously present in the U.S. market. It therefore found a reasonable overlap of competition between and among domestically produced LDW structural pipe and imports of LDW structural pipe from Canada, China, South Korea, and Turkey.²⁹⁸

²⁹⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 30-31.

²⁹⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29.

²⁹⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 31.

LDW Structural Pipe – Cumulation for Present Material Injury (Canada, South Korea, and Turkey). As a result of the Commission’s findings that subject imports of LDW structural pipe from Greece (antidumping) and India (antidumping and countervailing duty) were negligible for purposes of present material injury, only subject imports of LDW structural pipe from Canada, China, South Korea, and Turkey were eligible for cumulation for the Commission’s present material injury analysis in the trailing investigations. The Commission adopted and incorporated by reference its findings and analysis with respect to cumulation for LDW structural pipe in the leading investigations, as modified by the exclusion of evidence regarding LDW structural pipe from Greece.²⁹⁹ It again found a reasonable overlap in competition between and among the domestic like product and subject imports from Canada, China, South Korea, and Turkey. Therefore, the Commission cumulated subject imports of LDW structural pipe from those four countries for its analysis of present material injury by reason of subject imports of LDW structural pipe from Canada, South Korea, and Turkey.³⁰⁰

2. The Arguments of the Parties in the Current Reviews

a. Domestic Producers’ Arguments

Mirroring their arguments regarding LDW line pipe, Domestic Producers contend that subject imports from each subject country are not likely to have no discernible adverse impact on the domestic industry,³⁰¹ that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product, and that the subject imports from each country are likely to compete under similar conditions of competition if the orders are revoked.³⁰²

b. Respondents’ Arguments

Evrz argues that imports of LDW structural pipe from Canada are likely to have no discernible adverse impact after revocation, primarily because Evraz does not intentionally produce LDW structural pipe and has no intention of selling material quantities of LDW structural pipe into the U.S. market for the foreseeable future.³⁰³ It argues that import volumes of LDW structural pipe from Canada were low even prior to imposition of the antidumping order. Moreover, it argues that many of the distinctive likely conditions of competition facing

²⁹⁹ *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 17.

³⁰⁰ *Original Trailing Determinations*, USITC Pub. 4883 (Apr. 2019) at 17.

³⁰¹ ALPPA Prehearing Br. at 34-39.

³⁰² ALPPA Prehearing Br. at 26-33, 39.

³⁰³ Evraz Prehearing Br. at 48-49.

Evraz in the U.S. LDW line pipe market, as discussed above, apply equally in the U.S. LDW structural pipe market, including its disadvantageous location, high shipping expenses, vertical integration, and cost structure.³⁰⁴ In addition, Evraz contends that the ***.³⁰⁵ Therefore, in its view, imports from Canada of LDW structural pipe are likely to have no discernible adverse impact on U.S. producers after revocation and the Commission should exercise its discretion to assess imports of LDW structural pipe from Canada separately.³⁰⁶

3. Analysis — LDW Structural Pipe

a. Likelihood of No Discernible Adverse Impact

Canada. In the original investigations, the volume of subject imports of LDW structural pipe from Canada irregularly decreased during the POI, declining from 14,085 short tons in 2015 to 10,554 short tons in 2016, then increasing to 13,038 short tons in 2017, an overall decrease of 7.4 percent; the volume was lower in interim 2018, at 3,471 short tons, than in interim 2017, at 6,817 short tons.³⁰⁷ The share of apparent U.S. consumption accounted for by subject imports from Canada decreased by 1.2 percentage points overall from 2015 to 2017, decreasing from 5.4 percent in 2015 to 3.9 percent in 2016 and then increasing to 4.2 percent in 2017; it was lower in interim 2018 (2.8 percent) than in interim 2017 (4.7 percent).³⁰⁸

In the original investigations, the Commission received a questionnaire response from Evraz, which accounted for *** percent of LDWP production in Canada and *** exports of LDWP from Canada to the United States in 2017.³⁰⁹ Evraz reported that its capacity decreased from *** short tons in 2015 to *** short tons in 2017; and was lower in interim 2018 (*** short tons) than in interim 2017 (*** short tons).³¹⁰ Its reported production decreased from *** short tons in 2015 to *** short tons in 2016 and *** short tons in 2017; it was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).³¹¹ From 2015 to 2017 its exports as a share of total shipments were *** percent in 2015, *** percent in 2016, and *** percent in

³⁰⁴ Evraz Prehearing Br. at 49.

³⁰⁵ Evraz Prehearing Br. at 50.

³⁰⁶ Evraz Prehearing Br. at 50-51.

³⁰⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

³⁰⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

³⁰⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-3; Original Confidential Report, EDIS Doc. 818620 at VII-3.

³¹⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-3; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

³¹¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-3; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

2017, while its exports to the United States as a share of total shipments were *** percent in 2015, *** percent in 2016, and *** percent in 2017.³¹²

In these reviews, the volume of subject LDW structural pipe imports from Canada irregularly decreased by 45.1 percent from 2018 to 2023, decreasing from 4,311 short tons in 2018 to 2,123 short tons in 2019, increasing to 3,998 short tons in 2020, decreasing to 1,709 short tons in 2021 and 1,063 short tons in 2022, and then increasing to 1,946 short tons in 2023; the volume was lower in interim 2024 (1,094 short tons) than in interim 2023 (1,923 short tons).³¹³ The share of apparent U.S. consumption accounted for by subject imports from Canada was *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was lower in interim 2024, at *** percent, than in interim 2023, at *** percent.³¹⁴

The Commission received questionnaire responses from Evraz, which accounted for *** percent of LDW structural pipe production in Canada in 2023, and from Pipe and Piling, which accounted for the remaining *** percent of production that year.³¹⁵ The subject industry reported that its practical LDW structural pipe production capacity decreased precipitously in 2021 after ***.³¹⁶ The industry's practical capacity for LDW structural pipe declined from *** short tons in 2018, to *** short tons in 2019, increased to *** short tons in 2020, then fell to *** short tons in 2021, increased to *** short tons in 2022 and fell to *** short tons in 2023. It reported practical production capacity of *** short tons in interim 2024, slightly lower than the *** short tons it reported for interim 2023.³¹⁷ Evraz states that it ***.³¹⁸

Subject producers in Canada also reported producing LDW line pipe and other products on the same equipment and machinery used to produce LDW structural pipe.³¹⁹ Their installed overall capacity was at *** short tons in 2018 and 2019, decreasing to ***, and remaining at that level through 2023; it was *** short tons in interim 2023 and 2024.³²⁰ They also reported practical overall capacity of *** short tons in 2018, decreasing to *** short tons in 2019 and 2020, and to *** short tons in 2021, then increasing to *** short tons in 2022, and decreasing to *** short tons in 2023; with *** short tons of practical overall capacity in interim 2023 and

³¹² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-3; Original Confidential Report, EDIS Doc. 818620 at Table VII-3.

³¹³ CR/PR at Table C.2.

³¹⁴ CR/PR at Table C.2.

³¹⁵ CR/PR at SP 4.28, Table SP 4.9.

³¹⁶ CR/PR at Tables SP 4.10, SP 4.11

³¹⁷ CR/PR at Table SP 4.11, SP 4.13.

³¹⁸ CR/PR at Tables LP 4.10, LP 4.11.

³¹⁹ CR/PR at Table SP 4.18.

³²⁰ CR/PR at Table SP 4.11.

interim 2024.³²¹ They reported an installed overall capacity utilization rate of *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024.³²² They reported production of other products on shared equipment totaling *** short tons in 2018, decreasing to *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, then increasing to *** short tons in 2022, and decreasing to *** short tons in 2023; such reported production totaled *** short tons in interim 2023 and a lower *** short tons in interim 2024.³²³ As a share of production on shared equipment and machinery, the subject industry's production of out-of-scope merchandise accounted for between *** percent and *** percent of overall production, depending on the year.³²⁴

Subject producers in Canada reported that their LDW structural pipe exports to the United States decreased from *** short tons in 2018 to *** short tons in 2019, increased to *** short tons in 2020, decreased to *** short tons in 2021, and increased to *** short tons in 2023 and interim 2023. They reported *** exports to the United States in 2022 or interim 2024.³²⁵ Their exports as a share of total shipments decreased from *** percent in 2018 to *** percent in 2019, increased to *** percent in 2020, decreased to *** percent in 2021, *** in 2022, then increased to *** percent in 2023, and were *** in interim 2024.³²⁶

In the original investigations, the bid representing subject imports from Canada was higher priced than the competing domestic bid in the one instance of subject imports from Canada competing with domestically produced LDW structural pipe.³²⁷ In these reviews, the record shows that subject imports from Canada undersold the domestic like product in 2 of 3 quarterly comparisons, involving *** short tons, with underselling margins ranging from *** to *** percent and averaging *** percent.³²⁸ The Commission also collected data from purchasers regarding bidding events. Subject imports from Canada participated in *** of the *** projects U.S. purchasers issued for bid.³²⁹ Additionally, U.S. producer Trinity Metals testified that it competed for structural pipe projects against Pipe and Piling numerous times, noting

³²¹ CR/PR at Table SP 4.11.

³²² CR/PR at Table SP 4.11.

³²³ CR/PR at Table SP 4.18.

³²⁴ CR/PR at Table SP 4.18.

³²⁵ CR/PR at Table SP 4.17.

³²⁶ *Calculated from* CR/PR at Table SP 4.14.

³²⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4; Original Confidential Report, EDIS Doc. 818620 at Table V-4.

³²⁸ CR/PR at Table SP 5.9.

³²⁹ CR/PR at SP 5.15, Table SP 5.11.

specifically that it “recently lost a large project of 14,000 tons for the South Brooklyn Marine Terminal.”³³⁰

Effective March 12, 2025, LDW structural pipe originating in Canada became subject to an additional 25 percent *ad valorem* duty under Section 232. In addition, effective March 4, 2025, LDW structural pipe from Canada designated as energy or energy resources became subject to an additional 10 percent *ad valorem* duty under IEEPA, while all other LDW structural pipe originating in Canada, including products imported under HTS subheading 7305.39, became subject to an additional 25 percent *ad valorem* duty under IEEPA.³³¹

Based on the factors discussed above, including the significant volume of subject imports from Canada during the original investigations, the significant market share held by subject imports from Canada during the original investigations, the continued presence of subject imports from Canada in the U.S. market during the POR, the Canadian industry’s capability for product-shifting and the substantial available installed overall capacity, the underbidding by subject imports from Canada in the original investigations, and the underselling observed in these reviews, we find that subject imports from Canada would not likely have no discernible adverse impact on the domestic industry if the order were revoked.³³²

We again find that the record does not indicate that the additional 25 percent *ad valorem* duty applicable to LDW structural pipe imported from Canada under Section 232 and the additional 10 or 25 percent *ad valorem* duties under IEEPA would likely prevent subject imports from having a discernible adverse impact in the reasonably foreseeable future.³³³ When LDW structural pipe first became subject to Section 232 duties from June 1, 2018 to May 21, 2019,³³⁴ the measure did not prevent subject imports from Canada from entering the U.S.

³³⁰ Hearing Tr. at 50 (Griggs); CR/PR at SP 5.16.

³³¹ CR/PR at LDWP 1.41-42.

³³² For the same reasons stated above in section III.C.3.c, including prior instances of underbidding by Canadian subject producers and the subject industry’s significant capacity, including excess capacity, we are unpersuaded by Evraz’s contention that any material volumes of shipments of LDW structural pipe to the United States in the foreseeable future would only occur in a period of high demand and low availability of domestic supply. Nor does the record support its argument that the absence of any correlation between subject imports from Canada and the U.S. industry’s performance during the POR demonstrates that no adverse impact is likely if the order is revoked. Evraz Posthearing Br. at 14-16. As an initial matter, subject imports were under the discipline of the order during the POR. Nevertheless, subject imports from Canada entered the U.S. market throughout the POR, even at times of decreasing apparent consumption, when the domestic industry’s financial performance ebbed (*i.e.*, 2021).

³³³ We note that only products originating in Canada that do not enter with duty free treatment under the USMCA are subject to the additional *ad valorem* duty under IEEPA. CR/PR at LDWP 1.41-1.42.

³³⁴ *Adjusting Imports of Steel Into the United States*, Proclamation 9740, 83 Fed. Reg. 20683 (May 7, 2018); *Adjusting Imports of Steel Into the United States*, Proclamation 9894, 84 Fed. Reg. 23987 (May 23, 2019).

market, as they totaled 1,157 short tons from June 2018 through April 2019.³³⁵ Given that subject imports from Canada were present in the U.S. market during the POR with the Section 232 measures in place and the mixed reports on the effects of Section 232 duties generally during that period,³³⁶ as well as the uncertainties (*e.g.*, duration) with the IEEPA tariff that was announced and effective subsequent to the POR, we do not find that the record in these reviews indicates that the Section 232 and IEEPA measures applicable to Canada would likely prevent subject imports from entering the United States at levels that would not be likely to have no discernible adverse impact in the reasonably foreseeable future absent the restraining effect of the order.

We are also not persuaded that the decline in Evraz's production capacity would prevent the volume of subject imports from Canada from exceeding levels likely to have a discernible adverse impact on the U.S. industry. As discussed above, Evraz has demonstrated that it will ***, and that it would take at ***, it nevertheless estimates that it could commence commercial production at the fifth mill in the first quarter of 2026.³³⁷ Further, we are unpersuaded by Evraz's claim that, because it does not intentionally produce LDW structural pipe and has no intention of selling material quantities of LDW structural pipe into the U.S. market for the foreseeable future, imports of LDW structural pipe from Canada are not likely to have a discernible adverse impact if the order were revoked.³³⁸ Irrespective of whether the production of LDW structural pipe was intentional, subject imports from Canada entered the U.S. market throughout the POR in meaningful quantities, with market share ranging from *** percent to *** percent. Moreover, Evraz is not the only producer of subject merchandise in Canada. In 2023, Pipe and Piling produced *** short tons of LDW structural pipe compared to the *** short tons Evraz produced,³³⁹ and Pipe and Piling was the only Canadian producer to export subject merchandise to the United States that year.³⁴⁰ Moreover, as we noted, U.S. producer Trinity Metals testified that it has competed against Pipe and Piling numerous times and that it was recently outbid by Pipe and Piling on a project for delivery of 14,000 short tons.³⁴¹ Thus, if the order were revoked, both producers of LDW structural pipe in Canada are

³³⁵ *Calculated from* CR/PR at Table SP 4.6.

³³⁶ As discussed below in Section V.B.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW structural pipe market during the POR were wide-ranging.

³³⁷ Evraz Posthearing Br. at 6.

³³⁸ See Evraz Prehearing Br. at 48-49.

³³⁹ CR/PR at Table SP 4.9.

³⁴⁰ CR/PR at Table SP 4.9. For the reasons discussed in section III.C.3.c, below, we are unpersuaded by Evraz's argument that many of the distinctive likely conditions of competition facing Evraz in the U.S. LDW line pipe market, as discussed above, apply equally in the U.S. LDW structural pipe market, including that its high-cost structure and stigma based on corporate affiliation with Russia prevent it from competing in the U.S. market. Evraz Prehearing Br. at 49.

³⁴¹ Hearing Tr. at 50 (Griggs).

positioned to ship subject merchandise to the U.S. market at levels not likely to have no discernible adverse impact on the domestic industry if the order is revoked.

China. In the original investigations, subject LDW structural pipe imports from China decreased from 18,288 short tons in 2015 to 8,728 short tons in 2016, then increased to 20,897 short tons in 2017, an overall increase of 14.3 percent; they were lower in interim 2018 (6,137 short tons) than in interim 2017 (10,629 short tons).³⁴² Their share of apparent U.S. consumption declined from 7.0 percent in 2015 to 3.2 percent in 2016, then increased to 6.7 percent in 2017, for an overall decline of 0.3 percent; their share was lower in interim 2018 (4.9 percent) than in interim 2017 (7.4 percent).³⁴³

During the period of review, the quantity of subject LDW structural pipe imports from China was 9,422 short tons in 2018; 1,892 short tons in 2019; 300 short tons in 2020; 2,086 short tons in 2021; 29 short tons in 2022; and 132 short tons in 2023; it was 128 short tons in interim 2023, and 80 short tons in interim 2024.³⁴⁴ As a share of apparent U.S. consumption, subject imports from China accounted for *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in 2023; they were *** percent in interim 2023 and *** percent in interim 2024.³⁴⁵

The Commission did not receive a questionnaire response from any foreign producers/exporters in China in the original investigations or in these reviews.³⁴⁶ Therefore, the record contains limited new information concerning the LDW structural pipe industry in China. According to GTA data, total Chinese exports of welded structural pipe greater than 16 inches in diameter, which includes LDW structural pipe and out-of-scope products, nearly tripled from 2018 to 2023, as they were 140,791 short tons in 2018, 146,493 short tons in 2019, 174,889 short tons in 2020, 283,157 short tons in 2021, 352,090 short tons in 2022, and 421,550 short tons in 2023.³⁴⁷ GTA data also show that China was the world's second largest exporter of welded structural pipe greater than 16 inches in diameter.³⁴⁸ In 2023, the largest export destinations for Chinese exports of welded structural pipe greater than 16 inches in diameter were Hong Kong, Indonesia, and the United Arab Emirates.³⁴⁹

³⁴² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

³⁴³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

³⁴⁴ CR/PR at Table C.2.

³⁴⁵ CR/PR at Table C.2.

³⁴⁶ CR/PR at SP 4.43.

³⁴⁷ CR/PR at Table SP 4.20.

³⁴⁸ CR/PR at Table SP 4.37.

³⁴⁹ CR/PR at Table SP 4.20.

In the original investigations, bids from subject imports from China were lower than the domestic producers' bids in six out of eight bidding events.³⁵⁰ In these reviews, the Commission did not receive pricing or bid data regarding LDW structural pipe from China.

Effective March 2018, LDWP originating in China became subject to an additional 25 percent *ad valorem* duty under Section 232. LDWP originating in China is also subject to an additional 25 percent *ad valorem* duty under Section 301.³⁵¹ Effective February 4, 2025, LDWP originating in China became subject to an additional 10 percent *ad valorem* duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent *ad valorem*.³⁵² Given that subject imports from China have maintained a presence in the U.S. market during the POR with the Section 301 and 232 measures in place, and market participants' mixed reports on the effects of Section 232 duties generally and the effects of Section 301 duties on the U.S. market during that period,³⁵³ as well as the uncertainties (e.g., duration) with the IEEPA tariff that was announced and effective subsequent to the review period, we do not find that the record in these reviews indicates that these measures are likely to prevent imports of LDW structural pipe from China from reaching levels not likely to have no discernible adverse impact in the reasonably foreseeable future absent the restraining effect of the orders.

Based on the factors discussed above, including the large volumes of subject imports from China during the original investigations, the large share of the U.S. market held by subject imports from China throughout the original POI, the continued presence of subject imports from China in the U.S. market during the POR; and the information available regarding the Chinese industry's capacity and exports, including the large increase in its export volumes from 2018 to 2023, we find that subject imports from China would not likely have no discernible adverse impact on the domestic industry if the orders were revoked.

South Korea. In the original investigations, the quantity of subject imports of LDW structural pipe from South Korea increased from 9,237 short tons in 2015 to 23,441 short tons in 2016 and then decreased to 21,023 short tons in 2017, representing an overall increase of 127.6 percent; the quantity was higher in interim 2018, at 13,519 short tons, than in interim 2017, at 9,198 short tons.³⁵⁴ The share of apparent U.S. consumption accounted for by subject

³⁵⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4.

³⁵¹ CR/PR at LDWP 1.41. Effective September 1, 2019, LDWP originating in China became subject to an additional 15 percent *ad valorem* duty under Section 301. Effective February 14, 2020, the Section 301 duty for LDWP was reduced to 7.5 percent *ad valorem*.³⁵¹ Effective September 27, 2024, the Section 301 duty was increased to an additional 25 percent *ad valorem*. *Id.*

³⁵² CR/PR at LDWP 1.41.

³⁵³ As discussed below in Section V.B.3, market participants' responses concerning the effects of Section 232 tariffs generally and the effects of Section 301 duties on the LDW structural pipe market during the POR were mixed.

³⁵⁴ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

imports from South Korea during this period increased by 3.2 percentage points overall from 2015 to 2017, increasing from 3.5 percent in 2015 to 8.6 percent in 2016 and then decreasing to 6.7 percent in 2017; it was higher in interim 2018 (10.9 percent) than in interim 2017 (6.4 percent).³⁵⁵

In the original investigations, the Commission received questionnaire responses from EEW and Husteel, which together accounted for an estimated *** percent of LDWP production in South Korea and *** percent of exports of LDWP from South Korea to the United States in 2017.³⁵⁶ The subject producers reported that their capacity remained at *** short tons from 2015 to 2017, and *** short tons in interim 2017 and interim 2018.³⁵⁷ Their reported production decreased from *** short tons in 2015 to *** short tons in 2016, then increased to *** short tons in 2017; it was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).³⁵⁸ From 2015 to 2017, its exports as a share of total shipments ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent.³⁵⁹

In these reviews, the volume of subject imports from South Korea fluctuated, decreasing overall by 23.3 percent from 2018 to 2023. They totaled 16,272 short tons in 2018; 5,871 short tons in 2019; 4,275 short tons in 2020; 1,129 short tons in 2021; 6,801 short tons in 2022; and 12,492 short tons in 2023; and were higher in interim 2024 (9,238 short tons) than in 2023 (7,229 short tons).³⁶⁰ The share of apparent U.S. consumption accounted for by subject imports from South Korea was *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 2023 at *** percent.³⁶¹

In these reviews, the Commission received a questionnaire response from EEW.³⁶² EEW reported that its practical LDW structural pipe production capacity remained stable during the review period, at *** short tons from 2018 to 2023, and *** short tons in interim 2023 and interim 2024.³⁶³ The practical overall capacity utilization rate was *** percent in 2018, ***

³⁵⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

³⁵⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-16; Original Confidential Report, EDIS Doc. 818620 at VII-31.

³⁵⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at Table VII-18.

³⁵⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at Table VII-18.

³⁵⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-18; Original Confidential Report, EDIS Doc. 818620 at Table VII-18.

³⁶⁰ CR/PR at Table C.2.

³⁶¹ CR/PR at Table C.2.

³⁶² CR/PR at SP 4.45.

³⁶³ CR/PR at Tables SP 4.22, SP 4.24.

percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024.³⁶⁴ EEW attributes this ***.³⁶⁵

EEW reported producing LDW line pipe and other products on the same equipment and machinery used to produce LDW structural pipe.³⁶⁶ EEW's installed overall capacity remained at *** short tons from 2018 to 2023. It was *** short tons in interim 2023 and interim 2024.³⁶⁷ The installed overall capacity utilization rate was *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024.³⁶⁸ It reported production of other products on shared equipment increasing from *** short tons in 2018 to *** short tons in 2019, and *** short tons in 2020, then decreasing to *** short tons in 2021, increasing to *** short tons in 2022, and decreasing to *** in 2023; such production totaled *** short tons in interim 2023 and a higher *** short tons in interim 2024.³⁶⁹ As a share of all production on shared equipment and machinery, EEW's production of out-of-scope merchandise accounted for between *** and *** percent depending on the year.³⁷⁰

EEW reported LDW structural pipe exports to the United States throughout the POR, totaling *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023.³⁷¹ It exported *** of its production of subject merchandise, as its exports as a share of total shipments were greater than *** percent throughout the POR, at *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022 and *** percent in 2023; the share was *** percent in interim 2024, compared to *** percent in interim 2023.³⁷²

In the original investigations, there were no reported bids representing subject imports from South Korea.³⁷³ In these reviews, the Commission collected pricing data showing that subject imports from South Korea undersold the domestic like product in 20 of 27 quarterly comparisons, involving *** short tons, with underselling margins ranging from *** to *** with and averaging *** percent.³⁷⁴ The Commission also collected data from purchasers regarding

³⁶⁴ CR/PR at Table SP 4.22.

³⁶⁵ CR/PR at Table SP 4.23.

³⁶⁶ CR/PR at Table SP 4.29.

³⁶⁷ CR/PR at Table SP 4.22.

³⁶⁸ CR/PR at Table SP 4.22.

³⁶⁹ CR/PR at Table SP 4.29.

³⁷⁰ See CR/PR at Table SP 4.29.

³⁷¹ CR/PR at Table SP 4.30.

³⁷² CR/PR at Table SP 4.24.

³⁷³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4; Original Confidential Report, EDIS Doc. 818620 at Table V-4.

³⁷⁴ CR/PR at Table SP 5.9.

bidding events. Subject imports from South Korea participated in *** of the *** projects U.S. purchasers issued for bid.³⁷⁵

Effective June 2018, steel articles, including LDWP, originating in South Korea were subject to annual absolute import quotas under Section 232. Following the termination of the absolute import quotas, effective March 12, 2025, LDWP originating in South Korea is subject to an additional 25 percent *ad valorem* duty under Section 232.³⁷⁶ Because subject imports from South Korea were only subject to an additional 25 percent *ad valorem* tariff after the end of the POR, the record lacks information on how subject imports from South Korea were impacted by the 25 percent *ad valorem* duty during the POR, and market participants' reports on the effects of Section 232 duties generally during that period are mixed.³⁷⁷ Consequently, we do not find that the record in these reviews indicates that the measure is likely to prevent imports of LDW structural pipe from South Korea from reaching levels not likely to have no discernible adverse impact absent the restraining effect of the orders.

Based on the factors discussed above, including the significant volume and increasing market share of subject imports from South Korea during the original investigations; the continued presence of subject imports from South Korea in the U.S. market during the POR; the subject South Korean industry's large capacity, including excess capacity, and exports; we find that subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Turkey. In the original investigations, subject LDW structural pipe imports from Turkey increased from 1,282 short tons in 2015 to 3,259 short tons in 2016 and 16,770 short tons in 2017, an overall increase of 1,207.9 percent; they were lower in interim 2018 (4,111 short tons) than in interim 2017 (5,752 short tons).³⁷⁸ The share of apparent U.S. consumption accounted for by subject imports from Turkey increased from 0.5 percent in 2015 to 1.2 percent in 2016 and 5.4 percent in 2017, for an overall increase of 4.9 percentage points; it was lower in interim 2018 (3.3 percent) than in interim 2017 (4.0 percent).³⁷⁹

In the original investigations, the Commission received useable questionnaire responses from five firms: Umran, Borusan, Celik Boru, Erciyas, and Ozbal, which together accounted for *** percent LDWP production in Turkey and *** percent of exports of LDWP to the United

³⁷⁵ CR/PR at SP 5.15, Table SP 5.11.

³⁷⁶ CR/PR at LDWP 1.42.

³⁷⁷ As discussed below in Section V.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

³⁷⁸ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3. As noted previously, because Commerce found Borusan's margins to be *de minimis* after both of the original determinations, most "subject" LDWP imported from Turkey during the original POI should be viewed as nonsubject.

³⁷⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3.

States in 2017.³⁸⁰ These producers reported that their capacity slightly decreased from 2015 to 2017, as it remained almost unchanged from 2015 to 2016, at *** short tons and *** short tons, respectively, then decreased to *** short tons in 2017; it was higher in interim 2018 (*** short tons) than in interim 2017 (*** short tons).³⁸¹ Their reported production decreased from *** short tons in 2015 to *** short tons in 2016 and to *** short tons in 2017; it was lower in interim 2018 (*** short tons) than in interim 2017 (*** short tons).³⁸² From 2015 to 2017, their exports as a share of total shipments ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.³⁸³

In these reviews, the volume of subject LDW structural pipe imported from Turkey increased from *** short tons in 2018 to *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, then decreased to *** short tons in 2022 and *** short tons in 2023; it was *** short tons in interim 2023 and *** short tons in interim 2024.³⁸⁴ As a share of apparent U.S. consumption, subject imports from Turkey ranged from *** percent to *** percent.³⁸⁵

The Commission did not receive a questionnaire response from any foreign producers/exporters of subject merchandise in Turkey.³⁸⁶ Therefore, the record contains limited new information concerning the subject LDW structural pipe industry in Turkey. According to GTA data, total Turkish exports of welded structural pipe greater than 16 inches in diameter, which includes LDW structural pipe and out-of-scope products, increased from 2018 to 2023, as they were 160,863 short tons in 2018, 179,488 short tons in 2019, 207,483 short tons in 2020, 137,669 short tons in 2021, 274,639 short tons in 2022, and 425,823 short tons in 2023.³⁸⁷ GTA data also show that Turkey was the world's largest exporter of welded structural pipe greater than 16 inches in diameter in 2023.³⁸⁸ In 2023, the largest export destinations for

³⁸⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at VII-38.

³⁸¹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at Table VII-23.

³⁸² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at Table VII-23.

³⁸³ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table VII-23; Original Confidential Report, EDIS Doc. 818620 at Table VII-23.

³⁸⁴ CR/PR at Table C.2.

³⁸⁵ CR/PR at Table C.2.

³⁸⁶ CR/PR at SP 4.59.

³⁸⁷ CR/PR at Table SP 4.32.

³⁸⁸ CR/PR at Table SP 4.37.

Turkish exports of welded structural pipe greater than 16 inches in diameter were Morocco, Egypt, and Italy.³⁸⁹

In the original investigations, there were no bids representing subject imports from Turkey.³⁹⁰ In these reviews, the Commission collected pricing data showing that subject imports from Turkey undersold the domestic like product in 4 of 17 quarterly comparisons, involving *** short tons, with underselling margins ranging from *** to *** with and averaging *** percent.³⁹¹ The Commission did not receive specific bid data concerning subject LDW structural pipe from Turkey.³⁹²

LDWP originating in Turkey is subject to an additional 25 percent *ad valorem* duty under Section 232.³⁹³ Given that subject imports from Turkey have maintained a presence in the U.S. market during the POR with the Section 232 measure in place and market participants' mixed reports on the effects of Section 232 duties generally during that period,³⁹⁴ we do not find the measure likely to prevent imports of LDW structural pipe from Turkey from reaching levels not likely to have no discernible adverse impact absent the restraining effect of the orders.

Therefore, based on the factors discussed above, including the subject industry's large capacity, including excess capacity, and exports, we find that subject imports from Turkey would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

b. Likelihood of a Reasonable Overlap of Competition

Fungibility. In the original investigations, the Commission found a high degree of substitutability between domestically produced LDW structural pipe and subject imports from Canada, China, South Korea, and Turkey.³⁹⁵ The Commission observed that LDW structural pipe, regardless of source, was generally produced to the same ASTM standards.³⁹⁶ The Commission also observed that half or more of responding U.S. producers and importers

³⁸⁹ CR/PR at Table SP 4.32.

³⁹⁰ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table V-4.

³⁹¹ CR/PR at Table SP 5.9.

³⁹² See CR/PR at SP 5.16. Although the Commission did not receive specific bid instances to compare Turkey in Appendix G, six bidding events included product from Turkey.

³⁹³ CR/PR at LDWP 1.42. Effective March 2018, LDWP originating in Turkey were subject to an additional 25 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended. Effective August 2018, the Section 232 duty on LDWP originating in Turkey was increased to 50 percent *ad valorem* but was later reduced back to 25 percent *ad valorem* effective May 21, 2019. *Id.*

³⁹⁴ As discussed below in Section V.3, market participants' responses concerning the effects of Section 232 tariffs generally on the LDW line pipe market during the POR were wide-ranging.

³⁹⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29.

³⁹⁶ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29.

reported that the domestic like product and imports from each subject source were always or frequently used interchangeably. It also observed that half or more of the purchasers that primarily purchased LDW structural pipe indicated that LDWP from each of the subject sources and the domestic product were always or frequently used interchangeably.³⁹⁷

In these reviews, U.S. producers, importers, and purchasers reported a relatively high degree of interchangeability between LDW structural pipe from different subject sources and between subject sources and the domestic like product. All U.S. producers and a majority of importers reported that LDW structural pipe is always interchangeable, regardless of source.³⁹⁸ In addition, a majority of purchasers reported that LDW structural pipe from domestic and all subject sources can always or frequently be used interchangeably.³⁹⁹ Consistent with these responses, LDW structural pipe, regardless of source, continues to be produced to the same ASTM standards.⁴⁰⁰

When asked to compare LDW structural pipe from different sources with respect to 22 purchasing factors, a plurality of purchasers indicated that domestically produced LDW structural pipe was comparable to LDW structural pipe imported from all subject countries but China in terms of most factors.⁴⁰¹ When asked how often differences other than price were significant in sales, all U.S. producers reported that factors other than price are sometimes or never significant when comparing LDW structural pipe from different sources.⁴⁰² The views of the three importers that responded to this question were mixed. One or two importers indicated with respect to each comparison that differences other than price are always important, while one or two importers indicated that such differences are sometimes or never important.⁴⁰³ Purchasers most frequently reported that differences other than price are sometimes significant.⁴⁰⁴

The record also indicates that subject imports of LDW structural pipe from each source overlapped with each other and the domestic like product in terms of outside diameter, production process, and grade during the POR. With respect to outside diameter, *** percent of U.S. producers' U.S. shipments of LDW structural pipe were in the >16 inch OD to <=24 inch

³⁹⁷ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 29.

³⁹⁸ CR/PR at SP 2.31, Table SP 2.16.

³⁹⁹ CR/PR at Table SP 2.17.

⁴⁰⁰ CR/PR at LDWP 1.46, SP 2.1, 2.24, 4.7-4.8; Hearing Tr. at 26 (Brightbill).

⁴⁰¹ CR/PR at Table SP 2.15. U.S. LDW structural pipe was rated as superior to LDW structural pipe imported from China by a plurality of purchasers for availability, delivery terms, delivery time, quality meets and exceeds specifications, and technical support/ service and inferior on price. A plurality rated the two as comparable on all other factors. *Id.*

⁴⁰² CR/PR at Table SP 2.18.

⁴⁰³ CR/PR at Table SP 2.19.

⁴⁰⁴ CR/PR at Table SP 2.20.

OD range, *** percent were in the >24 inch to <=48 inch OD pipe range, and *** percent were in the >48 inch OD range from January 2023 through September 2024, compared with *** percent, *** percent, and *** percent, respectively, for subject imports from all sources in the aggregate.⁴⁰⁵ With respect to production method, HSAW, LSAW, and ERW structural pipe were sold in the U.S. market from both domestic and subject sources. From January 2023 to September 2024, LSAW and ERW LDW structural pipe was sold by suppliers of subject imports from South Korea, and HSAW LDW structural pipe was sold by suppliers of subject imports from Canada, China, and Turkey.⁴⁰⁶ U.S. producers primarily sold HSAW and ERW LDW structural pipe, but *** percent of their U.S. shipments were LSAW produced.⁴⁰⁷ With respect to grade, domestically produced LDW structural pipe was sold in all grades for which data were collected, while subject imports from all sources were sold in all grades except ASTM A500. Domestically produced LDW structural pipe was primarily sold as ASTM A252 but was also sold in the three other grade categories, including ASTM A500. During this period, subject imports from Canada, China, and Turkey were *** sold as ASTM A252, while subject imports from South Korea were sold in all grades except ASTM⁴⁰⁸

Channels of Distribution. In the original investigations, the Commission found that subject imports of LDW structural pipe and the domestic like product overlapped in terms of channels of distribution. Domestically produced LDW structural pipe was sold to end users and distributors, as were subject imports from Turkey and South Korea. Importers primarily sold LDW structural pipe imports from Canada and China to end users.⁴⁰⁹

The record in these reviews indicates that channels of distribution of subject imports of LDW structural pipe from each source and the domestic like product continued to overlap. During the POR, domestic producers primarily sold LDW structural pipe to construction end users, but also to other end users and distributors.⁴¹⁰ Almost all subject imports from Canada, China, and Turkey were sold to construction end users during the review period, while subject imports from South Korea were consistently sold to construction end users as well as distributors.⁴¹¹

Geographic Overlap. In the original investigations, the Commission found that U.S. producers reported selling LDWP to all regions of the contiguous United States. Imports of

⁴⁰⁵ CR/PR at Table SP 4.3. Subject imports from Turkey and South Korea were reported in all three outside diameter size ranges and all subject imports from Canada and China were reported in the >24 inch to <=48-inch OD pipe range. *Id.*

⁴⁰⁶ CR/PR at Table SP 4.4.

⁴⁰⁷ CR/PR at Table SP 4.4.

⁴⁰⁸ CR/PR at Table SP 4.2.

⁴⁰⁹ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 30.

⁴¹⁰ CR/PR at Table SP 2.2.

⁴¹¹ CR/PR at Table SP 2.2.

LDWP from Canada, South Korea, and Turkey were sold in the Northeast, Midwest, and Central Southwest, and subject imports from all subject countries except Canada were present in the Southeast. LDWP from China was sold to all regions except the Midwest.⁴¹²

In these reviews, U.S. producers and importers reported selling domestic LDW structural pipe and subject imports from Canada, Korea, and Turkey in the Northeast, Southeast, Central Southwest and Pacific Coast regions.⁴¹³ In 2023, subject imports from Canada entered through all U.S. borders of entry, subject imports from South Korea entered through all but the Northern border of entry, subject imports from Turkey entered through the Eastern and Western borders of entry, and subject imports from China entered solely through the Southern border of entry.⁴¹⁴

Simultaneous Presence in Market. In the original investigations, the Commission found that imports of LDW structural pipe from Canada and China were present in the U.S. market in all 42 months of the POI, and that subject imports from South Korea and Turkey were present in 41 of 42 months and 25 of 42 months, respectively.⁴¹⁵

In these reviews, the domestic like product and subject imports were simultaneously present in the U.S. market during the POR. The domestic like product was present throughout the POR.⁴¹⁶ Subject imports from Canada were present in 76 of 81 months, and subject imports from South Korea were present in 73 of 81 months.⁴¹⁷ The remaining subject imports were present less frequently – subject imports from China in 47 of 81 months, and subject imports from Turkey in five of 81 months.⁴¹⁸ Nevertheless, there is no information on the record indicating that subject imports from each source would not be simultaneously present in the U.S. market after revocation, as they were in the original investigations.

Conclusion. The record indicates that there is a relatively high degree of fungibility between and among subject imports from each source and the domestic like product. Most responding domestic producers, importers, and purchasers reported that LDW structural pipe is interchangeable, regardless of source, and most purchasers reported that domestically produced LDW structural pipe is comparable to LDW structural pipe imported from each source with respect to most purchasing factors. All LDW structural pipe is required to meet the ASTM

⁴¹² *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 30.

⁴¹³ See CR/PR at Table SP 2.3. No data on sales by region were available for subject imports from China. In 2023, all subject LDW structural pipe from China entered through the South border of entry. *Id.* at Table SP 4.5.

⁴¹⁴ CR/PR at Table SP 4.5.

⁴¹⁵ *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 30.

⁴¹⁶ See, e.g., CR/PR at Table SP 1.4.

⁴¹⁷ CR/PR at Table SP 4.6.

⁴¹⁸ See CR/PR at Table SP 4.6 (based upon official import statistics only and not including imports under non-primary HTS statistical reporting numbers).

standards in the U.S. market, regardless of source. In addition, the record indicates that LDW structural pipe from all sources overlapped in terms of channels of distribution and geographic markets, and would likely be simultaneously present in the U.S. market if the orders were revoked. We therefore find a likely reasonable overlap of competition among subject imports from Canada, China, South Korea, and Turkey and between the domestic like product and subject imports from each source.

c. Likely Conditions of Competition

We also find that the record in these reviews does not indicate that there would likely be significant differences in the conditions of competition between subject imports from Canada, China, South Korea, and Turkey if the orders were revoked. As discussed in section III.C.3.a, above, the volume of subject imports from each subject country was substantial during the original investigations. The record also indicates that the subject industries in Canada, China, South Korea, and Turkey maintained a presence in the U.S. market during the POR; generally possess significant production capacity, including excess capacity; and exported significant volumes of LDW structural pipe. Except for Canada, the subject countries are all among the world's largest exporters of LDW structural pipe.⁴¹⁹ As discussed in section III.C.3.b, we have also found that there would likely be a reasonable overlap of competition between and among LDW structural pipe imports from each subject country and the domestic like product if the orders were revoked.

For essentially the same reasons we describe in our analysis above in section III.B.3.c with respect to LDW line pipe from Canada, we find that LDW structural pipe from Canada is not likely to compete under different conditions of competition than imports of LDW structural pipe from the other subject countries if the orders are revoked.

We disagree with Evraz's view that its allegedly high-cost structure makes subject imports from Canada less competitive in the U.S. market than other subject merchandise. Regardless of whether its costs are relatively high, subject imports from Canada competed effectively in the U.S. market during the original investigations, winning significant market share and underbidding domestic producers in the sole bidding event that was part of the record.⁴²⁰ The record provides no indication that Evraz's cost structure has changed significantly since the

⁴¹⁹ See CR/PR at Table SP 4.37.

⁴²⁰ As discussed above, the share of apparent U.S. consumption accounted for by subject imports from Canada reached a period high of *** percent in interim 2018 and bid quotes for subject imports from Canada were lower than domestic producers' bids in 15 of 32 instances.⁴²⁰ See *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Tables C-2, V-4; *Original Confidential Report*, EDIS Doc. 818620 at Tables C-2, V-4.

original investigations, and subject imports from Canada have maintained a presence in the U.S. market and continued to compete for projects in these reviews.⁴²¹

Evrast has argued that the stigma in of its corporate affiliation with Russia impedes its ability to compete in the U.S. market. As discussed above, U.S. producers, importers, and purchasers reported a relatively high degree of interchangeability between LDW structural pipe from different subject sources, including Canada.⁴²² To the extent such stigma exists, it has not prevented subject imports from Canada from maintaining a presence in the U.S. market over the POR and competing for projects since January 2021 and, therefore, does not warrant exercising our discretion not to cumulate subject imports from Canada with imports the other the other subject countries.

With respect to the Section 232 and IEEPA tariffs applicable to LDW line pipe from Canada, we have previously found that these measures would not likely prevent subject imports from Canada from entering the United States at levels that would be likely to have a discernible adverse impact in the reasonably foreseeable future. Given that all subject imports are subject, at a minimum, to the same 25 percent *ad valorem* duty under Section 232,⁴²³ we further find that the additional 10 percent *ad valorem* duty applicable under IEEPA would not be likely to cause subject imports from Canada to compete under substantially different conditions of competition from imports from other subject countries if the order were revoked.

Therefore, based on the record of these reviews, we do not find differences in the likely conditions of competition that would warrant exercising our discretion to not cumulate subject imports from Canada, China, South Korea, and Turkey.

d. Conclusion

In sum, we determine that subject imports from Canada, China, South Korea, and Turkey considered individually, are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. We also find that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product if the orders were revoked. Finally, we find that subject imports from

⁴²¹ See *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at 26 (Evrast arguing that its higher AUVs during the POI reflect vertical integration and shorter lead times; Evrast Prehearing Br. at 4 and Exhibit 2.1 (unionization). We observe that the AUVs for subject imports from Canada were lower than the AUVs for subject imports from all other subject sources during the original period of investigations. See *Original Leading Determinations*, USITC Pub. 4859 (Jan. 2019) at Table C-3; Original Confidential Report, EDIS Doc. 818620 at Table C-3.

⁴²² CR/PR at SP 2.31, Tables SP 2.16-17.

⁴²³ CR/PR at LDWP 1.41-1.42. We note that only products originating in Canada that do not enter with duty free treatment under the USMCA are subject to the additional *ad valorem* duty under IEEPA. *Id.*

each subject country would be likely to compete under similar conditions of competition upon revocation of the orders. Accordingly, we exercise our discretion to cumulate subject imports from Canada, China, South Korea, and Turkey in these reviews with respect to LDW structural pipe.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”⁴²⁴ 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.”⁴²⁵ Thus, the likelihood standard is prospective in nature.⁴²⁶ 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.⁴²⁷

⁴²⁴ 19 U.S.C. § 1675a(a).

⁴²⁵ 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.

⁴²⁶ 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.

⁴²⁷ 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”); (Continued...)

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”⁴²⁸ 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.”⁴²⁹

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.”⁴³⁰ 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).⁴³¹ 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.⁴³²

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.⁴³³ 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

Usinor v. United States, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

⁴²⁸ 19 U.S.C. § 1675a(a)(5).

⁴²⁹ 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.*

⁴³⁰ 19 U.S.C. § 1675a(a)(1).

⁴³¹ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings since the imposition of the orders. CR/PR at LDWP 1.21 n.24.

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

⁴³³ 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.⁴³⁴

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.⁴³⁵

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.⁴³⁶ 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.⁴³⁷

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

⁴³⁴ 19 U.S.C. § 1675a(a)(2)(A-D).

⁴³⁵ 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.

⁴³⁶ 19 U.S.C. § 1675a(a)(4).

⁴³⁷ 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.

“within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁴³⁸ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. In its original determinations, the Commission found that LDW line pipe is used in oil and gas transmission pipelines and that demand reflects oil and gas drilling activity. It found that rig counts and prices for oil and gas were leading indicators of oil and gas drilling activity. The Commission observed that the rig count declined overall during the period of investigation while oil and gas prices irregularly increased. Most U.S. producers reported that demand for LDW line pipe had fluctuated during the period of investigation, while purchasers and importers reported that demand had increased or fluctuated. Apparent U.S. consumption of LDW line pipe declined from 2.9 million short tons in 2015 to 2.0 million short tons in 2016 and 2017, an overall decrease of 29.4 percent.⁴³⁹

Current Reviews. Demand for LDW line pipe continues to be driven by oil and gas sector activity.⁴⁴⁰ The COVID-19 pandemic occasioned a steep decline in oil prices in 2020, while gas prices declined from late 2018 through mid-2019, then increased irregularly through August 2020, and then fell back to 2020 levels.⁴⁴¹ The number rigs used for oil and gas production declined irregularly over POR, decreasing sharply in 2020 in light of the impact of the COVID-19 pandemic, then increasing until January 2023 and decreasing thereafter.⁴⁴² Oil production increased over the POR, while natural gas production irregularly increased from 2018 to 2023 and then plateaued.⁴⁴³ According to data from the U.S. Department of Transportation (“DOT”), the mileage of installed pipelines fluctuated but decreased overall from 2018 to 2023.⁴⁴⁴ DOT also provides data on pending pipeline projects and reports that new construction is expected to increase from 124 miles in 2025 to 238 miles in 2027.⁴⁴⁵

There is little consensus among market participants on how demand for LDW line pipe in the U.S. market has changed since 2018. Most U.S. producers reported that demand fluctuated downward during the POR. A plurality of importers reported that demand was flat, with the remainder evenly divided between reporting that demand had steadily increased or

⁴³⁸ 19 U.S.C. § 1675a(a)(4).

⁴³⁹ *Original Leading Determinations*, USITC Pub. 4859 at 37.

⁴⁴⁰ CR/PR at LP 2.16.

⁴⁴¹ CR/PR at LP 2.14-2.15.

⁴⁴² CR/PR at LP 2.16, Table LP 2.7. The record indicates, however, that recent improvements in drilling technology mean that historical rig counts may not provide reliable indications as to future production quantities. CR/PR at LP 2.16 n.13.

⁴⁴³ CR/PR at LP 2.16.

⁴⁴⁴ CR/PR at LP 2.18.

⁴⁴⁵ CR/PR at LP 2.18.

fluctuated downward. Purchasers were also divided as to whether demand had fluctuated upward, not changed, or fluctuated downward.⁴⁴⁶ With respect to anticipated demand, most U.S. importers and purchasers expect demand to increase in the United States, while an equal number of U.S. producers anticipate demand to increase as expect it to either decrease or remain flat.⁴⁴⁷

Apparent U.S. consumption decreased irregularly by *** percent from 2018 to 2023, first increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020 and 485,427 short tons in 2021, then increasing to 591,362 short tons in 2022 and 1.4 million short tons in 2023; it was higher in interim 2024, at 966,612 short tons, than in interim 2023, at 867,298 short tons.⁴⁴⁸

2. Supply Conditions

Original Investigations. In the original investigations, the Commission found that most LDW line pipe was made to order for oil and gas projects and shipped directly to end users. It observed that all LDWP is produced by one of three production processes in the United States: ERW, HSAW, or LSAW.⁴⁴⁹

The Commission found that the domestic industry had the largest share of the U.S. LDW line pipe market and that its share of apparent U.S. consumption increased from *** percent in 2015 to *** percent in 2016 and then declined to *** percent in 2017, for an overall decline of *** percentage points.⁴⁵⁰ It observed that the domestic industry's capacity also declined by *** percent from 2015 to 2017.⁴⁵¹

The Commission found that cumulated subject imports were the second largest source of supply to the U.S. LDW line pipe market. The share of apparent U.S. consumption accounted for by cumulated subject imports, excluding China, decreased from *** percent in 2015 to *** percent in 2016 and then increased to *** percent in 2017.⁴⁵²

⁴⁴⁶ CR/PR at LP 2.20, Table LP 2.10.

⁴⁴⁷ CR/PR at Table LP 2.11.

⁴⁴⁸ CR/PR at Table ALT C.1.

⁴⁴⁹ *Original Leading Determinations*, USITC Pub. 4859 at 37. The Commission observed that ERW is used to produce carbon and alloy LDWP up to 24 inches outside diameter while HSAW and LSAW are predominantly used for larger diameter LDWP, with LSAW being the most expensive of the three processes. *Id.*

⁴⁵⁰ *Original Leading Determinations*, USITC Pub. 4859 at 38; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 58.

⁴⁵¹ *Original Leading Determinations*, USITC Pub. 4859 at 38; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 58.

⁴⁵² *Original Leading Determinations*, USITC Pub. 4859 at 38; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 59.

Nonsubject imports were the third largest source of supply to the U.S. market during the POI. Their share of apparent U.S. consumption decreased from *** percent in 2015 to *** percent in 2016 and *** percent in 2017.⁴⁵³

Current Reviews. During the POR, the domestic industry continued to be the largest source of supply to the U.S. market. Its share of apparent U.S. consumption irregularly increased by *** percentage points from 2018 to 2023, increasing from *** percent in 2018 to *** percent in 2019 and *** in 2020, decreasing to 52.6 percent in 2021 and 51.4 percent in 2022, then increasing again to 78.3 percent in 2023; it was lower in interim 2024, at 73.7 percent, than in interim 2023, at 75.9 percent.⁴⁵⁴

The domestic industry's production capacity decreased from *** short tons in 2018 to 2.4 million short tons in 2023.⁴⁵⁵ Three producers permanently ceased production operations. In 2020, Evraz Oregon permanently closed its facility with *** short tons of annual capacity; Stupp permanently closed its facility with *** short tons of capacity in 2022; and Nucor-CSI permanently ceased operations by the end of the POR.⁴⁵⁶ In addition, several domestic producers reported prolonged shutdowns related to the COVID-19 pandemic and weak demand.⁴⁵⁷ However, other than ***, which ***,⁴⁵⁸ no U.S. producers reported any constraints on their supply during the POR.⁴⁵⁹ The domestic industry's practical capacity utilization rate never exceeded 54.5 percent during the POR.⁴⁶⁰

Cumulated subject imports were the second largest source of supply to the U.S. market in 2018 and 2019 but became the third largest source, beginning in 2020. Their share of apparent U.S. consumption irregularly declined by *** percentage points from 2018 to 2023, declining from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, then increasing to *** percent in 2021 and *** percent in 2022 before decreasing again to *** percent; it was lower in interim 2024, at *** percent than in interim 2023, at *** percent.⁴⁶¹

⁴⁵³ *Original Leading Determinations*, USITC Pub. 4859 at 38; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 59.

⁴⁵⁴ CR/PR at Table ALT C.1.

⁴⁵⁵ CR/PR at Table ALT C.1.

⁴⁵⁶ CR/PR at Tables LP 3.3, LP 3.6; Evraz Oregon's U.S. Producer Questionnaire at III-3a. Stupp reported that ***. Evraz Oregon provided no additional information on its closure. *Id.* at Table LP 3.2.

⁴⁵⁷ CR/PR at Table LP 3.2.

⁴⁵⁸ CR/PR at Table LP 3.2

⁴⁵⁹ CR/PR at LP 2.10.

⁴⁶⁰ CR/PR at Table ALT C.1. The domestic industry's practical capacity utilization rate was reported at *** percent in 2018, *** percent in 2019, *** percent in 2020, 8.2 percent in 2021, 16.2 percent in 2022, and 45.8 percent in 2023; it was 42.3 percent in interim 2023 and 36.5 percent in interim 2024. *Id.*

⁴⁶¹ CR/PR at Table ALT C.1.

Nonsubject imports became the second largest source of supply in 2020. Their share of apparent U.S. consumption decreased from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, increased to *** percent in 2021, then decreased to *** percent in 2022 and *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 203, at *** percent.⁴⁶² The largest sources of nonsubject imports were Germany, ***, Japan, and Mexico, which, combined, accounted for the vast majority of imports from nonsubject sources in 2023.⁴⁶³

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 LDW line pipe and subject imports, assuming both are made to the standards specified by the purchasers. It observed that LDW line pipe is usually produced to API 5L standards. Most purchasers of LDW line pipe reported that LDWP from domestic producers and subject sources were always or frequently used interchangeably. When asked to compare LDWP produced in the United States to subject imported LDWP, purchasers ranked imports from each subject country as comparable to the domestic like product with respect to the vast majority of purchasing factors.⁴⁶⁴ Further, most U.S. producers reported that differences other than price were never significant as between subject imports and domestically produced LDWP, and most importers reported that differences other than price were sometimes or never significant as between subject imports and domestic LDWP. Purchasers of LDW line pipe, on the other hand, more often indicated that differences other than price were significant when choosing between different sources of LDW line pipe.⁴⁶⁵

The Commission found that price was an important factor in purchasing decisions for LDW line pipe.⁴⁶⁶ Purchasers identified price, quality, and availability/supply as their top three most important purchasing factors, and ranked quality, product consistency, and price most frequently as very important considerations when selecting among LDWP producers for a project. Most purchasers reported that they always or usually purchase the lowest priced LDWP.⁴⁶⁷

The Commission observed that bidding was usually used to award contracts, sometimes after multiple bidding rounds. It found that the primary raw material used to manufacture

⁴⁶² CR/PR at Table ALT C.1.

⁴⁶³ CR/PR at LP 2.10.

⁴⁶⁴ *Original Leading Determinations*, USITC Pub. 4859 at 38.

⁴⁶⁵ *Original Leading Determinations*, USITC Pub. 4859 at 39.

⁴⁶⁶ *Original Leading Determinations*, USITC Pub. 4859 at 39.

⁴⁶⁷ *Original Leading Determinations*, USITC Pub. 4859 at 39.

LDWP was either hot-rolled coil, in the case of the ERW and HSAW production processes, or cut-to length plate, in the case of the LSAW production process.⁴⁶⁸

The Commission observed that additional tariffs of 25 percent *ad valorem* had been imposed on certain steel products in March and July 2018 under Section 232. These tariffs applied to imports of the raw materials used for domestic production of LDW line pipe as well as imports of LDW line pipe. Additionally, Commerce had issued antidumping and countervailing duty orders on hot-rolled steel from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom in October 2016; and on cut-to-length steel (“CTL”) plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey during the first five months of 2017.⁴⁶⁹

Current Reviews. In these reviews, we find that there is a moderate-to-high degree of substitutability between subject imports and domestically produced LDW line pipe. All LDW line pipe, regardless of source, is generally produced to the same API 5L standards.⁴⁷⁰ As discussed previously, U.S. producers, importers, and purchasers reported a relatively high degree of interchangeability between subject imports and the domestic like product. All U.S. producers reported that LDW line pipe from all sources is always interchangeable,⁴⁷¹ and a majority of importers and purchasers reported that LDW line pipe from subject sources is always or frequently interchangeable with the domestic like product, with an exception for subject imports from India.⁴⁷²

When asked to compare LDW line pipe from different sources with respect to 22 purchasing factors, a majority or plurality of responding purchasers indicated that U.S.-produced LDW line pipe was comparable with subject imported LDW line pipe in terms of at least 18 of the 22 factors for each subject country except China.⁴⁷³ When asked to assess how often differences other than price were significant for sales of LDW line pipe, all U.S. producers reported that differences other than price are sometimes or never significant when comparing LDW line pipe to subject sources.⁴⁷⁴ A majority of U.S. importers and purchasers reported that differences other than price are sometimes or never significant when comparing the domestic

⁴⁶⁸ *Original Leading Determinations*, USITC Pub. 4859 at 40.

⁴⁶⁹ *Original Leading Determinations*, USITC Pub. 4859 at 40.

⁴⁷⁰ CR/PR at LDWP 1.45.

⁴⁷¹ CR/PR at LP 2.38.

⁴⁷² CR/PR at Table LP 2.19. An equal number of imports reported that subject imports from India and the domestic like product were always or frequently interchangeable as reported that they were sometimes or never interchangeable. *Id.*

⁴⁷³ CR/PR at Table LP 2.18. A plurality of purchasers rated U.S.-produced LDW line pipe as superior to LDW line pipe imported from China for all factors except price, for which U.S. product was rated as inferior; and payment terms and availability of weld type, for which for which U.S.-produced product was rated as comparable. *Id.*

⁴⁷⁴ CR/PR at Table LP 2.21.

like product to subject imports from Canada, Greece, South Korea, and Turkey. Importers were evenly divided between reporting differences other than price as sometimes or never significant and always or frequently significant when comparing the domestic like product with subject imports from China and India.⁴⁷⁵

Most purchasers reported that they always or usually make purchasing decisions based on the producer (22 of 28), country of origin (19 of 27), and method of manufacture (ERW/HSAW/LSAW) (18 of 25).⁴⁷⁶ Most purchasers (20) reported that no more than ten percent of their purchases were required to be of U.S.-produced product, although 13 purchasers reported that some portion of their purchases were required either by law or by their customers to be of U.S.-produced product.⁴⁷⁷ With respect to the country of origin, 13 of 27 responding purchasers indicated that certain sizes/types/grades of LDW line pipe were available from only one source, which they listed as Greece, Germany, India, Japan, the United Kingdom, or the United States.⁴⁷⁸

Most responding purchasers (16 of 28) require their suppliers to become certified to sell LDW line pipe to their firms.⁴⁷⁹ In addition, a majority of responding purchasers reported that domestically produced LDW line pipe and subject imports from all sources except China always or usually met minimum quality specifications.⁴⁸⁰ Five purchasers reported that a supplier had failed in its attempt to qualify LDW line pipe or had lost its approved status since 2018, including two reporting that Hyundai Steel (South Korea) briefly lost its API license.⁴⁸¹

As discussed previously, during the POR, subject imports overlapped with the domestic like product in terms of outside diameter, production method, and grade. With respect to outside diameter, *** percent of U.S. shipments of subject imports were in the >16 inch OD to <=24 inch OD range, *** percent were in the >24 inch to <=48 inch OD pipe range, and *** percent were in the >48 inch range from January 2023 through September 2024, compared with *** percent, *** percent, and *** percent for domestically produced line pipe, respectively.⁴⁸² Likewise, the grades of U.S.-produced line pipe and subject imports overlapped for the vast majority of their U.S. shipments. U.S. shipments of subject imports were *** percent of grade X-69 and below, *** percent of grade X-70 to X-79, and *** percent grade X-

⁴⁷⁵ CR/PR at Table LP 2.22.

⁴⁷⁶ CR/PR at Table LP 2.12.

⁴⁷⁷ CR/PR at LP 2.25.

⁴⁷⁸ CR/PR at LP 2.25.

⁴⁷⁹ CR/PR at LP 2.27.

⁴⁸⁰ CR/PR at Table LP 2.15. Five purchasers reported that subject imports from China sometimes, rarely, or never met minimum quality specifications, while just one reported that they always met minimum quality specifications. *Id.*

⁴⁸¹ CR/PR at LP 2.27.

⁴⁸² CR/PR at Table LP 4.3.

80 and above, while U.S. producers' U.S. shipments were *** percent of grade X-69 and below and *** percent of grade X-70 to X-79 from January 2023 to September 2024.⁴⁸³

With respect to production method, all subject imports were LSAW produced, as were *** short tons domestic producers' U.S. shipments, accounting for *** percent of domestic producers' sales from January 2023 to September 2024.⁴⁸⁴

We also find that price is an important factor in purchasing decisions. Price was the factor most frequently identified by responding purchasers as among their top three factors in purchasing decisions (28 firms), followed by availability/delivery/lead time/supply (25 firms), and quality (23 firms).⁴⁸⁵ Price was also one of the factors most frequently identified by responding purchasers as very important to their purchasing decisions. Twenty-five purchasers identified price as very important, while 26 firms reported quality meets industry standards, and 25 firms reported product consistency as very important.⁴⁸⁶ A majority of responding purchasers (18 of 28) reported that they usually purchase the lowest-priced product.⁴⁸⁷

Bidding is usually used to award contracts for purchase of LDW line pipe, with awards sometimes made after multiple rounds of bidding.⁴⁸⁸ In addition, most purchasers sometimes permit bidders to submit bids with exceptions to their product specifications or alternative LDW line pipe products in lieu of their specified products.⁴⁸⁹

The primary raw material used to manufacture LDW line pipe is either hot-rolled coil or CTL plate, depending on the production process.⁴⁹⁰ The ERW and HSAW production processes use hot-rolled coil ("HRC") while LSAW uses CTL plate.⁴⁹¹ Raw material prices, as reflected in the price of HRC and CTL plate, fluctuated over the POR, with HRC prices decreasing slightly overall and CTL plate prices increasing from January 2018 to September 2024.⁴⁹²

⁴⁸³ CR/PR at Table LP 4.2.

⁴⁸⁴ CR/PR at Table LP 4.4.

⁴⁸⁵ CR/PR at Table LP 2.13.

⁴⁸⁶ CR/PR at Table LP 2.14.

⁴⁸⁷ CR/PR at LP 2.26.

⁴⁸⁸ CR/PR at LP 5.23.

⁴⁸⁹ CR/PR at LP 5.23.

⁴⁹⁰ CR/PR at LP 5.1.

⁴⁹¹ CR/PR at I-31; PR at I-24.

⁴⁹² See CR/PR at Table LP 5.1.

LDWP originating in Canada,⁴⁹³ China,⁴⁹⁴ Greece,⁴⁹⁵ India,⁴⁹⁶ South Korea,⁴⁹⁷ and Turkey,⁴⁹⁸ is subject to an additional 25 percent *ad valorem* duty under Section 232.⁴⁹⁹ In addition, effective March 4, 2025, LDW line pipe designated as energy and energy resources originating in Canada became subject to an additional 10 percent *ad valorem* duty while all other LDWP originating in Canada became subject to an additional 25 percent *ad valorem* duty under IEEPA.⁵⁰⁰ LDW line pipe originating in China is also subject to an additional 25 percent *ad valorem* duty under Section 301.⁵⁰¹ Effective February 4, 2025, LDW line pipe originating in China became subject to an additional 10 percent *ad valorem* duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent *ad valorem*.⁵⁰²

⁴⁹³ Effective March 12, 2025, LDWP originating in Canada became subject to an additional 25 percent *ad valorem* duty under Section 232. CR/PR at LDWP 1.42.

⁴⁹⁴ Effective March 2018, LDWP originating in China became subject to an additional 25 percent *ad valorem* duty under Section 232. CR/PR at LDWP 1.42.

⁴⁹⁵ CR/PR at LDWP 1.42. Effective June 1, 2018, LDWP originating in EU member countries, including Greece, was subject to an additional 25 percent *ad valorem* duty under Section 232. Effective January 1, 2022, LDWP originating in EU member countries became subject to TRQs, and imports that exceeded the TRQ limits became subject to the Section 232 duties. Effective March 12, 2025, the TRQs for EU member countries were terminated and LDWP originating in EU member countries became subject to an additional 25 percent *ad valorem* duty under Section 232. *Id.*

⁴⁹⁶ CR/PR at LDWP 1.42.

⁴⁹⁷ CR/PR at LDWP 1.42. Effective June 2018, steel articles, including LDWP, originating in South Korea were subject to annual absolute import quotas under Section 232. Following the termination of the absolute import quotas, effective March 12, 2025, LDWP originating in South Korea became subject to an additional 25 percent *ad valorem* duty under Section 232. *Id.*

⁴⁹⁸ CR/PR at LDWP 1.42. Effective March 2018, LDWP originating in Turkey became subject to an additional 25 percent *ad valorem* duty under Section 232. Effective August 2018, the Section 232 duty on LDWP originating in Turkey was increased to 50 percent *ad valorem* but was subsequently reduced to 25 percent *ad valorem*, effective May 2019. *Id.*

⁴⁹⁹ All or nearly all responding U.S. producers, importers, purchasers, and foreign producers reported that the Section 232 measures effective prior to March 2025 had an effect on the U.S. market. See CR/PR at LP 2.3.

⁵⁰⁰ CR/PR at LDWP 1.41-1.42. Only products originating in Canada that do not enter with duty free treatment under the USMCA are subject to the additional *ad valorem* duty under IEEPA. *Id.*

⁵⁰¹ CR/PR at LDWP 1.41. Effective September 1, 2019, LDWP originating in China became subject to an additional 15 percent *ad valorem* duty under Section 301. Effective February 14, 2020, the Section 301 duty for LDWP was reduced to 7.5 percent *ad valorem*.⁵⁰¹ Effective September 27, 2024, the Section 301 duty was increased to an additional 25 percent *ad valorem*. *Id.*

All five responding U.S. producers, all three responding foreign producers, and *** responding importers reported that the Section 301 tariffs had no effect on the LDW line pipe market. In contrast, more than half of responding purchasers (5 of 9) reported that Section 301 tariffs had an effect, with purchasers indicating the Section 301 duties led to higher prices for Chinese product. *Id.* at LP 2.3.

⁵⁰² CR/PR at LDWP 1.41.

Market participants' responses concerning the effects of Section 232 tariffs on the LDW line pipe market during the POR were wide-ranging, with reports of increased prices, reduced competition, availability issues, and backlogs at U.S. mills.⁵⁰³ U.S. importers and purchasers specifically reported on changes to availability due to Section 232 tariffs. Of the six responding U.S. importers, two stated that there was no significant impact to availability while one reported a "tangible" limitation on availability. With respect to the 19 responding purchasers, nine reported different variations of availability issues (five of these purchasers reported general availability issues), while five reported no changes to availability and two others reported that the only effects of the tariffs were increased prices.⁵⁰⁴ As discussed above, these market participant responses referred to the Section 232 duties as they were in effect during the POR and, therefore, would not include any changes that occurred after the POR.

Most market participants other than purchasers reported that the Section 301 duties had no effect on the LDW line pipe market during the POR. Of the nine responding purchasers, five reported that the duties had an effect on the market, with all noting increased prices for subject imports from China.⁵⁰⁵

C. Likely Volume of Subject Imports

1. The Original Investigations

In the original investigations, the Commission found that although the volume of cumulated subject imports from Canada, Greece, India, South Korea, and Turkey declined in absolute terms over the POI, they had an increasing presence in the U.S. market as a result of declining demand.⁵⁰⁶ Cumulated subject imports declined from *** short tons in 2015 to *** short tons in 2016, and then increased to *** short tons in 2017.⁵⁰⁷ They were *** short tons, than in interim 2017.⁵⁰⁸ The Commission found that the market share of cumulated subject imports declined from *** percent in 2015 to *** percent in 2016, but then increased to *** percent in 2017.⁵⁰⁹ They were *** percent of apparent U.S. consumption in interim 2017 and

⁵⁰³ CR/PR at LP 2.3.

⁵⁰⁴ CR/PR at LP 2.3.

⁵⁰⁵ CR/PR at LP 2.3.

⁵⁰⁶ *Original Leading Determinations*, USITC Pub. 4859 at 41, 43.

⁵⁰⁷ *Original Leading Determinations*, USITC Pub. 4859 at 41; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 63.

⁵⁰⁸ *Original Leading Determinations*, USITC Pub. 4859 at 41 n.287; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 63 n.287.

⁵⁰⁹ *Original Leading Determinations*, USITC Pub. 4859 at 41; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 63-64.

*** percent in interim 2018.⁵¹⁰ Respondents argued that two large projects accounted for much of the volume of subject imports over the POI and that these volumes were not injurious. However, the Commission found the subject imports' lower prices contributed to the decisions to use them on each project and, therefore, rejected respondents' request to consider imports under these contracts as noninjurious.⁵¹¹ In conclusion, the Commission found that the volume of cumulated subject imports of LDW line pipe from Canada, Greece, India, South Korea, and Turkey was significant in both absolute terms and relative to apparent U.S. consumption.⁵¹²

In its analysis of the likely volume of subject imports for purposes of its determination of threat of material injury by subject imports from China and Greece, the Commission found that the addition of subject imports from China to the volume of cumulated subject imports from Canada, Greece, India, South Korea, and Turkey provided further support for its finding that the significant volumes of subject LDW line pipe that entered the U.S. market during the POI would likely continue in the imminent future.⁵¹³ Further, the Commission found that the subject foreign industries possessed excess capacity, the ability to shift production from out-of-scope merchandise to LDW line pipe, and the overall ability to export large volumes of subject merchandise. It found that the subject industries exported in significant quantities, citing public data indicating that China was among the world's largest LDWP exporters. It also found that producers in the subject countries had already arranged for the importation of subject merchandise in quantities that demonstrated that the relevant Section 232 measures had not prevented subject imports from increasing.⁵¹⁴

⁵¹⁰ *Original Leading Determinations*, USITC Pub. 4859 at 41 n.287; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 64 n.289.

⁵¹¹ *Original Leading Determinations*, USITC Pub. 4859 at 41-43.

⁵¹² *Original Leading Determinations*, USITC Pub. 4859 at 43. In its trailing determinations, the Commission adopted its findings and analysis with respect to cumulated subject import volume but as modified by the exclusion of imports from Greece from cumulated subject imports. Absent LDW line pipe from Greece, cumulated subject imports of LDW line pipe from Canada, India, Korea, and Turkey declined from *** short tons in 2015 to *** short tons in 2016, and then increased to *** short tons in 2017. Cumulated subject imports were *** short tons in interim 2017 and *** short tons in interim 2018. These cumulated subject imports' share of the U.S. market decreased from *** percent of apparent U.S. consumption in 2015 to *** percent in 2016, but then increased to *** percent in 2017. They were *** percent of apparent U.S. consumption in interim 2017 and *** percent in interim 2018. The Commission found that the volume and increase in volume was significant in absolute terms and relative to apparent U.S. consumption. *Original Trailing Determinations*, USITC Pub. 4883 at 18-19; *Confidential Original Determinations (Trailing Investigations)*, EDIS Doc. 673355 at 24-25.

⁵¹³ *Original Leading Determinations*, USITC Pub. 4859 at 55-56.

⁵¹⁴ *Original Leading Determinations*, USITC Pub. 4859 at 55-56. In its trailing determination of threat of material injury in the antidumping duty investigation of LDW line pipe from Greece, the Commission cumulated subject imports from the same six subject countries as it did in its threat (Continued...)

2. The Current Reviews

Cumulated subject imports have maintained a continuous presence in the U.S. market during the POR. The volume of cumulated subject imports declined from *** short tons in 2018 to *** short tons in 2019, *** short tons in 2020 and *** short tons in 2021, then increased to *** short tons in 2022, and then decreased to *** short tons in 2023, an overall decline of *** percent; they were lower in interim 2024, at *** short tons, than in interim 2023, at *** short tons.⁵¹⁵ As a share of apparent U.S. consumption, cumulated subject imports irregularly declined by *** percentage points from 2018 to 2023, declining from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, then increased to *** percent in 2021 and *** percent in 2022, and then decreased again to *** percent; it was lower in interim 2024, at *** percent than in interim 2023, at *** percent.⁵¹⁶ We find that the reduced volume and market share of cumulated subject imports during the POR reflect the discipline of the orders.

The subject foreign industries have the ability to export significant volumes of subject merchandise to the United States. Responding subject producers reported production capacity, in aggregate, decreased from *** short tons in 2018 to *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, increased to *** short tons in 2022, then decreased to *** short tons in 2023; it was higher in interim 2024, at *** short tons than in interim 2023, at *** short tons. Their production irregularly decreased from *** short tons in 2018 to *** short tons in 2023; it was higher in interim 2024, at *** short tons, than in interim 2023, at ***.⁵¹⁷ Their reported capacity utilization rate irregularly decreased during the POR, declining from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, increasing to *** percent in 2021 and *** percent in 2022, and then decreasing to *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 2023, at *** percent.⁵¹⁸ The producers of cumulated subject imports, reported excess capacity of *** short tons in 2023, equivalent to *** percent of apparent U.S. consumption that year.⁵¹⁹ End-of-period inventories held by subject producers irregularly decreased during the POR from *** short tons in 2018 to ***

determination in the leading investigations. The Commission therefore adopted and incorporated by reference its findings and analyses in their entirety with respect to threat. *Original Trailing Determinations*, USITC Pub. 4883 at 22.

⁵¹⁵ CR/PR at Tables LP 4.1, ALT C.1.

⁵¹⁶ CR/PR at Table ALT C.1.

⁵¹⁷ CR/PR at Table LP 4.44. Because this reflects only the reported capacity of subject producers that responded to the Commission's questionnaires, this amount of capacity is likely understated.

⁵¹⁸ *Calculated from* CR/PR at Table LP 4.44.

⁵¹⁹ *Calculated from* CR/PR at Tables LP 4.44, ALT C.1. Because this reflects only the reported excess capacity of subject producers that responded to the Commission's questionnaires, this amount of excess capacity is likely understated.

short tons in 2023, equivalent to *** percent of apparent U.S. consumption that year.⁵²⁰ Additionally, as discussed above in section III.3.a, all responding producers of subject merchandise reported producing other products on the same equipment and machinery used to produce LDW line pipe in 2023, and would therefore have the ability to increase production of LDW line pipe by shifting production from out-of-scope merchandise produced on the same equipment.⁵²¹

These subject foreign producers are also large exporters. Their exports irregularly decreased during the POR, decreasing from *** short tons in 2018 to *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022 before increasing to *** short tons in 2023. They were lower in interim 2024, at *** short tons, than in interim 2023, at *** short tons.⁵²² Export shipments comprised a majority of their sales in each year of the POR except 2020, and increased as a share of total shipments toward the end of the POR, decreasing from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, then increasing to *** percent in 2021, decreasing to *** percent in 2022, and increasing again to *** percent in 2023. It was higher in interim 2024, at *** percent, than in interim 2023, at *** percent.⁵²³ GTA data indicate that subject producers exported welded line pipe greater than 16 inches in diameter (which includes LDW line pipe and out-of-scope products) at high levels throughout the POR, decreasing irregularly from 2.7 million short tons in 2018 to 1.8 million short tons in 2023. These same data show that exports from the subject countries, in aggregate, accounted for nearly half (48.9 percent) of global exports in 2023.⁵²⁴

The record indicates that the U.S. market remains attractive to the cumulated subject producers, which would incentivize them to export significant volumes of subject merchandise

⁵²⁰ CR/PR at Table LP 4.44. Cumulated subject producers' end-of-period inventories were reported at *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; they were *** short tons in interim 2023 and *** short tons in interim 2024. *Id.* Because this reflects only the reported inventories of subject producers that responded to the Commission's questionnaires, this amount of inventories is likely understated.

⁵²¹ CR/PR at Tables LP 4.18, LP 4.29, LP 4.41. We observe that, in aggregate, a substantial portion of the out-of-scope merchandise produced on shared equipment and machinery was LDW structural pipe, a product within the scope of these reviews. However, the subject foreign producers also reported substantial production of products other than LDWP on shared equipment and machinery. *** on shared equipment and machinery, totaling *** short tons in 2018, *** in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023. Evraz reported producing *** totaling *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022 and 2023. *Id.* at Tables LP 4.18, LP 4.29.

⁵²² CR/PR at Table LP 4.44. Because this reflects only the reported exports of subject producers that responded to the Commission's questionnaires, this amount of exports is likely understated.

⁵²³ *Calculated from* CR/PR at Table LP 4.44.

⁵²⁴ CR/PR at Table LP 4.48.

to the United States if the orders were revoked. As noted above, cumulated subject imports maintained a continuous presence in the U.S. market, indicating that they retain access to U.S. distribution networks and customers that could be used to expand their presence in the market if the orders were revoked.⁵²⁵ The record also indicates that the U.S. market offers attractive LDW line pipe prices. The AUVs of the subject industries' exports to third country markets were lower than the AUVs of their exports to the United States throughout most of the POR.⁵²⁶ In addition, Canada's existing antidumping measure on imports of LDWP from China would further enhance the relative attractiveness of the U.S. market to subject producers in China if the orders were revoked.⁵²⁷

Finally, we find that the Section 232 measures and other duties applicable to subject imports from each subject country during the POR would not likely prevent the volume of cumulated subject imports from reaching significant levels if the orders were revoked. As discussed above, all subject imports are subject to 25 percent *ad valorem* Section 232 duties as of March 12, 2025, as absolute quotas and TRQs are no longer part of the Section 232 regime applicable to any subject country. We observe that the Section 232 measures first took effect in March 2018, with 25 percent *ad valorem* duties applicable to imports from all subject countries except Canada (for which such duties were effective from June 1, 2018, to May 21, 2019) and South Korea (for which an absolute quota applied). Examining the period during which all subject countries were subject to the measures indicates that the measures did not prevent large volumes of cumulated subject imports from entering the United States, as, excepting subject imports from South Korea, cumulated subject imports totaled *** short tons from June 2018 through April 2019.⁵²⁸ As discussed above, to the extent that changes in the application of Section 232 duties to various subject countries were announced and took effect subsequent to the review period, the record in these reviews does not indicate that such changes would likely prevent the volume of cumulated subject imports from reaching significant levels if the orders were revoked.

⁵²⁵ CR/PR at Table LP 4.6.

⁵²⁶ The AUVs of the responding foreign producers' exports to third country markets were \$*** per short ton in 2018, \$*** per square short ton in 2019, \$*** per short ton in 2020, \$*** per short ton in 2021, \$*** per short ton in 2022, and \$*** per short ton in 2023; they were \$*** per short ton in interim 2023 and \$*** per short ton in interim 2024. For comparison, the AUVs of their exports to the United States were \$*** per short ton in 2018, \$*** per short ton in 2019, \$*** per short ton in 2020, \$*** per short ton in 2021, \$*** per short ton in 2022, and \$*** per short ton in 2023; they were \$*** per short ton in interim 2023 and \$*** per short ton in interim 2024. *Calculated from* Foreign Producer Questionnaires of *** at II-13.

⁵²⁷ CR/PR at LP 4.90.

⁵²⁸ *Calculated from* CR/PR at Table LP 4.6. *See also* ALPPA Posthearing Br. at Exh. 1., pp. 50-52.

In addition, as discussed previously, subject imports from China are subject to an additional 25 percent *ad valorem* duty under Section 301 and an additional 20 percent *ad valorem* under IEEPA, while some subject imports from Canada became subject to an additional 10 percent *ad valorem* duty under IEEPA. With respect to subject imports from China subject to Section 301 measures, we observe that the Section 301 duties did not prevent such merchandise from maintaining a presence in the U.S. market during the POR. Nor did they prevent subject imports from China from increasing from 233 short tons in interim 2023 to 4,235 short tons in interim 2024, a 1,718 percent increase.⁵²⁹ With respect to the IEEPA measures, in section III.B.3.a, we found that the IEEPA tariffs applicable to LDW line pipe from Canada and China would not likely prevent subject imports from those countries from entering the United States at levels that would not be likely to have no discernible adverse impact on the domestic industry. Notably, these measures only apply to Canada and China, not cumulated subject imports as a whole. However, given market participants' responses on the effects of other duties (*i.e.*, Sections 232 and 301) on the U.S. market during the POR, and the uncertainties with the IEEPA tariffs (announced and effective subsequent to the review period), the record in these reviews does not indicate that such measures would likely prevent the volume of cumulated subject imports from reaching significant levels if the orders were revoked. Accordingly, we find that the Section 301 and IEEPA duties would not likely prevent cumulated subject imports from entering the U.S. market at significant levels if the orders were revoked.

Accordingly, based on the significant volume and market share of cumulated subject imports during the original investigations; the continuous presence of cumulated subject imports in the U.S. market during the POR while under the disciplining effect of the orders; the cumulated subject producers' substantial capacity, excess capacity, inventories, and exports; and the attractiveness of the U.S. market, we find that the likely volume of cumulated subject imports would be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

D. Likely Price Effects of Subject Imports

1. The Original Investigations

In the original investigations, the Commission found that subject imports and the domestic like product were highly substitutable and that price was an important factor in purchasing decisions. The Commission based its underselling analysis, data regarding bids for sales, as a large volume of sales was awarded through bidding, and the parties considered that

⁵²⁹ CR/PR at ALT C.1.

quarterly price comparison data were not useful. The Commission found that bids to supply subject imports were lower than bids to supply the domestic like product in 59 of 100 instances. It found that subject import bids were lower than domestic producer's bids in 17 of the 22 competitions won by subject imports and that in ten of those competitions, the winning subject import bid was also the lowest bid submitted.⁵³⁰ The Commission also considered lost sales data. It found that purchasers had confirmed awarding a substantial portion of apparent U.S. consumption to cumulated subject imports during the POI for price-related reasons. Given the underbidding by the subject imports and the large volume of resulting lost sales, the Commission found that the underselling by cumulated subject imports was significant during the POI and put downward pressure on prices.⁵³¹

The Commission could not conclude that subject imports had significant price-depressing effects on the domestic like product, largely because it did not find that pricing data were a relevant measure for the domestic industry's prices, making price trends difficult to discern. In addition, although domestic producers' sales values decreased over the POI, demand was weak and declining.⁵³²

The Commission also did not find that subject imports prevented price increases which otherwise would have occurred to a significant degree. The Commission observed that the domestic industry reported declining costs from 2015 to 2017 and noted that it would not have expected producers to be able to increase prices when costs and demand were decreasing. Although the domestic industry's unit COGS were higher in interim 2018 than in interim 2017, the domestic industry's net sales values were also higher, suggesting that the domestic industry's prices were not suppressed during interim 2018.⁵³³

In sum, the Commission found that the underselling reflected in the bid data and lost sales data led to substantial volumes of subject imports of LDW line pipe being purchased instead of the domestic product. Therefore, it found that cumulated subject imports of LDW line pipe have had significant price effects on the domestic industry.⁵³⁴

⁵³⁰ *Original Leading Determinations*, USITC Pub. 4859 at 43-44.

⁵³¹ *Original Leading Determinations*, USITC Pub. 4859 at 44-45.

⁵³² *Original Leading Determinations*, USITC Pub. 4859 at 45-46.

⁵³³ *Original Leading Determinations*, USITC Pub. 4859 at 46.

⁵³⁴ *Original Leading Determinations*, USITC Pub. 4859 at 46. In its trailing determinations, the Commission adopted its findings and analysis with respect to the price effects of cumulated subject imports, but as modified by the exclusion of LDW line pipe from Greece. While the trends for cumulated subject imports and the Commission's response to parties' arguments were the same, the pricing data changed, necessitating additional analysis. The Commission found that subject import bids were lower than domestic like product bids in 40 of 72 instances. It found that subject import bids were lower than domestic like product bids in ten of the 14 instances in which purchasers awarded the project to subject imports. In six of the ten instances in which the subject imports' bids were lower than the domestic (Continued...)

In its analysis of likely price effects of subject imports for purposes of its determination of threat of material injury by reason of subject imports from China, the Commission found that the addition of subject imports from China to the cumulated volume of subject imports supported its likely price effects finding, as did the *** short tons of lower priced subject imports from China that purchasers reported buying instead of the domestic like product.⁵³⁵ It found that the likely increased volumes of subject imports would likely be sold at lower prices and displace sales of the domestic like product, as during the POI, and that the likely low prices of the subject imports, in turn, were likely to increase demand for subject imports and cause a reduction in the domestic industry's production, sales, and shipments in the imminent future. It concluded that cumulated subject imports were likely to enter the U.S. market in the imminent future at prices likely to increase demand for further imports.⁵³⁶

2. The Current Reviews

As discussed in section IV.B.3, we have found that there is a moderate-to-high degree of substitutability between domestically produced LDW line pipe and subject imports, and that price is an important factor in purchasing decisions.

The Commission requested pricing data for four pricing products in these reviews.⁵³⁷ Five U.S. producers and three importers of subject merchandise from Canada, Greece, and

producer's bid, the winning bid from the subject imports was also the lowest-priced bid submitted. *Original Trailing Determinations*, USITC Pub. 4883 at 19-20.

The Commission also considered lost sales data. It found that purchasers had awarded a substantial portion of apparent U.S. consumption to cumulated subject imports during the POI for price-related reasons. Given the underbidding by the subject imports and the large volume of resulting lost sales, the Commission found that the underselling by cumulated subject imports was significant during the POI and put downward pressure on prices. *Id.*

The Commission found that the significant underselling reflected in the bid data and lost sales data led to substantial volumes of cumulated subject imports of LDW line pipe (from Canada, India, Korea, and Turkey) purchased instead of the domestic product. It concluded that cumulated subject imports of LDW line pipe from Canada, India, Korea, and Turkey had significant price effects on the domestic industry. *Id.*

⁵³⁵ *Original Leading Determinations*, USITC Pub. 4859 at 57; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 88.

⁵³⁶ *Original Leading Determinations*, USITC Pub. 4859 at 57.

⁵³⁷ CR/PR at LP 5.6. The pricing product definitions are as follows:

Product 1.— Line pipe, coated, 42-inches OD, 0.600 inches- 1.000-inches wall, API 5L X52-X70, regardless of length

Product 2.— Line pipe, coated, 32 inches- 36-inches OD, 0.350 inches- 0.800-inches wall, API 5L X52-X70, regardless of length.

(Continued...)

South Korea provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁵³⁸ Pricing data reported by these firms accounted for approximately 79.5 percent of U.S. producers' commercial U.S. shipments of LDW line pipe, *** percent of U.S. shipments of imports from South Korea, and less than 0.05 percent of U.S. shipments from the remaining subject sources in 2023.⁵³⁹ No pricing data were reported for subject imports from China, India, or Turkey.⁵⁴⁰ The available pricing data indicate that subject imports from Canada, Greece, and South Korea undersold the domestic like product in 41 of 79 (or 51.9 percent of) quarterly comparisons, corresponding to sales totaling *** short tons and accounting for *** percent of the volume of cumulated subject imports covered by the Commission's pricing data.⁵⁴¹ The underselling margins ranged from *** percent to *** percent and averaged *** percent, depending on the product.⁵⁴² Subject imports oversold the domestic like product in the remaining 38 quarterly comparisons, corresponding to sales of *** short tons, at margins ranging from *** percent to *** percent and averaging *** percent.⁵⁴³ Thus, notwithstanding the discipline of the orders, subject imports undersold the domestic like product in just over half of the quarterly comparisons, encompassing a substantial portion of reported sales of subject imports during the POR.

The Commission also requested that purchasers provide bid data concerning projects issued for bid since January 2021 that involved bids from both U.S. producers and suppliers of LDW line pipe from subject sources. Seven purchasers indicated that, collectively, 63 of their projects received bids from both domestic producers and suppliers of subject merchandise. These purchasers were asked for details regarding the five projects with the largest volume of LDW line pipe, resulting in useable data regarding 11 of the projects. Domestic producers were awarded 10 of the 11 projects and were the lowest bidder seven of their 10 winning bids. In the sole project awarded to suppliers of subject merchandise, the subject imports supplier was the lowest-price bidder.⁵⁴⁴

Product 3.— Line pipe, coated, 26 inches- 30-inches OD, 0.350 inches- 0.800-inches wall, API 5L X52-X70, regardless of length.

Product 4.— Line pipe, coated, 20 inches- 24-inches OD, 0.300 inches- 0.500-inches wall, API 5L X60-X70, regardless of length.

⁵³⁸ CR/PR at LP 5.7.

⁵³⁹ Only *** had shipments of LDW line pipe in 2023. Pricing coverage is based on U.S. shipments reported in questionnaires.

⁵⁴⁰ CR/PR at Tables LP 5.5-5.8.

⁵⁴¹ CR/PR at Table LP 5.10.

⁵⁴² CR/PR at Table LP 5.10.

⁵⁴³ CR/PR at Table LP 5.10.

⁵⁴⁴ CR/PR at LP 5.23-5.25.

We have considered price trends. Over the POR, sales prices for domestically produced LDW line pipe pricing products irregularly increased by between *** and *** percent from January 2018 to September 2024.⁵⁴⁵

Based on the significant underselling in the original investigations resulting in lost sales and market share for the domestic industry, the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, the importance of price in purchasing decisions, and the underselling and underbidding by subject imports observed in these reviews, we find that if the orders were revoked, there would likely be significant underselling by cumulated subject imports, which would win bids and gain market share at the expense of the domestic industry. Absent the discipline of the orders, the likely significant volume of low-priced cumulated subject imports would likely force the domestic industry to either reduce its prices or risk losing sales to subject imports, as occurred in the original investigations. Thus, we find that if the orders were revoked, the significant volume of low-priced cumulated subject imports would likely have significant price effects within a reasonably foreseeable time.

E. Likely Impact of Subject Imports

1. The Original Investigations

In the original investigations, the Commission found that subject imports had a significant impact on the domestic industry. It found that low-priced subject imports underbid domestically produced LDW line pipe and captured a substantial volume of sales from the domestic industry during the POI. It observed that each of the domestic LDW line pipe industry's output indicia declined from 2015 to 2017, and that declines in production and shipments exceeded the 29.4 percent decline in apparent U.S. consumption during the POI. Moreover, it found that the declines in these indicators continued despite some improvement in demand in 2017. As a result, the domestic industry's capacity utilization, employment, sales, revenues, and profits were lower than they would have otherwise been during the 2015 to 2017 period. The Commission noted that data from the interim periods lent further support to its finding. When subject import volumes were lower in interim 2018 than in interim 2017, the domestic industry's production, shipments, sales values, and revenues were all higher than they had been in interim 2017, despite lower apparent U.S. consumption.⁵⁴⁶

The Commission found that other factors could not explain the domestic industry's loss of output and revenues that it had attributed to subject imports. It observed that nonsubject

⁵⁴⁵ CR/PR at Table LP 5.9. The pricing data of subject imports are too sporadic to discern any trends over the period. See CR/PR at Tables LP 5.5-5.8.

⁵⁴⁶ *Original Leading Determinations*, USITC Pub. 4859 at 47-49.

imports lost market share over the POI. With respect declining demand, the Commission found that the overall decrease in apparent U.S. consumption from 2015 to 2017 could not explain the domestic industry's continued declines in output and revenues from 2016 to 2017, when apparent U.S. consumption increased. Nor could it explain the modest improvements in some of the domestic industry's indicators in interim 2018 compared to interim 2017, when subject imports were lower than in interim 2017.⁵⁴⁷

The Commission rejected respondent arguments that the domestic industry did not produce many of the specific products that purchasers required. Recognizing that there may have been certain LDW line pipe products that the domestic industry did not produce, the Commission nevertheless found that the industry was capable of producing some of the allegedly unavailable products or could offer comparable products. Further, it found that the limited number of products genuinely unavailable from domestic producers could not explain the large volume of sales that purchasers had shifted from the domestic industry to subject imports due to price.⁵⁴⁸

In its threat determination with respect to subject imports from China, the Commission found that the material injury suffered by the domestic industry during the POI was likely to continue in the imminent future because cumulated subject imports, including subject imports from China, were likely to enter the U.S. market in significant and increasing volumes that were likely to have adverse price effects on the domestic like product. It found that the same downward trends in the domestic industry's financial performance during the 2015-2017 period that resulted from the increasing presence of low-priced subject imports, in terms of unit net sales values, total sales revenues, gross profits, operating income, operating income margin, and net income, would be likely to continue.⁵⁴⁹ It concluded that the significant volumes of low-priced cumulated subject imports of LDW line pipe that were likely in the imminent future would likely cause the domestic industry to lose additional sales and market share, adversely impacting the industry's revenues and financial performance as occurred during the POI.⁵⁵⁰

The Commission found that the imposition of Section 232 duties on subject imports from all sources was unlikely to slow their increase because importers had arranged to import substantial volumes of subject merchandise after the measure took effect. It also noted that the Section 232 duties had increased raw material costs for the domestic producers, rendering them more susceptible to further injury from cumulated subject imports.⁵⁵¹

⁵⁴⁷ *Original Leading Determinations*, USITC Pub. 4859 at 49-50.

⁵⁴⁸ *Original Leading Determinations*, USITC Pub. 4859 at 50.

⁵⁴⁹ *Original Leading Determinations*, USITC Pub. 4859 at 57-58.

⁵⁵⁰ *Original Leading Determinations*, USITC Pub. 4859 at 58.

⁵⁵¹ *Original Leading Determinations*, USITC Pub. 4859 at 56, 58. In its trailing determinations, the Commission adopted its findings and analysis with respect to the price effects of cumulated subject (Continued...)

2. The Current Reviews

Despite the decline in demand over the POR, the domestic industry's performance improved. Although its U.S. shipments declined from 2018 to 2023, they fell by less than the decline in apparent U.S. consumption, and domestic producers were able to increase their market share by *** percentage points.⁵⁵² Most of the domestic industry's performance indicators initially improved from 2018 to 2019, after imposition of the orders, before declining sharply in 2020 and 2021 as the effects of the COVID-19 pandemic peaked. The industry's performance began to improve from 2022 to 2023, but was weaker in interim 2024 compared to interim 2023.

The domestic industry's output indicators generally declined over the POR, although its capacity utilization rate improved modestly. From 2018 to 2023, the domestic industry's production irregularly declined by *** percent,⁵⁵³ its U.S. shipments declined by *** percent,⁵⁵⁴ and its production capacity declined by *** percent.⁵⁵⁵ On the other hand, its capacity

imports, but as modified by the exclusion of LDW line pipe from Greece. Specifically, its analysis of the impact on the domestic industry by cumulated subject imports and responses to party arguments were unchanged, and the trends underlying its nonattribution analysis were also unchanged. *Original Trailing Determinations*, USITC Pub. 4883 at 21 and n.90.

⁵⁵² The domestic industry's share of apparent U.S. consumption was 2.2 percentage points lower in interim 2024 than in interim 2023. Apparent U.S. consumption decreased irregularly by *** percent from 2018 to 2023, first increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020 and 485,427 short tons in 2021, then increasing to 591,362 short tons in 2022 and 1.4 million short tons in 2023; it was higher in interim 2024, at 966,612 short tons, than in interim 2023, at 867,298 short tons. CR/PR at Table C.1.

⁵⁵³ The domestic industry's production increased from *** short tons in 2018 to *** short tons in 2019, then decreased to *** short tons in 2020 and 217,544 short tons in 2021, and then increased to 426,274 short tons in 2022 and 1.1 million short tons in 2023; it was lower in interim 2024, at 649,602 short tons, than in interim 2023, at 731,761 short tons. CR/PR at Table ALT C.1.

⁵⁵⁴ The domestic industry's U.S. shipments irregularly declined by *** percent from 2018 to 2023, first increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020 and 217,544 short tons in 2021 before increasing to 426,274 short tons in 2022 and 1.1 million short tons in 2023; it was lower in interim 2024, at 649,602 short tons, than in interim 2023, at 731,761 short tons. CR/PR at Table ALT C.1.

⁵⁵⁵ The domestic industry's practical production capacity declined by *** percent from 2018 to 2023, increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020, 2.7 million short tons in 2021, 2.6 million short tons in 2022, and 2.4 million in 2023; it was higher in interim 2024, at 1.8 million short tons, than in interim 2023, at 1.8 million short tons. CR/PR at Table ALT C.1.

utilization rate increased by *** percentage points from 2018 to 2023.⁵⁵⁶ End-of-period inventories irregularly declined by *** percent.⁵⁵⁷

With respect to the domestic industry's employment indicators, the number of production related workers ("PRWs") irregularly increased by *** percent,⁵⁵⁸ hours worked irregularly increased by *** percent,⁵⁵⁹ and wages paid irregularly increased by *** percent from 2018 to 2023.⁵⁶⁰ Hourly wages decreased by *** percent overall,⁵⁶¹ productivity decreased by *** percent overall,⁵⁶² and unit labor costs increased by *** percent over the period.⁵⁶³

By most measures, the domestic industry's financial performance generally improved from 2018 to 2019, then declined and showed weakness from 2020 to 2022, and rebounded in 2023. Its financial performance was somewhat weaker in interim 2024 than in interim 2023.

⁵⁵⁶ The domestic industry's practical capacity utilization rate increased from *** percent in 2018 to *** percent in 2019, then decreased to *** percent in 2020 and 8.2 percent in 2021 before increasing to 16.2 percent in 2022 and 45.8 percent in 2023; it was 42.3 percent in interim 2023 and 36.5 percent in interim 2024. CR/PR at Table ALT C.1.

⁵⁵⁷ The domestic industry's end-of-period inventories increased from *** short tons in 2018 to *** short tons in 2019 before declining to *** short tons in 2020 and 63,364 short tons in 2021, then increased to 163,458 short tons in 2022 then declined to 111,411 short tons in 2023; they were lower in interim 2024, at 82,271 short tons than in interim 2023, at 144,674 short tons. CR/PR at Table ALT C.1.

⁵⁵⁸ The industry's number of PRWs increased from *** in 2018 to *** in 2019, then decreased to *** in 2020 and 959 in 2021 before increasing to 1,106 in 2022 and 2,007 in 2023; it was lower in interim 2024, at 1,719 than in interim 2023, at 1,803. CR/PR at Table ALT C.1.

⁵⁵⁹ The domestic industry's number of hours worked increased from *** in 2018 to *** in 2019, then decreased to *** in 2020 and 1.4 million in 2021, then increased to 2.0 million in 2022 and 4.0 million in 2023; they were greater in interim 2024, at 3.1 million, than in interim 2023, at 3.0 million. CR/PR at Table ALT C.1.

⁵⁶⁰ Wages paid were \$104.0 million in 2018, \$145.6 million in 2019, \$102.5 million in 2020, \$37.3 million in 2021, \$61.1 million in 2022, and \$128.4 million in 2023; they were \$92.7 million in interim 2023 and \$94.0 million in interim 2024. CR/PR at Table ALT C.1.

⁵⁶¹ Hourly wages increased from \$*** per hour in 2018, to \$*** per hour in 2019, decreased to \$*** per hour in 2020, then increased to \$26.46 per hour in 2021, \$30.36 per hour in 2022, and \$31.82 per hour in 2023; they were \$31.32 per hour in interim 2023, and \$30.57 in interim 2023. CR/PR at Table ALT C.1.

⁵⁶² Productivity measured in short tons per 1,000 hours decreased from *** in 2018, *** in 2019, to *** in 2020, and 154.2 in 2021, then increased to 212.0 in 2022, and 269.4 in 2023; it fell from 247.3 in interim 2023 to 211.4 in interim 2024. CR/PR at Table ALT C.1.

⁵⁶³ Unit labor costs increased from \$*** per short ton in 2018 to \$*** per short ton in 2019, \$*** per short ton in 2020 and \$172 per short ton in 2021, then decreased to \$143 per short ton in 2022 and \$118 per short ton in 2023; they were higher in interim 2024, at \$145 per short ton, than in interim 2023, at \$127 per short ton. CR/PR at Table ALT C.1.

The domestic industry's revenues,⁵⁶⁴ gross profits,⁵⁶⁵ net income,⁵⁶⁶ and net income margin,⁵⁶⁷ were all higher in 2023 than in 2018 after the industry sustained operating and net losses in 2020, 2021, and 2022. In contrast, its operating income margin was *** percentage points lower in 2023 than 2018,⁵⁶⁸ and the operating income decreased irregularly between 2018 and 2023.⁵⁶⁹ The domestic industry's capital expenditures fluctuated, and its research and development ("R&D") spending declined.⁵⁷⁰ Its return on assets followed the general trend of its financial results, improving from 2018 to 2019, then declining from 2020 to 2022 before improving again in 2023.⁵⁷¹

In assessing the vulnerability of the domestic industry, we observe that the domestic industry's performance indicators show mixed results, with its financial indicia showing overall improvement from 2018 to 2023, in contrast to its trade-related indicators, which show an

⁵⁶⁴ The domestic industry's net sales revenues increased from \$*** in 2018, to \$*** in 2019, decreased to \$*** in 2020 \$*** in 2021 and then increased to \$*** in 2022, and \$*** in 2023; they were \$*** in interim 2023 and \$*** in interim 2024. CR/PR at Table ALT C.1.

⁵⁶⁵ The domestic industry's gross profits increased from \$*** in 2018 to \$*** in 2019, then declined to \$*** in 2020 and \$*** in 2021, then increased to \$*** in 2022 and \$*** in 2023; they were lower in interim 2024, at \$***, than in interim 2023, at \$***. CR/PR at Table ALT C.1.

⁵⁶⁶ The domestic industry reported net income that improved from \$*** in 2018 to \$*** in 2019, then reported losses of \$*** in 2020, \$*** in 2021, and \$*** in 2022, then income of \$*** in 2023; net income was lower in interim 2024, at \$***, than in interim 2023, at \$***. CR/PR at Table ALT C.1.

⁵⁶⁷ The domestic industry reported a net income margin that improved from *** percent in 2018 to *** percent in 2019, then, incurring losses, reported negative margins of *** percent in 2020, 0.7 percent in 2021, and 6.3 percent in 2022, then returned to a positive margin of 5.3 percent in 2023; it was lower in interim 2024, at 3.4 percent, than in interim 2023, at 7.5 percent. CR/PR at Table ALT C.1.

⁵⁶⁸ The domestic industry reported an operating income margin that improved from *** percent in 2018 to *** percent in 2019, then, incurring losses, reported negative margins of *** percent in 2020, 9.1 percent in 2021, and 7.6 percent in 2022, then returned to a positive operating income margin of 4.6 percent in 2023; it was lower in interim 2024, at 2.9 percent, than in interim 2023, at 6.8 percent. CR/PR at Table ALT C.1.

⁵⁶⁹ The domestic industry reported operating income that improved from \$*** in 2018 to \$*** in 2019, then reported losses of \$*** in 2020, \$*** in 2021, and \$*** in 2022, then income of \$*** in 2023; operating income was lower in interim 2024, at \$***, than in interim 2023, at \$***. CR/PR at Table ALT C.1.

⁵⁷⁰ The domestic industry's capital expenditures increased from \$*** in 2018 to *** in 2019, then decreased to *** in 2020 and \$*** in 2021, and increased to \$*** in 2022 and \$*** in 2023; capital expenditures were \$***, in interim 2024. CR/PR at Table ALT C.1. The domestic industry's R&D expenses initially increased from \$*** in 2018 to \$*** in 2019 before decreasing to \$*** in 2020, \$*** in 2021, \$*** in 2022, and \$*** in 2023; they were \$*** in interim 2023 and *** in interim 2024. CR/PR at Table LP 3.19.

⁵⁷¹ The domestic industry's return on assets increased from *** percent in 2018 to *** percent in 2019, decreased to *** percent in 2020, increased to *** percent in 2021, decreased to *** percent in 2022, and increased to *** percent in 2023. CR/PR at Table LP 3.23.

overall decline. While the domestic industry was able to recapture *** percentage points of market share between 2018 and 2023 with the orders in place, apparent U.S. consumption was *** percent lower in 2023 than in 2018. This significant decline in apparent U.S. consumption prevented the domestic industry from sustaining a solid financial performance. It reported net and gross losses in three of the six full-year reporting periods of the POR, and its profits margins, though they began to recover in the post-COVID period, leave little room for a surge in import competition, as a comparison of the interim period data show that its net and operating income margins are again trending downward despite higher apparent U.S. consumption in interim 2024 than in interim 2023.⁵⁷² We therefore find that the domestic industry is currently in a vulnerable condition.⁵⁷³

As discussed above, we have found that if the orders were revoked, the volume of cumulated subject imports would likely be significant within a reasonably foreseeable time. We have also found that the significant volume of cumulated subject imports would likely undersell the domestic like product, allowing it to win bids and gain market share, forcing the domestic industry to either cut prices or lose sales. The likely significant volume of cumulated subject imports, coupled with their significant price effects, would have an adverse impact on the domestic industry's production, shipments, profitability, and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Consequently, we conclude that if the orders were revoked, cumulated subject imports would be likely to have an adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Nonsubject imports had an irregularly declining presence in the U.S. market that ranged from *** percent to *** percent, depending on the year.⁵⁷⁴ We observe that during the original period of investigations, nonsubject imports accounted for

⁵⁷² CR/PR at Table ALT C.1.

⁵⁷³ Commissioner Johanson does not join this vulnerability finding. Having weathered the pandemic and fluctuations in demand during the POR, the domestic LDW line pipe industry is operating profitably. *See, e.g.*, CR/PR at Table ALT C.1. Several domestic producers have completed, announced, or planned major investments in production operations as a result of the discipline of the orders. *See, e.g.*, CR/PR at Tables LP 3.1, LP 3.3; Tr. at 39-40 (Mr. Phillips) and 83 (Mr. Kirkland). For oil and gas uses, most producers and importers expect demand in the United States to increase steadily or fluctuate upward, and most purchasers expect such demand to fluctuate upward. CR/PR at Table LP 2.11. On this record, Commissioner Johanson does not find the domestic LDW line pipe industry to be in a vulnerable condition.

⁵⁷⁴ The share of apparent U.S. consumption accounted for by nonsubject imports decreased from *** percent in 2018 to *** in 2019 and *** percent in 2020, increased to *** percent in 2021, then decreased to *** percent in 2022 and *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 2023, at *** percent. CR/PR at Table ALT C.1.

between *** percent and *** percent of apparent U.S. consumption,⁵⁷⁵ but they did not prevent significant quantities of low-priced cumulated subject imports from entering the U.S. market and capturing sales from the domestic industry. On this record, there is no indication that the presence of nonsubject imports would prevent subject imports from again entering the U.S. market in significant volumes. Given that the domestic industry accounted for *** percent of apparent U.S. consumption in 2023,⁵⁷⁶ as well as the general substitutability of the domestic like product and subject imports and the importance of price in purchasing decisions, the presence of nonsubject imports in the U.S. market would likely not prevent the significant volume of low-priced cumulated subject imports that is likely if the orders are revoked from taking market share from the domestic industry 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 effects of nonsubject imports would be distinct from the likely effects attributable to subject imports.

We have also considered the likely effects of demand trends on the domestic industry. Apparent U.S. consumption decreased irregularly by *** percent from 2018 to 2023, but was 11.5 percent higher in interim 2024 than in interim 2023.⁵⁷⁷ As discussed above, U.S. producers, importers, and purchasers provided mixed responses regarding anticipated demand.⁵⁷⁸ Even if demand were to decline, the significant volume of low-priced cumulated subject imports that is likely if the orders are revoked would exacerbate any negative effects caused by adverse demand trends by further reducing the industry's sales and placing additional downward pressure price pressure on domestic producers.

We therefore conclude that if the orders were revoked, cumulated subject imports from Canada, China, South Korea, and Turkey would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

⁵⁷⁵ *Original Leading Determinations*, USITC Pub. 4859 at Table ALT C-5.

⁵⁷⁶ CR/PR at Table C.1.

⁵⁷⁷ CR/PR at Table ALT C.1. Apparent U.S. consumption increased from *** short tons in 2018 to *** short tons in 2019, then decreased to *** short tons in 2020 and 485,427 short tons in 2021, then increased to 591,362 short tons in 2022 and 1.4 million short tons in 2023; it was higher in interim 2024, at 966,612 short tons, than in interim 2023, at 867,298 short tons. *Id.*

⁵⁷⁸ Most U.S. importers and purchasers expect demand to increase in the United States, while equal numbers of U.S. producers anticipate demand to increase or to either decrease or remain flat. CR/PR at Tables LP 2.10-11.

V. Revocation of the Antidumping and Countervailing Duty Orders on LDW Structural Pipe Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

We reviewed the pertinent legal standards in section IV.A.

A. Conditions of Competition and the Business Cycle

The following conditions of competition inform our determinations with respect to LDW structural pipe.

1. Demand Conditions

Original Investigations. In its original determinations, the Commission found that LDW structural pipe was used for structural or load-bearing purposes and that U.S. demand for LDW structural pipe reflected demand in the nonresidential construction industry. As U.S. nonresidential spending increased by 19.8 percent from 2015 to 2017, apparent U.S. consumption of LDW structural pipe increased by a similar magnitude, *** percent.⁵⁷⁹

Current Reviews. Demand for LDW structural pipe continues to be driven by demand for projects in which it is used, primarily in nonresidential construction and infrastructure such as bridges, stadiums, and deepwater ports.⁵⁸⁰ U.S. nonresidential construction spending increased from \$759.0 billion in January 2018 to \$1,247.2 billion in December 2024, a 62.6 percent increase.⁵⁸¹

Similar to the U.S. LDW line pipe market, there is little consensus among responding market participants on how demand for LDW structural pipe in the United States has changed since 2018. Pluralities of U.S. producers, importers, and purchasers indicated that demand either did not change or fluctuated.⁵⁸² With respect to anticipated demand, most responding U.S. producers, importers, and purchasers anticipate no change in demand, and more anticipate that demand will increase than decrease.⁵⁸³

Apparent U.S. consumption increased irregularly by *** percent from 2018 to 2023, increasing from *** short tons in 2018 to *** short tons in 2019, decreasing to *** short tons in 2020 and *** short tons in 2021, then increasing to *** short tons in 2022 and *** short

⁵⁷⁹ *Original Leading Determinations*, USITC Pub. 4859 at 58-59; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 90 (apparent U.S. consumption increased from *** short tons in 2015 to *** short tons in 2016 and *** short tons in 2017). *Id.*

⁵⁸⁰ CR/PR at SP 2.1, 2.13, 2.16.

⁵⁸¹ CR/PR at SP 2.13.

⁵⁸² See CR/PR at Table SP 2.7.

⁵⁸³ CR/PR at Table SP 2.8.

tons in 2023; it was higher in interim 2024, at *** short tons, than in interim 2023, at *** short tons.⁵⁸⁴

2. Supply Conditions

Original Investigations. In the original investigations, the Commission found that LDW structural pipe was typically made to order for nonresidential construction projects, with most LDW structural pipe shipped directly to end users.⁵⁸⁵ The Commission found that the domestic industry's share of apparent U.S. consumption decreased from *** percent in 2015 to *** percent in 2016 and then to *** percent in 2017, for an overall decline of *** percentage points.⁵⁸⁶ The domestic LDW structural pipe industry's production capacity increased *** percent from 2015 to 2017.⁵⁸⁷

The Commission found that cumulated subject imports were the second largest source of supply to the U.S. LDW structural pipe market. Their share of apparent U.S. consumption decreased from *** percent in 2015 to *** percent in 2016 and then increased to *** percent in 2017, for an overall increase of *** percentage points.⁵⁸⁸

Nonsubject imports were the smallest source of supply to the U.S. market during the original investigations. Nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2015 to *** percent in 2016 and then decreased to *** percent in 2017, for an overall increase of *** percentage points.⁵⁸⁹ The largest sources of nonsubject imports in 2023 were Mexico, Italy, and Japan.⁵⁹⁰

Current Reviews. LDW structural pipe remains typically made to order for nonresidential construction projects, with most LDW structural pipe shipped directly to end users.⁵⁹¹ The domestic industry continued to be the largest source of supply in the U.S. market. Its share of apparent U.S. consumption irregularly increased by *** percentage points from 2018 to 2023, increasing from *** percent in 2018 to *** percent in 2019 and *** percent in 2020, then decreasing to *** percent in 2021, and then increasing to *** percent in 2022 and

⁵⁸⁴ CR/PR at Tables SP 1.4, C.2.

⁵⁸⁵ *Original Leading Determinations*, USITC Pub. 4859 at 59.

⁵⁸⁶ *Original Leading Determinations*, USITC Pub. 4859 at 59; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 91.

⁵⁸⁷ *Original Leading Determinations*, USITC Pub. 4859 at 59; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 91.

⁵⁸⁸ *Original Leading Determinations*, USITC Pub. 4859 at 59-60; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 92.

⁵⁸⁹ *Original Leading Determinations*, USITC Pub. 4859 at 60; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 818620 at 92.

⁵⁹⁰ CR/PR at SP 2.10.

⁵⁹¹ CR/PR at SP 2.10, 2.13.

*** percent in 2023; it was lower in interim 2024, at *** percent, than in interim 2023, at *** percent.⁵⁹² The domestic industry's practical production capacity fluctuated, ending the period *** percent higher in 2023 than in 2018.⁵⁹³ It reported available capacity throughout the POR, as its capacity utilization rate ranged from *** percent to *** percent.⁵⁹⁴

Subject imports were the second largest source of supply to the U.S. market during the POR. Their share of apparent U.S. consumption irregularly decreased by *** percentage points from 2018 to 2023, decreasing from *** percent in 2018 to *** percent in 2019, increasing to *** in 2020 and *** percent in 2021, then decreasing to *** percent in 2022 and *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 2023, at *** percent.⁵⁹⁵

Nonsubject imports were the smallest source of supply during the POR. Their share of apparent U.S. consumption irregularly decreased by *** percentage points from 2018 to 2023, decreasing from *** percent in 2018 to 10.7 percent in 2019 and *** percent in 2020, increasing to *** percent in 2021, then decreasing again to *** percent in 2022 and *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 2023, at ***.⁵⁹⁶ The largest sources of nonsubject imports were Mexico, Italy, and Vietnam.⁵⁹⁷

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 LDW structural pipe and subject imports.⁵⁹⁸ It found that all LDW structural pipe is typically produced to ASTM standards. At least half of responding purchasers of LDW structural pipe reported that LDWP from domestic producers and subject sources is always or frequently used interchangeably.⁵⁹⁹ When asked to compare LDWP produced in the United States to subject imports, responding purchasers ranked the domestic like product as comparable to imports from each subject country with respect to the vast majority of purchasing factors.⁶⁰⁰

⁵⁹² CR/PR at Tables SP 1.4, C.2.

⁵⁹³ The domestic industry's LDW structural pipe capacity was 556,409 short tons in 2018, 557,722 short tons in 2019, 555,482 short tons in 2020, 537,803 short tons in 2021, 691,514 short tons in 2022, 563,969 short tons in 2023; it was 431,229 short tons in interim 2023 and 413,657 short tons in interim 2024. CR/PR at Tables SP 3.4, C.2.

⁵⁹⁴ CR/PR at Tables SP 1.4, C.2.

⁵⁹⁵ CR/PR at Tables SP 1.4, C.2.

⁵⁹⁶ CR/PR at Tables SP 1.4, C.2.

⁵⁹⁷ CR/PR at SP 4.2.

⁵⁹⁸ *Original Leading Determinations*, USITC Pub. 4859 at 60.

⁵⁹⁹ *Original Leading Determinations*, USITC Pub. 4859 at 60.

⁶⁰⁰ *Original Leading Determinations*, USITC Pub. 4859 at 60.

The Commission found that price was an important factor in purchasing decisions for LDW structural pipe.⁶⁰¹ Purchasers had ranked price as among their top three purchasing factors more than any other factor and named price most frequently as a very important consideration when choosing among LDW structural pipe producers for a project.⁶⁰²

The Commission observed that, as with LDW line pipe, bidding was usually used to award contracts, sometimes after multiple bidding rounds. It also observed that the primary raw material used to manufacture LDWP was either hot-rolled coil or CTL plate, depending on the production process.⁶⁰³

As noted above, additional tariffs of 25 percent *ad valorem* were imposed on certain steel products in March and July 2018 under Section 232, including the imported raw materials used in domestic production of LDW structural pipe and imports of LDW structural pipe. Additionally, Commerce had issued antidumping and countervailing duty orders on hot-rolled steel from Australia, Brazil, Japan, Korea, Netherlands, Turkey, and the United Kingdom in October 2016; and on CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey in 2017.⁶⁰⁴

Current Reviews. In these reviews, we find that there is a moderate-to-high degree of substitutability between domestically produced LDW structural pipe and LDW structural pipe imported from subject sources.⁶⁰⁵ As discussed previously, responding market participants reported a relatively high degree of interchangeability between LDW line pipe from different subject sources and the domestic like product. All U.S. producers and a majority of importers reported that LDW structural pipe is always interchangeable, regardless of source.⁶⁰⁶ In addition, a majority of purchasers reported that LDW structural pipe from domestic and all subject sources can always or frequently be used interchangeably.⁶⁰⁷ Consistent with these responses, LDW structural pipe, regardless of source, continues to be produced to the same ASTM standards.⁶⁰⁸

When asked to compare LDW structural pipe from different sources with respect to 22 purchasing factors, a plurality of purchasers indicated that domestically produced LDW structural pipe was comparable to LDW structural pipe imported from all subject countries

⁶⁰¹ *Original Leading Determinations*, USITC Pub. 4859 at 60.

⁶⁰² *Original Leading Determinations*, USITC Pub. 4859 at 61.

⁶⁰³ *Original Leading Determinations*, USITC Pub. 4859 at 61.

⁶⁰⁴ *Original Leading Determinations*, USITC Pub. 4859 at 61-62.

⁶⁰⁵ See CR/PR at SP 2.19.

⁶⁰⁶ CR/PR at SP 2.31, Table SP 2.16.

⁶⁰⁷ CR/PR at Table SP 2.17.

⁶⁰⁸ CR/PR at LDWP 1.46, SP 2.1; Hearing Tr. at 26 (Brightbill).

except China in terms of most factors.⁶⁰⁹ When asked how often differences other than price were significant in sales, all U.S. producers reported that factors other than price are sometimes or never significant when comparing domestically produced LDW structural pipe to subject imports.⁶¹⁰ The views of the importers that responded to this question were mixed. For individual factors, one or two importers indicated that differences other than price are always important in their sales of products from U.S. and subject sources, while one or two importers indicated that such differences are sometimes or never important.⁶¹¹ Purchasers most frequently reported that differences other than price are sometimes significant.⁶¹²

Also as discussed previously, the record indicates that subject imports of LDW structural pipe from subject sources overlapped with the domestic like product in terms of outside diameter, production process, and grade during the POR.⁶¹³

Most responding purchasers reported that they sometimes or usually make purchasing decisions based on the country of origin (11 of 14 purchasers) and/or method of manufacture (*i.e.*, ERW, HSAW, LSAW) (nine of 13 purchasers).⁶¹⁴ Purchasers were more evenly split between usually and never making decisions based on the producer, with seven purchasers

⁶⁰⁹ CR/PR at Table SP 2.15. U.S. LDW structural pipe was rated as superior to LDW structural pipe imported from China by a plurality of purchasers for availability, delivery terms, delivery time, quality meets and exceeds specifications, and technical support/ service and inferior on price. A plurality rated the two as comparable on all other factors. *Id.*

⁶¹⁰ CR/PR at Table SP 2.18.

⁶¹¹ CR/PR at Table SP 2.19.

⁶¹² CR/PR at Table SP 2.20.

⁶¹³ With respect to outside diameter, *** percent of U.S. producers' U.S. shipments of LDW structural pipe were in the >16 inch OD to <=24 inch OD range, *** percent were in the >24 inch to <=48 inch OD pipe range, and *** percent were in the >48 inch OD range from January 2023 through September 2024, compared with *** percent, *** percent, and *** percent, respectively, for subject imports from all sources in the aggregate. CR/PR at Table SP 4.3.

With respect to production method, HSAW-, LSAW-, and ERW-produced structural pipe was sold in the U.S. market from both domestic and subject sources. From January 2023 to September 2024, there were U.S. purchases of LSAW and ERW LDW structural pipe from South Korea, and HSAW LDW structural pipe from Canada and China. U.S. producers primarily sold HSAW and ERW LDW structural pipe, but *** percent of their U.S. shipments were produced in LSAW mills. *Id.* at Table SP 4.2.

With respect to grade, ASTM 252 LDW structural pipe was by far the largest share of LDW structural pipe shipments from January 2023 to September 2024, constituting the large majority of shipments of the domestic like product and subject imports from Canada, China, and Turkey. Subject imports from South Korea sold meaningful quantities of ASTM A252, but sold larger quantities of ASTM A53 and all other grades. Domestic producers also sold the domestically produced ASTM 53 and all other grades, in larger quantities than South Korean subject merchandise. *Id.*

⁶¹⁴ CR/PR at Table SP 2.9.

reporting that they always or usually base decisions on the producer, and seven reporting that they sometimes or never do.⁶¹⁵

We find that price continues to be an important factor in purchasing decisions. Price was most frequently identified by responding purchasers as among their top three factors in purchasing decisions (14 firms), followed by availability/delivery/lead times/schedule (11 firms), and quality/meeting technical specifications (eight firms).⁶¹⁶ Price and quality were the only two factors (out of 22 total factors) that all 14 responding purchasers rated as very important in their purchasing decisions.⁶¹⁷ In addition, a majority of responding purchasers (ten of 14) reported that they usually purchase the lowest-priced product.⁶¹⁸

All responding purchasers reported that domestically produced LDW line pipe and subject imports from all sources except China always or usually meet minimum quality specifications.⁶¹⁹ Most responding purchasers (nine of 14) do not require their suppliers to become certified to sell LDW structural pipe to their firms,⁶²⁰ and no purchasers reported that any suppliers had failed qualification or had lost approved status during the POR.⁶²¹

Bidding is usually used to award contracts for purchase of LDW structural pipe. A majority of purchasers reported that they purchase LDW structural pipe using a bidding process, although competitions with multiple bids appear to be less common than in the LDW line pipe market.⁶²² Three of six responding purchasers sometimes permit bidders to submit bids with exceptions to their product specifications or alternative products in lieu of their specified products.⁶²³

The primary raw material used to manufacture LDW structural pipe is either HRC or CTL plate, depending on the production process.⁶²⁴ Raw material prices, as reflected in the price of

⁶¹⁵ CR/PR at Table SP 2.9.

⁶¹⁶ CR/PR at Table SP 2.10.

⁶¹⁷ CR/PR at Table SP 2.11.

⁶¹⁸ CR/PR at SP 2.21.

⁶¹⁹ CR/PR at Table SP 2.12. Two purchasers reported that subject imports from China sometimes, rarely, or never met minimum quality specifications, while five reported that they always or usually meet minimum quality specifications. *Id.*

⁶²⁰ CR/PR at SP 2.23.

⁶²¹ CR/PR at SP 2.23.

⁶²² CR/PR at SP 5.15. Four of six responding purchasers reported that they rarely or never allow bidders more than one opportunity to submit bids, while one purchaser always does, and one frequently does. *Id.*

⁶²³ CR/PR at SP 5.15. One purchaser each reported that they each always, frequently, or rarely/never permit bidders to submit bids with exceptions to their product specifications or alternative LDWP products in lieu of their specified products. *Id.*

⁶²⁴ CR/PR at LP 5.1.

HRC and CTL plate, fluctuated over the POR, with HRC prices decreasing slightly overall and CTL plate prices increasing from January 2018 to September 2024.⁶²⁵

LDW structural pipe originating in Canada,⁶²⁶ China,⁶²⁷ South Korea,⁶²⁸ and Turkey,⁶²⁹ is subject to additional 25 percent *ad valorem* duties under Section 232. In addition, effective March 4, 2025, certain LDW structural pipe from Canada became subject to an additional 10 percent *ad valorem* duty, while LDW structural pipe originating in Canada imported under HTS subheading 7305.39 became subject to an additional 25 percent *ad valorem* duty under IEEPA.⁶³⁰ LDW structural pipe originating in China is also subject to an additional 25 percent *ad valorem* duty under Section 301.⁶³¹ Effective February 4, 2025, LDW structural pipe originating in China became subject to an additional 10 percent *ad valorem* duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent *ad valorem*.⁶³²

Market participants' responses concerning the effects of Section 232 duties on the LDW structural pipe market during the POR were wide-ranging, with reports of increased prices (including raw material prices), reduced supply, increased difficulty for foreign producers to win projects, and backlogs at U.S. mills.⁶³³ Purchasers specifically reported on availability issues caused by the Section 232 duties, which were a mix of domestic and subject availability issues.⁶³⁴ As discussed above, these market participant responses referred to the Section 232 duties as they were in effect during the POR and, therefore, would not include any changes that occurred after the POR.

⁶²⁵ See CR/PR at Table LP 5.1.

⁶²⁶ Effective March 12, 2025, LDWP originating in Canada became subject to an additional 25 percent *ad valorem* duty under Section 232. CR/PR at LDWP 1.42.

⁶²⁷ Effective March 2018, LDWP originating in China became subject to an additional 25 percent *ad valorem* duty under Section 232. CR/PR at LDWP 1.42.

⁶²⁸ CR/PR at LDWP 1.42. Effective June 2018, steel articles, including LDWP, originating in South Korea were subject to annual absolute import quotas under Section 232. Following the termination of the absolute import quotas, effective March 12, 2025, steel articles originating in South Korea became subject to an additional 25 percent *ad valorem* duty under Section 232. *Id.*

⁶²⁹ CR/PR at LDWP 1.42. Effective March 2018, LDW structural pipe originating in Turkey became subject to an additional 25 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended. Effective August 2018, the Section 232 duty on steel articles originating in Turkey was increased to 50 percent *ad valorem* but was subsequently reduced to 25 percent *ad valorem*, effective May 2019. *Id.*

⁶³⁰ CR/PR at LDWP 1.41-42.

⁶³¹ CR/PR at LDWP 1.41. Effective September 1, 2019, LDWP originating in China became subject to an additional 15 percent *ad valorem* duty under Section 301 of the Trade Act of 1974. Effective February 14, 2020, the Section 301 duty for LDWP was reduced to 7.5 percent *ad valorem*. Effective September 27, 2024, the Section 301 duty was increased to an additional 25 percent *ad valorem*. *Id.*

⁶³² CR/PR at LDWP 1.41.

⁶³³ CR/PR at SP 2.3.

⁶³⁴ CR/PR at SP 2.3.

Most market participants other than purchasers reported that the Section 301 duties had no effect on the LDW structural pipe market during the POR. Six of seven purchasers reported that the Section 301 duties affected the market, with four noting that the duties generally had an effect or increased prices.⁶³⁵

B. Likely Volume of Subject Imports

1. The Original Investigations

In the original investigations, the Commission found that cumulated subject imports of LDW structural pipe from Canada, China, South Korea, and Turkey had a substantial and increasing presence in the U.S. market every year from 2015 to 2017. The volume of cumulated subject imports increased from 42,293 short tons in 2015 to 42,806 short tons in 2016 and 71,239 short tons in 2017, an overall increase of 68.4 percent. The Commission found that their market share increased overall at the expense of the domestic industry, first decreasing from *** percent of apparent U.S. consumption in 2015 to *** percent in 2016 and then increasing to *** percent in 2017, for an overall increase of *** percentage points.⁶³⁶ The Commission concluded that the volume of cumulated subject imports of LDW structural pipe and the increase in volume was significant in both absolute terms and relative to consumption.⁶³⁷

2. The Current Reviews

Cumulated subject imports have maintained a continuous presence in the U.S. market during the POR, although they declined irregularly to lower levels than during the original investigations. The volume of cumulated subject imports declined from *** short tons in 2018 to *** short tons in 2019, increased to *** short tons in 2020 and *** short tons in 2021, then decreased to *** short tons in 2022 and increased to *** short tons in 2023, an overall decline of *** percent; they were 38.4 percent higher in interim 2024, at *** short tons, than in interim 2023, at *** short tons.⁶³⁸ As a share of apparent U.S. consumption, cumulated subject

⁶³⁵ CR/PR at SP 2.3.

⁶³⁶ *Original Leading Determinations*, USITC Pub. 4859 at 62-63; *Confidential Original Determinations (Leading Investigations)*, EDIS Doc. 673355 at 96. Cumulated subject imports were 32,018 short tons in interim 2017 and 27,017 short tons in interim 2018. Their market share was *** percent in interim 2017 and *** percent in interim 2018. *Id.* at n. 432 and 433.

⁶³⁷ *Original Leading Determinations*, USITC Pub. 4859 at 62-63. In its trailing determinations, the countries eligible for cumulation were the same as in the leading investigations (Canada, China, South Korea, and Turkey). Therefore, the Commission adopted and incorporated by reference its findings and analyses with respect to material injury by reason of cumulated subject imports of LDW structural pipe. *Original Trailing Determinations*, USITC Pub. 4883 at 22-23.

⁶³⁸ CR/PR at Table C.2.

imports irregularly declined by *** percentage points from 2018 to 2023, first decreasing from *** percent in 2018 to *** percent in 2019, increasing to *** in 2020 and *** percent in 2021, then decreasing to *** percent in 2022 and *** percent in 2023; they were higher in interim 2024, at *** percent, than in interim 2023, at *** percent.⁶³⁹

We find that the reduced volume and market share of cumulated subject imports during the POR reflect the discipline of the orders.

The subject industries have the ability to export significant volumes of subject merchandise to the United States. Responding subject producers reported production capacity, in the aggregate, decreased overall from *** short tons in 2018 to *** short tons in 2023; and was essentially flat in a comparison of the interim periods.⁶⁴⁰ Their reported production irregularly increased overall from *** short tons in 2018 to *** short tons in 2023; it was higher in interim 2024 (at *** short tons) than in interim 2023 (at *** short tons).⁶⁴¹ Their reported capacity utilization rate irregularly increased as well, from *** percent in 2018 to *** percent in 2023; it was lower in interim 2024 (*** percent) than in interim 2023 (*** percent).⁶⁴² Thus, subject foreign producers had an aggregate excess capacity of *** short tons in 2023, equivalent to *** percent of apparent U.S. consumption that year.⁶⁴³ End-of-period inventories held by subject producers irregularly decreased during the POR from *** short tons in 2018 to *** short tons in 2023, equivalent to *** percent of apparent U.S. consumption that year.⁶⁴⁴

⁶³⁹ CR/PR at Tables SP 1.4, C.2.

⁶⁴⁰ CR/PR at Table SP 4.33. Their reported production capacity decreased from *** short tons in 2018 to *** short tons in 2019, increased to *** short tons in 2020, decreased to *** short tons in 2021, increased to *** short tons in 2022, and decreased *** short tons in 2023. *Id.* Because this reflects only the reported production capacity of subject producers that responded to the Commission's questionnaires, this amount of capacity is likely understated.

⁶⁴¹ CR/PR at Table SP 4.33. Their reported production totaled *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023. *Id.* Because this reflects only the reported production of subject producers that responded to the Commission's questionnaires, this amount of excess capacity is likely understated.

⁶⁴² *Calculated from* CR/PR at Table SP 4.33. Their capacity utilization rate was 21.4 percent in 2018, 21.2 percent in 2019, 20.5 percent in 2020, 32.1 percent in 2021, 42.4 percent in 2022, and 88.9 percent in 2023. *Id.* Because this reflects only the reported capacity utilization of subject producers that responded to the Commission's questionnaires, this amount of excess capacity is likely understated.

⁶⁴³ *Calculated from* CR/PR at Tables SP 4.33, ALT C.2. Because this reflects only the reported excess capacity of subject producers that responded to the Commission's questionnaires, this amount of excess capacity is likely understated.

⁶⁴⁴ CR/PR at Table SP 4.33. Cumulated subject producers' end-of-period inventories were reported at *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; they were lower in interim 2024, at *** short tons, than in interim 2023, at ***. *Id.* Because this reflects only the reported inventories of subject producers that responded to the Commission's questionnaires, this amount of inventories is likely understated.

Additionally, as discussed above in section III.3.a, Evraz reported production of out-of-scope subject merchandise (other than LDW line pipe) on the same equipment and machinery used to producer LDW structural pipe during the POR, and would therefore have the ability to increase production of LDW line pipe by shifting production from out-of-scope merchandise produced the same equipment.⁶⁴⁵

The subject foreign producers are also large exporters. Their exports irregularly increased during the POR, decreasing from *** short tons in 2018 to *** short tons in 2019, increasing to *** short tons in 2020, decreasing to *** short tons in 2021, then increasing again to *** short tons in 2022 and *** short tons in 2023; they were lower in interim 2024, at *** short tons, than in interim 2023, at *** short tons.⁶⁴⁶ In addition, exports comprised a majority of subject foreign producers' sales in each year of the POR, with their share ranging from *** to *** percent of total shipments.⁶⁴⁷ Based on GTA data concerning welded structural pipe greater than 16 inches in diameter, including LDW structural pipe and out-of-scope products, subject foreign producers exported such merchandise at high levels throughout the POR, which irregularly increased from 509,195 short tons in 2018 to 1.1 million short tons in 2023.⁶⁴⁸ These same data show that exports from the subject countries, in aggregate, accounted for 41.5 percent of global exports in 2023.⁶⁴⁹

The record indicates that the U.S. market remains attractive to the cumulated subject producers, incentivizing them to export significant volumes of subject merchandise to the United States if the orders were revoked. As noted above, cumulated subject imports maintained a continuous presence in the U.S. market, indicating that they retain access to U.S. distribution networks and customers that could be used to expand their presence in the market if the orders were revoked.⁶⁵⁰ The record also indicates that the U.S. market offers attractive LDW line pipe prices. The AUVs for the subject producers' export shipments to third country markets were lower than the AUVs of their shipments to the United States during the POR.⁶⁵¹

⁶⁴⁵ CR/PR at Table SP 4.18. Evraz's production of products other than LDWP on shared equipment and machinery totaled *** short tons in 2018, increased to *** short tons in 2019, decreased to *** short tons in 2020, then increased to *** short tons in 2021 and *** short tons in 2022, and decreased *** short tons in 2023; the *** short tons in interim 2023 was less than the *** short tons in interim 2024. *Id.*

⁶⁴⁶ CR/PR at Table SP 4.33.

⁶⁴⁷ *Calculated from* CR/PR at Table SP 4.33.

⁶⁴⁸ CR/PR at Table SP 4.37.

⁶⁴⁹ CR/PR at Table SP 4.37.

⁶⁵⁰ *See* CR/PR at SP 4.6.

⁶⁵¹ The responding foreign producer's AUV of its exports to the United States was \$*** per short ton compared with \$*** per short ton for its exports to third country markets in 2018, the only year for which such comparative data is available. *Calculated from* ***'s Foreign Producer Questionnaire at II-13. The United States was the only export market for ***. CR/PR at Table SP 4.17.

In addition, Canada's existing antidumping measure on imports of LDWP from China would further enhance the relative attractiveness of the U.S. market to subject producers in China if the orders were revoked.⁶⁵²

Finally, we find that the Section 232 measures and other duties applicable to subject imports from each subject country would not prevent the volume of cumulated subject imports from being significant if the orders were revoked. As discussed above, all subject imports are subject to 25 percent *ad valorem* Section 232 duties as of March 12, 2025, as absolute quotas or TRQs are no longer applicable to any subject country. *Ad valorem* duties of 25 percent under Section 232 became effective on imports from China and Turkey in March 2018, and imports from Canada from June 1, 2018, to May 21, 2019, but not to South Korea, for which an absolute quota applied. These measures did not prevent large volumes of cumulated subject imports from China and Turkey entering the United States throughout the POR. As we described previously, there were more than *** short tons of subject imports from Turkey alone in each year of the POR, with a peak of *** short tons in 2021.⁶⁵³ These imports continued despite an increase in the Section 232 duty applicable to Turkey to 50 percent *ad valorem* between August 13, 2018, and May 21, 2019.⁶⁵⁴ Additionally, as discussed above, to the extent that changes in the application of Section 232 duties to various subject countries were announced and took effect subsequent to the review period, the record in these reviews does not indicate that such changes would likely prevent the volume of cumulated subject imports from reaching significant levels if the orders were revoked.

Further, as discussed previously, subject imports from China are subject to an additional 25 percent *ad valorem* duty under Section 301 and an additional 20 percent *ad valorem* duty under IEEPA. Certain LDW structural pipe from Canada designated as energy or energy resources became subject to an additional 10 percent *ad valorem* duty under IEEPA, while all other LDW structural pipe originating in Canada, including products imported under HTS subheading 7305.39, became subject to an additional 25 percent *ad valorem* duty under IEEPA.⁶⁵⁵ We note that the Section 301 duties on subject imports from China, which took effect in September 2019, did not prevent that merchandise from maintaining a presence in the U.S.

⁶⁵² CR/PR at LP 4.90.

⁶⁵³ CR/PR at Table C.2 (showing subject imports from Turkey of *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; it was *** short tons in interim 2023, and *** short tons in interim 2024).

⁶⁵⁴ CR/PR at LDWP 1.42 n.48.

⁶⁵⁵ CR/PR at LDWP 1.41-42. We note that only products originating in Canada that do not enter with duty free treatment under the USMCA are subject to the additional *ad valorem* duty under IEEPA. *Id.*

market during the POR.⁶⁵⁶ As discussed above, given market participants' responses on the effects of other duties (*i.e.*, Sections 232 and 301) on the U.S. market during the POR, and the uncertainties with the IEEPA tariffs (announced and effective subsequent to the review period), the record in these reviews does not indicate that such measures would likely prevent the volume of cumulated subject imports from reaching significant levels if the orders were revoked. Accordingly, we find that the Section 301 and IEEPA duties would not likely prevent cumulated subject imports from entering the U.S. market at significant levels if the orders were revoked.

Thus, based on the significant volume and market share of cumulated subject imports during the original investigations; the continuous presence of cumulated subject imports in the U.S. market during the POR while under the disciplining effect of the orders; the cumulated subject producers' substantial capacity, excess capacity, inventories, and exports; and the attractiveness of the U.S. market, we find that the likely volume of cumulated subject imports would be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

C. Likely Price Effects of Subject Imports

1. The Original Investigations

In the original investigations, the Commission found that subject imports of LDW structural pipe and the domestic like product were highly substitutable and that price was an important factor in purchasing decisions. It found that subject import bids were lower than domestic producers' bids in six of nine instances. It further found that subject imports' bids were lower than domestic producer's bids in five of the seven instances in which purchasers awarded the project to subject imports. In three of those five instances, the winning bid for the subject imports was also the lowest bid submitted. Therefore, the Commission found that the bid data indicated that suppliers of subject imports frequently won bidding events while offering lower bid prices than domestic competitors. The Commission also considered lost sales data. It found that nine of 11 purchasers indicated that low prices were a primary reason for purchasing subject imports over the domestic product. The Commission therefore found that the underselling by cumulated subject imports was significant during the POI and, as a result, subject imports gained market share at the expense of the domestic industry.⁶⁵⁷

⁶⁵⁶ The initial tariff rate of 15 percent *ad valorem* was reduced to 7.5 percent *ad valorem* in February 2020, then increased to 25 percent *ad valorem* effective September 2024. CR/PR at LDWP 1.41.

⁶⁵⁷ *Original Leading Determinations*, USITC Pub. 4859 at 63-64.

The Commission could not conclude that subject imports had significant price-depressing effects on the domestic like product because, absent quarterly pricing data, price trends were difficult to discern. In addition, although domestic producers' unit sales values decreased over the POI, so did their unit costs.⁶⁵⁸

The Commission also did not find that subject imports prevented price increases which otherwise would have occurred to a significant degree. The record indicated that the industry's COGS to net sales ratio improved overall from 2015 to 2017 and remained stable between interim periods. The Commission also found that the industry's increase in unit net sales values in the latter half of the POI indicated that the domestic industry was able to raise prices.⁶⁵⁹

In sum, the Commission found that subject imports significantly undersold the domestic like product and that the domestic industry lost market share as a result of the low-priced cumulated subject imports. It consequently found that the cumulated subject imports of LDW structural pipe had significant price effects.⁶⁶⁰

2. The Current Reviews

The Commission requested pricing data for two pricing products in these reviews.⁶⁶¹ Six U.S. producers and *** importers provided useable pricing data for sales of the requested productions, although not all firms reported pricing for all products for all quarters. For 2023, pricing data reported by these firms accounted for approximately 73.4 percent of U.S. producers' U.S. shipments of LDW structural pipe, *** percent of U.S. shipments of imports from South Korea and *** percent of shipments of imports from Turkey. Although pricing data were reported for subject imports from Canada, no such data were reported covering 2023.⁶⁶² The available pricing data indicate that subject imports from Canada, South Korea, and Turkey undersold the domestic like product in 26 of 47 (or 55.3 percent of) quarterly comparisons,

⁶⁵⁸ *Original Leading Determinations*, USITC Pub. 4859 at 64.

⁶⁵⁹ *Original Leading Determinations*, USITC Pub. 4859 at 64-65.

⁶⁶⁰ *Original Leading Determinations*, USITC Pub. 4859 at 65-66. As noted previously, in its trailing determinations, the countries eligible for cumulation were the same as in the leading investigations (Canada, China, South Korea, and Turkey). Therefore, the Commission adopted and incorporated by reference its findings and analysis with respect to material injury by reason of cumulated subject imports of LDW structural pipe. *Original Trailing Determinations*, USITC Pub. 4883 at 22-23.

⁶⁶¹ CR/PR at SP 5.6. The pricing product definitions are as follows:

Product 5.— Structural pipe, 18-inch- 24-inch OD, 0.375-inch- 0.750-inch wall, ASTM A252, A1035, or similar, regardless of length

Product 6.— Structural pipe, >24-inch- 32-inch OD, 0.500-inch- 1.000-inch wall, ASTM A252, A1035, or similar, regardless of length.

⁶⁶² CR/PR at SP 5.6. No pricing data were reported for LDW structural pipe from China. *Id.*

corresponding to sales totaling *** short tons and accounting for *** percent of the volume of cumulated subject imports covered by the Commission's pricing data.⁶⁶³ The underselling margins ranged from *** percent to *** percent and averaged *** percent.⁶⁶⁴ Subject imports oversold the domestic like product in the remaining 21 quarterly comparisons, corresponding to sales of *** short tons, at margins ranging from *** to *** percent and averaging *** percent.⁶⁶⁵ Thus, even under the disciplining effect of the orders, subject imports undersold the domestic like product in more than *** of the quarterly comparisons, encompassing more than *** of reported sales of subject imports by volume during the POR.

The Commission also requested that purchasers provide bid data on projects issued since January 2021. Six purchasers indicated that, collectively, U.S. producers submitted 76 bids and suppliers of subject imports submitted 27 bids.⁶⁶⁶ Purchasers were asked to submit details of projects that received bids from both domestic producers and suppliers of subject merchandise. The Commission received information on three such projects, all involving competition between ***. Purchasers awarded all three of these projects to *** and each winning bidder had submitted the lowest bid.⁶⁶⁷

We have considered price trends. Sales prices for domestically produced LDW structural pipe irregularly increased from January 2019 through September 2024 by 47.2 percent for product five and 56.9 percent for product six, with peaks in the first and second quarters of 2022, respectively.⁶⁶⁸ The pricing data are generally insufficient to determine a trend for subject imports over the review period, although subject imports from South Korea generally tracked prices for the domestic like product with respect to product five.⁶⁶⁹

Based on the significant underselling in the original investigations resulting in lost sales and market share for the domestic industry, the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, the importance of price in purchasing decisions, and the underselling by subject imports observed in these reviews, we find that there would likely be significant underselling by subject imports, which would allow them to win bids and gain market share at the expense of the domestic industry, if the orders were revoked. Absent the discipline of the orders, the likely significant volume of low-priced cumulated subject imports would likely force the domestic industry to either reduce its prices or risk losing sales to subject imports, as occurred in the original investigations. Thus, we find

⁶⁶³ CR/PR at Table SP 5.8.

⁶⁶⁴ CR/PR at Table SP 5.8.

⁶⁶⁵ CR/PR at Table SP 5.8.

⁶⁶⁶ CR/PR at SP 5.16, Table SP 5.11.

⁶⁶⁷ CR/PR at SP 5.16.

⁶⁶⁸ CR/PR at Tables SP 5.6-7.

⁶⁶⁹ See CR/PR at Table SP 5.5.

that if the orders were revoked, the significant volume of low-priced cumulated subject imports would likely have significant price effects within a reasonably foreseeable time.

D. Likely Impact of Subject Imports

1. The Original Investigations

The Commission found that cumulated subject imports had a significant impact on the domestic LDW structural pipe industry. It found that the significant increase in low-priced cumulated subject imports in absolute terms and relative to consumption from 2015 to 2017 had captured market share from the domestic industry. Due to the surge in low-priced cumulated subject imports, the Commission found, the domestic industry had been unable to capitalize on the increase in apparent U.S. consumption during the POI. As a consequence, the domestic industry's production, shipments, capacity utilization, employment, revenues, and profits were lower than they would have otherwise been during the 2015 to 2017 period. As with LDW line pipe, the Commission found that the interim data provided additional support, in that lower subject import volume in interim 2018 compared to interim 2017 coincided with higher domestic industry revenue and profits, despite lower apparent U.S. consumption.⁶⁷⁰

In its non-attribution analysis, the Commission again noted that apparent U.S. consumption had increased from 2015 to 2017. It also observed that nonsubject imports remained the smallest source of LDW structural pipe in the U.S. market during the 2015-2017 period, though their market share had increased slightly. Further, it observed that the AUVs of U.S. shipments of nonsubject imports were generally higher than those of cumulated subject imports and the domestic like product. Accordingly, the Commission found that other factors could not explain the adverse effects it attributed to cumulated subject imports.⁶⁷¹

2. The Current Reviews

The domestic industry's performance improved over the POR. Its trade-related and financial indicators generally improved from 2018 to 2023, and domestic producers were able to increase their market share by *** percentage points.⁶⁷² From 2018 to 2019, after

⁶⁷⁰ *Original Leading Determinations*, USITC Pub. 4859 at 68.

⁶⁷¹ *Original Leading Determinations*, USITC Pub. 4859 at 68.

⁶⁷² CR/PR at Table C.2. The domestic industry's share of apparent U.S. consumption was 7.1 percentage points lower in interim 2024 than in interim 2023. Apparent U.S. consumption increased irregularly by *** percent from 2018 to 2023, increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020 and *** short tons in 2021, then increasing to *** short tons in 2022 and *** short tons in 2023; it was higher in interim 2024, at *** short tons, than in interim 2023, at *** short tons.

imposition of the orders, most of the domestic industry's performance indicators initially improved, but declined in 2020 and 2021 as the COVID-19 pandemic negatively affected the U.S. market. The industry then resumed its recovery from 2022 through interim 2024, although its financial performance softened and it ceded market share in interim 2024 compared to interim 2023.⁶⁷³

More specifically, the domestic industry's output indicators generally improved over the POR, although its end-of-period inventories were increasing at the end of the POR. From 2018 to 2023, the domestic industry's production irregularly increased by 19.5 percent,⁶⁷⁴ its U.S. shipments increased by 28.7 percent,⁶⁷⁵ and its production capacity increased by 1.4 percent.⁶⁷⁶ Its capacity utilization rate increased by 17.9 percentage points from 2018 to 2023.⁶⁷⁷ End-of-period inventories irregularly declined by 31.0 percent.⁶⁷⁸

The domestic industry's employment indicators generally followed a similar trend. The number of PRWs irregularly increased by 19.4 percent,⁶⁷⁹ hours worked irregularly increased by

⁶⁷³ See CR/PR at Table C.2.

⁶⁷⁴ The domestic industry's production increased from 204,981 short tons in 2018 to 215,595 short tons in 2019, then decreased to 192,547 short tons in 2020 and 138,715 short tons in 2021 before increasing to 204,800 short tons in 2022 and 244,978 short tons in 2023; it was higher in interim 2024, at 197,163 short tons, than in interim 2023, at 173,727 short tons. CR/PR at Table C.2.

⁶⁷⁵ The domestic industry's U.S. shipments irregularly increased by 28.7 percent from 2018 to 2023, increasing from 181,633 short tons in 2018 to 210,711 short tons in 2019, then decreasing to 202,083 short tons in 2020 and 155,387 short tons in 2021 before increasing to 206,266 short tons in 2022 and 233,702 short tons in 2023; shipments were higher in interim 2024, at 185,467 short tons, than in interim 2023, at 172,640. CR/PR at Table C.2.

⁶⁷⁶ The domestic industry's practical production capacity increased by 1.4 percent from 2018 to 2023, increasing from 556,409 short tons in 2018 to 557,722 short tons in 2019, then decreasing to 555,482 short tons in 2020, and 537,803 short tons in 2021, then increasing to 691,514 short tons in 2022, and decreasing to 563,939 in 2023; it was lower in interim 2024, at 413,657 short tons, than in interim 2023, at 431,229 short tons. CR/PR at Table C.2.

⁶⁷⁷ The domestic industry's practical capacity utilization rate increased from 36.8 percent in 2018 to 38.7 percent in 2019 then decreased to 34.7 percent in 2020 and 25.8 percent in 2021, then increased to 29.6 percent in 2022 and 43.4 percent in 2023; it was 40.3 percent in interim 2023 and 47.7 percent in interim 2024. CR/PR at Table C.2.

⁶⁷⁸ The domestic industry's end-of-period inventories increased from 64,639 short tons in 2018 to 66,872 short tons in 2019, then declined to 55,223 short tons in 2020, 35,194 short tons in 2021, and 34,257 short tons in 2022, and then increased to 44,605 short tons in 2023; they were higher in interim 2024, at 57,185 short tons, than in interim 2023, at 32,24 short tons. CR/PR at Table C.2.

⁶⁷⁹ The industry's number of PRWs increased from 278 in 2018 to 294 in 2019 then decreased to 293 in 2020 and 321 in 2021, then increased to 434 in 2022 and 332 in 2023; the number of PRWs was lower in interim 2024, at 404 than in interim 2023, at 344. CR/PR at Table C.2.

23.8 percent,⁶⁸⁰ and wages paid irregularly increased by 66.2 percent from 2018 to 2023.⁶⁸¹ Hourly wages increased by 34.3 percent overall,⁶⁸² productivity decreased by 3.4 percent overall,⁶⁸³ and unit labor costs increased by 39.1 percent over the period.⁶⁸⁴

Likewise, by most measures, the domestic industry's financial performance generally improved from 2018 to 2020, then declined and showed weakness in 2021, and rebounded from 2022 to 2023. Its financial performance was somewhat weaker in interim 2024 than in interim 2023. The domestic industry's revenues,⁶⁸⁵ gross profits,⁶⁸⁶ operating income,⁶⁸⁷ net income,⁶⁸⁸ and net income margin,⁶⁸⁹ were all higher in 2023 than in 2018 after the industry

⁶⁸⁰ The domestic industry's number of hours worked increased from 606,000 in 2018 to 697,000 in 2019, then decreased to 685,000 in 2020 and 575,000 in 2021, then increased to 894,000 in 2022 and decreased to 750,000 in 2023; they were greater in interim 2024, at 691,000, than in interim 2023, at 619,000. CR/PR at Table C.2.

⁶⁸¹ Wages paid were \$15.3 million in 2018, \$17.1 million in 2019, \$19.0 million in 2020, \$15.9 million in 2021, \$27.8 million in 2022, and \$25.5 million in 2023; they were \$20.5 million in interim 2023 and \$23.9 million in interim 2024. CR/PR at Table C.2.

⁶⁸² Hourly wages decreased from \$25.32 per hour in 2018 to \$24.57 per hour in 2019, increased to \$27.69 per hour in 2020, decreased to \$27.67 per hour in 2021, then increased to \$31.06 per hour in 2022, and \$34.00 per hour in 2023; they were \$33.15 per hour in interim 2023, and \$34.60 in interim 2024. CR/PR at Table C.2.

⁶⁸³ Productivity measured in short tons per 1,000 hours decreased from 338.3 in 2018, to 309.3 in 2019, 281.1 in 2020, 241.2 in 2021, and 229.1 in 2022, and then increased to 329.6 in 2023; it was 280.7 in interim 2023 and 285.3 in interim 2024. CR/PR at Table C.2.

⁶⁸⁴ Unit labor costs increased from \$75 per short ton in 2018 to \$79 per short ton in 2019, \$99 per short ton in 2020, \$115 per short ton in 2021, and \$136 per short ton in 2022 before decreasing to \$104 per short ton in 2023; they were higher in interim 2024, at \$121 per short ton, than in interim 2023, at \$118 per short ton. CR/PR at Table C.2.

⁶⁸⁵ The domestic industry's net sales revenues increased from \$*** in 2018 to \$*** in 2019, decreased to \$*** in 2020, and then increased to \$*** in 2021, \$*** in 2022, and \$*** in 2023; they were higher, at \$***, in interim 2024 than in interim 2023, at \$***. CR/PR at Table C.2.

⁶⁸⁶ The domestic industry's gross profits decreased from \$*** in 2018 to \$*** in 2019, increased to \$*** in 2020, declined to \$*** in 2021, and then increased to \$*** in 2022 and \$*** in 2023; they were lower in interim 2024, at \$***, than in interim 2023, at \$***. CR/PR at Table C.2.

⁶⁸⁷ The domestic industry reported operating income that initially decreased from \$*** in 2018 to \$*** in 2019, and \$*** in 2020, then reported a loss of \$*** in 2021, then income of \$*** in 2022, which increased to \$*** in 2023; operating income was lower in interim 2024, at \$***, than in interim 2023, at \$***. CR/PR at Table C.2.

⁶⁸⁸ The domestic industry reported net income that improved from \$*** in 2018 to \$*** in 2019, then decreased to \$*** in 2020, then reported losses of \$*** in 2021, and income of \$*** in 2022, which increased to \$*** in 2023; net income was lower in interim 2024, at \$***, than in interim 2023, at \$***. CR/PR at Table C.2.

⁶⁸⁹ The domestic industry reported a net income margin that worsened from 1.2 percent in 2018 to 1.1 percent in 2019, 1.1 percent in 2020, then incurring losses, reported a negative margin of 1.8 percent in 2021, then returned to a positive margin of 1.1 percent in 2022, and 11.3 percent in 2023; it was lower in interim 2024, at 5.0 percent, than in interim 2023, at 9.2 percent. CR/PR at Table C.2.

sustained operating and net losses in 2021. Similarly, its operating income margin was 10.0 percentage points higher in 2023 than 2018.⁶⁹⁰ The domestic industry's capital expenditures fluctuated during the POR, and its research and development ("R&D") spending decreased from 2018 to 2023.⁶⁹¹ Its return on assets followed the general trend of its financial results, improving from 2018 to 2020, then declining in 2021 and improving from 2022 to 2023.⁶⁹²

In assessing the vulnerability of the domestic industry, we observe that the domestic industry's performance generally improved throughout the POR, excepting 2020 and 2021, the years most impacted by the effects of the COVID-19 pandemic. The domestic industry's financial and trade-related indicators show overall improvement from 2018 to 2023, culminating in period highs in production, U.S. shipments, capacity utilization, gross profits, and profit margins. Comparing interim 2024 to interim 2023, the industry's trade-related indicators continued the upward trend, although the industry's financial performance was somewhat worse. Nevertheless, the domestic industry's operating margin was higher in interim 2024 (5.2 percent) than in any other period of POR but for 2023 and interim 2023 (11.3 percent and 9.3 percent, respectively), and also higher than at any time during the original period of investigation.⁶⁹³ In addition, demand, as measured by apparent U.S. consumption, was *** percent higher in 2023 than in 2018 and 17.5 percent higher in interim 2024 than in interim 2023. Based on the foregoing, we do not find that the domestic industry is currently in a vulnerable condition.⁶⁹⁴

⁶⁹⁰ The domestic industry reported an operating income margin that worsened from 1.3 percent in 2018 to 1.1 percent in 2019, 1.1 percent in 2020, and a negative margin of 4.0 percent in 2021. The operating income margin improved to a positive of 0.8 percent in 2022, and 11.3 percent in 2023; it was lower in interim 2024, at 5.2 percent, than in interim 2023, at 9.3 percent. CR/PR at Table C.2.

⁶⁹¹ The domestic industry's capital expenditures decreased from \$*** in 2018 to *** in 2019, and *** in 2020, then increased to \$*** in 2021 and \$*** in 2022, and decreased to \$*** in 2023; capital expenditures were \$*** in interim 2023 and \$*** in interim 2024. CR/PR at Table C.2. The domestic industry's R&D expenses initially decreased from \$*** in 2018 to \$*** in 2019 before increasing to \$*** in 2020 and subsequently decreasing to \$*** in 2021, \$*** in 2022, and \$*** in 2023; they were \$*** in interim 2023 and \$*** in interim 2024. CR/PR at Table SP 3.16.

⁶⁹² The domestic industry's return on assets increased from *** percent in 2018 to *** percent in 2019, and *** percent in 2020, decreased to *** percent in 2021, then increased to *** percent in 2022 and *** percent in 2023. CR/PR at Table SP 3.21.

⁶⁹³ Compare CR/PR at Table C.2 with *Original Leading Determinations*, USITC Pub. 4859 at Table ALT C-5.

⁶⁹⁴ In Commissioner Kearns' view, the industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders. The industry operated at low capacity utilization rates in 2023, at 43.4 percent, and interim 2024, at 47.7 percent. While the industry's operating income and operating income to net sale ratio improved to \$*** and 11.3 percent, respectively, in 2023 (both indicators were *** in the prior years of the POR), the financial indicators were lower in interim 2024 than in interim 2023. Specifically, the industry's operating income was *** percent lower at \$*** and (Continued...)

As discussed above, we have found that if the orders were revoked, the volume of cumulated subject imports would likely be significant within a reasonably foreseeable time. We have also found that the significant volume of cumulated subject imports would likely undersell the domestic like product, allowing them to win bids and gain market share, forcing the domestic industry to either cut prices or lose sales. The likely significant volume of cumulated subject imports, coupled with their significant price effects, would have an adverse impact on the domestic industry's production, shipments, profitability, and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Consequently, we conclude that if the orders were revoked, cumulated subject imports would be likely to have an adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Nonsubject imports had a declining presence in the U.S. market that irregularly decreased as a share of apparent U.S. consumption from *** percent in 2018 to *** percent in 2023, and was higher in interim 2024, at *** percent, than in interim 2023, at *** percent. Similarly, during the POI, nonsubject imports accounted for between *** and *** percent of apparent U.S. consumption.⁶⁹⁵ However, they did not prevent the significant increase in low-priced cumulated subject imports that captured market share from the domestic industry. On this record, there is no indication that the presence of nonsubject imports would prevent subject imports from again entering the U.S. market in significant volumes. Given that the domestic industry accounted for *** percent of apparent U.S. consumption in 2023, the moderate-to-high degree of substitutability between the domestic like product and subject imports, and the importance of price in purchasing decisions, the presence of nonsubject imports in the U.S. market would not likely prevent the significant volume of low-priced cumulated subject imports that is likely if the orders are revoked from taking market share from the domestic industry 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 effects of nonsubject imports would be distinct from the likely effects attributable to subject imports.

We have also considered the likely effects of demand trends on the domestic industry. Apparent U.S. consumption increased irregularly by *** percent from 2018 to 2023, increasing from *** short tons in 2018 to *** short tons in 2019, then decreasing to *** short tons in 2020 and *** short tons in 2021, then increasing to *** short tons in 2022 and *** short tons

its operating income to net sales ratio was 4.1 percentage points lower at 5.2 percent. Thus, similar to the Commission's vulnerability finding for the domestic LDW line pipe industry, Commissioner Kearns believes that the domestic LDW structural pipe has not yet been able to sustain a solid financial performance.

⁶⁹⁵ *Original Leading Determinations*, USITC Pub. 4859 at Table ALT C-5.

in 2023; it was higher in interim 2024, at *** short tons, than in interim 2023, at *** short tons.⁶⁹⁶ As discussed above, U.S. producers, importers, and purchasers provided mixed responses regarding anticipated demand.⁶⁹⁷ Even if demand were to decline, the significant volume of low-priced cumulated subject imports that is likely if the orders are revoked would exacerbate any negative effects caused by adverse demand trends by further reducing the industry's sales and placing additional downward pressure price pressure on domestic producers.

We therefore conclude that if the orders were revoked, cumulated subject imports from Canada, China, South Korea, and Turkey would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

VI. Conclusion

For the above reasons, we determine that revocation of the antidumping duty orders on LDW line pipe from Canada, China, Greece, India, South Korea, and Turkey, the countervailing duty orders on LDW line pipe from India and South Korea, the antidumping duty orders on LDW structural pipe from Canada, China, South Korea, and Turkey, and the countervailing duty orders on LDW structural pipe from China, South Korea, and Turkey would be likely to lead to continuation or recurrence of material injury to pertinent industries in the United States within a reasonably foreseeable time.

⁶⁹⁶ CR/PR at Table C.2.

⁶⁹⁷ See CR/PR at Table SP 2.8.

LDWP 1: Overview and general introduction

Background

On February 1, 2024, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the countervailing duty orders on large diameter welded pipe (“LDW pipe”) from China, India, South Korea, and Turkey and the antidumping duty orders on LDW pipe from Canada, China, Greece, India, South Korea, and Turkey would likely lead to the continuation or recurrence of material injury to a domestic industry.^{2 3} On May 6, 2024, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table LDWP 1.1 presents information relating to the background and schedule of these proceedings.⁵

¹ 19 U.S.C. 1675(c).

² 89 FR 6543, February 1, 2024. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 89 FR 6499, February 1, 2024.

⁴ 89 FR 46160, May 28, 2024. On May 6, 2024, the Commission found that the domestic interested party group responses and the respondent interested party group responses from Canada and Greece to its notice of institution were adequate and determined to conduct full reviews of the orders on imports from Canada and Greece. The Commission also found that the respondent interested party group responses from China, India, South Korea, and Turkey were inadequate but determined to conduct full reviews of the orders on imports from those countries in order to promote administrative efficiency in light of its determinations to conduct full reviews of the orders with respect to Canada and Greece.

⁵ The Commission’s notice of institution, notice to conduct full reviews and scheduling notice are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. A list of witnesses that appeared at the hearing is presented in appendix B of this report.

Table LDWP 1.1: Information relating to the background and schedule of these proceedings

Effective date	Action
March 6, 2019	Commerce's countervailing duty (CVD) and antidumping duty (AD) orders on LDW pipe from China and India (84 FR 8075—China CVD, 84 FR 8079—India AD, 84 FR 8083—China AD, and 84 FR 8085—India CVD)
May 2, 2019	Commerce's countervailing duty orders on LDW pipe from South Korea and Turkey (84 FR 18771 and 84 FR 18775) and antidumping duty orders on LDWP from Canada, Greece, South Korea, and Turkey (84 FR 18767, 18771, 18799, and 18801)
February 1, 2024	Commission's institution of five-year reviews (89 FR 6543)
February 1, 2024	Commerce's initiation of five-year reviews (89 FR 6499)
May 6, 2024	Commission's determinations to conduct full five-year reviews (89 FR 46160, May 28, 2024)
May 22, 2024	Commerce's final results of expedited five-year reviews of the countervailing duty order on LDW pipe from India (89 FR 44961)
May 22, 2024	Commerce's final results of expedited five-year reviews of the countervailing duty order on LDW pipe from South Korea (89 FR 44960)
June 6, 2024	Commerce's final results of expedited five-year reviews of the countervailing duty order on LDW pipe from China (89 FR 48381)
June 7, 2024	Commerce's final results of expedited five-year reviews of the antidumping duty orders on LDW pipe from Canada, China, Greece, India, South Korea, and Turkey (89 FR 48558)
June 7, 2024	Commerce's final results of expedited five-year reviews of the countervailing duty order on LDW pipe from Turkey (89 FR 48561)
August 8, 2024	Commission's scheduling of the reviews (89 FR 65932, August 13, 2024)
February 25, 2025	Commission's hearing
April 9, 2025	Commission's vote
April 28, 2025	Commission's determinations and views (administrative)

The original investigations

The original investigations resulted from petitions filed on January 17, 2018, with Commerce and the Commission by American Cast Iron Pipe Company ("ACIPCO"), Birmingham, Alabama; Berg Steel Pipe Corp. ("Berg"), Panama City, Florida; Berg Spiral Pipe Corp. ("Berg"), Mobile, Alabama; Dura-Bond Industries, Inc. ("Dura-Bond"), Export, Pennsylvania; Skyline Steel ("Skyline"), Newington, Virginia; Stupp Corporation ("Stupp"), Baton Rouge, Louisiana, and Trinity Products, Inc., ("Trinity"), St. Peters, Missouri.⁶ Welspun Tubular, LLC ("Welspun") joined the petitioners in the final phase of the investigations.

On November 14, 2018, Commerce determined that imports of LDW pipe from China and India were being sold at less than fair value ("LTFV") and subsidized by the Governments of

⁶ *Large Diameter Welded Pipe from China and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019 ("Original publication"), p. I-1.

China and India.⁷ The Commission determined on January 30, 2019, that the domestic industry was materially injured by reason of LTFV and subsidized imports of carbon and alloy (other than stainless) steel large diameter welded line pipe (“LDW line pipe”) from India. The Commission also determined that the domestic industry was threatened with material injury by reason of LTFV imports of carbon and alloy (other than stainless) LDW line pipe from China. The Commission terminated the countervailing duty investigation on carbon and alloy (other than stainless) steel LDW line pipe from China. The Commission also determined that the domestic industry was materially injured by reason of LTFV and subsidized imports of carbon and alloy (other than stainless) steel large diameter welded structural pipe (“LDW structural pipe”) from China. In addition, the Commission terminated the antidumping and countervailing duty investigations on carbon and alloy (other than stainless) steel LDW structural pipe from India. The Commission also determined that the domestic industry was not materially injured or threatened with material injury by reason of imports of stainless steel LDW pipe from China and India and subsidized by the governments of China and India.⁸

On April 15, 2019, the Commission determined that the domestic industry was materially injured by reason of imports of carbon and alloy (other than stainless) steel LDW line pipe from Canada, South Korea, and Turkey sold in the United States at LTFV and subsidized by the government of South Korea. The Commission also determined the domestic industry was threatened with material injury by reason of LTFV imports of carbon and alloy (other than stainless) steel LDW line pipe from Greece. The Commission terminated the countervailing duty investigation on carbon and alloy (other than stainless) steel LDW line pipe from Turkey. The Commission also determined that the domestic industry was materially injured by reason of LTFV and subsidized imports of carbon and alloy (other than stainless) steel LDW structural pipe from South Korea and Turkey. The Commission terminated the antidumping duty investigation on carbon and alloy (other than stainless) steel LDW structural pipe from Greece. The Commission determined that the domestic industry was not materially injured or threatened with material injury by reason of imports of stainless steel LDW pipe from Canada and South Korea and subsidized by the government of South Korea.^{9 10}

⁷ 83 FR 56811-16, November 14, 2018.

⁸ 84 FR 8079-83, March 6, 2019.

⁹ *Large Diameter Welded Pipe from Canada, Greece, Korea, and Turkey, Inv. Nos. 701-TA-595-596 and 731-TA-1401, 1403, 1405-1406 (Final)*, USITC Publication 4883, April 2019 (“Trailing publication”), pp. 1-3.

¹⁰ 84 FR 16533, April 19, 2019.

On March 6, 2019, Commerce issued its antidumping and countervailing duty orders on imports of LDW pipe from India with final weighted-average dumping margins at 50.55 percent and net subsidy rates at 16.85 percent.¹¹ ¹² On March 6, 2019, Commerce issued its antidumping duty order on imports of LDW pipe from China with final weighted-average dumping margins at 132.63 percent.¹³ On May 2, 2019, Commerce issued its antidumping and countervailing duty orders on imports of LDW pipe from South Korea with final weighted-average dumping margins ranging from 6.87 to 20.39 percent and net subsidy rates ranging from 4.76 to 18.28 percent.¹⁴ On May 2, 2019, Commerce issued its antidumping order on imports of LDW pipe from Greece with final weighted-average dumping margins at 10.26 percent.¹⁵ On May 2, 2019, Commerce issued its countervailing duty order on imports of LDW pipe from Turkey with final net subsidy rates at 3.72 percent.¹⁶ On May 2, 2019, Commerce issued its antidumping duty order on imports of LDW pipe from Canada with final weighted-average dumping margins at 12.32 percent.¹⁷

Previous and related investigations

The Commission has conducted several previous import relief investigations on LDW line pipe or LDW structural pipe. Table LDWP 1.2 presents information on investigations for LDW line pipe exceeding 16 inches in diameter.

¹¹ 84 FR 8079, March 6, 2019.

¹² Subject orders issued by Commerce are entitled "Large Diameter Welded Pipe" regardless of the specific scope.

¹³ 84 FR 8083, March 6, 2019.

¹⁴ 84 FR 18767, May 2, 2019.

¹⁵ 84 FR 18769, May 2, 2019.

¹⁶ 84 FR 18771, May 2, 2019. Borusan Mannesmann Boru Sanayi ve Ticaret A.S. ("Borusan") received a final net subsidy rate of 0.92 percent (de minimis). Borusan Birleşik Boru Fabrikaları Sanayi ve Ticaret A.S. (Borusan Boru) is the successor-in-interest to Borusan Mannesmann Boru Sanayi ve Ticaret A.S.

¹⁷ 84 FR 18775, May 2, 2019.

Table LDWP 1.2: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
1984	731-TA-183	Brazil	Negative	Petition withdrawn
2001	731-TA-919 ¹	Japan	Affirmative	Fourth review; full review currently proceeding
2001	731-TA-920 ¹	Mexico	Affirmative	USITC negative in first review; order revoked
2001	TA-201-73 ²	NA	Affirmative	Safeguard measure ended, December 4, 2003
2014	731-TA-1260 ³	South Korea	Affirmative	USITC affirmative in first review, order continued
2014	731-TA-1261 ³	Turkey	Affirmative	USITC affirmative in first review, order continued

¹ The Commission found that the domestic like product was welded carbon and alloy line pipe with an outside diameter greater than 16 inches but less than 64 inches.

² The Commission majority found that the like or directly competitive product was carbon and alloy (other than stainless steel) welded pipe other than OCTG. The like or directly competitive product did not include welded line pipe with an outside diameter that does not exceed 16 inches (the excluded welded line pipe 16 inches or less in diameter was covered by an existing section 201 relief request on line pipe, TA-201-70).

³ The Commission found a single domestic like product consisting of certain welded line pipe, coextensive with the scope of the investigations (circular welded carbon and alloy steel (other than stainless steel) pipe of a kind used for oil or gas pipelines, not more than 24" inch nominal outside diameter, regardless of wall thickness, length, surface finish, end finish, or stenciling).

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

Note: "Date" refers to the year in which the investigation was instituted by the Commission.

Summary data

Tables LDWP 1.3, 1.4, 1.5, and 1.6 along with figures LDWP 1.1. and 1.2 present a summary of data from the original investigations¹⁸ and the current full five-year reviews for LDW line pipe and LDW structural pipe.¹⁹ Apparent U.S. consumption for LDW line pipe, by quantity, was lower in 2023 with 1.4 million short tons than in 2017 with 2.0 million short tons. Apparent U.S. consumption for LDW line pipe, by value, was higher in 2023 at \$2.3 billion than in 2017 at \$2.0 billion. U.S. producers' LDW line pipe market share by quantity and by value were higher in 2023 than in 2017 by quantity and value. U.S. producers' LDW line pipe capacity was lower in 2023 than in 2017, while LDW line pipe production, and U.S. shipments were higher in 2023 than in 2017. Table LDWP 1.3 presents LDW line pipe comparative data from the original investigations and the current reviews.

¹⁸ In the original investigations concerning LDW pipe, the Commission defined two separate domestic like products upon which it issued affirmative determinations: "LDW line pipe" and "LDW structural pipe." Data and other product, industry, and market information in this report reflect this finding.

¹⁹ The Commission received a U.S. producer questionnaire from Evraz Inc. NA d/b/a Evraz Oregon Steel Tubular, ("Evraz Oregon") that has largely been excluded from the data compilations in this report. In the original investigations, Evraz Oregon, a related party, was excluded from the domestic LDW line pipe and structural pipe industries. Evraz Oregon ***. Despite the exclusion of Evraz Oregon from the domestic industry, Evraz Oregon will be referenced in this report ***.

Table LDWP 1.3 LDW line pipe: Comparative data from the original investigations and subsequent reviews (2017 and 2023)

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares in percent.

Item	Measure	2017	2023
Apparent consumption	Quantity	2,025,788	1,408,159
U.S. producers	Share of quantity	52.4	78.3
Canada	Share of quantity	8.0	0.0
China	Share of quantity	0.7	0.0
Greece	Share of quantity	0.7	—
India	Share of quantity	19.3	1.8
South Korea, subject	Share of quantity	***	***
Turkey, subject	Share of quantity	***	***
Subject sources	Share of quantity	***	***
South Korea, nonsubject	Share of quantity	***	***
Turkey, nonsubject	Share of quantity	***	***
All other sources	Share of quantity	7.6	8.3
Nonsubject sources	Share of quantity	***	***
All import sources	Share of quantity	47.6	21.7
Apparent consumption	Value	1,955,243	2,338,438
U.S. producers	Share of value	56.9	79.9
Canada	Share of value	8.8	0.0
China	Share of value	0.6	0.0
Greece	Share of value	0.6	—
India	Share of value	15.1	1.6
South Korea, subject	Share of value	***	***
Turkey,subject	Share of value	***	***
Subject sources	Share of value	***	***
South Korea, nonsubject	Share of value	***	***
Turkey, nonsubject	Share of value	***	***
All other sources	Share of value	7.5	8.9
Nonsubject sources	Share of value	***	***
All import sources	Share of value	43.1	20.1

Table continued

Table LDWP 1.3 LDW line pipe (Continued): Comparative data from the original investigations and subsequent reviews, (2017 and 2023)

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

Item	Measure	2017	2023
Canada	Quantity	161,169	200
Canada	Value	171,292	538
Canada	Unit value	\$1,063	\$2,693
China	Quantity	14,442	233
China	Value	11,940	359
China	Unit value	\$827	\$1,540
Greece	Quantity	13,811	—
Greece	Value	11,377	—
Greece	Unit value	\$824	—
India	Quantity	391,976	25,008
India	Value	295,220	37,124
India	Unit value	\$753	\$1,484
South Korea, subject	Quantity	***	***
South Korea, subject	Value	***	***
South Korea, subject	Unit value	***	***
Turkey, subject	Quantity	***	***
Turkey, subject	Value	***	***
Turkey, subject	Unit value	***	***
Subject sources	Quantity	***	***
Subject sources	Value	***	***
Subject sources	Unit value	***	***

Table continued

Table LDWP 1.3 LDW line pipe (Continued): Comparative data from the original investigations and subsequent reviews, (2017 and 2023)

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

Item	Measure	2017	2023
South Korea, nonsubject	Quantity	***	***
South Korea, nonsubject	Value	***	***
South Korea, nonsubject	Unit value	***	***
Turkey, nonsubject	Quantity	***	***
Turkey, nonsubject	Value	***	***
Turkey, nonsubject	Unit value	***	***
All other sources	Quantity	153,883	117,491
All other sources	Value	146,169	208,894
All other sources	Unit value	\$950	\$1,778
Nonsubject sources	Quantity	***	***
Nonsubject sources	Value	***	***
Nonsubject sources	Unit value	***	***
All import sources	Quantity	963,758	305,700
All import sources	Value	843,181	469,333
All import sources	Unit value	\$875	\$1,535

Table continued

Table LDWP 1.3 LDW line pipe (Continued): Comparative data from the original investigations and subsequent reviews, (2017 and 2023)

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares and ratios in percent

Item	Measure	2017	2023
Capacity	Quantity	3,102,518	2,370,741
Production	Quantity	1,039,228	1,086,892
Capacity utilization	Ratio	33.5	45.8
Producer U.S. shipments	Quantity	1,062,030	1,102,459
Producer U.S. shipments	Value	1,112,062	1,869,105
Producer U.S. shipments	Unit value	\$1,047	\$1,695
Producer inventories	Quantity	91,879	111,411
Producer inventory ratio to total shipments	Ratio	***	***
Production workers (number)	Noted in label	1,725	2,007
Hours worked (in 1,000 hours)	Noted in label	3,435	4,034
Wages paid (1,000 dollars)	Value	97,200	128,352
Hourly wages (dollars per hour)	Noted in label	\$28.30	\$31.82
Productivity (short tons per 1,000 hours)	Noted in label	302.5	269.4
Net sales	Quantity	***	***
Net sales	Value	***	***
Net sales	Unit value	***	\$1,717
Cost of goods sold	Value	***	***
Gross profit or (loss)	Value	***	***
SG&A expense	Value	***	***
Operating income or (loss)	Value	***	***
Unit COGS	Unit value	***	\$1,493
Unit operating income	Unit value	\$41	\$79
COGS/ Sales	Ratio	89.8	86.9
Operating income or (loss)/ Sales	Ratio	3.9	4.6

Source: Office of Investigations memorandum INV-QQ-137 (November 26, 2018), INV-RR-012 (March 21, 2019), official U.S. import statistics, adjusted using proprietary, Census-edited Customs records, and compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2017 are from the last complete year of the original investigations; and 2023 the last year of these first reviews. Both years of data presented exclude U.S. producer Evraz Oregon. In the original investigations, the Commission found that appropriate circumstances existed to exclude Evraz Oregon as a related party from both the LDW line pipe and LDW structural pipe domestic industries. As a practical matter, Evraz Oregon idled its HSAW mill in Portland, Oregon, in April 2016, and neither produced nor shipped either LDW line pipe or LDW structural pipe in 2017 or 2023.

Table LDWP 1.4 and figure LDWP 1.1 present U.S. producers' U.S. shipments and U.S. imports of LDW line pipe from the original investigations and the current full five-year reviews.

Table LDWP 1.4 LDW line pipe: U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

Quantity in short tons

Source	2015	2016	2017
U.S. producers	1,581,866	1,325,070	1,062,030
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	1,053,804	573,639	935,504
All sources	2,635,670	1,898,709	1,997,534

Table continued

Table LDWP 1.4 LDW line pipe (Continued): U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

Quantity in short tons

Source	2018	2019	2020
U.S. producers	1,356,052	1,744,225	1,093,067
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	1,044,065	817,319	219,784
All sources	2,400,117	2,561,544	1,312,851

Table continued

Table LDWP 1.4 LDW line pipe (Continued): U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

Quantity in short tons

Source	2021	2022	2023
U.S. producers	255,408	304,092	1,102,459
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	230,019	287,270	305,700
All sources	485,427	591,362	1,408,159

Source: Office of Investigations memorandum INV-QQ-137 (November 26, 2018), INV-RR-012 (March 21, 2019), official U.S. import statistics, adjusted using proprietary, Census-edited Customs records, and compiled from data submitted in response to Commission questionnaires.

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

Figure LDWP 1.1 LDW line pipe: U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

* * * * *

Source: Office of Investigations memorandum INV-QQ-137 (November 26, 2018), INV-RR-012 (March 21, 2019), official U.S. import statistics, adjusted using proprietary, Census-edited Customs records, and compiled from data submitted in response to Commission questionnaires.

Table LDWP 1.5 presents comparative data for LDW structural pipe from the original investigations and the current reviews. Apparent U.S. consumption for LDW structural pipe, by quantity, was lower in 2023 with *** short tons than in 2017 with 302,468 short tons. Apparent U.S. consumption for LDW structural pipe, by value, was higher in 2023 with \$*** than in 2017 with \$260 million. U.S. producers' LDW structural pipe market share by quantity and by value was higher in 2023 than in 2017 by quantity and value. Additionally, U.S. producers' LDW structural pipe capacity was lower in 2023 than in 2017, while U.S. producers' LDW structural pipe production and U.S. shipments were higher in 2023 than in 2017.

Table LDWP 1.5 LDW structural pipe: Comparative data from the original investigations and subsequent reviews (2017 and 2023)

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

Item	Measure	2017	2023
Apparent consumption	Quantity	302,468	***
U.S. producers	Share of quantity	67.7	***
Canada	Share of quantity	4.3	***
China	Share of quantity	6.8	***
South Korea, subject	Share of quantity	6.9	***
Turkey	Share of quantity	5.5	***
Subject sources	Share of quantity	23.6	***
Nonsubject sources	Share of quantity	8.7	***
All import sources	Share of quantity	32.3	***
Apparent consumption	Value	260,468	***
U.S. producers	Share of value	68.8	***
Canada	Share of value	3.5	***
China	Share of value	6.7	***
South Korea, subject	Share of value	6.1	***
Turkey	Share of value	5.9	***
Subject sources	Share of value	22.3	***
Nonsubject sources	Share of value	8.8	***
All import sources	Share of value	31.2	***

Table continued

Table LDWP 1.5 LDW structural pipe (Continued): Comparative data from the original investigations and subsequent reviews, (2017 and 2023)

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

Item	Measure	2017	2023
Canada	Quantity	12,980	1,946
Canada	Value	9,234	7,363
Canada	Unit value	\$711	\$3,785
China	Quantity	20,496	132
China	Value	17,507	168
China	Unit value	\$854	\$1,275
South Korea	Quantity	20,993	12,492
South Korea	Value	15,846	16,898
South Korea	Unit value	\$755	\$1,353
Turkey	Quantity	16,770	***
Turkey	Value	15,447	***
Turkey	Unit value	\$921	***
Subject sources	Quantity	71,403	***
Subject sources	Value	58,172	***
Subject sources	Unit value	\$815	***
Nonsubject sources	Quantity	26,433	14,220
Nonsubject sources	Value	23,041	17,234
Nonsubject sources	Unit value	\$872	\$1,212
All import sources	Quantity	97,836	***
All import sources	Value	81,213	***
All import sources	Unit value	\$830	***

Table continued

Table LDWP 1.5 LDW structural pipe (Continued): Comparative data from the original investigations and subsequent reviews, (2017 and 2023)

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

Item	Measure	2017	2023
Capacity	Quantity	767,544	563,969
Production	Quantity	211,911	244,978
Capacity utilization	Ratio	27.6	43.4
Producer U.S. shipments	Quantity	204,632	233,702
Producer U.S. shipments	Value	179,255	370,963
Producer U.S. shipments	Unit value	\$876	\$1,587
Producer inventories	Quantity	38,493	44,605
Producer inventory ratio to total shipments	Ratio	***	***
Production workers (number)	Noted in label	447	332
Hours worked (in 1,000 hours)	Noted in label	930	750
Wages paid (1,000 dollars)	Value	20,775	25,498
Hourly wages (dollars per hour)	Noted in label	\$22	\$34
Productivity (short tons per 1,000 hours)	Noted in label	227.9	326.6
Net sales	Quantity	***	***
Net sales	Value	***	***
Net sales	Unit value	***	\$1,587
Cost of goods sold	Value	***	***
Gross profit or (loss)	Value	***	***
SG&A expense	Value	***	***
Operating income or (loss)	Value	***	***
Unit COGS	Unit value	***	\$1,346
Unit operating income	Unit value	***	\$180
COGS/ Sales	Ratio	***	84.8
Operating income or (loss)/ Sales	Ratio	***	11.3

Source: Office of Investigations memorandum INV-QQ-137 (November 26, 2018), INV-RR-012 (March 21, 2019), official U.S. import statistics, adjusted using proprietary, Census-edited Customs records, and compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2017 are from the last year of the original investigations; and 2023 the last year of these first reviews. Both years of data presented exclude U.S. producer Evraz Oregon. In the original investigations, the Commission found that appropriate circumstances existed to exclude Evraz Oregon as a related party from both the LDW line pipe and LDW structural pipe domestic industries. As a practical matter, Evraz Oregon idled its HSAW mill in Portland, Oregon, in April 2016, and neither produced nor shipped either LDW line pipe or LDW structural pipe in 2017 or 2023.

Table LDWP 1.6 and figure LDWP 1.2 present U.S. producers' U.S. shipments and U.S. imports of LDW structural pipe from the original investigations and the current full five-year reviews.

Table LDWP 1.6 LDW structural pipe: U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

Quantity in short tons

Source	2015	2016	2017
U.S. producers	201,655	197,998	213,283
Subject sources	42,893	45,982	71,728
Nonsubject sources	18,250	28,166	26,581
All import sources	61,143	74,148	98,309
All sources	262,798	272,146	311,592

Table continued

Table LDWP 1.6 LDW structural pipe (Continued): U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

Quantity in short tons

Source	2018	2019	2020
U.S. producers	181,633	210,711	202,083
Subject sources	***	***	***
Nonsubject sources	34,195	29,721	13,923
All import sources	***	***	***
All sources	***	***	***

Table continued

Table LDWP 1.6 LDW structural pipe (Continued): U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

Quantity in short tons

Source	2021	2022	2023
U.S. producers	155,387	206,266	233,702
Subject sources	***	***	***
Nonsubject sources	20,323	15,828	14,220
All import sources	***	***	***
All sources	***	***	***

Source: Office of Investigations memorandum INV-QQ-137 (November 26, 2018), INV-RR-012 (March 21, 2019), official U.S. import statistics, adjusted using proprietary, Census-edited Customs records, and compiled from data submitted in response to Commission questionnaires.

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

Figure LDWP 1.2 LDW structural pipe: U.S. producers' U.S. shipments and U.S. imports, 2015 to 2023

* * * * *

Source: Office of Investigations memorandum INV-QQ-137 (November 26, 2018), INV-RR-012 (March 21, 2019), official U.S. import statistics, adjusted using proprietary, Census-edited Customs records, and compiled from data submitted in response to Commission questionnaires.

Statutory criteria

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

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

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

the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

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

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

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

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

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

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

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

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

(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.

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

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

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

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

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

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

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

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

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

Organization of report

Information obtained during the course of the proceeding that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for LDW line and structural pipe as collected in the original investigations and the current full five-year reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of 11 U.S. producers²⁰ of LDW pipe that are believed to have accounted for the vast majority of

²⁰ Evraz Oregon completed a U.S. producer questionnaire, but with the exception of some limited reporting of its operations, its questionnaire has largely been excluded from this report.

(continued...)

domestic production of LDW line and LDW structural pipe in 2023. U.S. import data and related information are based on Commerce’s official import statistics and the questionnaire responses of 15 U.S. importers of LDW pipe. Foreign industry data and related information are based on the questionnaire responses of three LDW line pipe producers and three LDW structural pipe producers. Two producers in Canada (Evraz NA and Pipe and Piling Supplies, LTD.) accounted for all or nearly all of total production of LDW line and structural pipe.²¹ Additionally, one producer, Corinth Pipeworks Pipe Industry S.A. (“Corinth”) in Greece accounted for all or nearly all of total production of LDW line pipe during 2023. One producer in South Korea reported both LDW line and LDW structural pipe production during 2023.²² The Commission did not receive foreign producer questionnaires from any company in China or India. In addition, one nonsubject producer in Turkey reported that it had accounted for *** percent of total production of LDW line pipe in Turkey during 2023,²³ and *** percent of LDW structural pipe production in Turkey during 2023. Responses by U.S. producers, importers, purchasers, and foreign producers of LDW pipe to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

(...continued)

In addition, Staff received a late revision from ***, in the form of a *** The revision from *** in the form of a ***. Because of the timing of the revision, Staff ***.

²¹ Staff included information from a ***.

²² EEW Korea Co., Ltd. (“EEW”) provided estimates of its production that appear to be inaccurate. EEW indicated that it had accounted for *** LDW line pipe production in South Korea during 2023, and EEW additionally reported that it had accounted for *** percent of LDW structural pipe production in South Korea during 2023.

²³ Turkish producer Borusan Mannesman Boru Sanayi ve Ticaret A.S. (“Borusan”) foreign producer questionnaire responses (both LDW line pipe and LDW structural pipe) are considered nonsubject due to Borusan’s exclusions from the AD and CVD orders.

Commerce's reviews and related actions²⁴

Court decision²⁵

On May 22, 2020, the United States Court of International Trade (CIT) sustained Commerce's remand redetermination pertaining to the LTFV investigation of LDW pipe from Turkey. Commerce notified the public that the CIT's final judgment in the litigation was not in harmony with Commerce's amended final determination and order in the LTFV investigation of LDW pipe from Turkey. Pursuant to the CIT's final judgment, Commerce amended the estimated weighted-average dumping margins for Borusan and all other producers and exporters of subject merchandise, and Borusan was excluded from the order.

Administrative reviews²⁶

Canada

Commerce has completed four antidumping duty administrative reviews with regard to subject imports of LDW pipe from Canada. The results of the administrative reviews are shown in table LDWP 1.7.

Table LDWP 1.7: Administrative reviews of the antidumping duty order for Canada

Date results published	Period of review	Producer or exporter	Margin (percent)
March 11, 2022, 87 FR 13964	August 27, 2018-April 30, 2020	Evraz Inc NA	7.90
December 29, 2022, 87 FR 80159	May 1, 2020-April 30, 2021	Evraz Inc NA	26.15
January 18, 2024, 89 FR 3380	May 1, 2021-April 30, 2022	Evraz Inc NA	0.00
October 31, 2024, 89 FR 86787	May 1, 2022-April 30, 2023	Pipe and Piling Supplies, Ltd., Ontario LTD, and Spiralco Inc.	50.89

Source: Cited Federal Register notices.

²⁴ Commerce has not issued any scope rulings, duty absorption findings, or anti-circumvention findings since the imposition of the orders.

²⁵ 85 FR 35262, June 9, 2020. As a result of the amended final determination, in which Commerce calculated an estimated weighted-average dumping margin for Borusan that is de minimis, Commerce excluded merchandise produced and exported by Borusan from the antidumping duty order.

²⁶ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

Greece

Commerce has completed two antidumping duty administrative reviews with regard to subject imports of LDW pipe from Greece. The results of the administrative reviews are shown in table LDWP 1.8.

Table LDWP 1.8: Administrative reviews of the antidumping duty order for Greece

Date results published	Period of review	Producer or exporter	Margin (percent)
February 8, 2022, 87 FR 7120	April 19, 2019-April 30, 2020	Corinth Pipeworks Industry SA	41.04
December 22, 2023, 88 FR 88573	May 1, 2021-April 30, 2022	Corinth Pipeworks Industry SA	0.00

Source: Cited Federal Register notices.

South Korea

Commerce has completed four antidumping duty administrative reviews with regard to subject imports of LDW pipe from South Korea. The results of the administrative reviews are shown in table LDWP 1.9.

Table LDWP 1.9: Administrative reviews of the antidumping duty order for South Korea

Date results published	Period of review	Producer or exporter	Margin (percent)
December 3, 2021, 86 FR 68638	August 27, 2018-April 30, 2020	Hyundai RB Co. LTD; Hyundai Steel Comp. Non examined companies	0.00 0.00 0.00
November 26, 2022, 87 FR 68675	May 1, 2020-April 30, 2021	Hyundai RB Co. LTD; Hyundai Steel Comp; Non examined companies	2.67 0.00 2.67
October 18, 2023, 89 FR 3380	May 1, 2021-April 30, 2022	HiSteel Co. LTD. Hyundai Steel Comp. Non-examined companies	6.17 0.00 6.17
December 23, 2024, 89 FR 100980	May 1, 2022-April 30, 2023	SeAh Steel Corporation Hyundai Steel Comp. Review specific rate for non-examined companies	0.00 0.00 0.00

Source: Cited Federal Register notices.

Turkey

Commerce has completed two antidumping duty administrative reviews with regard to subject imports of LDW pipe from Turkey. The results of the administrative reviews are shown in table LDWP 1.10.

Table LDWP 1.10: Administrative reviews of the antidumping duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
September 7, 2023, 88 FR 61504	April 30, 2021-April 30, 2022	HDM Celik Boru Sanayi Ve Ticaret A.S Companies Not Selected for Individual Examination	0.00 0.00
August 20, 2024, 89 FR 67416	May 1, 2022-April 30, 2023	HDM Celik Boru Sanyai Ve Ticaret A.S. Cimtas Boru Imalatlari ve Ticaret, Ltd Emek Boru Makine Sanayi ve Ticaret A.S	0.00 0.00 0.00

Source: Cited Federal Register notices.

South Korea

Commerce has completed four countervailing duty administrative reviews with regard to subject imports of LDW pipe from South Korea. The results of the administrative reviews are shown in table LDWP 1.11.

Table LDWP 1.11: Administrative reviews of the antidumping duty order for South Korea

Date results published	Period of review	Producer or exporter	Subsidy rate (by percent)
February 2, 2022, 87 FR 5780	June 29, 2018-December 31, 2019	Hyundai RB Co. LTD; SeAh Steel Corp. Non examined companies under review	0.51 0.24 (de minimis) 0.51
November 3, 2022, 87 FR 66268	January 1, 2020-December 31, 2021	Hyundai RB Co. LTD; SeAh Steel Corp Chang Won Bending Co., Ltd Dong Yang Steel Pipe Co., Ltd EEW Korea Co., Ltd HiSteel Co., Ltd	1.66 0.31 (de minimis) 1.66 1.66 1.66 1.66
December 23, 2023, 88 FR 85236	January 1, 2021-December 31, 2021	HiSteel Co. LTD. Hyundai RB Co. LTD; SeAh Steel Corp	1.54 1.54 0.19 (de minimis)
November 7, 2024, 89 FR 88234	January 1, 2022-December 31, 2022	Hyundai RB Co. LTD; SeAh Steel Corp Chang Won Bending Co., Ltd Dong Yang Steel Pipe Co., Ltd EEW Korea Co., Ltd HiSteel Co., Ltd. Husteel Co. Ltd. Kumsoo Connecting Co. Ltd.	0.71 0.54 0.56 0.56 0.56 0.56 0.56 0.56

Source: Cited Federal Register notices.

Turkey

Commerce has completed one countervailing duty administrative review with regard to subject imports of LDW pipe from Turkey. The results of the administrative review are shown in table LDWP 1.12.

Table LDWP 1.12: Administrative review of the countervailing duty order for Turkey

Date results published	Period of review	Producer or exporter	Subsidy rate
October 18, 2024, 89 FR 83837	January 1, 2022- December 31, 2022	Çimtaş Boru İmalatari Ticaret Ltd	2.18
		HDM Çelik Boru Sanayi Ve Ticaret A.S.	6.31

Source: Cited Federal Register notices.

Changed circumstances reviews

Commerce has conducted five changed circumstances reviews since the completion of the original investigations. These changed circumstances reviews were completed specifically for Greece,²⁷ India,²⁸ and South Korea²⁹ in 2020.

In late 2019, ten members of the domestic industry (including the petitioners) requested exclusions and a partial revocation to certain LDW line pipe products with specific combinations of grades, diameters and wall thicknesses for LDW pipe from India. Specifically, the domestic industry did not produce the particular LDW line pipe products (this specific LDW line pipe product having been produced in India) subject to this partial revocation request, and they indicated that the investment needed to do so far exceeded the potential benefit of such investment. In addition, the domestic producers provided an explanation indicating that the commercial reality has changed since the antidumping duty orders were put into place.

Commerce found that it was appropriate to revoke the orders, in part, with respect to certain large diameter welded pipe products with specific combinations of grades, diameters and wall thicknesses, as reflected in the “scope of the orders.”³⁰ These certain large diameter welded pipe products included:

²⁷ 85 FR 37424, June 22, 2020. Greek LDW line pipe producer Corinth commented on these changed circumstances review regarding the domestic industry’s requests for exclusions and partial revocations for LDW line pipe from India.

²⁸ 85 FR 26930, May 6, 2020.

²⁹ 85 FR 51697, August 21, 2020. South Korean LDW line pipe producer SeAH Steel commented on these changed circumstances review regarding the domestic industry’s request for exclusions and partial revocations for LDW line pipe from India.

³⁰ 85 FR 37424, June 22, 2020.

- Grade X60, X65, or X70, 18 inches OD, 0.688 inches or greater wall thickness
- Grade X60, X65, or X70, 20 inches OD, 0.688 inches or greater wall thickness
- Grade X60, X65, or X70, 22 inches OD, 0.750 inches or greater wall thickness
- Grade X60, X65, or X70, 24 inches OD, 0.750 inches or greater wall thickness

Additionally, two changed circumstances reviews were completed specifically for South Korea and Turkey in 2024.

In the final results of its changed circumstances reviews for South Korea, Commerce found that Hyundai Steel Pipe Co., Ltd., (“Hyundai”) is the successor-in-interest to Hyundai Steel Company, and that Hyundai is entitled to its predecessor’s exclusions from the antidumping duty orders on circular welded non-alloy steel pipe, certain oil country tubular goods (OCTG), welded line pipe, and LDW pipe from South Korea.³¹

In the final results of its changed circumstances reviews for Turkey, Commerce found that Borusan Birleşik Boru Fabrikalari Sanayi ve Ticaret A.S. (Borusan) is the successor-in-interest to Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (Borusan) that Borusan is entitled to its predecessor's exclusions from the OCTG antidumping duty order and LDW pipe antidumping duty order for entries of subject merchandise produced and exported by Borusan.³²

Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to all subject countries.³³ Tables LDWP 1.13 (China), 1.14 (India), 1.15 (South Korea), and 1.16 (Turkey) present the subsidy rates calculated by Commerce in its original investigations and first reviews for China, India, South Korea, and Turkey.

³¹ 89 FR 89962, November 14, 2024.

³² 89 FR 96211, December 4, 2024.

³³ 84 FR 8075—China CVD, 84 FR 8079—India AD, 84 FR 8083—China AD, and 84 FR 8085—India CVD, March 6, 2019; 84 FR 18771—South Korea CVD, 84 FR 18775—Turkey CVD, 84 FR 18767—Canada AD, 84 FR 18771—Greece AD, 84 FR 18799—South Korea AD, and 84 FR 18801—Turkey AD, May 2, 2019.

Table LDWP 1.13: Commerce's original and first five-year subsidy rates for producers/exporters in China

Producer/exporter	Original subsidy rate (percent)	First five-year review subsidy rate (percent)
Hefei Zijin Steel Tube Manufacturing Co	198.49	198.49
Hefei Ziking Steel Pipe	198.49	198.49
Panyu Chu Kong Steel Pipe Co. Ltd	198.49	198.49
All others	198.49	198.49

Source: 84 FR 8075, March 6, 2019, 89 FR 48381, June 6, 2024.

Table LDWP 1.14: Commerce's original and first five-year subsidy rates for producers/exporters in India

Producer/exporter	Original subsidy rate (percent)	First five-year review subsidy rate (percent)
Bhushan Steel	541.15	541.15
Welspun Trading Limited	541.15	541.15
All others	541.15	541.15

Source: 84 FR 8085, March 6, 2019, 89 FR 44961, May 22, 2024

Table LDWP 1.15: Commerce's original and first five-year subsidy rates for producers/exporters in South Korea

Producer/exporter	Original subsidy rate (percent)	First five-year review subsidy rate (percent)
Husteel Co., LTD.	0.01 (de minimis)	0.01 (de minimis)
Hyundai Steel	0.44 (de minimis)	0.44 (de minimis)
SeAh Steel	27.42	27.42
All others	9.29	9.29

Source: 84 FR 18773, May 2, 2019, 89 FR 44960, May 22, 2024.

Table LDWP 1.16: Commerce's original and first five-year subsidy rates for producers/exporters in Turkey

Producer/exporter	Original subsidy rate (percent)	First five-year review subsidy rate (percent)
HDM Celik Boru Sanayi ve Ticaret A.S	3.72	3.72
Borusan Mannesmann Boru Sanayi ve Ticaret A.S.	0.92 (de minimis)	N/A
All others	3.72	3.72

Source: 84 FR 18771, May 2, 2019, 89 FR 48561, June 7, 2024.

Note: Based on the CIT court decision in 2020, Borusan was excluded from the AD order.

Tables LDWP 1.17 (Canada), 1.18 (China), 1.19 (Greece), 1.20 (India), 1.21 (South Korea), and 1.22 (Turkey) present the dumping margins calculated by Commerce in its original investigations and first reviews for Canada, China, Greece, India, South Korea, and Turkey.

Table LDWP 1.17: Commerce's original and first five-year dumping margins for producers/exporters in Canada

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Evraz Inc. NA	12.32	12.32
All others	12.32	12.32

Source: 84 FR 8083, May 2, 2019, 89 FR 48558, June 7, 2024.

Note: Commerce determined that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 12.32 percent.

Table LDWP 1.18: Commerce's original and first five-year dumping margins for producers/exporters in China

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
China-wide entity	132.63	132.63

Source: 84 FR 8083, March 6, 2019 and 89 FR 48558, June 7, 2024.

Note: Commerce determined that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 132.63 percent.

Table LDWP 1.19: Commerce's original and first five-year dumping margins for producers/exporters in Greece

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Corinth Pipeworks Pipe Industry SA	10.26	10.26
All others	10.26	10.26

Source: 84 FR 18769, May 2, 2019, 89 FR 48558, June 7, 2024.

Note: Commerce determined that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 10.26 percent.

Table LDWP 1.20: Commerce's original and first five-year dumping margins for producers/exporters in India

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Bhushan Steel	50.55	50.55
Welspun Trading Limited	50.55	50.55
All-others	50.55	50.55

Source: 84 FR 8079, March 6, 2019 and 89 FR 48558, June 7, 2024.

Note: Commerce determined that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 50.55 percent.

Table LDWP 1.21: Commerce's original and first five-year dumping margins for producers/exporters in South Korea

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Hyundai RB Co. Ltd.	14.97	20.39
SeAH Steel Corporation	6.87	20.39
Samkang M&T Co. LTD.	20.39	20.39
All others	9.19	20.39

Source: 84 FR 18767, May 2, 2019, 89 FR 48558, June 7, 2024.

Note: Commerce determined that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 20.39 percent.

Table LDWP 1.22: Commerce's original and first five-year dumping margins for producers/exporters in Turkey

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Borusan Mannesmann Boru Sanayi ve Ticaret A.S.	5.11	N/A
HDM Celik Boru Sanayi ve Ticaret A.S.	2.57	2.57
All others	4.47	2.57

Source: 84 FR 18799, May 2, 2019, 89 FR 48558, June 7, 2024.

Note: Commerce determined that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 2.57 percent.

The subject merchandise

Commerce's scope

Commerce modified several of the scope definitions after the conduct of changed circumstances reviews. Commerce defines the current scopes of the various orders as follows:

Canada (AD) and China (AD). *The merchandise covered by this order is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.*

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.³⁴

³⁴ 84 Fed. Reg. 18775 (May 2, 2019); 84 Fed. Reg. 8083 (Mar. 6, 2019). Email correspondence with Dept. of Commerce regarding LDWP scope language, February 24, 2025; and Issues and Decisions Memorandum; *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the* (continued...)

China (CVD). *The merchandise covered by this order is welded carbon and alloy steel structural pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded structural pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded structural pipe may be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.*

Large diameter welded structural pipe may be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded structural pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All structural pipe meeting the physical description set forth above, including any dual- or multiple-certified/stenciled pipe with an ASTM (or comparable) welded structural pipe certification/stencil, is covered by the scope of this order.

Subject merchandise also includes large diameter welded structural pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded structural pipe.

Excluded from the scope of this order is line pipe which is suitable for transporting oil, gas, slurry, steam, or other fluids, liquids, or gases, and is normally produced to American Petroleum Institute (API) specification 5L or equivalent foreign specifications grades and/or standards or to proprietary specifications, grades and/or standards.³⁵

(...continued)

*Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries, March 21, 2025. Additionally, Commerce indicated that it will be issuing an additional memorandum specific to the correction of the scopes for the Countervailing duty orders for China, India, South Korea, and Turkey. Staff telephone interview with ***, Dept. of Commerce, March 21, 2025.*

³⁵ 84 Fed. Reg. 8075 (Mar. 6, 2019); Email correspondence with Dept. of Commerce regarding LDWP scope language, February 24, 2025; and Issues and Decisions Memorandum; *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries, March 21, 2025.*

Additionally, Commerce indicated that it will be issuing an additional memorandum specific to the

(continued...)

Turkey (AD). *The merchandise covered by this order is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.*

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope are any products covered by the existing antidumping duty order on welded line pipe from the Republic of Turkey. See Welded Line Pipe from the Republic of Korea and the Republic of Turkey: Antidumping Duty Orders, 80 FR 75056 (December 1, 2015).³⁶

(...continued)

correction of the scopes for the Countervailing duty orders for China, India, South Korea, and Turkey. Staff telephone interview with ***, Dept. of Commerce, March 21, 2025.

³⁶ 84 Fed. Reg. 18799 (May 2, 2019); Email correspondence with Dept. of Commerce regarding LDWP scope language, February 24, 2025; and Issues and Decisions Memorandum; *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the*

(continued...)

Turkey (CVD). *The merchandise covered by this order is welded carbon and alloy steel structural pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded structural pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded structural pipe may be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.*

Large diameter welded structural pipe may be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded structural pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All structural pipe meeting the physical description set forth above, including any dual- or multiple-certified/stenciled pipe with an ASTM (or comparable) welded structural pipe certification/stencil, is covered by the scope of this order.

Subject merchandise also includes large diameter welded structural pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded structural pipe.

Excluded from the scope of this order is line pipe which is suitable for transporting oil, gas, slurry, steam, or other fluids, liquids, or gases, and is normally produced to American Petroleum Institute (API) specification 5L or equivalent foreign specifications grades and/or standards or to proprietary specifications, grades and/or standards. Also excluded from the scope are any products covered by the existing countervailing duty order on welded line pipe from the Republic of Turkey. See Welded Line

(...continued)

*Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries, March 21, 2025. Additionally, Commerce indicated that it will be issuing an additional memorandum specific to the correction of the scopes for the Countervailing duty orders for China, India, South Korea, and Turkey. Staff telephone interview with ***, Dept. of Commerce, March 21, 2025.*

Pipe from the Republic of Turkey: Countervailing Duty Order, 80 FR 75054 (December 1, 2015).³⁷

covered by these orders is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope are any products covered by the existing antidumping duty order on welded line pipe from the Republic of Korea and Turkey.

³⁷ 84 Fed. Reg. 18771 (May 2, 2019); Email correspondence with Dept. of Commerce regarding LDWP scope language, February 24, 2025; and Issues and Decisions Memorandum; *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries*, March 21, 2025. Additionally, Commerce indicated that it will be issuing an additional memorandum specific to the correction of the scopes for the Countervailing duty orders for China, India, South Korea, and Turkey. Staff telephone interview with ***, Dept. of Commerce, March 21, 2025.

See Welded Line Pipe from the Republic of Korea and the Republic of Turkey: Antidumping Duty Orders, 80 FR 75056 (December 1, 2015).

The large diameter welded pipe that is subject to this proceeding is currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) under statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6090, 7305.39.1000 and 7305.39.5000. While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this order is dispositive.

Commerce's scope with respect to the orders on imports from South Korea are defined to exclude LDWP in certain combinations of grades, outside diameter, and wall thicknesses, resulting from changed circumstances reviews.³⁸

South Korea (AD). *The merchandise covered by the Order is carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.*

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

³⁸ See Issues and Decision Memorandum for the Final Results of the Administrative Review of the Antidumping Duty Order on Large Diameter Welded Pipe from the Republic of Korea; 2022-2023 (Dec. 6, 2024); Large Diameter Welded Pipe from the Republic of Korea: Final Results of Antidumping and Countervailing Duty Changed Circumstances Reviews, 85 Fed. Reg. 51679 (Aug. 21, 2020).

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope are any products covered by the existing antidumping duty orders on welded line pipe from the Republic of Korea and Turkey. See Welded Line Pipe from the Republic of Korea and the Republic of Turkey: AD Orders, 80 FR 75056 (December 1, 2015).

Also excluded is large diameter welded pipe in the following combinations of grades, outside diameters, and wall thicknesses:

- *Grade X60, X65, or X70, 18 inches outside diameter, 0.688 inches or greater wall thickness;*
- *Grade X60, X65, or X70, 20 inches outside diameter, 0.688 inches or greater wall thickness;*
- *Grade X60, X65, X70, or X80, 22 inches outside diameter, 0.750 inches or greater wall thickness; and*
- *Grade X60, X65, or X70, 24 inches outside diameter, 0.750 inches or greater wall thickness.³⁹*

South Korea (CVD). *The merchandise covered by this Order is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for*

³⁹ *Issues and Decision Memorandum for the Final Results of the Administrative Review of the Antidumping Duty Order on Large Diameter Welded Pipe from the Republic of Korea; 2022-2023 (Dec. 6, 2024); Email correspondence with Dept. of Commerce regarding LDWP scope language, February 24, 2025; and Issues and Decisions Memorandum; Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries, March 21, 2025. Additionally, Commerce indicated that it will be issuing an additional memorandum specific to the correction of the scopes for the Countervailing duty orders for China, India, South Korea, and Turkey. Staff telephone interview with ***, Dept. of Commerce, March 21, 2025.*

structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of the Order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the Order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope is large diameter welded pipe in the following combinations of grades, outside diameters, and wall thicknesses:⁴⁰

- Grade X60, X65, or X70, 18 inches outside diameter, 0.688 inches or greater wall thickness;*
- Grade X60, X65, or X70, 20 inches outside diameter, 0.688 inches or greater wall thickness;*
- Grade X60, X65, X70, or X80, 22 inches outside diameter, 0.750 inches or greater wall thickness; and*
- Grade X60, X65, or X70, 24 inches outside diameter, 0.750 inches or greater wall thickness.⁴¹*

⁴⁰ See *Large Diameter Welded Pipe from the Republic of Korea: Final Results of Antidumping and Countervailing Duty Changed Circumstances Reviews*, 85 Fed. Reg. 51679 (Aug. 21, 2020).

⁴¹ *Issues and Decision Memorandum for the Final Results of the Expedited Sunset Review of the Countervailing Duty Order on Large Diameter Welded Pipe from the Republic of Korea* (May 15, 2024).

Finally, Commerce's scope with respect to the orders on imports from Greece and India are defined to exclude LDW structural pipe, as well as LDW line pipe in certain combinations of grades, outside diameter, and wall thicknesses, also resulting from changed circumstances reviews.⁴²

Greece (AD) and India (AD and CVD). The merchandise covered by these orders is welded carbon and alloy steel line pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded line pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases.

Large diameter welded line pipe is used to transport oil, gas, or natural gas liquids and is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded line pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All line pipe meeting the physical description set forth above, including any dual- or multiple-certified/stenciled pipe with an API (or comparable) welded line pipe certification/stencil, is covered by the scope of the Orders.

Subject merchandise also includes large diameter welded line pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the Orders if performed in the country of manufacture of the in-scope large diameter welded line pipe.

Excluded from the scope of the Orders is structural pipe, which is produced only to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, or comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards. Also excluded is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe. Also excluded is large diameter welded pipe in the following combinations of grades, outside diameters, and wall thicknesses:

⁴² Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the Republic of Korea: Correction to the Scope of the Order in the Decision Memorandum.

- *Grade X60, X65, or X70, 18 inches outside diameter, 0.688 inches or greater wall thickness;*
- *Grade X60, X65, or X70, 20 inches outside diameter, 0.688 inches or greater wall thickness;*
- *Grade X60, X65, X70, or X80, 22 inches outside diameter, 0.750 inches or greater wall thickness; and*
- *Grade X60, X65, or X70, 24 inches outside diameter, 0.750 inches or greater wall thickness.*⁴³

Tariff treatment

LDW line pipe and LDW structural pipe are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number(s) 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6090, 7305.39.1000 and 7305.39.5000. The HTS statistical reporting numbers specific to LDW line pipe are 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000. The HTS statistical reporting numbers specific to LDW structural pipe are 7305.31.4000, 7305.31.6090, 7305.39.1000 and 7305.39.5000. The general rate of duty is “free” for HTS subheadings 7305.11.10, 7305.11.50, 7305.12.10, 7305.12.50, 7302.19.10, 7305.19.50, 7305.31.40, 7305.31.60, 7305.39.10 and 7305.39.50.⁴⁴ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Table LDWP 1.23 summarizes the additional duties applied to LDWP from subject countries. Information on the history and sourcing of these duties follows the table.

⁴³ *Expedited First Sunset Reviews of the Antidumping Duty Orders on Large Diameter Welded Pipe from the People’s Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Correction to the Scopes of the Orders in the Decision Memorandum for Certain Countries* (Mar. 21, 2025); *Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Large Diameter Welded Pipe from India* (May 15, 2024); 89 Fed. Reg. 44961 (May 22, 2024).

⁴⁴ USITC, HTS (2025) Basic Revision 5, Publication 5602, March 2025, p. 73.15.

Table LDWP 1.23: Additional tariff duties by duty type on subject countries.

Country	Section 301	Section 232	IEEPA
Canada	NA	25 percent ad valorem	10 percent ad valorem for LDWP designated as energy and energy resources; 25 percent ad valorem for all other LDWP.
China	25 percent ad valorem	25 percent ad valorem	20 percent ad valorem
Greece	NA	25 percent ad valorem	NA
India	NA	25 percent ad valorem	NA
South Korea	NA	25 percent ad valorem	NA
Turkey	NA	25 percent ad valorem	NA

Note: LDW line pipe and LDW structural pipe originating from Canada and imported under HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1060, 7305.19.5000, and 7305.31.4000 are designated as energy products under IEEPA tariffs. CBP, CSMS # 64514918 - UPDATE - Energy and Energy Resources from Canada Subject to Additional Duties Pursuant to Executive Order, March 24, 2025, at https://content.govdelivery.com/bulletins/gd/USDHSCBP-3d86b66?wgt_ref=USDHSCBP_WIDGET_2.

Effective September 1, 2019, LDW pipe originating in China was subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for LDW pipe was reduced to 7.5 percent.⁴⁵ Effective September 27, 2024, the section 301 duty for LDW pipe originating in China was increased from an additional 7.5 percent to an additional 25 percent ad valorem duty.⁴⁶ There is no distinction in section 301 tariff treatment between LDW structural pipe and LDW line pipe.

Effective February 4, 2025, LDW line pipe and LDW structural pipe originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”), and on March 4, 2025, that additional duty increased to 20 percent ad valorem.⁴⁷

⁴⁵ 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Basic Revision 5, Publication 5602, March 2025, pp. 99.3.96 to 99.3.109, 99.3.334.

⁴⁶ 89 FR 76581, September 18, 2024; See also HTS heading 9903.91.01 and U.S. 31(a) and 31(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Basic Edition, USITC Publication 5575, January 2025, pp. 99.3.277 to 99.3.278, 99.3.345.

⁴⁷ 90 FR 9121, February 7, 2025; 90 FR 11463, March 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter III of chapter 99 and related
(continued...)

Effective March 4, 2025, LDW line pipe and LDW structural pipe designated as energy and energy resources originating in Canada were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”) while all other LDW line pipe and LDWP structural pipe originating in Canada was subject to an additional 25 percent ad valorem duty under IEEPA.⁴⁸ Effective March 7, 2025, only products originating in Canada that did not enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) were subject to the additional ad valorem duty under IEEPA.⁴⁹

LDW line pipe and LDW structural pipe originating in Canada, China, Greece, India, South Korea, and Turkey are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.⁵⁰

(...continued)

tariff provisions for this duty treatment. USITC, HTS (2025) Revision 5, Publication 5602, March 2025, pp. 99.3.3 to 99.3.4, 99.3.286 to 99.3.287.

⁴⁸ LDW line pipe imported under HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1060, and 7305.19.5000 is designated as energy and energy resources under IEEPA tariffs. LDW structural pipe imported under HTS statistical reporting number 7305.31.4000 is designated as energy and energy resources under IEEPA tariffs. CBP, “CSMS #64472173 – CORRECTION – Guidance Energy and Energy Resources from Canada,” March 19, 2025 at https://content.govdelivery.com/bulletins/gd/USDHSCBP-3d7c46d?wgt_ref=USDHSCBP_WIDGET_2.

⁴⁹ 90 FR 9113, February 7, 2025; 90 FR 9183, February 10, 2025; 90 FR 11743, March 11, 2025. See also HTS headings 9903.01.10, 9903.01.14, and 9903.01.15 and U.S. notes 2(I) and 2(j) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 5, Publication 5602, March 2025, pp. 99.3.2 to 99.3.3, 99.3.285 to 99.3.286.

⁵⁰ Effective March 23, 2018, steel articles originating in China and India became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.

Effective March 12, 2025, steel articles originating in Canada are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.

Effective June 1, 2018, steel articles originating in European Union (“EU”) member countries, including Greece, were subject to an additional 25 percent ad valorem duty under section 232. Effective January 1, 2022, steel articles originating in EU member countries became subject to tariff-rate quotas (“TRQs”), and imports that exceeded the TRQ limits became subject to the section 232 duties. Effective March 12, 2025, the TRQs for EU member countries were terminated and steel articles originating in EU member countries are subject to an additional 25 percent ad valorem duty under section 232.

Effective June 1, 2018, steel articles originating in South Korea were subject to annual absolute import quotas under section 232 of the Trade Expansion Act of 1962, as amended. Following the termination of the absolute import quotas, effective March 12, 2025, steel articles originating in South Korea are subject to an additional 25 percent ad valorem duty under section 232.

Effective March 23, 2018, steel articles originating in Turkey were subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective August

(continued...)

The product

Description and applications⁵¹

Welded pipe is classified as a long-rolled steel pipe product that can be produced in sizes from 1/8 inch to over 80 inches in outside diameter (O.D.). Structural pipe and tubing is used as structural support or for load-bearing purposes. Structural pipe may be used for: piling, structural supports, sign poles, bollards, columns, and fencing. Line pipe is used for the gathering, transmission, and distribution of oil and gas, generally in a pipeline or utility distribution system (figure LDWP 1.3). Line pipe can be produced with plain ends, threaded, beveled, grooved, flanged or expanded, depending on the requirements. Figure LDWP 1.4 is a visual depiction of welded line pipe.

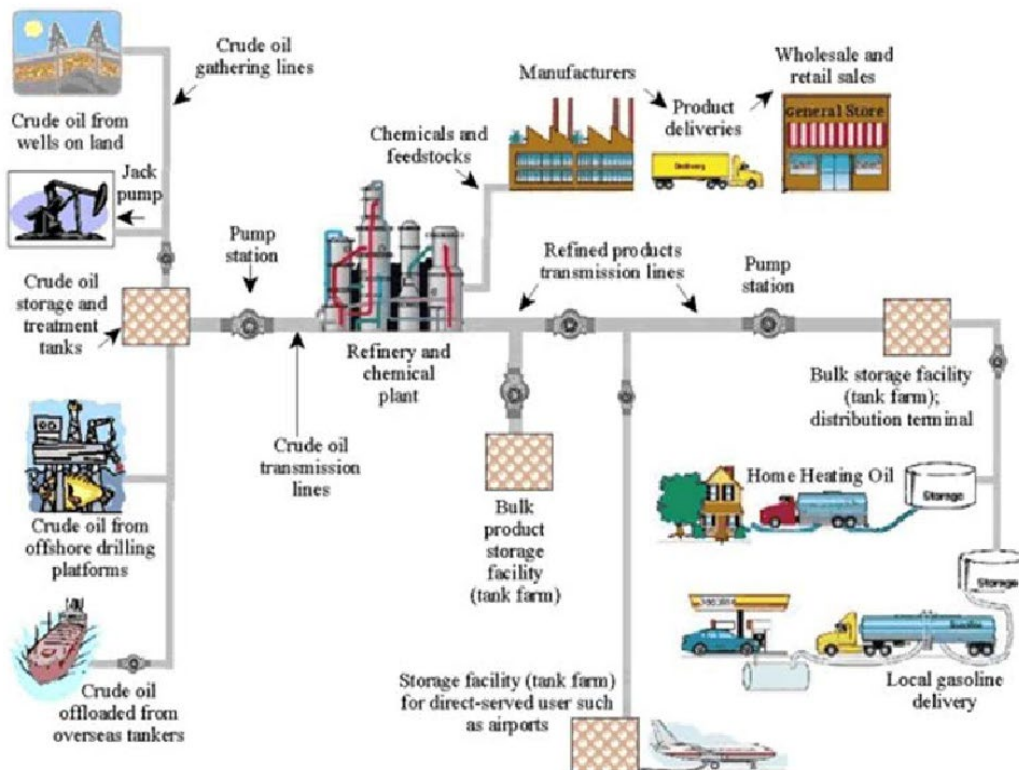
(...continued)

13, 2018, the section 232 duty on steel articles originating in Turkey was increased to 50 percent ad valorem but was later reduced back to 25 percent ad valorem effective May 21, 2019.

83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 40429, August 15, 2018; 84 FR 23421, May 21, 2019; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 89 FR 227, January 3, 2024; 89 FR 57347, July 15, 2024; 90 FR 9817, February 18, 2025. See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 5, Publication 5602, March 2025, pp. 99.3.9 to 99.3.10, 99.3.299.

⁵¹ Unless otherwise noted, this information is based on information from the Original publication, pp. I-14-I-20.

Figure LDWP 1.3: LDW line pipe
Example of an oil and natural gas pipeline system



Source: "Pipeline and Hazardous Materials Safety Administration," U.S. Department of Transportation, retrieved April 1, 2024, at <https://primis.phmsa.dot.gov/comm/PetroleumPipelineSystems.htm?nocache=165>.

Figure LDWP 1.4:
LDW line pipe: Welded API line pipe



Source: "Introduction of API 5L X42 Steel Line Pipe," World Iron & Steel, retrieved April 1, 2024 at <https://www.wldsteel.com/api-5l-x42-steel-line-pipe/>.

The line pipe subject to these reviews is a welded circular pipe product, having an O.D. more than 16 inches (406.4 millimeters), regardless of wall thickness, length, surface finish, or end finish. Line pipe can be produced from carbon or alloy steel. Carbon steel contains

controlled amounts of carbon and manganese. Alloy steels, which provide physical properties not achievable to the same degree with carbon steels, contain controlled amounts of alloying elements, such as nickel, chromium, and molybdenum.

Line pipe is generally produced in the United States in lengths of 40 feet or greater, and with either a bare finish or a black (lacquered) finish to protect the pipe from rusting, which is especially important for storage in humid climates or for waterborne transportation. End finishes typically include square cut or beveled for welding in the field.

The subject product includes welded line pipe used in oil and gas pipelines for the gathering, transmission, and distribution of oil and gas. Gathering is an upstream application in which welded line pipe is used to move the natural gas out of the fields and into the processing plant, or to gather crude oil for further processing in oil refineries. Smaller O.D. line pipe ranging from 2 to 8 inches traditionally has been used in standard gathering applications for the oil and gas industries; however, O.D. sizes of line pipe for gathering applications have been increasing in recent years due to extensive shale gas development. More specifically, welded line pipe in diameter sizes up to 24 inches has become more common in gathering applications for pad drilling in shale gas regions.

Transmission of oil and gas is a midstream application in which welded line pipe is used to move oil and gas to any type of collection or distribution point. Line pipe used in transmission applications has larger O.D. sizes than that used in gathering applications because refined oil or natural gas often has to move over long distances and even across national or international boundaries to reach distribution channels. Line pipe diameter sizes used in the transmission of oil and gas can vary greatly, although line pipe used in standard transmission applications for natural gas is traditionally larger (O.D. between 30 and 36 inches) than line pipe used for oil (O.D. between 8 and 24 inches).

Distributing oil and gas is a downstream application in which welded line pipe is used to move the oil and gas from the transmission pipeline to the end-use customer. Line pipe used for distributing oil and gas to end users is generally smaller diameter sizes than those used in transmission applications, with O.D. ranging between 0.5 to 6 inches.

Subject line pipe is normally produced in conformance with the American Petroleum Institute's ("API") 5L specifications, which provides standards for "pipe suitable for use in conveying gas, water, and oil in both the oil and gas industries." The subject product generally bears an API line pipe stencil. The API 5L specification for line pipe indicates the marking and class (e.g. A-25, A, B, and X-42 through X-80), process of manufacture, product specification levels (PSL 1 and PSL 2), heat treatment, and test pressure. The API 5L grades define the yield (tensile) strength level of the pipe and of the steel used to make the pipe.

The API 5L specification also suggests that “products in compliance with multiple compatible standards may be marked with the name of each standard.” Thus, line pipe can bear multiple stencils, signifying compliance with one or more certifications (such as grade B/ X-42), as well as standard pipe, piling, or structural pipe certifications.

Structural pipe is generally used for structural or load-bearing purposes above ground by the construction industry, as well as for structural members in ships, trailers, farm equipment, or other similar uses. It is produced in nominal wall thicknesses and sizes to American Society for Testing and Materials (“ASTM”) specifications, such as A53, A252, or A500. ASTM A53 consists of welded or seamless pipe designed for use in mechanical and pressure applications, but may be suitable for welding and forming operations, such as coiling, bending, and flanging. ASTM A252 is a specification for welded or seamless pipe for use as pipe piles used for load-bearing purposes or as a shell to form cast-in-place concrete piles. ASTM A500 is a specification for cold-formed welded or seamless carbon steel structural tubing utilized in the construction of bridges, buildings, or other structures.

Manufacturing processes⁵²

Welded pipe is most commonly manufactured by either the electric resistance weld (“ERW”) process or the submerged arc welding process (“SAW”). SAW encompasses both helical (spiral) welding (“HSAW”) and longitudinal welding (“LSAW”). The API 5L specification permits both ERW and SAW processes in all grades and classes of line pipe. The ERW manufacturing process is the least expensive production method, and the LSAW manufacturing process is the most expensive manufacturing method for producing welded pipe. Line pipe produced by LSAW is used for transporting oil and gas, either onshore or offshore, while ERW- and HSAW-produced line pipe is used for transporting oil and gas onshore. The ERW method cannot produce welded line pipe with a very heavy wall thickness, and therefore is not favored for offshore or deep-water applications where a heavier internal pressure is needed to move crude oil or gas through the pipeline.

Welded-pipe manufactured using the HSAW and ERW methods is produced from steel sheet in coils in a continuous forming process. By contrast, LSAW pipe requires piece-by-piece production from thicker steel plates, and is used in more demanding applications. Unlike the ERW and LSAW methods, the HSAW process offers the advantage of producing pipe with diameters larger than the width of the coiled steel input because of its helical wrap during the forming process of the cylindrical hollow body. The ERW process is limited by the width of the

⁵² Unless otherwise noted, this information is based on original confidential report, pp. I-27 – I-33.

available steel coils and suitable for thinner-walled and small-diameter pipes, and is used to produce pipe with a maximum O.D. of 24 inches, maximum length of 80 feet, and a maximum pipe wall thickness of 0.75 inches. The LSAW method of production can produce line pipe with a maximum O.D. of 120 inches, and maximum length of 40 feet, and a maximum pipe wall thickness of 1.5 inches. Virtually all subject pipe of O.D. 24 inches or less is manufactured using the ERW or HSAW method in the United States. Pipe of O.D. 24 inches or less can be manufactured by the LSAW method, but it tends to be cost-prohibitive. A summary of the differences among ERW, LSAW, and HSAW pipe produced in the United States is presented in the following table LDWP 1.24.

Table LDWP 1.24: Production differences by manufacturing process

Manufacturing method	Maximum outside diameter (inches)	Maximum length (feet)	Production method cost ruling	Maximum pipe wall thickness (inches)
Electric Resistance Weld	26	80	Least expensive	0.75
Longitudinal Submerged Arc Welding	204	40	Most expensive	2.25
Helical (Spiral) Submerged Arc Welding	157	80	NA	1.03

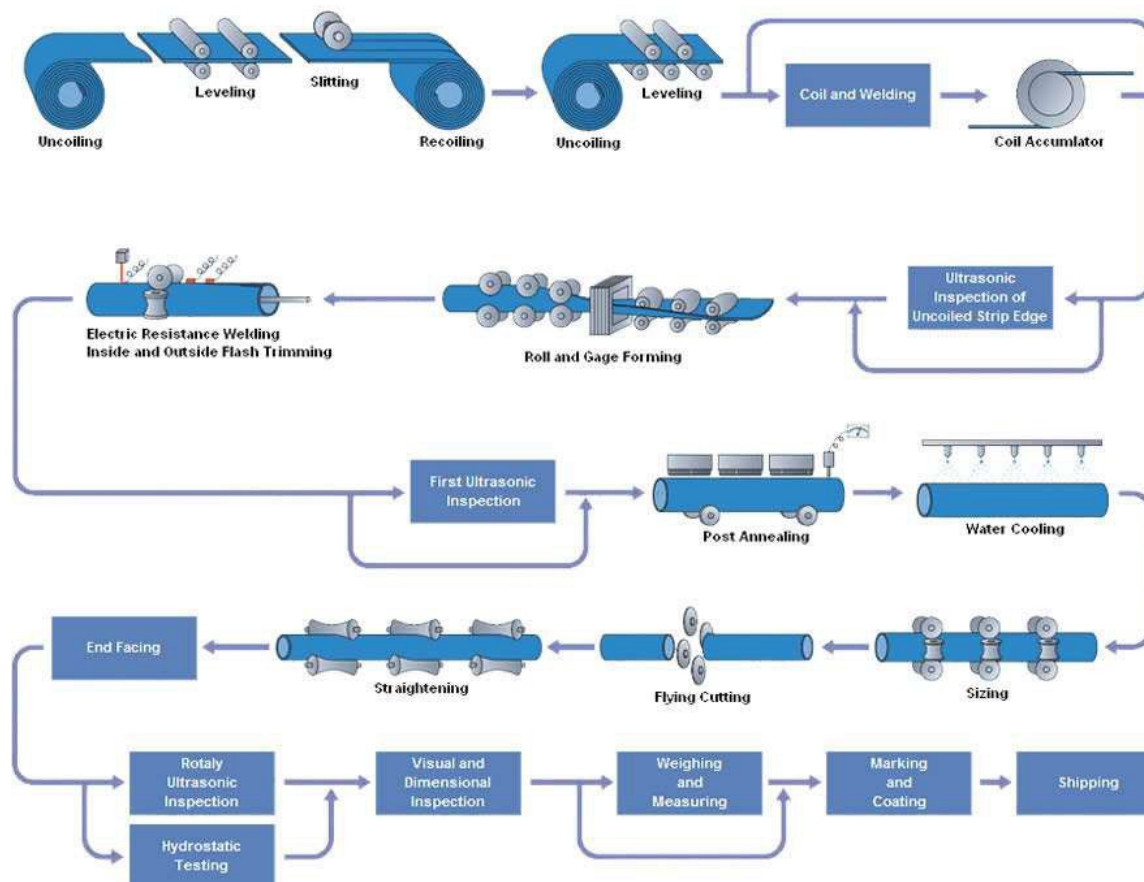
Source: Original publication, pp. I-21; Nucor Skyline, "Rolled & Welded Steel Pipe," accessed March 13, 2025 at <https://www.nucorskyline.com/globalnav/products/pipe/rolled-welded>.

ERW manufacturing method

ERW is the dominant manufacturing method for producing welded line pipe with O.D. up to 24 inches; and virtually all U.S. producers manufacturing such line pipe use the ERW or HSAW method. The ERW manufacturing process begins with coils of hot-rolled sheet steel, which are cut by a slitting machine into strips of the precise width needed to produce a desired diameter of pipe. The slit coils are fed into tube mills, which cold-form the flat ribbon of steel into a tubular cylinder by a series of tapered forming rolls. The product is then welded along the joint axis by heat obtained from the pipe's resistance to the flow of electric current. The welded tube next passes under a tool that removes the outside flash (the metal extruded by the weld process) resulting from pressure during the welding. Inside flash is likewise removed by cutting tools. The tube is then subjected to such post-weld heat treatment as is required, and may involve heat treatment of the welded seam only or treatment of the full cross-section of the

pipe. After heat treatment, sizing rolls shape the tube to specific diameter tolerances. The product is then cooled and cut to length at the end of the tube mill (figure LDWP 1.5).

Figure LDWP 1.5: Electric resistance welding manufacturing process

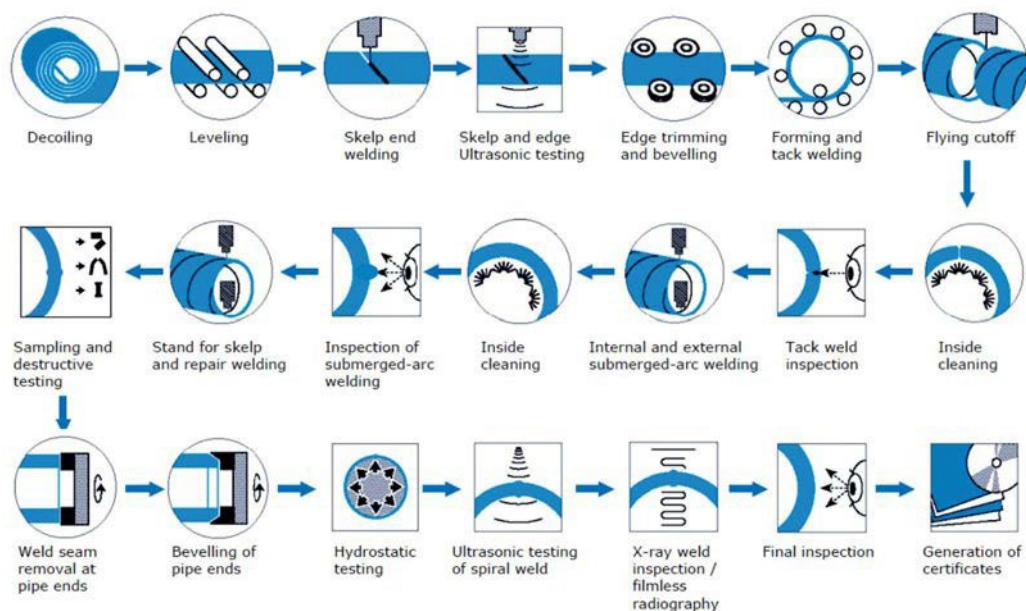


Source: "ERW Pipe Manufacturing Process," Permanent Steel Manufacturing Co., Ltd, retrieved April 2, 2024 at <https://www.permanentsteel.com/newsshow/erw-pipe-manufacturing-process.html>.

HSAW manufacturing method

Like ERW, the HSAW manufacturing method uses coiled hot-rolled steel strip as the starting material for formation of pipes. The coiled steel strip is loaded on a decoiler and the strip is straightened and edges are milled to the desired joint configuration. The steel strip is guided into a forming station where it produces a cylinder hollowed body which is then welded-spirally, like a helix, so that the coil strip assumes the shape of the pipe at a predetermined forming angle. Inside and outside welding is performed by an automatic submerged arc process. HSAW line pipe is not limited by coil width because of the helical wrap of the steel and is generally used for larger-diameter pipe projects in the United States. The HSAW method of production can produce line pipe with a maximum O.D. of 157 inches, a maximum length of 80 feet, and a maximum pipe wall thickness of 1.03 inches. Figure I-6 depicts the HSAW manufacturing process for welded line pipes.

Figure LDWP 1.6: Helical (spiral) submerged arc weld manufacturing process



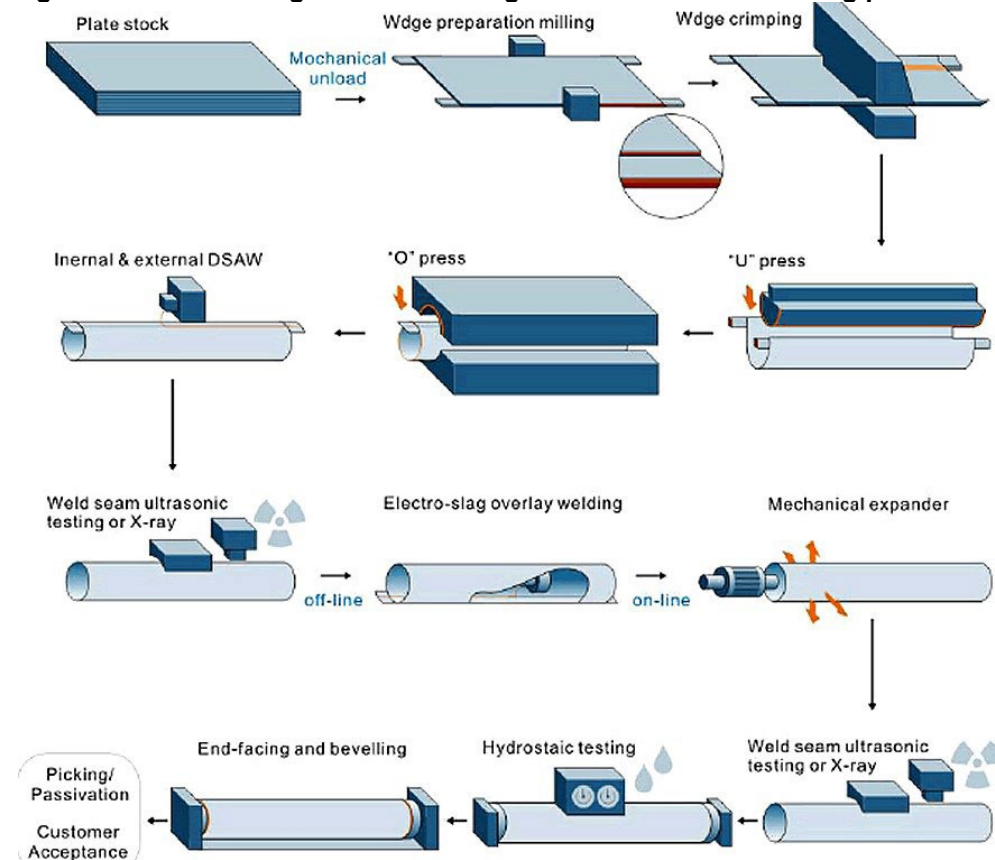
Source: “SAWH Manufacturing Process”, Borusan Berg Pipe, retrieved April 2, 2024 at <https://www.borusanbergpipe.com/sawh-manufacturing-process>.

LSAW manufacturing method

Unlike the ERW and HSAW manufacturing methods, which begin with steel coils, the LSAW method produces line pipe from cut-to-length steel plates. Each individual plate proceeds through various steps including (a) shearing and edge planing to ensure that the plate is flat and aligned so that the two edges of the steel plate are parallel and square with the ends and (b)

crimping or bending of the plate edges to avoid a flat surface along the seam of the pipe and (c) bending the plate to the desired form. The two primary methods of shaping line pipe in the LSAW process are the pyramid rolling and the U-O-E methods. Figure I-7 visually depicts the LSAW manufacturing process for welded line pipes.

Figure LDWP 1.7: Longitudinal submerged arc weld manufacturing process



Source: "UOE Process of LSAW Steel Pipe", HSCO, retrieved April 2, 2024 at https://www.hu-steel.com/workshop378_195.html,

Testing and finishing stage

The sizing, testing, and finishing stage is similar in the ERW, LSAW, and HSAW manufacturing methods. LDW line pipe is subject to various tests including hydrostatic testing and X-ray examination of the weld in order to detect any defects, and if necessary, would undergo finishing of the pipe ends including beveling. LDW structural pipe does not undergo this additional hydrostatic testing or X-ray examinations.

Domestic like product issues

In its original affirmative determinations, the Commission defined two domestic like products: large diameter welded carbon and alloy steel line pipe and large diameter welded carbon and alloy steel structural pipe. In addition, the Commission unanimously found that LDW stainless steel pipe was separate from LDW carbon and alloy steel structural pipe, and the Commission unanimously determined that the domestic industry was not materially injured or threatened with material injury by reason of imports of stainless steel LDW pipe from any of the subject sources. Four Commissioner's found two domestic like products (line pipe and structural pipe), while one Commissioner defined the domestic like product to include both LDW line pipe and structural pipe.⁵³

No party requested that the Commission collect data concerning other possible domestic like products in their responses to the notice of institution or in their comments on the Commission's draft questionnaires. At the Commission's hearing, the domestic interested parties indicated that it maintains (from the original investigations) that LDW line and structural pipe should be considered one like product.⁵⁴ In its posthearing brief, the domestic interested parties also take the position that "what appears to be practical given the circumstances is for the outcome of the Commission's analysis of cumulated line pipe and structural pipe imports to affect the subject countries pursuant only to the orders that are in place now."⁵⁵ The respondent interested parties (both Corinth and Evraz) support the Commission's finding that LDW line pipe and LDW structural pipe are separate domestic like products. The respondent interested party Evraz indicated that no party has seriously argued that the like product should

⁵³ Trailing publication, p. 41.

⁵⁴ Hearing transcript, p. 109 (Brightbill).

⁵⁵ Domestic interested parties' posthearing brief, p. 86.

be changed and nothing in the record of this review warrants revisiting the Commissions original determination.^{56 57}

⁵⁶ Respondent interested party's (Evraz) posthearing brief, Appendix p. 21.

⁵⁷ Respondent interested party's (Corinth) posthearing brief, Annex 4, p. 1.

Line 1: Introduction

U.S. market participants—LDW line pipe

U.S. producers

During the original investigations, 15 firms supplied the Commission with information on their U.S. operations with respect to all LDW pipe, eight of which indicated that they had produced LDW line pipe: ACIPCO, Berg, Dura-Bond, Evraz Oregon, Jindal, JSW, Stupp, and Welspun. These eight U.S. producers accounted for the vast majority of U.S. production of LDW line pipe in 2017.¹ In these current proceedings, the Commission issued U.S. producers' questionnaires to 15 firms, 11 of which provided the Commission with information on their product operations (which includes 8 firms that reported production of LDW line pipe).² These 8 firms are believed to account for the vast majority of U.S. production of LDW line pipe in 2023. Presented in table LP 1.1 is a list of current and former domestic producers of LDW line pipe and each company's position on continuation of the orders, production locations, and share of reported production of LDW line pipe in 2023.^{3 4}

¹ Original publication, p. III-1.

² ***.

³ ***. *** indicated in its U.S. producer questionnaire response that it had ceased all production of LDW line pipe during 2023. *** U.S. producer questionnaire responses, section III-2a, and email correspondence with *** December 19, 2024

⁴ For ***, the company indicated ***. This was due to ***. *** U.S. producer questionnaire, section I-3a.

Table LP 1.1 LDW line pipe: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2023

Share in percent

Firm	Position on continuation of the orders	Production location(s)	Share of production
ACIPCO	***	Birmingham, AL	***
Berg	***	Panama City, FL Mobile, AL	***
Dura-Bond	***	Steelton, PA McKeesport, PA	***
Evrax Oregon	***	Portland, OR	***
Jindal	***	Bay St. Louis, MS Baytown, TX	***
Nucor	***	Fontana, CA	***
Stupp	***	Baton Rouge, LA	***
Welspun	***	Little Rock, AR	***
All firms	Various	Various	100.0

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

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

Note: In the original investigations, the Commission found that appropriate circumstances existed to exclude Evrax Oregon as a related party from both the LDW line pipe and LDW structural pipe domestic industries. Thus, Evrax Oregon is identified in this table as a former U.S. producer of LDW line pipe but is not included in subsequent domestic industry data tables.

As indicated in table LP 1.2, two U.S. producers (***) are related to foreign producers of the subject merchandise and two are related to U.S. importers of the subject merchandise (***)⁵. In addition, as discussed in greater detail in Part 3, one U.S. producer directly imports the subject merchandise and one purchases the subject merchandise from U.S. importers.

⁵ ***.

Table LP 1.2 LDW line pipe: U.S. producers' ownership, related and/or affiliated firms

[illegible]

Table continued

Table LP 1.2 LDW line pipe (Continued): U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

U.S. importers

In the original investigations, the Commission received U.S. importer questionnaires from 35 firms, which accounted for nearly 90 percent of total U.S. imports of LDW pipe ⁶ from Canada, China, Greece, India, South Korea, and Turkey during 2017.⁷ Import data presented in the original investigations were based on official Commerce statistics and questionnaire responses.

In the current proceedings, the Commission issued U.S. importers' questionnaires to 30 firms believed to be importers of LDW line and LDW structural pipe, as well as to all U.S. producers of both LDW line and LDW structural pipe. Usable questionnaire responses were received from 15 firms that imported subject merchandise since 2018, but reported no imports of LDW line pipe from Canada, China, Greece, and India in 2023; and represented *** percent of LDW line pipe imports from South Korea in 2023, and ***

⁶ In the original investigations, the Commission received 35 total U.S. importer questionnaire responses from firms that had imported LDW line pipe, LDW structural pipe, and LDW stainless steel pipe. Original publication, p. IV-1.

⁷ Original publication, p. IV-1.

*** of LDW line pipe imports from Turkey during 2023, and *** of reported nonsubject imports of LDW line pipe during 2023.⁸ Table LP 1.3 lists all responding U.S. importers of LDW line pipe from Canada, China, Greece, India, South Korea, and Turkey, and all other sources, their locations, and their shares of U.S. imports of LDW line pipe in 2023.

Table LP 1.3 LDW line pipe: U.S. importers, their headquarters, and share of imports within each source, 2023

Share in percent

Firm	Headquarters	Canada	China	Greece	India	South Korea, subject	Turkey, subject
Berg	Panama City, FL	***	***	***	***	***	***
Corpac	Aventura, FL	***	***	***	***	***	***
CPW	Houston, TX	***	***	***	***	***	***
Evrz NA	Rm Of Sherwood And Camrose, SK	***	***	***	***	***	***
Exxonmobil	Spring, TX	***	***	***	***	***	***
Hyundai Steel	Ulsan,	***	***	***	***	***	***
Master	Los Angeles, CA	***	***	***	***	***	***
Metal One	Rosemont, IL	***	***	***	***	***	***
Rushmore	Baytown, TX	***	***	***	***	***	***
Salzgitter	Houston, TX	***	***	***	***	***	***
Traxys	New York, NY	***	***	***	***	***	***
Welspun	Little Rock, AR	***	***	***	***	***	***
All firms	Various	—	—	—	—	100.0	—

Table continued

⁸ In 2023, there were no reported U.S. imports of LDW line pipe from Canada, China, Greece, and India. Additionally, all imports of LDW line pipe from Turkey during 2023 were categorized as nonsubject due to the exclusion of Borusan from the subject orders.

Table LP 1.3 LDW line pipe (Continued): U.S. importers, their headquarters, and share of imports within each source, 2023

Share in percent

Firm	Headquarters	Subject sources	South Korea, non subject	Turkey, non subject	All other sources	Non subject sources	All import sources
Berg	Panama City, FL	***	***	***	***	***	***
Corpac	Aventura, FL	***	***	***	***	***	***
CPW	Houston, TX	***	***	***	***	***	***
Evraz NA	Rm Of Sherwood And Camrose, SK	***	***	***	***	***	***
Exxonmobil	Spring, TX	***	***	***	***	***	***
Hyundai Steel	Ulsan,	***	***	***	***	***	***
Master	Los Angeles, CA	***	***	***	***	***	***
Metal One	Rosemont, IL	***	***	***	***	***	***
Rushmore	Baytown, TX	***	***	***	***	***	***
Salzgitter	Houston, TX	***	***	***	***	***	***
Traxys	New York, NY	***	***	***	***	***	***
Welspun	Little Rock, AR	***	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0	100.0

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

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

U.S. purchasers

The Commission received 34 usable questionnaire responses from firms that bought LDW line pipe during January 2018 to September 2024.⁹ Thirteen responding purchasers are distributors, 14 are oil and gas end users, and 3 are other end users. In general, responding U.S. purchasers were located in across the contiguous United States. The responding purchasers represented firms in a variety of domestic industries, including the oil and gas industry, pipe and piling, and construction. Large purchasers of LDW line pipe include ***.

⁹ Of the 34 responding purchasers, 24 purchased the domestic product, 11 purchased imports of the subject merchandise from subject sources, 17 firms purchased subject merchandise from other sources and 6 firms purchased imports of LDW line pipe from unknown sources.

Apparent U.S. consumption and market shares

Quantity

Table LP 1.4 and figure LP 1.1 present data on apparent U.S. consumption and U.S. market shares by quantity for LDW line pipe. Apparent U.S. consumption based on quantity decreased by 44.7 percent from 2018 to 2023. Apparent U.S. consumption by quantity was 12.6 percent higher in January to September 2024 than in January to September 2023. U.S. producers' market share based on quantity increased by 20.5 percentage points from 2018 to 2023 but was 2.0 percentage points lower in January to September 2024 than in January to September 2023. Subject import market share decreased by *** percentage points from 2018 to 2023, and was lower by *** percentage points in January to September 2024 than in January to September 2023. The market shares of imports from all sources decreased by 21.8 percent from 2018 to 2023, but were higher during interim 2024 compared to interim 2023. The market shares of imports from nonsubject imports of LDW line pipe decreased by *** percent as a share of quantity from 2018 to 2023, but were higher during interim 2024 compared to interim 2023.

Table LP 1.4 LDW line pipe: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent; interim period is January to September

Source	Measure	2018	2019	2020
U.S. producers	Quantity	1,356,052	1,744,225	1,093,067
Canada	Quantity	261,992	244,475	26,548
China	Quantity	4,651	—	165
Greece	Quantity	244,042	69,221	—
India	Quantity	4,657	18	7,032
South Korea, subject	Quantity	***	***	***
Turkey, subject	Quantity	***	***	***
Subject sources	Quantity	***	***	***
South Korea, nonsubject	Quantity	***	***	***
Turkey, nonsubject	Quantity	***	***	***
All other sources	Quantity	267,527	318,585	113,079
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	1,044,065	817,319	219,784
All sources	Quantity	2,400,117	2,561,544	1,312,851
U.S. producers	Share	56.5	68.1	83.3
Canada	Share	10.9	9.5	2.0
China	Share	0.2	---	0.0
Greece	Share	10.2	2.7	---
India	Share	0.2	0.0	0.5
South Korea, subject	Share	***	***	***
Turkey, subject	Share	***	***	***
Subject sources	Share	***	***	***
South Korea, nonsubject	Share	***	***	***
Turkey, nonsubject	Share	***	***	***
All other sources	Share	11.1	12.4	8.6
Nonsubject sources	Share	***	***	***
All import sources	Share	43.5	31.9	16.7
All sources	Share	100.0	100.0	100.0

Table continued

Table LP 1.4 LDW line pipe (Continued): Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent; interim period is January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	255,408	304,092	1,102,459	657,925	712,406
Canada	Quantity	21,787	138	200	80	1,444
China	Quantity	1,534	141	233	233	4,235
Greece	Quantity	5,576	—	—	—	10,522
India	Quantity	4	40,848	25,008	24,662	69
South Korea, subject	Quantity	***	***	***	***	***
Turkey, subject	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
South Korea, nonsubject	Quantity	***	***	***	***	***
Turkey, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	125,287	107,665	117,491	81,381	77,278
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	230,019	287,270	305,700	209,373	254,206
All sources	Quantity	485,427	591,362	1,408,159	867,298	966,612
U.S. producers	Share	52.6	51.4	78.3	75.9	73.7
Canada	Share	4.5	0.0	0.0	0.0	0.1
China	Share	0.3	0.0	0.0	0.0	0.4
Greece	Share	1.1	—	—	—	1.1
India	Share	0.0	6.9	1.8	2.8	0.0
South Korea, subject	Share	***	***	***	***	***
Turkey, subject	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
South Korea, nonsubject	Share	***	***	***	***	***
Turkey, nonsubject	Share	***	***	***	***	***
All other sources	Share	25.8	18.2	8.3	9.4	8.0
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	47.4	48.6	21.7	24.1	26.3
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series.

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 "—". South Korea, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Figure LP 1.1 LDW line pipe: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series.

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 "—". South Korea, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Value

Table LP 1.5 and figure 1.2 present data on apparent U.S. consumption and U.S. market shares by value for LDW line pipe. Apparent U.S. consumption based on value decreased by 22.4 percent from 2018 to 2023. Apparent U.S. consumption was 1.2 percent higher in January to September 2024 than in January to September 2023. U.S. producers’ market share based on value increased by 20.7 percentage points from 2018 to 2023 but was less than one percentage

points lower in January to September 2024 than in January to September 2023. Subject import market share decreased by *** percentage points from 2018 to 2023 and was *** percentage points lower in January to September 2024 than in January to September 2023. The market shares of imports from all sources decreased by 20.7 percent from 2018 to 2023, but were higher by 0.6 percent during interim 2024 compared to interim 2023. The market shares of imports from nonsubject imports of LDW line pipe decreased by *** percentage points as a share of quantity from 2018 to 2023, but were higher during interim 2024 compared to interim 2023.

Table LP 1.5 LDW line pipe: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim period is January to September

Source	Measure	2018	2019	2020
U.S. producers	Value	1,785,970	2,670,898	1,362,828
Canada	Value	354,184	335,853	30,064
China	Value	4,036	—	177
Greece	Value	235,185	82,655	—
India	Value	5,305	40	7,439
South Korea, subject	Value	***	***	***
Turkey, subject	Value	***	***	***
Subject sources	Value	***	***	***
South Korea, nonsubject	Value	***	***	***
Turkey, nonsubject	Value	***	***	***
All other sources	Value	351,368	396,425	138,902
Nonsubject sources	Value	***	***	***
All import sources	Value	1,228,028	1,015,825	233,091
All sources	Value	3,013,998	3,686,723	1,595,919
U.S. producers	Share	59.3	72.4	85.4
Canada	Share	11.8	9.1	1.9
China	Share	0.1	—	0.0
Greece	Share	7.8	2.2	—
India	Share	0.2	0.0	0.5
South Korea, subject	Share	***	***	***
Turkey, subject	Share	***	***	***
Subject sources	Share	***	***	***
South Korea, nonsubject	Share	***	***	***
Turkey, nonsubject	Share	***	***	***
All other sources	Share	11.7	10.8	8.7
Nonsubject sources	Share	***	***	***
All import sources	Share	40.7	27.6	14.6
All sources	Share	100.0	100.0	100.0

Table continued

Table LP 1.5 LDW line pipe (Continued): Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim period is January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Value	307,119	552,760	1,869,105	1,150,571	1,154,903
Canada	Value	28,133	53	538	386	1,778
China	Value	3,050	222	359	359	3,883
Greece	Value	6,126	—	—	—	15,421
India	Value	3	64,529	37,124	36,677	137
South Korea, subject	Value	***	***	***	***	***
Turkey, subject	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
South Korea, nonsubject	Value	***	***	***	***	***
Turkey, nonsubject	Value	***	***	***	***	***
All other sources	Value	146,280	186,458	208,894	144,671	112,539
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	263,607	484,070	469,333	319,337	331,921
All sources	Value	570,726	1,036,830	2,338,438	1,469,908	1,486,824
U.S. producers	Share	53.8	53.3	79.9	78.3	77.7
Canada	Share	4.9	0.0	0.0	0.0	0.1
China	Share	0.5	0.0	0.0	0.0	0.3
Greece	Share	1.1	—	—	—	1.0
India	Share	0.0	6.2	1.6	2.5	0.0
South Korea, subject	Share	***	***	***	***	***
Turkey, subject	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
South Korea, nonsubject	Share	***	***	***	***	***
Turkey, nonsubject	Share	***	***	***	***	***
All other sources	Share	25.6	18.0	8.9	9.8	7.6
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	46.2	46.7	20.1	21.7	22.3
All sources	Share	100.0	100.0	100.0	100.0	100.0

Table continued

Table LP 1.5 LDW line pipe (Continued): Apparent U.S. consumption and market shares based on value, by source and period

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 02, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values.

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 "—". South Korea, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Figure LP 1.2 LDW line pipe: Apparent U.S. consumption based on value, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 02, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values.

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 "—". South Korea, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Line 2: Conditions of competition in the market

U.S. market characteristics

LDW line pipe is used to convey gas, oil, and other liquids, generally in a pipeline or utility distribution system. LDW line pipe is produced from cut-to-length plate and hot-rolled coil. LDW line pipe used to convey oil or gas is generally produced to an American Petroleum Institute ("API") standard (5L). LDW line pipe is generally sold to end users for specific projects, such as pipelines for energy applications.¹

Four of 6 U.S. producers, *** importers, and 14 of 25 purchasers² indicated that the market was subject to distinctive conditions of competition. Specifically, firms noted that the demand for LDW line pipe is influenced by energy industry cycles (e.g., drilling activity for oil and gas), the price of oil, and government regulations on the demand side. Supply for LDW line pipe in general was noted as being more limited than smaller diameter line pipe (i.e., there are fewer manufacturers), the supply from South Korea being limited by quotas,³ and LDW line pipe competing with other types of steel users for raw steel. One firm indicated that constant changes in mergers and acquisitions of customers has increased competitiveness in the market for LDW line pipe.

Firms in the market were asked to assess the level of integration in the North American market for LDW line pipe. Table LP 2.1 demonstrates that most firms do not view the North American market as very integrated. Twenty-five of 35 responding producers, importers, and purchasers consider the North American market to be somewhat or slightly integrated.

Table LP 2.1 Level of integration of the North American LDW line pipe market

Firm type	Extremely	Very	Moderately	Somewhat	Slightly
Producer	0	0	0	5	0
Importer	***	***	***	***	***
Purchaser	1	2	3	4	11

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

¹ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. II-1.

² In limited instances, and typically for 1 to 3 purchasers, certain firms provided responses based on general knowledge of tubular products rather than 2023 purchases of line and/or structural pipe.

³ See Part LDWP 1 for more information regarding the changing nature of import quotas for South Korea.

Apparent U.S. consumption of LDW line pipe has fluctuated since January 1, 2018. Apparent U.S. consumption increased slightly between 2018 and 2019 but was 81.0 percent lower in 2021 than in 2019. Since that time, apparent U.S. consumption of LDW line pipe has increased, and was 190.1 percent higher in 2023 than in 2021. Overall, apparent U.S. consumption declined by 41.3 percent between 2018 and 2023. U.S. apparent consumption was 11.5 percent higher in January to September (“interim”) 2024 than in interim 2023.

Purchasers

Purchaser questionnaires were sent to 80 purchasers of LDW pipe, whether LDW line pipe or LDW structural pipe. The Commission received 34 responses from these purchasers,⁴ with 28 indicating that firms had purchased LDW line pipe in 2023 with approximately half identifying themselves as distributors and half as oil and gas end users. Some purchasers also import LDW line pipe. The largest purchasers of LDW line pipe in 2023 were ***, each of which reported purchasing more than *** short tons that year. Eight of 15 distributing purchasers reported competing with their suppliers for sales.

⁴ These purchasers were ***.

Impact of section 301 and section 232 measures

U.S. producers, importers, purchasers, and foreign producers were asked if the section 301 tariffs had an effect on the LDW line pipe market. All five responding U.S. producers, all three responding foreign producers, and *** responding importers reported that the section 301 tariffs had no effect on the LDW line pipe market. In contrast, more than half of responding purchasers (5 of 9) reported that section 301 tariffs had an effect. All five purchasers reported higher prices for imported Chinese material. Purchaser *** stated that this led to increased U.S. investment in capacity and profits, and purchaser *** noted increased consideration of domestic product. A third purchaser noted that the impact on the pricing of Chinese LDW line pipe helped impact China's sales into the United States at below-market prices to gain market share, but also stated that end users in the oil and gas segments "typically shy away from Chinese sourced material due to quality" (***). A fourth (*** reported that it has led to less supply of, and zero demand for, Chinese LDW pipe.

U.S. producers, importers, and purchasers were asked if the section 232 tariffs had an effect on the LDW line pipe market. All or nearly all responding U.S. producers, importers, purchasers, and foreign producers reported that they had. The reported impacts of these included: increased prices, the number of potential sources have been reduced so there is more competition for space at domestic mills, availability of steel has become volatile, backlogs at U.S. mills, quotas have limited the number of projects that are competitive for imports, decreased competitiveness for imports in the U.S. market in general, and some end users not having suitable suppliers for projects. One firm noted that the impact of the section 232 duties differs by import source, as some are exempt, and it has had a limited impact on imports from China because its AD/CVD duties were already very high.

Purchasers were asked to report any changes in availability caused by the section 232 tariffs. Nineteen purchasers responded, with five noting limits to availability in general, two noting availability issues on certain product(s), and two noting limited availability from South Korea. Five purchasers stated that there were no changes to availability and two others noted the effect was only on price. The remaining three noted extending U.S. manufacturer backlogs, increased U.S. capacity, and requiring more planning time to account for longer lead times. Of the six importers responding to this question, three noted that AD/CVD measures had more impact on the market (***), two importers stated there was no significant impact on availability, and one importer noted a "tangible impact in limiting availability of line pipe."

Channels of distribution

U.S. producers and importers sold LDW line pipe mainly to oil and gas end users as shown in table LP 2.2 for most of the years. Sales of total imports were mainly to the oil and gas sector in 2018, 2019, mainly to distributors in 2020 to 2023, and nearly evenly split in interim 2024. Due to the more infrequent nature of sales from subject producers, the shares sold to distributors, oil and gas end users, and other end users was more variable. The increase in nonsubject percentage sold to oil and gas end users in 2023 and interim 2024 is mainly due to increased imports into that channel from ***.

Table LP 2.2 LDW line pipe: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January to September

Source	Channel	2018	2019	2020
United States	Distributor	14.4	13.9	7.4
United States	Oil and gas end users	85.6	86.1	92.6
United States	Other end user	—	—	—
Canada	Distributor	***	***	***
Canada	Oil and gas end users	***	***	***
Canada	Other end user	***	***	***
China	Distributor	***	***	***
China	Oil and gas end users	***	***	***
China	Other end user	***	***	***
Greece	Distributor	***	***	***
Greece	Oil and gas end users	***	***	***
Greece	Other end user	***	***	***
India	Distributor	***	***	***
India	Oil and gas end users	***	***	***
India	Other end user	***	***	***
South Korea (subject)	Distributor	***	***	***
South Korea (subject)	Oil and gas end users	***	***	***
South Korea (subject)	Other end user	***	***	***
Turkey (subject)	Distributor	***	***	***
Turkey (subject)	Oil and gas end users	***	***	***
Turkey (subject)	Other end user	***	***	***
Subject sources	Distributor	***	***	***
Subject sources	Oil and gas end users	***	***	***
Subject sources	Other end user	***	***	***
Nonsubject sources	Distributor	***	***	***
Nonsubject sources	Oil and gas end users	***	***	***
Nonsubject sources	Other end user	***	***	***
All import sources	Distributor	24.2	33.9	77.4
All import sources	Oil and gas end users	75.7	66.0	22.4
All import sources	Other end user	0.1	0.1	0.2

Table continued.

Table LP 2.2 (Continued) LDW line pipe: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January to September

Source	Channel	2021	2022	2023	Interim 2023	Interim 2024
United States	Distributor	26.9	28.2	21.0	23.7	11.4
United States	Oil and gas end users	73.1	71.8	79.0	76.3	88.6
United States	Other end user	—	—	—	—	—
Canada	Distributor	***	***	***	***	***
Canada	Oil and gas end users	***	***	***	***	***
Canada	Other end user	***	***	***	***	***
China	Distributor	***	***	***	***	***
China	Oil and gas end users	***	***	***	***	***
China	Other end user	***	***	***	***	***
Greece	Distributor	***	***	***	***	***
Greece	Oil and gas end users	***	***	***	***	***
Greece	Other end user	***	***	***	***	***
India	Distributor	***	***	***	***	***
India	Oil and gas end users	***	***	***	***	***
India	Other end user	***	***	***	***	***
South Korea (subject)	Distributor	***	***	***	***	***
South Korea (subject)	Oil and gas end users	***	***	***	***	***
South Korea (subject)	Other end user	***	***	***	***	***
Turkey (subject)	Distributor	***	***	***	***	***
Turkey (subject)	Oil and gas end users	***	***	***	***	***
Turkey (subject)	Other end user	***	***	***	***	***
Subject sources	Distributor	***	***	***	***	***
Subject sources	Oil and gas end users	***	***	***	***	***
Subject sources	Other end user	***	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***	***
Nonsubject sources	Oil and gas end users	***	***	***	***	***
Nonsubject sources	Other end user	***	***	***	***	***
All import sources	Distributor	79.8	97.2	78.6	99.3	46.7
All import sources	Oil and gas end users	20.2	1.5	21.4	0.7	46.6
All import sources	Other end user	—	1.3	—	—	6.8

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

Geographic distribution

U.S. producers reported selling LDW line pipe to all regions in the contiguous United States (table LP 2.3). Importers reported selling product imported from Canada to five regions of the United States, product imported from Greece to two regions, and subject product imported from South Korea to five regions. For U.S. producers, 3.9 percent of sales were within 100 miles of their production facility, 78.5 percent were between 101 and 1,000 miles, and 17.6 percent were over 1,000 miles. Importers sold all or virtually all of their imported large diameter line pipe within 100 miles of their U.S. point of shipment.

Table LP 2.3 LDW line pipe: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	Canada	China	Greece	India	South Korea, subject	Turkey, subject	Subject sources
Northeast	3	***	0	***	0	***	0	***
Midwest	4	***	0	***	0	***	0	***
Southeast	4	***	0	***	0	***	0	***
Central Southwest	5	***	0	***	0	***	0	***
Mountain	2	***	0	***	0	***	0	***
Pacific Coast	2	***	0	***	0	***	0	***
Other	0	***	0	***	0	***	0	***
All regions (except Other)	2	***	0	***	0	***	0	***
Reporting firms	5	1	0	1	0	6	0	8

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table LP 2.4 provides a summary of the supply factors regarding LDW line pipe from U.S. producers and from subject countries.

Table LP 2.4 LDW line pipe: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in thousand short tons; ratio and share in percent

Factor	Measure	United States	Canada	China	Greece	India	South Korea (subject)	Turkey (subject)	Subject total
Capacity 2018	Quantity	3,244	***	***	***	***	***	***	***
Capacity 2023	Quantity	2,371	***	***	***	***	***	***	***
Capacity utilization 2018	Ratio	44.0	***	***	***	***	***	***	***
Capacity utilization 2023	Ratio	45.8	***	***	***	***	***	***	***
Inventories to total shipments 2018	Ratio	11.9	***	***	***	***	***	***	***
Inventories to total shipments 2023	Ratio	***	***	***	***	***	***	***	***
Home market shipments 2023	Share	***	***	***	***	***	***	***	***
Non-US export market shipments 2023	Share	***	***	***	***	***	***	***	***
Ability to shift production (firms reporting "yes")	Count	7 of 7	***	***	***	***	***	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of LDW line pipe in 2023. There were no imports of subject merchandise from Canada, Greece, and Turkey (subject) in 2023. Reporting foreign producers accounted for less than five percent of U.S. imports of LDW line pipe from South Korea (subject) during 2023. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part Line 1, "Summary Data and Data Sources."

Domestic production

Based on available information, U.S. producers of LDW line pipe have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced LDW line pipe to the U.S. market. The main contributing factors to this degree of responsiveness of supply are large amounts of unused capacity and the ability to shift production to or from alternate products or inventories. Factors mitigating responsiveness of supply include little ability to shift shipments from alternate markets, and the produced-to-order nature of the product limiting inventory usage to fill spot orders.

Domestic production capacity decreased sharply despite the opening of some additional U.S. capacity. Capacity utilization increased slightly between 2018 and 2023 as well. The only principal export market noted by domestic producers was Canada. Other products that producers reportedly can produce on the same equipment as LDW line pipe are LDW structural

pipe and smaller diameter pipe products, but such production may be limited except during periods of uncertainty in the energy market.

Subject imports

Based on available information, producers of LDW line pipe from Canadian sources have the ability to respond to changes in demand with small changes in the quantity of shipments of LDW line pipe to the U.S. market, while subject imports from suppliers in Greece and South Korea have the ability to respond with large changes.⁵ While there was no response from foreign producers of subject product from China, India, or Turkey, in the 2018 original investigations, all three were reported to have the ability to respond to changes in price with large changes in shipments to the United States.⁶ Turkish producer HDM Steel Pipe appears to be currently producing LDWP which may include line pipe; its website lists a 108,000 tons per year capacity of spiral welded steel pipe, profile pipe, and welding wire, and it is 100 percent export-oriented.⁷

The main contributing factors to this degree of responsiveness of supply for sources in Canada was capacity and low inventories. The responding Canadian producer reported *** in 2023 and shipments more than *** percent below those in 2018. It reported ***, and in interim 2024, reported capacity of *** short tons and a capacity utilization of *** percent. ***.

⁵ No foreign producer responded to the USITC's questionnaire from China or India. In the original investigation in 2018, the staff report noted that both China and India could respond to price changes with large changes in shipments of imports. *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, pp. II-8 and II-10.

⁶ One Turkish pipe producer, Borusan, responded to the Commission's questionnaire, but this firm is not subject to either the countervailing or antidumping duty orders on LDW line and structural pipe from Turkey.

⁷ HDM Steel Pipe, <https://www.hdm.com.tr/en/production-facilities/19/turkey-hdm-steel-pipe>, retrieved March 18, 2025.

In general, the main contributing factor to a large degree of responsiveness of supply for subject imports from Greece and South Korea are low levels of capacity utilization. The producer in Greece reported higher inventory ratios at the end of 2023 (***) and interim 2024 (***) than in 2018 (***) percent), but actual quantity of inventories were somewhat lower than in 2018 (***) percent lower for 2023 and ***) percent lower in interim 2024). The Greek foreign producer shipped ***) percent of its total shipments to third-country export markets, however, which enhances its ability to export LDW line pipe to the United States. The responding producer in South Korea had high inventory levels and shipments to third-country markets which enhances its ability to export subject product to the United States as well.

Imports from nonsubject sources

Imports from nonsubject sources accounted for more than half of total U.S. imports of LDW line pipe in 2023. The largest sources of such imports in 2023 were Germany, ***, Japan, and Mexico. Combined, these sources accounted for the vast majority of imports from nonsubject sources in 2023.

Supply constraints

All responding U.S. producers, and most responding importers and purchasers reported that they had not experienced supply constraints since January 1, 2018. Importer *** stated that it declines to quote on a weekly basis due to a lack of supply stemming from a limited manufacturing base and the section 232 quota on product from South Korea. Importers *** also reported that the quota restrictions constrain their ability to supply the market. Importer ***'s self-reported high cost of production limits it from fulfilling small orders. Though most responding purchasers reported that there were no supply constraints, the constraints that purchasers reported included: section 232 import quota restrictions on South Korean imports; capacity constraints at several South Korean mills, with those mills forcing large diameter capacity to "only be leveraged with purchases of smaller {diameter} quantities (2-16" OD)"; the Greek producer being unwilling to bid for small orders; in 2022, having quoted material be sold out before purchaser placed orders, which required the purchaser to look for other sources; domestic mills being sold out or unwilling to produce LDW line pipe in smaller runs;⁸ domestic

⁸ Purchaser *** stated "Currently, Welspun (domestic spiral mill) is booked until first quarter of 2026, Jindal (domestic spiral) is booked until end of first quarter of 2026, Borusan Berg (domestic spiral and long seam) is booked through fourth quarter 2025, and Dura-Bond (domestic long seam) is booked
(continued...)"

mills being unable to meet required timelines, and domestic mills opting to focus on larger customers rather than spot purchasers to fill their capacity; and U.S. mills' capability and quality not meeting required technical specs.

Producers, importers, and purchasers were asked if there have been changes in the availability of LDW line pipe from domestic, subject, and nonsubject sources has changed since January 1, 2018, and whether they anticipate future changes. Most producers and importers noted that there had been changes in the availability of supply from any source, and they anticipated changes in availability of supply from each source (table LP 2.5).⁹ Producers mostly noted increased availability of domestic supply, with four attributing the increase to the effect of the subject orders. Two noted the closure of the Stupp mill in Baton Rouge, Louisiana, as affecting domestic supply availability. *** importers noted some domestic producers have increased their production capabilities or capacity. Purchasers' responses were more mixed. Whereas some noted increased U.S. capacity, others noted that some mills have opened and some have closed, and one noted that access to domestic pipe is limited. Four purchasers noted increased availability. Although most purchasers had noted that availability had increased in the United States, some purchasers noted that there are certain products they have difficulty sourcing domestically within certain time frames, or at all. Purchaser *** stated that U.S. mills have limited capability making imports necessary.

through third quarter 2025... {***} each of the above domestic mills to be fully booked through 2026 by first quarter of 2025. In addition to the above, domestic ERW and some spiral mills will not accept smaller mill run quantities as they are only targeting major awards. Mills like Borusan Berg (domestic spiral), American (domestic ERW), and Welspun (domestic spiral and ERW) have refused to quote smaller mill runs for us on multiple occasions. Their international competition in Greece (CPW), the UK (Liberty), India (Welspun and Jindal), Korea (SEAH), Germany (Salzgitter), and Japan (JFE) are often willing to support these smaller (minimum of 5,000 feet) awards."

⁹ An equal number of U.S. producers anticipated nonsubject supply changes as did not expect them.

Table LP 2.5 LDW line pipe: Count of firms' responses regarding changes in availability of supply since January 1, 2018, by firm type

Source of product	Firm type	No, since January 1, 2018	Yes, since January 1, 2018	No, anticipated change	Yes, anticipated change
U.S.-produced product	U.S. producers	0	6	1	4
U.S.-produced product	Importers	***	***	***	***
U.S.-produced product	Purchasers	11	14	12	12
Subject imports	U.S. producers	0	7	1	4
Subject imports	Importers	***	***	***	***
Subject imports	Purchasers	10	13	14	9
Nonsubject imports	U.S. producers	2	4	2	2
Nonsubject imports	Importers	***	***	***	***
Nonsubject imports	Purchasers	11	8	12	7

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

Producers, importers, and purchasers most frequently noted that the subject orders, section 232 tariffs and quotas (South Korea) decreased the availability of subject product. In addition, purchaser *** replied that Canadian mills are not fully operational. Producers only noted that their anticipated changes depend on whether the subject orders are maintained in place. *** importers anticipate increased domestic capacity, including making reference to Welspun's November 2024 announcement to invest in manufacturing 24" ERW pipe. Importer *** anticipates an increase in domestic projects will be met with insufficient domestic supply, as international mills are closing down and selling their assets. Importer *** stated, "Given the current political climate, {it is} very possible we'll see a reduction in import volumes." Purchasers expecting changes also shared mixed views about domestic supply in the future. Purchaser *** stated that distributors have been reducing their inventories, which will likely lead to shortages of pipe to complete projects and upgrades. Four purchasers noted likely increased demand, two noting anticipating difficulty securing domestic product, but two anticipated that domestic supply will be adequate.

In addition, foreign producers were asked if there were any changes in factors affecting import supply to the United States since January 1, 2018. Two of three firms stated that changes occurred. Changes noted included: the closure of mills by ***, decreased demand for longitudinal pipe, green transformation projects such as carbon capture and hydrogen pipelines,¹⁰ and section 232 duty effects. One of three foreign producers anticipates decreases in the availability of LDW line pipe from their home country, while two anticipate no change.

¹⁰ Hearing transcript, pp. 162-164 (Mentzelopoulos).

New suppliers

Eleven of 28 purchasers indicated that new suppliers entered the U.S. market since January 1, 2018, and 5 expect additional entrants. Ten purchasers cited Jindal in Baytown, Texas, one cited Dura-Bond in McKeesport, Pennsylvania, and one cited a supplier in Vietnam. Five of 27 purchasers indicated that they anticipate new suppliers to enter the U.S. market.

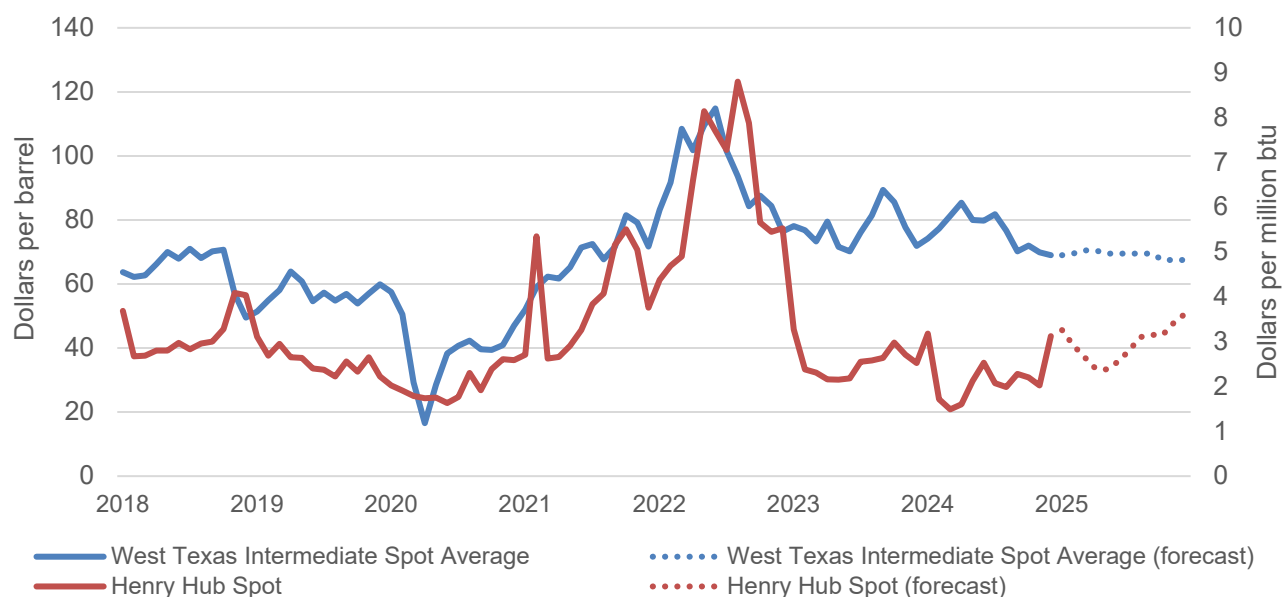
U.S. demand

Based on available information, the overall demand for LDW line pipe is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the relatively small to moderate cost share of LDW line pipe in most of its end use applications.

Since LDW line pipe is used as an intermediate product, demand for LDW line pipe depends on the price and productivity of the end product for which it is used. Most LDW line pipe is used in the transmission of oil and gas, including liquefied natural gas (“LNG”); therefore, demand for LDW line pipe has historically been sensitive to changes in oil and gas prices which affect the capital investment in the production of oil and gas, where a large portion of LDW line pipe is used.

Spot prices for oil and natural gas fluctuated between January 2018 and December 2024, with the price of oil increasing overall by 8.3 percent and the price of natural gas decreasing by 15.4 percent overall (figure LP 2.1 and table LP 2.6). The WTI spot price for crude oil generally decreased through February 2020, then decreased sharply in the next two months, with the nadir of April 2020 coinciding with the greatest impact of the COVID-19 epidemic in the United States, then increased through July 2022, peaking 80.3 percent higher than in January 2018. Since that time, the WTI spot price decreased irregularly, and is forecasted to remain near its December 2024 level. The Henry Hub spot price of natural gas followed a similar pattern, and in August 2022 was 138.5 percent higher than in January 2018. After that point, the Henry Hub Spot Price dropped to below the January 2018 in early 2023, and has remained fluctuating near that level through December 2024, though generally increasing through 2024.

Figure LP 2.1 Oil and natural gas: Short term actual and predicted monthly West Texas Intermediate crude oil prices and Henry Hub spot prices of natural gas, January 2018 to December 2024, forecast January 2025 to December 2025



Source: U.S. EIA, <https://www.eia.gov/outlooks/steo/>, retrieved January 12, 2025.

Table LP 2.6 Oil and natural gas: Short term actual and predicted monthly West Texas Intermediate crude oil prices and Henry Hub spot prices of natural gas, January 2018 to December 2024 and forecast January to December 2025

West Texas Intermediate Crude Oil (dollars per barrel)								
Month	2018	2019	2020	2021	2022	2023	2024	2025 (forecast)
January	63.70	51.38	57.52	52.00	83.22	78.12	74.15	69.00
February	62.23	54.95	50.54	59.04	91.64	76.83	77.25	69.50
March	62.73	58.15	29.21	62.33	108.5	73.28	81.28	70.50
April	66.25	63.86	16.55	61.72	101.78	79.45	85.35	70.50
May	69.98	60.83	28.56	65.17	109.55	71.58	80.02	69.50
June	67.87	54.66	38.31	71.38	114.84	70.25	79.77	69.50
July	70.98	57.35	40.71	72.49	101.62	76.07	81.8	69.50
August	68.06	54.80	42.34	67.73	93.67	81.39	76.68	69.50
September	70.23	56.95	39.63	71.65	84.26	89.43	70.24	69.50
October	70.75	53.96	39.40	81.48	87.55	85.64	71.99	67.50
November	56.96	57.03	40.94	79.15	84.37	77.69	69.95	67.50
December	49.52	59.88	47.02	71.71	76.44	71.90	69.00	67.50

Table continued.

Table LP 2.6 (Continued) Oil and natural gas: Short term actual and predicted monthly West Texas Intermediate crude oil prices and Henry Hub spot prices of natural gas, January 2018 to December 2024 and forecast January to December 2025

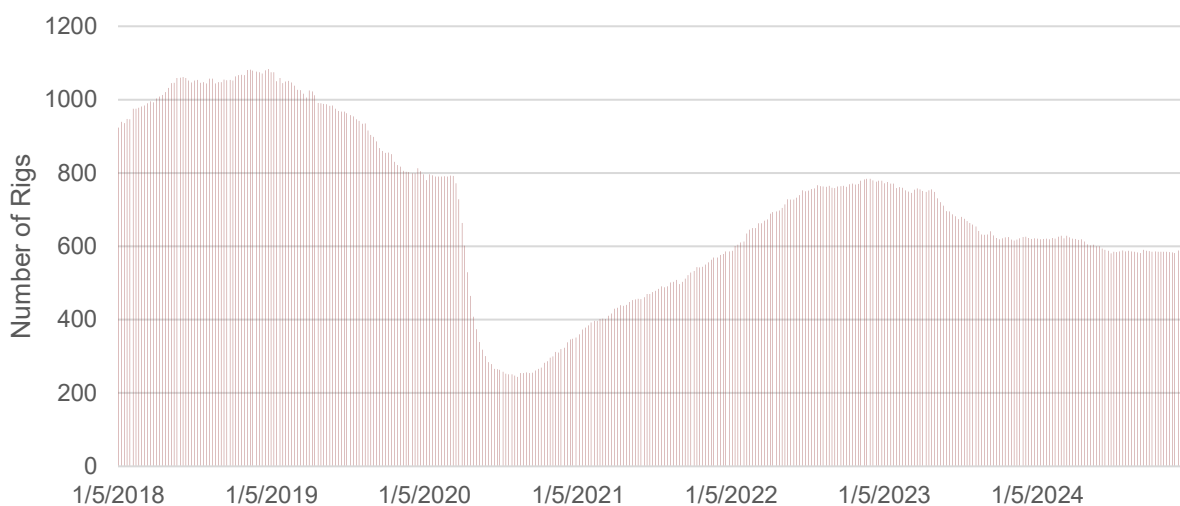
Henry Hub Spot Price for Natural Gas (dollars per million btu)

Month	2018	2019	2020	2021	2022	2023	2024	2025 (forecast)
January	3.69	3.11	2.02	2.71	4.38	3.27	3.18	3.26
February	2.67	2.69	1.91	5.35	4.69	2.38	1.72	2.92
March	2.69	2.95	1.79	2.62	4.90	2.31	1.49	2.66
April	2.80	2.65	1.74	2.66	6.59	2.16	1.60	2.40
May	2.80	2.64	1.75	2.91	8.14	2.15	2.12	2.38
June	2.97	2.40	1.63	3.26	7.70	2.18	2.53	2.55
July	2.83	2.37	1.77	3.84	7.28	2.55	2.07	2.80
August	2.96	2.22	2.30	4.07	8.80	2.58	1.99	3.10
September	3.00	2.56	1.92	5.16	7.88	2.64	2.28	3.15
October	3.28	2.33	2.39	5.51	5.66	2.98	2.20	3.15
November	4.09	2.65	2.61	5.05	5.45	2.71	2.02	3.42
December	4.04	2.22	2.59	3.76	5.53	2.52	3.12	3.62

Source: U.S. EIA, <https://www.eia.gov/outlooks/steo/>, retrieved January 12, 2025.

Production of oil and gas can affect demand conditions for LDW line pipe, and rig count is a leading indicator of oil and gas sector activity. Crude petroleum production increased irregularly from 11.0 million barrels per day in 2018 to 12.9 million barrels per day in 2023 and is expected to increase further to 13.5 million barrels per day in 2025.¹¹ Natural gas production increased irregularly from 84.3 billion cubic feet per day in 2018 to 103.8 billion cubic feet per day in 2023 and is expected to remain at approximately that level in 2025.¹² Despite the increased production, the number of oil rigs and rotary rigs used for natural gas decreased irregularly over the period (figure LP 2.2 and table LP 2.7).¹³ After decreasing from the start of 2019 through the COVID-19 pandemic, rig counts increased until the start of 2023, and decreased until the start of 2024 before leveling out over the first three months of the year.

Figure LP 2.2 Rotary rig count: Average weekly rig counts, January 2018 to December 2024



Source: Hughes Incorporated, <https://rigcount.bakerhughes.com/na-rig-count>, retrieved January 13, 2025.

¹¹ U.S. Energy Information Administration, Short Term Energy Outlook: U.S. Energy Markets Summary, <https://www.eia.gov/outlooks/steo/>, retrieved January 13, 2025.

¹² Ibid.

¹³ As noted by the Federal Energy Regulatory Commission (“FERC”), “The rig count is used to measure exploration activity by assessing the number of rotary drilling rigs actively drilling for oil and gas. Historically, rig counts were used as a rough predictor of future production. However, improvements in drilling technology and practices have caused a decoupling between rig count and production. The adoption of horizontal drilling significantly increased production per rig, making historical comparisons of rig counts problematic as horizontal rigs are considerably more productive than vertical rigs. Within the total rig count, the use of horizontal drilling rigs, used in the production of natural gas and oil in shale formations, has been growing for years, while the traditional vertical rig count has steadily declined.” 2024 Energy Primer: A Handbook for Energy Market Basics, FERC, https://www.ferc.gov/sites/default/files/2024-01/24_Energy-Markets-Primer_0117_DIGITAL_0.pdf, p. 11.

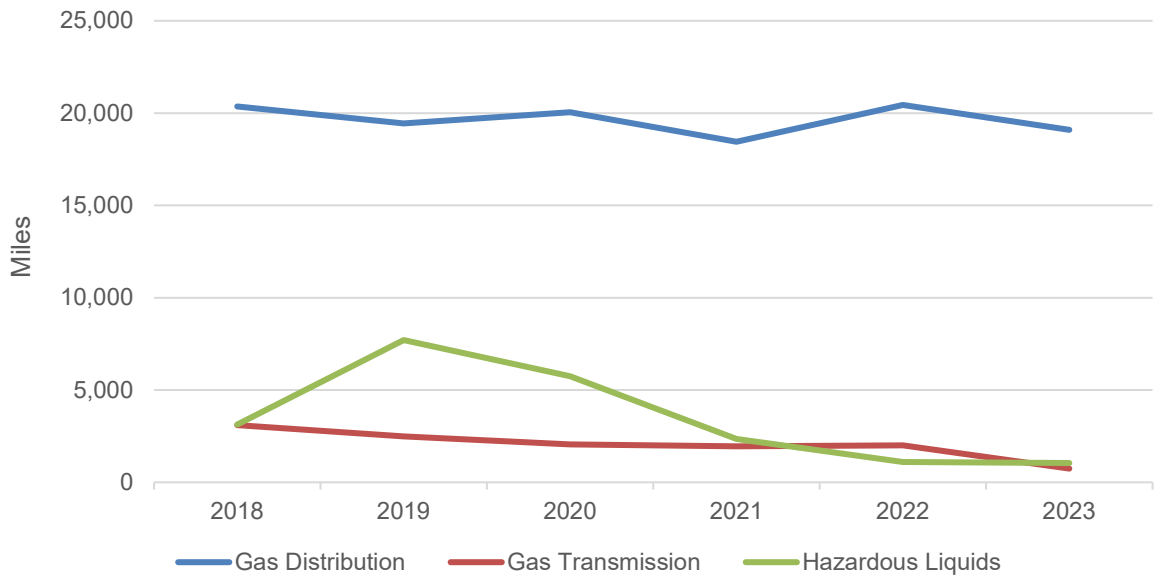
Table LP 2.7 Rotary rig count: Average weekly rig counts, January 2018 to December 2024

Week	2018	2019	2020	2021	2022	2023	2024
Week 1	924	1075	796	360	588	772	621
Week 2	939	1075	781	373	601	775	619
Week 3	936	1050	796	378	604	771	620
Week 4	947	1059	794	384	610	771	621
Week 5	946	1045	790	392	613	759	619
Week 6	975	1049	790	397	635	761	623
Week 7	975	1051	790	397	645	760	621
Week 8	978	1047	791	402	650	753	626
Week 9	981	1038	790	403	650	749	629
Week 10	984	1027	793	402	663	746	622
Week 11	990	1026	792	411	663	754	629
Week 12	995	1016	772	417	670	758	624
Week 13	993	1006	728	430	673	755	621
Week 14	1003	1025	664	432	689	751	620
Week 15	1008	1022	602	439	693	748	617
Week 16	1013	1012	529	438	695	753	619
Week 17	1021	991	465	440	698	755	613
Week 18	1032	990	408	448	705	748	605
Week 19	1045	988	374	453	714	731	603
Week 20	1046	987	339	455	728	720	604
Week 21	1059	983	318	457	727	711	600
Week 22	1060	984	301	456	727	696	600
Week 23	1062	975	284	461	733	695	594
Week 24	1059	969	279	470	740	687	590
Week 25	1052	967	266	470	753	682	588
Week 26	1047	967	265	475	750	674	581
Week 27	1052	963	263	479	752	680	585
Week 28	1054	958	258	484	756	675	584
Week 29	1046	954	253	491	758	669	586
Week 30	1048	946	251	488	767	664	589
Week 31	1044	942	251	491	764	659	586
Week 32	1057	934	247	501	763	654	588
Week 33	1057	935	244	503	762	642	586
Week 34	1044	916	254	508	765	632	585
Week 35	1048	904	254	497	760	631	583
Week 36	1048	898	256	503	759	632	582
Week 37	1055	886	254	512	763	641	590
Week 38	1053	868	255	521	764	630	588
Week 39	1054	860	261	528	765	623	587
Week 40	1052	855	266	533	762	619	585
Week 41	1063	856	269	543	769	622	586
Week 42	1067	851	282	542	771	624	585
Week 43	1068	830	287	544	768	625	585
Week 44	1067	822	296	550	770	618	585
Week 45	1081	817	300	556	779	616	585
Week 46	1082	806	312	563	782	618	584
Week 47	1079	803	310	569	784	622	583
Week 48	1076	802	320	569	784	625	582
Week 49	1075	799	323	576	780	626	589
Week 50	1071	799	338	579	776	623	589
Week 51	1080	813	346	586	779	620	589
Week 52	1083	805	348	586	779	622	589
Week 53	—	—	351	—	—	—	—

Source: Hughes Incorporated, <https://rigcount.bakerhughes.com/na-rig-count>, retrieved January 13, 2025.

The number of projects and miles of installed pipelines fluctuated but decreased overall from 2018 to 2023 (figure LP 2.3). Installed mileage was driven mainly by gas distribution mileage, which decreased by 6.2 percent; gas transmission and hazardous liquids pipeline mileage decreased by 76.0 and 66.5 percent between 2018 and 2023, respectively.

Figure LP 2.3 Miles of natural gas distribution mains, gas transmission pipelines, and hazardous liquid pipelines, 2018 to 2023



Source: U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Miles by Decade, <https://portal.phmsa.dot.gov/analytics/saw.dll?Dashboard>, retrieved January 16, 2025.

Note: Data is based on differences in the installed mileage listed between years. Data for 2020 include differences for pipeline mileage differences listed in both the 2010s and 2020s decade. Data includes nonsubject pipeline (plastic and steel pipelines less than 16 inches in diameter). Over 99 percent of gas transmission and hazardous liquid miles are steel pipes; *** percent of the gas transmission pipeline mileage is of 16-inch or greater diameter steel pipe. Email from Piyali Talukdar, PHMSA, January 16, 2025.

Table LP 2.8 Miles of natural gas distribution mains, gas transmission pipelines, and hazardous liquid pipelines, 2018 to 2023

Week	2018	2019	2020	2021	2022	2023
Gas distribution	20,354	19,433	20,051	18,448	20,441	19,098
Gas transmission	3,098	2,485	2,060	1,946	2,007	744
Hazardous liquids	3,122	7,706	5,740	2,343	1,098	1,046
Total	26,573	29,623	27,851	22,737	23,546	20,888

Source: U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Miles by Decade, <https://portal.phmsa.dot.gov/analytics/saw.dll?Dashboard>, retrieved January 16, 2025.

Table LP 2.9 presents the miles of planned natural gas pipeline in the United States through 2027. The number of miles expected to be completed is generally increasing: rising from 123.8 miles in 2025 to 237.7 miles in 2027.

Table LP 2.9 Natural gas: Miles of 16-inch or greater OD pipeline approved and pending approval, expected in-service years 2025 to 2027

FERC approval stage	2024	2025	2026	2027
Approved	225.4	33.3	22.5	91.4
Pending Approval	0	90.5	141.5	146.3

Source: Oil & Gas Watch, “CP2 LNG Terminal,” <https://oilandgaswatch.org/facility/4556>; Kinder Morgan, “Cumberland Project,” <https://www.kindermorgan.com/Operations/Projects/cumberland-project>; Oil & Gas Watch, “Wisconsin Reliability Project,” <https://oilandgaswatch.org/pipeline/5915>; Oil & Gas Watch, “Saguaro Connector Pipeline Project,” <https://oilandgaswatch.org/pipeline/5975>; Enbridge, “Ridgeline Expansion Project Opportunity,” <https://www.enbridge.com/projects-and-infrastructure/projects/ridgeline-expansion-project>; Northern Natural Gas, “Northern Lights 2025,” <https://www.northernnaturalgas.com/expansionprojects/Pages/Northern-Lights-2025.aspx>; Oil & Gas Watch, “Tioga Pathway Project,” https://oilandgaswatch.org/pipeline/rec_crgaqv2cbbh487u1gagg; Williams, “Southeast Supply Enhancement,” <https://www.williams.com/expansion-project/southeast-supply-enhancement/>; Oil & Gas Watch, “CP Express Pipeline Project,” <https://oilandgaswatch.org/pipeline/3281>; Oil & Gas Watch, “East Tennessee Natural Gas System Alignment Program,” <https://oilandgaswatch.org/pipeline/5754>; TC Energy, “Oak Grove Enhancement Project,” <https://www.tcenergy.com/operations/natural-gas/oak-grove-enhancement-project/#timelines>; Oil & Gas Watch, “Westbound Compression Expansion Project,” <https://oilandgaswatch.org/pipeline/7193>, retrieved January 16, 2025, and Oil & Gas Watch, “Three Rivers Interconnection Project,” <https://oilandgaswatch.org/pipeline/3363>, Oil & Gas Watch, “Driftwood line 200 and Line 300 Project,” <https://oilandgaswatch.org/pipeline/4199>, Oil & Gas Watch, “Venice Expansion Project,” at <https://oilandgaswatch.org/pipeline/4839>, Oil & Gas Watch, “Ohio Valley Connector Expansion,” <https://oilandgaswatch.org/pipeline/5309>, Oil & Gas Watch, “Northern Lights 2023 Expansion,” <https://oilandgaswatch.org/pipeline/5078>, Oil & Gas Watch, “Trailblazer Conversion Project (Natural Gas Component),” <https://oilandgaswatch.org/pipeline/5667>, Oil & Gas Watch, “Appalachia to Market II and Replacement Project,” <https://oilandgaswatch.org/pipeline/5797>, Oil & Gas Watch, “Commonwealth Energy Connector Project,” <https://oilandgaswatch.org/pipeline/4603>, Oil & Gas Watch, “Regional Energy Access Expansion (REAE) Project,” <https://oilandgaswatch.org/pipeline/3353>, Oil & Gas Watch, “Delta Lateral Project,” <https://oilandgaswatch.org/pipeline/3285>, Oil & Gas Watch, “Evangeline Pass Expansion Project,” <https://oilandgaswatch.org/pipeline/3292>, Oil & Gas Watch, “East lateral Xpress Project,” <https://oilandgaswatch.org/pipeline/3289>, Oil & Gas Watch, “Henderson County Expansion Project,” <https://oilandgaswatch.org/pipeline/4384>, retrieved February 2, 2025, and Federal Energy Regulatory Commission, “Major Pipeline Projects Pending,” <https://www.ferc.gov/industries-data/natural-gas/major-pipeline-projects-pending> and “Approved Major Pipeline Projects,” <https://www.ferc.gov/industries-data/natural-gas/approved-major-pipeline-projects-2015-present>, retrieved March 25, 2025.

End uses and cost share

U.S. demand for LDW line pipe depends on the demand for U.S.-produced downstream products. Reported end uses from the initial investigations include oil and gas transmission pipelines. *** responding importers reported changes in end uses. Importer *** described that the continued development and expansion of CO₂ pipelines, hydrogen pipelines, and sour service pipelines have increased demand for heavier walled pipe and higher grade LDWP. One of six responding producers noted a change in end use: *** noted “There is potential for use in carbon capture & sequestration, hydrogen transportation, and other green energy applications.” U.S. producer Jindal Steel has also entered the carbon

capture market.¹⁴ None of the 19 responding purchasers reported changes. In the original investigations, LDW line pipe was reported to account for a small-to-moderate share of the cost of the end-use products in which it is used. Most U.S. producers, importers, and purchasers reported cost shares for oil and gas transmission ranging from 15 to 30 percent; among all responses, cost shares ranged from 3 to 71 percent.¹⁵ None of the three foreign producers indicated that the end uses for LDW line pipe differ between their home market and the U.S. or other markets. Two of the four did note changes in end uses since January 1, 2018, however. *** noted LDW line pipe uses for green global initiatives like carbon capture and hydrogen transportation. Foreign producers *** both noted pursuing these changes in product usage. All three foreign producers have indicated having the same product range for their home market as other markets.

Business cycles

Three of 6 U.S. producers, *** importers, and 21 of 27 purchasers indicated that the market was subject to business cycles. The majority of responding firms reported that that demand for LDW line pipe is linked to the production and consumption of oil and gas. One purchaser, ***, also noted that demand for LDW line pipe peaks in the second quarter of each year, corresponding to summer pipeline projects. Other factors that were noted by purchasers included climate change initiatives, commodity prices, geopolitical factors/political climate, interest rates, permit restrictions, project portfolios and weather.

Demand trends

There is little consensus on how U.S. demand for LDW line pipe has changed since January 1, 2018 (table LP 2.10). For oil and gas use, most producers reported that demand had fluctuated downward, a plurality of importers reported similar demand at the start and end of the period, and most purchasers reported demand either fluctuating upward, downward, or ending close to where it was at the start of 2018. Fewer firms responded with respect to demand in markets other than oil and gas.¹⁶ Among the responding firms, a majority (including 8 of 14 responding purchasers) reported this was unchanged from its level at the start of 2018. Most importers and purchasers expect demand for oil and gas usage to increase over the next

¹⁴ See, e.g., AIST, “Jindal Steel and Power Partners With SeaVar on Carbon Capture Technology,” August 9, 2023, <https://www.aist.org/jindal-steel-and-power-partners-with-seavar-on-carbon-capture-technology>, retrieved March 18, 2025.

¹⁵ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. II-20.

¹⁶ No firm described what other markets they used as reference.

two years (table LP 2.11) but demand in other uses to remain constant. Purchasers indicated that demand for their end-use products incorporating LDW line pipe had either fluctuated upward or was at a level near where it was in 2018. Nine of 17 responding purchasers noted that this change did not affect their demand for LDW line pipe.

Table LP 2.10 LDW line pipe: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2018, by firm type

Market	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
U.S. demand, oil and gas	U.S. producers	1	1	0	3	0
U.S. demand, oil and gas	Importers	***	***	***	***	***
U.S. demand, oil and gas	Purchasers	3	8	6	7	2
U.S. demand, other	U.S. producers	0	0	0	0	0
U.S. demand, other	Importers	***	***	***	***	***
U.S. demand, other	Purchasers	1	1	7	2	1
U.S. demand, overall	U.S. producers	0	0	0	3	0
U.S. demand, overall	Importers	***	***	***	***	***
U.S. demand, overall	Purchasers	1	4	6	3	1
U.S. demand, overall	Foreign producers	0	1	1	1	0
Foreign demand	U.S. producers	0	0	0	0	0
Foreign demand	Importers	***	***	***	***	***
Foreign demand	Purchasers	2	3	4	1	0
Demand in subject country	Foreign producers	0	0	0	2	1
Demand in other export markets	Foreign producers	0	2	0	0	0
Demand for end use products	Purchasers	3	6	5	2	1

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

Note: Questions regarding demand for foreign producers focused generally on overall country markets, not portions of the markets within those countries.

Table LP 2.11 LDW line pipe: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type

Market	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
U.S. demand oil and gas	U.S. producers	2	1	1	1	1
U.S. demand oil and gas	Importers	***	***	***	***	***
U.S. demand oil and gas	Purchasers	3	13	7	1	1
U.S. demand other	U.S. producers	0	0	0	0	0
U.S. demand other	Importers	***	***	***	***	***
U.S. demand other	Purchasers	1	2	8	0	0
U.S. demand overall	U.S. producers	0	1	1	1	1
U.S. demand overall	Importers	***	***	***	***	***
U.S. demand overall	Purchasers	0	7	8	0	0
U.S. demand overall	Foreign producers	0	2	1	0	0
Foreign demand	U.S. producers	0	0	0	0	0
Foreign demand	Importers	***	***	***	***	***
Foreign demand	Purchasers	1	2	8	0	0
Demand in subject country	Foreign producers	0	1	0	1	1
Demand in other export markets	Foreign producers	0	2	0	0	0

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

Substitute products

Substitutes for LDW line pipe are limited.¹⁷ All responding U.S. producers, importers, purchasers, and foreign producers reported that there had not been change in substitutes since 2018 nor did they anticipate any future changes in substitutes.

¹⁷ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. II-23. The vast majority of responding firms indicated that there were no substitutes for LDWP. Three of 15 U.S. producers, 3 of 32 responding importers, and 1 of 42 purchasers indicated that there were substitutes for LDWP. Substitutes listed in those investigations were seamless pipe and ductile iron pipe.

Substitutability issues

This section assesses the degree to which U.S.-produced LDW line pipe and imports of LDW line pipe from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of LDW line pipe from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced LDW line pipe and LDW line pipe imported from subject sources.¹⁸ Factors contributing to this level of substitutability include broad comparability on a number of non-price factors, reported interchangeability between domestic and subject imports, few domestic content requirements, similar ability to meet quality specifications, and somewhat limited significant factors other than price.¹⁹ Factors reducing substitutability include differences in lead times for domestic and imported product due to the produced-to-order nature of LDW line pipe, limited availability from South Korea due to import quotas or domestic capacity availability, certain types of LDW line pipe only being available only from certain sources, some purchasers' preferences for LDW line pipe from some sources over other sources.

¹⁸ The degree of substitution between domestic and imported #abbrproduct depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced LDW line pipe to the LDW line pipe imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

¹⁹ While LDW line pipe is typically produced to order, the specifications of the product are provided to suppliers intending to bid on a project and suppliers typically respond using pipe that meets or is substitutable with those specifications.

Factors affecting purchasing decisions²⁰

Purchaser decisions based on source and/or method of manufacture

As shown in table LP 2.12, most purchasers always or usually make purchasing decisions based on the producer, country of origin, and/or method of manufacture, while their customers are more evenly divided. The ten purchasers that reported that they always make decisions based on the manufacturer noted reasons for doing so including: availability, domestic production, qualification, quality, price, schedule, and technical specifications (technical capabilities/method of manufacture). More purchasers indicated that they always base their purchases based on the method of manufacture (ERW/HSAW/LSAW) than the producers. Most purchasers (16 of 25) reported that they always purchased based on the production process. Reasons they always purchased based on the production process included: customer preference; the type of weld purchased depends on the project needs or product mix needs; cost of the weld method; and quality. Purchasers somewhat less frequently based their purchases on the country of origin of the LDW line pipe. Purchasers reported that their customers less frequently determined their purchase patterns on any of the three bases listed, but 22 of 28 purchasers noted that their customers prefer to order LDW line pipe produced in a specific country or countries over other possible sources.

Table LP 2.12 LDW line pipe: Count of purchasers' responses regarding frequency of purchasing decisions based on producer, method of manufacture, and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	11	11	5	1
Customer	Producer	1	7	6	5
Purchaser	Method of manufacture	16	2	5	2
Customer	Method of manufacture	5	4	4	4
Purchaser	Country	8	11	8	0
Customer	Country	3	6	4	5

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

Purchasers were asked how interchangeable pipe using different methods of manufacture (ERW, HSAW, and LSAW) was for two different sizes – 16-24” and above 24”. Purchasers generally noted that ERW is preferred and most common for pipe that is less than 24” in diameter, since it is a much less expensive method to produce pipe, although a few

²⁰ Twenty-seven purchasers indicated they had marketing/pricing knowledge of domestic product, 18 of product imported from Canada, 5 of product imported from China, 17 of product imported from Greece, 10 of product imported from India, 18 of product imported from subject producers in South Korea, 12 of product imported from subject producers in Turkey, and 14 of product from nonsubject countries.

purchasers noted that HSAW and LSAW could hypothetically be used. For diameter LDW line pipe over 24" HSAW and LSAW were most frequently noted as the preferred weld type. The most frequent response given by purchasers regarding interchangeability between the weld types in this size range noted that the specifics of the project would determine the type to be used. Purchaser *** observed that ERW is only available up to 26".

Twenty-five purchasers noted that some portion of their purchases did not require purchasing U.S.-produced product, with 20 of these purchasers reporting this for 90 percent or more of their purchases. Thirteen reported that domestic product was required by law (for 0.1 to 100 percent of their purchases), six reported it was required by their customers (for 10 to 90 percent of their purchases), and two reported other preferences for domestic product (for 10 to 15 percent of their purchases).

Thirteen of 27 responding purchasers indicated that certain sizes/types/grades of LDW line pipe were available from only one source. Most purchasers described certain characteristics that are only available from certain countries: thick-walled pipe, large diameter pipe, or pipe for low temperature environments. Of these, certain specifications were noted to only be available from Greece, Germany, India, Japan, the United Kingdom, and the United States. For example, purchaser *** relayed that "the USA mills are limited to 1" {outer wall thickness} and can only produce up to X70 sweet service. All pipe above 1" {outer wall thickness} or sour service or X80 need to be bought overseas. These grades/sizes can be made in Korea, UK, EU and Japan."

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for LDW line pipe were price (28 firms), availability/delivery/lead time/supply (25 firms), and quality (23 firms) as shown in table LP 2.13. Quality was the most frequently cited first-most important factor (cited by 12 firms), followed by price (10 firms) and approved/traditional supplier (7 firms); availability/delivery/lead time/supply was the most frequently reported second- and third-most important factors.

Table LP 2.13 LDW line pipe: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price/cost	10	8	10	28
Availability/delivery/lead time/supply	4	10	11	25
Quality	12	9	2	23
Approved/traditional supplier	7	0	2	9
Terms	0	0	4	4
Product range and minimum order per size	0	1	2	3

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

Note: Some firms reported more than one factor and some reported more than their top three factors. In addition to factors listed, one purchaser each listed warranty, safety, stock vs. new, and lead time transparency.

The majority of purchasers (18 of 28) reported that they usually purchase the lowest-priced product. Ten reported sometimes purchasing the lowest-priced product and no purchasers always or never purchased the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 22 factors in their purchasing decisions (table LP 2.14). The factors rated as very important by more than half of responding purchasers were quality meets industry standards (26 firms), price and product consistency (25 each), delivery times and reliability of supply (24 firms each), availability (23 firms), project specifications (22 firms), delivery terms and producer's available capacity (20 firms), availability of size >24" to 48" (18 firms), and availability of size <16" to 24", quality exceeds industry standards, availability of weld type, and technical support (17 firms each).

Table LP 2.14 LDW line pipe: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Quality meets industry standards	26	2	0
Price	25	3	0
Product consistency	25	3	0
Delivery time	24	4	0
Reliability of supply	24	4	0
Availability	23	5	0
Project specification	22	3	2
Delivery terms	20	7	1
Producer available capacity	20	7	0
Availability of size >24" to ≤48"	18	8	2
Technical support/service	17	10	1
Availability of weld type (HSAW, LSAW, ERW)	17	9	2
Quality exceeds industry standards	17	9	2
Availability of size >16" to ≤24"	17	8	3
Minimum quantity requirements	14	11	3
Payment terms	14	10	4
Total installation costs	13	9	6
U.S. transportation costs	12	12	4
Product range	10	15	3
Discounts offered	10	13	5
Packaging	8	7	13
Availability of size >48"	7	10	11

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

Lead times

LDW line pipe is primarily produced-to-order. U.S. producers reported that 98.8 percent of their commercial shipments were produced-to-order, with lead times averaging 90 days. The remaining 1.2 percent of their commercial shipments came from inventories, with lead times averaging 5 days. Importers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from foreign inventories, with lead times averaging *** days.

Supplier certification

Most responding purchasers (16 of 28) require their suppliers to become certified or qualified to sell LDW line pipe to their firm. Purchasers reported that the time to qualify a new supplier ranged from 3 to 180 days. Five purchasers reported that domestic or foreign supplier had failed in its attempt to qualify LDW line pipe or had lost its approved status since 2018. Two reported that Hyundai Steel (South Korea) briefly lost its API license, one purchaser reported Axis had been removed from its approved list because of quality and one reported Dura-Bond HFW mill in Pennsylvania had lost its approved status.

Quality specifications

As can be seen from table LP 2.15, the majority of responding purchasers reported that domestically produced LDW line pipe always or usually met minimum quality specifications. Most responding purchasers reported that LDWP from Canada, Greece, India, South Korea (subject), and Turkey (subject) always or usually met minimum quality specifications, in contrast, most purchasers reported China sometimes or never met minimum quality specifications.

Table LP 2.15 LDW line pipe: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	8	16	0	1	1
Canada	5	10	1	0	10
China	1	0	3	2	19
Greece	7	10	0	1	8
India	2	3	4	0	16
South Korea (subject)	6	10	2	0	8
Turkey (subject)	3	7	1	0	15
Nonsubject sources	4	6	1	0	8

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

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

Nineteen of 26 responding purchasers reported that at least part of what helped that determine quality was either meeting or exceeding API standards, and the firms' specifications. Other factors listed included: shape (straight, round, wall thickness, length, size); composition (minimize Chinese and Indian melt sources, source of hot rolled coil, chemical composition); producer support (on-time performance, technical support); testing reports (clear accurate, follow test protocols); weld quality and consistency (characteristics of steel near weld); ends prepared for connections; strength; lack of flaws and imperfections, appearance, and treatments for hot, cold, and sour service.

Changes in purchasing patterns

Eleven purchasers reported that they had changed suppliers since January 1, 2018, while 17 reported that they had not. Specifically, firms dropped or reduced purchases from North American Stupp, California Steel (no longer produced), Evraz (Russian/Ukraine conflict), and Axis and SeAH's LSAW mill in Korea (quality issues). Firms added or increased purchases from the following firms: Jindal (U.S., which started production since January 1, 2018); Dura-Bond (U.S., with one noting doing so because of product quality); Tubacero (Mexico); Corinth

Pipe (Greece, due to increasing number of projects, diminished U.S. capacity, and product unavailability from U.S. producers); sources not in South Korea (due to the quotas on South Korean LDW line pipe); Interpipe/Eisenblau Kramer (qualified to supply pipe for ***); SeAH and Tata (quality); and Forza (no reason given).

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2018 (table LP 2.16). Purchasers reported increased purchases of U.S.-produced product because of reduced imports because of the antidumping and countervailing duties, section 232 duties or quotas, availability of U.S. produced product, and increased demand/project needs. Purchasers reported decreased purchases of product from Canada because of the Russia/Ukraine conflict (specifically, Russian ownership of Evraz), the antidumping and countervailing duty orders, and the pipe size not being available. Purchasers reported decreased purchases of product from Greece because of the subject orders and the availability of pipe sizes. Purchasers reported decreased purchases of product from India because of the subject orders and product availability. Purchasers reported decreased purchases of product from South Korea (subject) because of quotas. Purchasers reported decreased purchases of product from Turkey (subject) because of the subject orders, section 232 limits, and the increased U.S. availability. Purchasers reported increased purchases of product from nonsubject countries because of availability and an expanded approved manufacturers list. Purchasers reported decreased purchases of product from nonsubject countries because of reduced demand. Eighteen purchasers had purchased LDW line pipe from subject sources before the subject orders entered into effect.

Table LP 2.16 LDW line pipe: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease	Did not purchase
United States	7	11	5	0	0	2
Canada	0	0	6	6	4	10
China	0	0	6	0	0	20
Greece	0	0	8	4	2	12
India	0	0	7	1	2	15
South Korea (subject)	1	3	11	3	0	11
Turkey (subject)	0	0	7	2	1	15
Nonsubject sources	2	4	12	0	1	6
Sources unknown	0	0	12	0	0	10

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

Changes in purchasing patterns

Nineteen purchasers had purchased LDW line pipe from subject sources before the subject orders entered into effect. Those purchasers were asked how their purchases from the subject sources had changed after the orders went into effect (table LP 2.17). Purchasers most frequently discontinued purchases of imported LDW line pipe from Greece, and most frequently reduced purchases from Canada and Turkey (subject sources) because of the order. In addition, some purchasers reported changing purchasing patterns since 2018 for reasons other than the order, with a majority indicating this to be the case for imports from Canada. Sixteen of 20 purchasers noted not changing their patterns of purchasing nonsubject imports. Of the four that did change, three did so due to the subject orders being placed into effect, and one changed purchasing patterns for other reasons.

Table LP 2.17 LDW line pipe: Count of purchasers' responses regarding changes in purchase patterns from subject and nonsubject sources due to the subject orders and other reasons

Source of purchases	No change	Discontinued due to the order	Reduced due to the order	Changed patterns for other reasons
Canada	6	2	4	6
China	12	3	0	1
Greece	9	4	3	2
India	11	3	2	0
South Korea (subject)	14	0	2	2
Turkey (subject)	11	1	4	0

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

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing LDW line pipe produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 22 factors (table LP 2.18) for which they were asked to rate the importance.

A plurality of purchasers reported U.S. LDW line pipe and LDW line pipe imported from Canada were comparable for all factors other than availability of product greater than 16 inches to 24 inches and delivery time, for which a plurality of purchasers reported U.S. product was superior. U.S. LDW line pipe was rated as superior to LDW line pipe imported from China by a plurality of purchasers for all factors except price, for which U.S. product was rated as inferior, and availability of weld type and payment terms, for which most purchasers rated the two as

comparable.²¹ A majority of purchasers reported U.S. LDW line pipe and LDW line pipe imported from Greece as comparable for all but four factors. U.S. product was rated by a majority of purchasers as superior to that from Greece for delivery time; a plurality of purchasers rated the U.S. as inferior on price, and equally superior and comparable on availability of >16" to ≤24" pipe and pipe >48". A majority of purchasers reported U.S. LDW line pipe and LDW line pipe imported from India as comparable for all but three factors: a plurality reported U.S. product superior on delivery time, equal numbers rated U.S. superior and comparable on U.S. transportation costs, and equal numbers rated U.S. inferior and comparable on price. A plurality of purchasers reported U.S. LDW line pipe and LDW line pipe imported from South Korea (subject) as comparable for all but three factors; a plurality rated U.S. product inferior on price but superior on delivery time and U.S. transportation costs. A plurality of purchasers reported U.S. LDW line pipe and LDW line pipe imported from Turkey (subject) as comparable for all but two factors; a plurality reported U.S. product as superior on delivery time and U.S. transportation costs.

A majority of purchasers reported U.S. LDW line pipe and LDW line pipe imported from nonsubject sources was comparable for all but two factors: delivery time, where most purchasers reported the U.S. product was superior, and price, for which most purchasers reported the U.S. product was inferior.

²¹ There were seven factors for which the equal number of purchasers reported the U.S. as superior to China as the number that reported they were comparable (for six factors) or inferior (for total installation costs).

Table LP 2.18 LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Canada	7	14	0
Availability of size >16" to ≤24"	U.S. v. Canada	11	9	1
Availability of size >24" to ≤48"	U.S. v. Canada	9	11	1
Availability of size >48"	U.S. v. Canada	6	13	0
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Canada	8	13	0
Delivery terms	U.S. v. Canada	7	13	0
Delivery time	U.S. v. Canada	11	10	0
Discounts offered	U.S. v. Canada	2	15	1
Minimum quantity requirements	U.S. v. Canada	4	16	0
Packaging	U.S. v. Canada	2	18	0
Payment terms	U.S. v. Canada	1	18	1
Price	U.S. v. Canada	2	14	4
Producer available capacity	U.S. v. Canada	3	16	1
Product consistency	U.S. v. Canada	2	18	1
Product range	U.S. v. Canada	4	15	1
Project specification	U.S. v. Canada	2	17	1
Quality meets industry standards	U.S. v. Canada	1	19	0
Quality exceeds industry standards	U.S. v. Canada	1	19	1
Reliability of supply	U.S. v. Canada	5	15	0
Technical support/service	U.S. v. Canada	3	18	0
Total installation costs	U.S. v. Canada	3	15	1
U.S. transportation costs	U.S. v. Canada	8	10	1

Table continued.

Table LP 2.18 (Continued) LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. China	3	2	0
Availability of size >16" to ≤24"	U.S. v. China	2	2	0
Availability of size >24" to ≤48"	U.S. v. China	2	2	0
Availability of size >48"	U.S. v. China	2	2	1
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. China	2	4	0
Delivery terms	U.S. v. China	3	2	0
Delivery time	U.S. v. China	4	1	0
Discounts offered	U.S. v. China	3	2	0
Minimum quantity requirements	U.S. v. China	2	2	1
Packaging	U.S. v. China	3	2	0
Payment terms	U.S. v. China	2	3	0
Price	U.S. v. China	2	1	3
Producer available capacity	U.S. v. China	2	2	1
Product consistency	U.S. v. China	3	2	0
Product range	U.S. v. China	2	2	1
Project specification	U.S. v. China	3	2	0
Quality meets industry standards	U.S. v. China	3	2	0
Quality exceeds industry standards	U.S. v. China	3	2	0
Reliability of supply	U.S. v. China	3	2	0
Technical support/service	U.S. v. China	3	2	0
Total installation costs	U.S. v. China	2	1	2
U.S. transportation costs	U.S. v. China	4	1	0

Table continued.

Table LP 2.18 (Continued) LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Greece	6	11	1
Availability of size >16" to ≤24"	U.S. v. Greece	8	8	1
Availability of size >24" to ≤48"	U.S. v. Greece	7	8	2
Availability of size >48"	U.S. v. Greece	7	7	3
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Greece	7	10	1
Delivery terms	U.S. v. Greece	5	12	0
Delivery time	U.S. v. Greece	15	3	0
Discounts offered	U.S. v. Greece	1	14	1
Minimum quantity requirements	U.S. v. Greece	4	12	1
Packaging	U.S. v. Greece	2	14	1
Payment terms	U.S. v. Greece	3	12	1
Price	U.S. v. Greece	2	7	8
Producer available capacity	U.S. v. Greece	5	10	2
Product consistency	U.S. v. Greece	0	16	1
Product range	U.S. v. Greece	2	13	3
Project specification	U.S. v. Greece	1	15	1
Quality meets industry standards	U.S. v. Greece	1	15	1
Quality exceeds industry standards	U.S. v. Greece	1	15	2
Reliability of supply	U.S. v. Greece	4	12	2
Technical support/service	U.S. v. Greece	0	18	0
Total installation costs	U.S. v. Greece	4	10	3
U.S. transportation costs	U.S. v. Greece	7	8	2

Table continued.

Table LP 2.18 (Continued) LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. India	3	5	0
Availability of size >16" to ≤24"	U.S. v. India	3	5	0
Availability of size >24" to ≤48"	U.S. v. India	2	6	0
Availability of size >48"	U.S. v. India	2	4	2
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. India	1	7	1
Delivery terms	U.S. v. India	3	5	0
Delivery time	U.S. v. India	6	2	1
Discounts offered	U.S. v. India	0	6	1
Minimum quantity requirements	U.S. v. India	2	6	0
Packaging	U.S. v. India	1	6	0
Payment terms	U.S. v. India	1	6	0
Price	U.S. v. India	0	4	4
Producer available capacity	U.S. v. India	0	7	0
Product consistency	U.S. v. India	3	6	0
Product range	U.S. v. India	0	6	1
Project specification	U.S. v. India	1	6	1
Quality meets industry standards	U.S. v. India	3	5	1
Quality exceeds industry standards	U.S. v. India	3	4	2
Reliability of supply	U.S. v. India	3	5	2
Technical support/service	U.S. v. India	3	5	1
Total installation costs	U.S. v. India	1	5	2
U.S. transportation costs	U.S. v. India	3	3	2

Table continued.

Table LP 2.18 (Continued) LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. South Korea (subject)	3	10	3
Availability of size >16" to ≤24"	U.S. v. South Korea (subject)	3	9	3
Availability of size >24" to ≤48"	U.S. v. South Korea (subject)	3	8	5
Availability of size >48"	U.S. v. South Korea (subject)	5	7	4
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. South Korea (subject)	3	11	2
Delivery terms	U.S. v. South Korea (subject)	4	12	0
Delivery time	U.S. v. South Korea (subject)	9	5	2
Discounts offered	U.S. v. South Korea (subject)	0	13	1
Minimum quantity requirements	U.S. v. South Korea (subject)	2	10	3
Packaging	U.S. v. South Korea (subject)	1	12	0
Payment terms	U.S. v. South Korea (subject)	2	11	1
Price	U.S. v. South Korea (subject)	1	6	8
Producer available capacity	U.S. v. South Korea (subject)	4	8	2
Product consistency	U.S. v. South Korea (subject)	2	11	1
Product range	U.S. v. South Korea (subject)	3	10	2
Project specification	U.S. v. South Korea (subject)	4	10	2
Quality meets industry standards	U.S. v. South Korea (subject)	3	13	0
Quality exceeds industry standards	U.S. v. South Korea (subject)	3	11	2
Reliability of supply	U.S. v. South Korea (subject)	4	9	1
Technical support/service	U.S. v. South Korea (subject)	4	11	1
Total installation costs	U.S. v. South Korea (subject)	1	11	1
U.S. transportation costs	U.S. v. South Korea (subject)	6	5	2

Table continued.

Table LP 2.18 (Continued) LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Turkey (subject)	5	5	0
Availability of size >16" to ≤24"	U.S. v. Turkey (subject)	3	7	0
Availability of size >24" to ≤48"	U.S. v. Turkey (subject)	2	8	0
Availability of size >48"	U.S. v. Turkey (subject)	3	5	2
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Turkey (subject)	2	8	0
Delivery terms	U.S. v. Turkey (subject)	2	7	0
Delivery time	U.S. v. Turkey (subject)	7	2	1
Discounts offered	U.S. v. Turkey (subject)	1	8	0
Minimum quantity requirements	U.S. v. Turkey (subject)	0	9	0
Packaging	U.S. v. Turkey (subject)	0	9	0
Payment terms	U.S. v. Turkey (subject)	1	8	0
Price	U.S. v. Turkey (subject)	1	5	4
Producer available capacity	U.S. v. Turkey (subject)	2	7	0
Product consistency	U.S. v. Turkey (subject)	1	9	0
Product range	U.S. v. Turkey (subject)	1	9	0
Project specification	U.S. v. Turkey (subject)	0	10	0
Quality meets industry standards	U.S. v. Turkey (subject)	1	9	0
Quality exceeds industry standards	U.S. v. Turkey (subject)	2	8	0
Reliability of supply	U.S. v. Turkey (subject)	0	10	0
Technical support/service	U.S. v. Turkey (subject)	0	10	0
Total installation costs	U.S. v. Turkey (subject)	2	8	0
U.S. transportation costs	U.S. v. Turkey (subject)	6	3	1

Table continued.

Table LP 2.18 (Continued) LDW line pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	2	7	0
Availability of size >16" to ≤24"	U.S. v. Nonsubject	2	6	1
Availability of size >24" to ≤48"	U.S. v. Nonsubject	2	4	3
Availability of size >48"	U.S. v. Nonsubject	2	6	1
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Nonsubject	1	5	3
Delivery terms	U.S. v. Nonsubject	2	5	1
Delivery time	U.S. v. Nonsubject	5	4	0
Discounts offered	U.S. v. Nonsubject	0	7	1
Minimum quantity requirements	U.S. v. Nonsubject	1	6	2
Packaging	U.S. v. Nonsubject	0	7	0
Payment terms	U.S. v. Nonsubject	0	7	1
Price	U.S. v. Nonsubject	1	2	5
Producer available capacity	U.S. v. Nonsubject	0	6	2
Product consistency	U.S. v. Nonsubject	1	6	2
Product range	U.S. v. Nonsubject	1	6	2
Project specification	U.S. v. Nonsubject	1	7	1
Quality meets industry standards	U.S. v. Nonsubject	1	7	1
Quality exceeds industry standards	U.S. v. Nonsubject	1	6	2
Reliability of supply	U.S. v. Nonsubject	1	7	1
Technical support/service	U.S. v. Nonsubject	1	7	1
Total installation costs	U.S. v. Nonsubject	0	5	1
U.S. transportation costs	U.S. v. Nonsubject	2	3	1

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

Note: With respect to cost/price factors, a rating of superior means that the cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported LDW line pipe

In order to determine whether U.S.-produced LDW line pipe can generally be used in the same applications as imports from Canada, China, Greece, India, South Korea (subject), and/or Turkey (subject), U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. U.S. producers indicated that all LDW line pipe is always interchangeable between any of the countries. As shown in tables 2.19 and 2.20, a plurality of importers rated product from the United States and that imported from China, Greece, and Turkey as always interchangeable as well, but responses were more mixed with respect to the other three subject sources. Purchasers' responses were even more varied, but there were relatively more purchasers noting LDWP from the United States were more interchangeable with product imported from Canada and Greece than from other subject sources. No purchaser reported that domestic and subject imported LDWP were never interchangeable.

Interchangeability was noted by responding firms to be limited by quality of the mill/approval for use; some sources producing limited pipe sizes, weld types, or wall thicknesses; U.S. and Canadian LDW line pipe were superior quality to LDW line pipe from China and India; some purchasers prefer vertically integrated producers; and there are limited sources for LDW line pipe for deep water, with very large diameter, and with ultra heavy wall. Three of four foreign producers indicated that the LDW line pipe sold to their home market is interchangeable with that exported to the United States and/or third-country markets.

Table LP 2.19 LDW line pipe: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Canada	3	3	1	0
U.S. vs. China	3	1	2	1
U.S. vs. Greece	4	1	2	0
U.S. vs. India	2	1	3	0
U.S. vs. South Korea (subject)	3	4	2	0
U.S. vs. Turkey (subject)	3	2	2	0
Canada vs. China	3	1	2	1
Canada vs. Greece	3	2	2	0
Canada vs. India	2	1	3	0
Canada vs. South Korea (subject)	3	3	1	0
Canada vs. Turkey (subject)	3	2	2	0
China vs. Greece	3	1	2	1
China vs. India	2	1	2	1
China vs. South Korea (subject)	3	1	2	1
China vs. Turkey (subject)	3	1	2	1
Greece vs. India	3	1	2	0
Greece vs. South Korea (subject)	4	1	2	0
Greece vs. Turkey (subject)	4	1	2	0
India vs. South Korea (subject)	3	1	2	0
India vs. Turkey (subject)	3	1	2	0
South Korea (subject) vs. Turkey (subject)	4	2	1	0
U.S. vs. other	3	2	1	0
Canada vs. other	2	3	1	0
China vs. other	2	1	2	0
Greece vs. other	3	1	2	0
India vs. other	2	1	2	0
South Korea (subject) vs. other	2	3	1	0
Turkey (subject) vs. other	2	1	2	0

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

Table LP 2.20 LDW line pipe: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Canada	11	6	4	0
U.S. vs. China	3	2	3	1
U.S. vs. Greece	9	6	5	0
U.S. vs. India	6	3	4	1
U.S. vs. South Korea (subject)	7	7	6	0
U.S. vs. Turkey (subject)	5	4	6	0
Canada vs. China	3	1	4	0
Canada vs. Greece	8	4	3	0
Canada vs. India	3	3	4	0
Canada vs. South Korea (subject)	7	5	1	0
Canada vs. Turkey (subject)	4	3	5	0
China vs. Greece	3	2	2	0
China vs. India	2	1	3	0
China vs. South Korea (subject)	4	2	2	0
China vs. Turkey (subject)	3	2	4	0
Greece vs. India	4	2	3	0
Greece vs. South Korea (subject)	5	5	2	0
Greece vs. Turkey (subject)	3	3	5	0
India vs. South Korea (subject)	4	3	2	0
India vs. Turkey (subject)	2	2	5	0
South Korea (subject) vs. Turkey (subject)	3	2	4	0
U.S. vs. other	4	3	4	0
Canada vs. other	2	4	1	0
China vs. other	2	1	1	0
Greece vs. other	3	3	1	0
India vs. other	3	2	1	0
South Korea (subject) vs. other	2	3	1	0
Turkey (subject) vs. other	2	1	2	0

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of LDW line pipe from the United States, subject, or nonsubject countries. As seen in table LP 2.21, four of five producers indicated there are never any factors other than price that are significant. Table LP 2.22 and table LP 2.23 demonstrate that there are a number of importers and purchasers which believe there are factors other than price that are important in their sales/purchases of LDW line pipe. A number of importers and purchasers indicated that these factors are always important. For some country pair comparisons responses varied greatly: just as many said there were always factors other than price as said there were never factors other than price that were important. The

greatest proportion of purchasers noted across comparisons that there were sometimes factors other than price that were important in their purchasing decisions. A majority of importers indicated there are sometimes significant non-price factors when comparing U.S. LDW line pipe to that imported from four subject countries. Purchasers and importers reported differences other than price not listed above including: Korean product can be higher quality than domestic but its quota on large OD pipe is very limited;²² Greek quality is superior to U.S. and Canadian producers' quality; and there is no Indian or Chinese LDW line pipe currently in the United States.

²² See Part LDWP 1 for more information regarding the changing nature of import quotas for South Korea.

Table LP 2.21 LDW line pipe: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Canada	0	0	1	4
U.S. vs. China	0	0	1	4
U.S. vs. Greece	0	0	1	4
U.S. vs. India	0	0	1	4
U.S. vs. South Korea (subject)	0	0	1	4
U.S. vs. Turkey (subject)	0	0	1	4
Canada vs. China	0	0	1	4
Canada vs. Greece	0	0	1	4
Canada vs. India	0	0	1	4
Canada vs. South Korea (subject)	0	0	1	4
Canada vs. Turkey (subject)	0	0	1	4
China vs. Greece	0	0	1	4
China vs. India	0	0	1	4
China vs. South Korea (subject)	0	0	1	4
China vs. Turkey (subject)	0	0	1	4
Greece vs. India	0	0	1	4
Greece vs. South Korea (subject)	0	0	1	4
Greece vs. Turkey (subject)	0	0	1	4
India vs. South Korea (subject)	0	0	1	4
India vs. Turkey (subject)	0	0	1	4
South Korea (subject) vs. Turkey (subject)	0	0	1	4
U.S. vs. other	0	0	1	4
Canada vs. other	0	0	1	4
China vs. other	0	0	1	4
Greece vs. other	0	0	1	4
India vs. other	0	0	1	4
South Korea (subject) vs. other	0	0	1	4
Turkey (subject) vs. other	0	0	1	4

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

Table LP 2.22 LDW line pipe: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Canada	2	1	2	2
U.S. vs. China	2	1	1	2
U.S. vs. Greece	2	1	2	2
U.S. vs. India	1	2	1	2
U.S. vs. South Korea (subject)	2	1	4	2
U.S. vs. Turkey (subject)	2	1	2	2
Canada vs. China	2	1	1	2
Canada vs. Greece	2	1	2	2
Canada vs. India	1	2	1	2
Canada vs. South Korea (subject)	2	1	2	2
Canada vs. Turkey (subject)	2	1	2	2
China vs. Greece	2	2	0	2
China vs. India	1	2	1	2
China vs. South Korea (subject)	1	2	1	2
China vs. Turkey (subject)	1	2	1	2
Greece vs. India	1	2	1	2
Greece vs. South Korea (subject)	2	1	2	2
Greece vs. Turkey (subject)	2	1	2	2
India vs. South Korea (subject)	1	1	2	2
India vs. Turkey (subject)	1	1	2	2
South Korea (subject) vs. Turkey (subject)	1	1	2	2
U.S. vs. other	1	1	2	2
Canada vs. other	1	1	2	2
China vs. other	2	1	1	2
Greece vs. other	1	1	1	3
India vs. other	1	2	1	2
South Korea (subject) vs. other	1	1	2	2
Turkey (subject) vs. other	1	1	2	2

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

Foreign producers were asked how easily they can shift their sales between the U.S. and third-country markets. *** replied, “Of *** primary export markets, only the United States maintains trade restrictions against imports from ***. ***, therefore, is more easily able to shift its sales of LDWP to other countries than to the United States. Since 2018, *** has devoted resources into solidifying alternative export markets other than the United States due to the adverse AD finding by Commerce, currently in litigation, and the imposition of Section 232 duties.” *** replied, “Basically our LSAW pipes are ‘order-made’ basis so we supply the our pipes per each project's demand in the country.” *** stated it only sells pipe to the United States and ***.

Table LP 2.23 LDW line pipe: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Canada	3	2	7	7
U.S. vs. China	2	2	4	0
U.S. vs. Greece	3	2	12	1
U.S. vs. India	2	2	8	0
U.S. vs. South Korea (subject)	3	2	12	2
U.S. vs. Turkey (subject)	3	0	9	2
Canada vs. China	1	1	4	0
Canada vs. Greece	2	1	8	1
Canada vs. India	1	1	6	0
Canada vs. South Korea (subject)	3	1	6	1
Canada vs. Turkey (subject)	2	0	6	2
China vs. Greece	1	1	3	0
China vs. India	1	1	3	0
China vs. South Korea (subject)	3	1	3	0
China vs. Turkey (subject)	2	1	3	0
Greece vs. India	1	0	6	0
Greece vs. South Korea (subject)	3	0	6	1
Greece vs. Turkey (subject)	2	0	6	1
India vs. South Korea (subject)	3	0	5	0
India vs. Turkey (subject)	2	0	5	1
South Korea (subject) vs. Turkey (subject)	2	0	4	0
U.S. vs. other	2	2	5	0
Canada vs. other	1	1	3	0
China vs. other	1	1	1	0
Greece vs. other	1	0	3	0
India vs. other	1	0	3	0
South Korea (subject) vs. other	1	0	3	0
Turkey (subject) vs. other	1	0	3	0

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

Elasticity estimates

This section discusses supply, demand, and substitution elasticity estimates in the LDW line pipe market.²³

U.S. supply elasticity

The domestic supply elasticity for LDW line pipe measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of LDW line pipe. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced LDW line pipe. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 6 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for LDW line pipe measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of LDW line pipe. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the LDW line pipe in the production of any downstream products. As noted earlier, there are few, if any, substitutes for LDWP. In addition, the cost component of LDWP is likely relatively moderate for its main uses, though still important share of the total cost of an oil and gas transmission project. Based on the available information, the aggregate demand for LDW line pipe is likely to be inelastic; a range of -0.25 to -0.50 is suggested.

²³ No party commented on the estimates that were presented in the prehearing report.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.²⁴ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced LDW line pipe and imported LDW line pipe is likely to be in the range of 3 to 5. This estimate of substitution elasticity is driven by a number of factors including broad comparability of pipe between sources, reported interchangeability, similar ability to meet quality standards, and few domestic content requirements, differences in lead times, quotas for product from South Korea, certain types of LDW pipe being available from certain sources, and some purchasers' preferences for producers or country of origin.

²⁴ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Line 3: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires. Eight firms, which accounted for the vast majority of U.S. production of LDW line pipe during 2023, supplied information on their operations in these reviews on LDW line pipe.^{1 2}

Table LP 3.1 presents events in the U.S. industry since January 1, 2018.

Table LP 3.1 LDW line pipe: Developments in the U.S. industry since 2018

Item	Firm	Event
***	***	***
Layoffs	Stupp Corporation	In November 2021, Stupp Corporation laid off 45 workers at its Baton Rouge, LA, pipe manufacturing plant. In October 2021, Stupp had notified the state of Louisiana that it had decided to lay off up to 300 workers at the pipe manufacturing plant due to the decline in the oil market.
Purchase	Dura-Bond	In 2022, Dura-Bond purchased the U.S. Steel McKeesport Tubular Operations facility in McKeesport, PA, which produces ERW pipe in sizes from 8" to 20" O.D. Dura-Bond had leased the McKeesport ERW mill since 2017.
Purchase	California Steel Industries Inc. (Nucor)	In 2022, Nucor purchased a majority ownership of California Steel Industries. ***
***	***	***
Merger	Berg Pipe	In April 2023, Turkish producer Borusan Mannesmann finalized the 100 percent acquisition of Berg Pipe for \$162 million, to create Borusan Pipe. Berg Pipe was one of the leading manufacturers of large-diameter line pipe in the U.S. with two facilities in Florida and Alabama.
Expansion	Welspun Tubular	In October 2024, Welspun Tubular announced that it will invest \$100 million at their Little Rock, AR, plant to expand and upgrade their pipe manufacturing capacity to include LDW line

¹ Evraz Oregon completed a U.S. producer questionnaire and is referenced throughout this report. Evraz Oregon's questionnaire responses are generally not presented throughout most of this report due to the Commission's determination in the original investigations to exclude the firm from the domestic industry. In tabulations where nine producers are referenced, Evraz Oregon is the ninth firm.

² ***; produced *** of LDW line pipe in 2023, and had the *** share of production for shares of LDW line pipe production in 2023 with *** of all reported LDW line pipe production during 2023.

Item	Firm	Event
		pipe of up to an OD of 24".
Investment	Borusan Pipe	In January 2025, Borusan Pipe announced a \$68 million investment to their pipe production facility in Panama City, FL, to increase their LDWP production capacity.
Expansion	Jindal Baytown	In 2023, Jindal finished the expansion of their pipe and plate mill in Baytown, Texas. Jindal invested \$260 million into the mill.
Certification	Jindal Baytown	In April 2024, Jindal successfully met the requirements for hydrogen transportation in line pipe manufactured from coals produced by ArcelorMittal's AM/NS Calvert joint venture, at its Baytown facility.

Sources: "Borusan Mannesmann finalizes acquisition of Berg Pipe," World Pipelines, April 17, 2023. Retrieved April 14, 2024 at <https://www.worldpipelines.com/business-news/17042023/borusan-mannesmann-finalises-acquisition-of-berg-pipe/>.; "Steel pipe manufacturer laying off dozens at its Baton Rouge plant," The Advocate, September 27, 2021. Retrieved April 1, 2024 at https://www.theadvocate.com/baton_rouge/news/business/steel-pipe-manufacturer-laying-off-dozens-at-its-baton-rouge-plant/article_5868ef26-1fb2-11ec-a4a9-a301155f2569.html ***; West Orlando News, "\$68 Million Invested to Advance Pipe Production Technology in Florida," January 11, 2025 at <https://westorlandonews.com/68-million-invested-to-advance-pipe-production-technology-in-florida/>; GlobeNewswire, "Welspun Tubular to invest \$100 million in Little Rock plant to expand and upgrade current pipe portfolio," November 1, 2024 at <https://www.globenewswire.com/news-release/2024/11/01/2973417/0/en/Welspun-Tubular-to-invest-100-million-in-Little-Rock-plant-to-expand-and-upgrade-current-pipe-portfolio.html> ; Tube City Almanac, "Dura-Bond Purchases Former U.S. Steel Facility," April 11, 2022 at <http://almanac.tubecityonline.com/almanac/?e=2704>; Charlotte Business Journal, "Nucor completes purchase of majority stake in California Steel Industries," February 4, 2022 at <https://www.bizjournals.com/charlotte/news/2022/02/04/nucor-closes-on-stake-in-california-steel.html> ; ***
Business Standard, "JSW Steel USA Begins Phase II upgrade in plate mill facility in Texas, US," November 1, 2021 at https://www.business-standard.com/article/pti-stories/jsw-steel-usa-begins-phase-ii-upgrade-of-plate-mill-facility-in-texas-us-121110100530_1.html.

Changes experienced by the industry

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of LDW line pipe since January 1, 2018. Seven of nine producers indicated in their questionnaires that they had experienced such changes. Table LP 3.2 presents the changes identified by these producers.

Table LP 3.2 LDW line pipe: Reported changes in operations since January 1, 2018

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Plant openings	***
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Expansions	***
Acquisitions	***
Acquisitions	***
Weather related or force majeure events	***
Other	***

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

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of LDW line pipe. Four of the responding firms *** indicated that they had anticipated changes in operations. Their responses appear in Table LP 3.3.

Table LP 3.3 LDW line pipe: Anticipated changes in operations

Firm name	Narrative on anticipated changes in operations
***	***
***	***
***	***
***	***

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

U.S. production, capacity, and capacity utilization

Table LP 3.4 presents U.S. producers' installed and practical capacity and production on the same equipment. Overall capacity decreased between 2018 and 2023, and was lower in January to September 2024 than in January to September 2023. This downward trend reflected developments at the CSI facility purchased by Nucor as well as long-time producer Stupp, and was only partially offset by the API 5L certification of Jindal's Baytown facility. In their posthearing brief, the domestic interested parties indicated that "Stupp has subsequently sold all of its pipe-making assets, which have all been removed from the former manufacturing site.

Stupp retains the majority of the real estate that housed the site.”^{3 4} At the Commission’s hearing, Dura-Bond company officials indicated that its LSAW production facility in Steelton, Pennsylvania produces LDW line pipe in outer diameters ranging from 24 to 42 inches.⁵

Table LP 3.4 LDW line pipe: U.S. producers’ installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January through September

Item	Measure	2018	2019	2020
Installed overall	Capacity	4,324,000	4,324,000	4,324,000
Installed overall	Production	1,511,668	1,881,393	1,107,081
Installed overall	Utilization	35.0	43.5	25.6
Practical overall	Capacity	3,518,068	3,518,068	3,043,268
Practical overall	Production	1,511,668	1,881,393	1,107,081
Practical overall	Utilization	43.0	53.5	36.4
Practical LDW line pipe	Capacity	3,243,528	3,281,140	2,810,561
Practical LDW line pipe	Production	1,426,557	1,786,876	1,051,165
Practical LDW line pipe	Utilization	44.0	54.5	37.4

Table continued

³ Domestic interested parties posthearing brief, Exhibit 1, p. 89.

⁴ At the Commission’s hearing, Welspun indicated that it will add an additional 350,000 short tons of production capacity (LDW line pipe) to its existing Little Rock, Arkansas production facility in 2026. Hearing transcript, p. 46 (Phillips).

⁵ Hearing transcript, p. 41 (Norris).

Table LP 3.4 LDW line pipe (Continued): U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; Interim period is January through September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	4,324,000	4,474,000	3,862,000	2,971,500	2,525,250
Installed overall	Production	265,046	564,970	1,201,550	828,658	749,666
Installed overall	Utilization	6.1	12.6	31.1	27.9	29.7
Practical overall	Capacity	3,043,068	3,165,554	2,758,002	2,146,290	2,129,250
Practical overall	Production	265,046	564,970	1,201,550	828,658	749,666
Practical overall	Utilization	8.7	17.8	43.6	38.6	35.2
Practical LDW line pipe	Capacity	2,653,688	2,637,074	2,370,741	1,728,478	1,778,022
Practical LDW line pipe	Production	217,544	426,274	1,086,892	731,761	649,602
Practical LDW line pipe	Utilization	8.2	16.2	45.8	42.3	36.5

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

Constraints on capacity

Table LP 3.5 presents U.S. producers' reported narratives regarding practical capacity constraints. Six of the responding LDW line pipe producers reported constraints on capacity.

Table LP 3.5 LDW line pipe: U.S. producers' reported capacity constraints since January 1, 2018

Type of change	Firm name and narrative on constraints to practical overall capacity
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table LP 3.6 presents U.S. producers' production, capacity, and capacity utilization for LDW line pipe. U.S. producers' capacity to produce LDW line pipe fluctuated year to year, ending 26.9 percent lower in 2023 than in 2018, and was slightly higher by 2.9 percent in January to September 2024 than in January to September 2023. U.S. production fluctuated year to year, ending 23.8 percent lower in 2023 than in 2018, and was 11.2 percent lower in January to September 2024 than in January to September 2023. Two firms (***) accounted for a substantial portion of production during 2023 and January to September 2024.

As noted above, (***).⁶ ***. ***. LDW line pipe production for (***) was lower in January to September 2024 than in January to September 2023. U.S. producers' capacity utilization increased by 1.9 percentage points in 2018 to 2023. Capacity utilization was 5.8 percentage points lower in January to September 2024 than in January to September 2023. Four of seven firms (**) had lower capacity utilization in 2023 than in 2018, and capacity utilization was lower for *** in January to September 2024 than in January to September 2023.⁷

⁶ *** U.S. producer questionnaire response, section IV-2a.

⁷ Evraz Oregon's U.S. producer questionnaire data has been excluded from the following responses due to the Commission's determination in its original investigations that appropriate circumstances existed to exclude Evraz Oregon as a related party from both the LDW line pipe and LDW structural pipe domestic industries.

Table LP 3.6 LDW line pipe: U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons; Interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	3,243,528	3,281,140	2,810,561

Table continued.

Table LP 3.6 LDW line pipe (continued): U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons; interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	* *	* *	*		
All firms	2,653,688	2,637,074	2,370,741	1,728,478	1,778,022

Table continued

Table LP 3.6 LDW line pipe (Continued): U.S. producers' output, by firm and period

Production

Production in short tons; interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	1,426,557	1,786,876	1,051,165

Table continued.

Table LP 3.6 LDW line pipe (Continued): U.S. producers' output, by firm and period

Production

Production in short tons; interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	*	*	*	*	
All firms	217,544	426,274	1,086,892	731,761	649,602

Table continued

Table LP 3.6 LDW line pipe (Continued): U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	44.0	54.5	37.4

Table continued

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Table LP 3.6 LDW line pipe (Continued): U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	* *	* *	*	*	
All firms	8.2	16.2	45.8	42.3	36.5

Table continued.

Table LP 3.6 LDW line pipe (Continued): U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2018	2019	2020
* * * *	* *	*	
All firms	100.0	100.0	100.0

Table continued

Table LP 3.6 LDW line pipe (Continued): U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	* *	* *	* *	*	
All firms	100.0	100.0	100.0	100.0	100.0

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

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

Figure 3.1 LDW line pipe: U.S. producers' output, by period

* * * * *

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

Alternative products

As shown in Table LP 3.7, at least three quarters of the product produced during 2018 to 2023 by U.S. producers was LDW line pipe. During 2021 and 2022, the share of LDW line pipe production was noticeably below 90.0 percent due to market conditions, which include ***.

LDW line pipe accounted for 90.5 percent of U.S. producers' overall production during 2023, with other products accounting for 6.8 percent, LDW structural pipe accounting for 2.7 percent of overall production during 2023. Other products produced on the same equipment include small diameter line pipe (under 16") and OCTG.

Table LP 3.7 LDW line pipe: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; ratio and share in percent

Product type	Measure	2018	2019	2020
LDW line pipe	Quantity	1,426,557	1,786,876	1,051,165
LDW structural pipe	Quantity	42,013	57,117	34,204
Other products	Quantity	43,098	37,400	21,712
All out-of-scope products	Quantity	85,111	94,517	55,916
All products	Quantity	1,511,668	1,881,393	1,107,081
LDW line pipe	Share	94.4	95.0	94.9
LDW structural pipe	Share	2.8	3.0	3.1
Other products	Share	2.9	2.0	2.0
All out-of-scope products	Share	5.6	5.0	5.1
All products	Share	100.0	100.0	100.0

Table continued

Table LP 3.7 LDW line pipe (Continued): U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; ratio and share in percent; interim period January to September

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW line pipe	Quantity	217,544	426,274	1,086,892	731,761	649,602
LDW structural pipe	Quantity	16,422	64,387	32,530	23,941	49,835
Other products	Quantity	31,080	74,309	82,128	72,956	50,229
All out-of-scope products	Quantity	47,502	138,696	114,658	96,897	100,064
All products	Quantity	265,046	564,970	1,201,550	828,658	749,666
LDW line pipe	Share	82.1	75.5	90.5	88.3	86.7
LDW structural pipe	Share	6.2	11.4	2.7	2.9	6.6
Other products	Share	11.7	13.2	6.8	8.8	6.7
All out-of-scope products	Share	17.9	24.5	9.5	11.7	13.3
All products	Share	100.0	100.0	100.0	100.0	100.0

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

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

Table LP 3.8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for at least 82.8 percent of total shipments in every year from 2018 to 2023 of U.S. producers' total shipments.⁸ The quantity of U.S. shipments

⁸ None of the responding firms reported internal consumption or reported transfers to related parties.

fluctuated year-to-year, decreasing overall by 18.7 percent from 2018 to 2023, but was 8.3 percent higher in January to September 2024 than in January to September 2023. The decrease reflects ***, which accounted for ***, during 2018 to 2020. The value of U.S. producers' U.S. shipments fluctuated year to year, slightly increasing overall by 4.7 percent from 2018 to 2023, and were 0.4 percent higher in January to September 2024 than in January to September 2023.

The average unit value of U.S. producers' U.S. shipments fluctuated year to year, increasing overall by 28.7 percent from 2018 to 2023, but was 7.3 percent lower in January to September 2024 than in January to September 2023.

By quantity, export shipments accounted for a minor share of U.S. producers' total shipments in each year from 2018 to 2023.⁹ The quantity and value and average unit value of export shipments increased from 2018 to 2023, but were all lower in January to September 2024 than in January to September 2023.

⁹ (***) reported exports during 2018 to 2023, while *** during interim 2024.

Table LP 3.8 LDW line pipe: U.S. producers' shipments by destination and period

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

Item	Measure	2018	2019	2020
U.S. shipments	Quantity	1,356,052	1,744,225	1,093,067
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	1,785,970	2,670,898	1,362,828
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	1,317	1,531	1,247
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	100.0	100.0	100.0

Table continued

Table LP 3.8 LDW line pipe (Continued): U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. shipments	Quantity	255,408	304,092	1,102,459	657,925	712,406
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	307,119	552,760	1,869,105	1,150,571	1,154,903
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	1,202	1,818	1,695	1,749	1,621
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

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 "—".

U.S. producers' inventories

Table LP 3.9 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' end-of-period inventories fluctuated year-to-year but decreased by 32.3 percent from 2018 to 2024, and were 43.1 percent lower in September 2024 than in September 2023. The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments each fluctuated year to year from 2018 to 2023, each ending slightly lower, respectively. The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments were lower in January to September 2024 than in January to September 2023.

Table LP 3.9 LDW line pipe: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio are inventories to production and shipments

Item	Measure	2018	2019	2020
End-of-period inventory	Quantity	164,516	201,120	154,375
Inventory to U.S. production	Ratio	11.5	11.3	14.7
Inventory to U.S. shipments	Ratio	12.1	11.5	14.1
Inventory to total shipments	Ratio	***	***	***

Table continued

Table LP 3.9 LDW line pipe (Continued): U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio are inventories to production and shipments; interim period is January to Sept

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
End-of-period inventory	Quantity	63,364	163,458	111,411	144,674	82,271
Inventory to U.S. production	Ratio	29.1	38.3	10.3	14.8	9.5
Inventory to U.S. shipments	Ratio	24.8	53.8	10.1	16.5	8.7
Inventory to total shipments	Ratio	***	***	***	***	***

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

U.S. producers' imports from subject sources

U.S. producers' imports of LDW line pipe are presented in tables 3.10 and 3.11 (Evraz Oregon) and table LP 3.12 for ***. Evraz Oregon's LDW line pipe production ceased in 2020 (and sold and liquidated the facility),¹⁰ while its affiliates imported from *** and continued to import LDW line pipe from Canada into 2021. *** halted production of LDW line pipe in 2023 (***), while there were no reported LDW line pipe exports to the United States during 2022 and 2023.¹¹ From 2018 to 2020, Evraz Oregon produced *** short tons of LDW line pipe, but it ceased all production due to its permanent shut down in 2020. As previously mentioned, in the original investigations Evraz Oregon's U.S. producer data were excluded due to the Commission's determination that appropriate circumstances existed to exclude Evraz Oregon as a related party from both the LDW line pipe and LDW structural pipe domestic industries. In these reviews, Evraz Oregon's production during 2018 to 2020 is not included in the dataset for the domestic industry.

¹⁰ Hearing transcript, p. 161 (Cassise).

¹¹ *** foreign producer questionnaire response, section II-13.

Table LP 3.10 LDW line pipe: * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2018	2019	2020
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***

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

Table LP 3.10 LDW line pipe (Continued): * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

Table LP 3.11 LDW line pipe: * reasons for importing**

Item	Narrative response on reason(s) for importation
***'s reason for importing	***

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

During 2018, *** imported LDW line pipe from ***. In 2018, Welspun produced *** short tons of LDW line pipe, and reported ***. *** indicated it only imported LDW line pipe during 2018.¹²

Table LP 3.12 LDW line pipe: * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent; interim period is January to September

Item	Measure	2018	2019	2020
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***

Table continued

Table LP 3.12 LDW line pipe (continued): * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

U.S. employment, wages, and productivity

Table LP 3.13 shows U.S. producers' employment-related data. Production and related workers fluctuated year-to-year but increased by 24.8 percent from 2018 to 2023, but were 4.7 percent lower in January to September 2024 than in January to September 2023.¹³ At the Commission's hearing, Welspun indicated that it had approximately 950 (total) workers at its Little Rock, Arkansas LDW line pipe facility, and that the current Greenfield facility located in

¹² ***" Email correspondence with *** March 20, 2025.

¹³ ***.

the same Little Rock, Arkansas industrial site will create 175 additional jobs.¹⁴ Additionally, ACIPCO indicated that employed approximately 200 workers at its ERW mill at its two facilities in Birmingham, Alabama.¹⁵ Hours worked by PRWs fluctuated year-to-year but increased by 30.7 percent from 2018 to 2023 and were 3.9 percent higher in January to September 2024 than in January to September 2023. Wages paid fluctuated year-to-year but increased by 24.7 percent from 2018 to 2023 and were 1.3 percent higher in January to September 2024 than in January to September 2023.

Productivity decreased by 41.7 percent from 2018 to 2023, and was 14.5 percent lower in January to September 2024 than in January to September 2023. As a result of the pronounced decline in productivity, unit labor costs increased by 63.6 percent from 2018 to 2023 and were 14.2 percent higher in interim 2024 than in interim 2023.

Table LP 3.13 LDW line pipe: U.S. producers' employment related information, by period

Interim period is January through September

Item	2018	2019	2020
Production and related workers (PRWs) (number)	1,608	1,812	1,589
Total hours worked (1,000 hours)	3,086	4,207	3,178
Hours worked per PRW (hours)	1,919	2,322	2,000
Wages paid (\$1,000)	102,948	138,280	97,938
Hourly wages (dollars per hour)	\$33.36	\$32.87	\$30.82
Productivity (short tons per 1,000 hours)	462.3	424.7	330.8
Unit labor costs (dollars per short ton)	\$72	\$77	\$93

Table continued

Table LP 3.13 LDW line pipe (Continued): U.S. producers' employment related information, by period

Interim period is January through September

Item	2021	2022	2023	Interim 2023	Interim 2024
Production and related workers (PRWs) (number)	959	1,106	2,007	1,803	1,719
Total hours worked (1,000 hours)	1,411	2,011	4,034	2,959	3,073
Hours worked per PRW (hours)	1,471	1,818	2,010	1,641	1,788
Wages paid (\$1,000)	37,335	61,052	128,352	92,689	93,931
Hourly wages (dollars per hour)	\$26.46	\$30.36	\$31.82	\$31.32	\$30.57
Productivity (short tons per 1,000 hours)	154.2	212.0	269.4	247.3	211.4
Unit labor costs (dollars per short ton)	\$172	\$143	\$118	\$127	\$145

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

¹⁴ Hearing transcript, p. 46 (Phillips).

¹⁵ Hearing transcript, p. 48 (Noland).

Financial experience of U.S. LDW line pipe producers

Background¹⁶

ACIPCO, Berg, Dura-Bond, Jindal, Nucor, Stupp, and Welspun provided usable financial results on their LDW line pipe operations.¹⁷ All U.S. producers except *** reported financial data for a fiscal year ending December 31.¹⁸ All of the responding U.S. producers provided their financial data on the basis of GAAP. The net sales of LDW line pipe consisted of commercial sales only. Internal consumption and transfers to related firms were not reported.

Figure LP 3.2 presents each responding firm's share of the total reported net sales quantity in 2023.

¹⁶ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

¹⁷ ***. U.S. producers' questionnaire responses of ***, question 3-2a.

¹⁸ ***. U.S. Producers' questionnaire response, question 5-2.

Figure LP 3.2 LDW line pipe: U.S. producers' share of net sales quantity in 2023, by firm

* * * * *

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

Operations on LDW line pipe

Table LP 3.14 presents aggregated data on U.S. producers' operations in relation to LDW line pipe, while table LP 3.15 presents corresponding changes in AUVs. Table LP 3.16 presents selected company-specific financial data.

Table LP 3.14 LDW line pipe: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent; interim period is January to September

Item	Measure	2018	2019	2020
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
COGS: Raw materials	Value	***	***	***
COGS: Direct labor	Value	***	***	***
COGS: Other factory	Value	***	***	***
COGS: Total	Value	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Other expense / (income), net	Value	***	***	***
Net income or (loss)	Value	***	***	***
Depreciation/amortization	Value	***	***	***
Cash flow	Value	***	***	***
COGS: Raw materials	Ratio to NS	69.0	68.1	72.3
COGS: Direct labor	Ratio to NS	6.7	5.7	7.7
COGS: Other factory	Ratio to NS	11.6	10.5	17.0
COGS: Total	Ratio to NS	87.3	84.3	96.9
Gross profit	Ratio to NS	12.7	15.7	3.1
SG&A expense	Ratio to NS	7.2	6.2	7.0
Operating income or (loss)	Ratio to NS	5.5	9.4	(4.0)
Net income or (loss)	Ratio to NS	5.0	9.2	(3.5)

Table continued.

Table LP 3.14 (Continued) LDW line pipe: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	66.8	71.5	70.0	65.8	68.2
COGS: Direct labor	Ratio to NS	11.6	10.8	8.1	8.6	10.3
COGS: Other factory	Ratio to NS	17.5	14.3	8.8	9.4	10.8
COGS: Total	Ratio to NS	95.8	96.7	86.9	83.8	89.4
Gross profit	Ratio to NS	4.2	3.3	13.1	16.2	10.6
SG&A expense	Ratio to NS	13.2	10.9	8.5	9.3	7.8
Operating income or (loss)	Ratio to NS	(9.1)	(7.6)	4.6	6.8	2.9
Net income or (loss)	Ratio to NS	(0.7)	(6.3)	5.3	7.5	3.4

Table continued.

Table LP 3.14 (Continued) LDW line pipe: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting; interim period is January to September

Item	Measure	2018	2019	2020
COGS: Raw materials	Share	79.1	80.8	74.6
COGS: Direct labor	Share	7.6	6.8	7.9
COGS: Other factory	Share	13.3	12.4	17.5
COGS: Total	Share	100.0	100.0	100.0
Total net sales	Unit value	1,313	1,531	1,247
COGS: Raw materials	Unit value	907	1,043	902
COGS: Direct labor	Unit value	87	88	96
COGS: Other factory	Unit value	152	160	211
COGS: Total	Unit value	1,146	1,291	1,209
Gross profit or (loss)	Unit value	167	240	38
SG&A expenses	Unit value	95	95	87
Operating income or (loss)	Unit value	72	145	(49)
Net income or (loss)	Unit value	65	141	(43)
Operating losses	Count	3	0	3
Net losses	Count	3	0	3
Data	Count	7	7	7

Table continued.

Table LP 3.14 (Continued) LDW line pipe: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
COGS: Raw materials	Share	69.7	74.0	80.5	78.5	76.3
COGS: Direct labor	Share	12.1	11.2	9.3	10.3	11.6
COGS: Other factory	Share	18.3	14.8	10.2	11.2	12.1
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	1,221	1,862	1,717	1,793	1,621
COGS: Raw materials	Unit value	815	1,332	1,202	1,180	1,106
COGS: Direct labor	Unit value	141	201	139	155	168
COGS: Other factory	Unit value	214	267	152	169	176
COGS: Total	Unit value	1,170	1,800	1,493	1,503	1,449
Gross profit or (loss)	Unit value	51	62	225	290	173
SG&A expenses	Unit value	162	204	146	167	126
Operating income or (loss)	Unit value	(111)	(142)	79	122	47
Net income or (loss)	Unit value	(9)	(118)	92	135	54
Operating losses	Count	5	7	2	2	2
Net losses	Count	3	6	1	3	3
Data	Count	7	8	7	7	7

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

Note: Shares represent the share of COGS. ***.

Table LP 3.15 LDW line pipe: Changes in AUVs between comparison periods

Changes in percent; interim period is January to September

Item	2018 to 2023	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲30.8	▲16.5	▼(18.5)	▼(2.0)	▲52.5	▼(7.8)	▼(9.6)
COGS: Raw materials	▲32.5	▲15.0	▼(13.6)	▼(9.6)	▲63.4	▼(9.8)	▼(6.3)
COGS: Direct labor	▲59.3	▲0.2	▲9.0	▲47.8	▲42.7	▼(30.9)	▲8.4
COGS: Other factory	▼(0.3)	▲5.2	▲32.1	▲1.0	▲24.8	▼(43.1)	▲4.2
COGS: Total	▲30.2	▲12.6	▼(6.4)	▼(3.2)	▲53.8	▼(17.1)	▼(3.6)

Table continued.

Table LP 3.15 (Continued) LDW line pipe: Changes in AUVs between comparison periods

Changes in dollars per short ton; interim period is January to September

Item	2018 to 2023	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲404	▲217	▼(284)	▼(25)	▲641	▼(145)	▼(171)
COGS: Raw materials	▲295	▲136	▼(142)	▼(86)	▲517	▼(131)	▼(74)
COGS: Direct labor	▲52	▲0	▲8	▲46	▲60	▼(62)	▲13
COGS: Other factory	▼(0)	▲8	▲51	▲2	▲53	▼(115)	▲7
COGS: Total	▲346	▲144	▼(82)	▼(38)	▲630	▼(308)	▼(54)
Gross profit or (loss)	▲58	▲73	▼(202)	▲13	▲11	▲163	▼(117)
SG&A expense	▲51	▲0	▼(8)	▲74	▲42	▼(58)	▼(41)
Operating income or (loss)	▲7	▲73	▼(194)	▼(61)	▼(32)	▲221	▼(76)
Net income or (loss)	▲26	▲76	▼(184)	▲35	▼(109)	▲210	▼(80)

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

Note: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table LP 3.16 LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars: interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	87.3	84.3	96.9	95.8	96.7	86.9	83.8	89.4

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	12.7	15.7	3.1	4.2	3.3	13.1	16.2	10.6

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	7.2	6.2	7.0	13.2	10.9	8.5	9.3	7.8

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	5.5	9.4	(4.0)	(9.1)	(7.6)	4.6	6.8	2.9

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	5.0	9.2	(3.5)	(0.7)	(6.3)	5.3	7.5	3.4

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	1,313	1,531	1,247	1,221	1,862	1,717	1,793	1,621

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	907	1,043	902	815	1,332	1,202	1,180	1,106

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	87	88	96	141	201	139	155	168

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	152	160	211	214	267	152	169	176

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	1,146	1,291	1,209	1,170	1,800	1,493	1,503	1,449

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	167	240	38	51	62	225	290	173

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	95	95	87	162	204	146	167	126

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	72	145	(49)	(111)	(142)	79	122	47

Table continued.

Table LP 3.16 (Continued) LDW line pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	65	141	(43)	(9)	(118)	92	135	54

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

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

Net sales

Both total net sales quantity and value increased in 2019 then decreased sharply in 2020 and 2021 before increasing from 2021 to 2023. Overall net sales quantity declined by *** percent from 2018 to 2023, while net sales value increased by *** percent in the same period. Net sales quantity was higher in interim 2024 than in interim 2023 while net sales value was lower in the same period. As shown in table LP 3.16, all firms except *** reported overall declining net sales quantity and value from 2018 to 2021. All firms except *** reported an overall increasing net sales quantity and value from 2021 or the first year of production to 2023. Only two of the reporting firms (***) reported higher net sales quantity in interim 2024 than in interim 2023 while all firms except *** reported lower net sales value in the same period.¹⁹

The average unit sales value declined irregularly from 2018 to 2021 then increased irregularly from 2021 to 2023. However, the average unit sales value was lower in interim 2024 than in interim 2023. Several firms (***) reported an overall decline in unit sales value from 2018 to 2021 and all firms except *** reported an overall increase in unit sales value from 2021 to 2023 or the last full year of production. All firms except *** reported lower unit sales values in interim 2024 than in interim 2023.

Cost of goods sold and gross profit or loss

As shown in table LP 3.14, raw materials represent the single largest component of total COGS and ranged from 69.7 percent of total COGS in 2021 to 80.8 percent of total COGS in 2019. Per-unit raw material costs declined irregularly from 2018 to 2021 then increased irregularly from 2021 to 2023. They were lower in interim 2024 than in interim 2023. As shown in table LP 3.16, U.S. producers *** reported an overall decline in per unit raw material costs from 2018 to 2021, and all firms except ***

¹⁹ ***. U.S. producers' questionnaire response of ***, question 3-2a. ***. U.S. producers' questionnaire response of ***, question 3-2a. ***. U.S. producers' questionnaire response of ***, question 3-2a. ***. U.S. producers' questionnaire response of ***, question 3-2a.

*** reported an overall increase in per-unit raw material costs from 2021 to 2023 or the last year of production.²⁰ All firms except *** reported lower per-unit raw material costs in interim 2024 than in interim 2023.

As a ratio to net sales, raw material costs increased irregularly from 2018 to 2020 then declined from 2020 to 2021 before increasing irregularly from 2021 to 2023, and were higher in interim 2024 than in interim 2023.

Raw materials consisted of steel plate, steel coils, and other material inputs. The “other material inputs” category included ***. Table LP 3.17 presents raw materials, by type.

Table LP 3.17 LDW line pipe: U.S. producers’ raw material costs in 2023

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Steel coils	***	74.0
Steel plate	***	21.6
Other material inputs	***	4.3
All raw materials	***	100.0

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

As a share of total COGS, direct labor costs ranged from 6.8 percent in 2019 to 12.1 percent in 2021, while other factory costs ranged from 10.2 percent in 2023 to 18.3 percent in 2021. The average per-unit direct labor costs increased from 2018 to 2022 then declined in 2023.²¹ They were higher in interim 2024 than in interim 2023. The average per-unit other

²⁰ ***. Email from ***, January 15, 2025. ***. Email from ***, January 17, 2025. ***. Email from ***, January 23, 2025.

²¹ ***. Email from ***, January 15, 2025.

factory costs also increased from 2018 to 2022 then declined to 2023. They were higher in interim 2024 than in interim 2023.²²

As a ratio to net sales, both direct labor costs and other factory costs irregularly increased from 2018 to 2021 then declined from 2021 to 2023. They were higher in interim 2024 than in interim 2023.

Total COGS declined irregularly from 2018 to 2020 then further declined notably from 2020 to 2021 before increasing from 2021 to 2023. It was lower in interim 2024 than in interim 2023. As shown in table LP 3.16, all firms except *** reported an overall declining total COGS from 2018 to 2021; all firms except *** reported an increasing total COGS from 2021 or the first year of production to 2023. U.S producers *** reported lower total COGS in interim 2024 than in interim 2023. Per-unit total COGS moved within a relatively narrow range from 2018 to 2021 then increased irregularly from 2021 to 2023 and was lower in interim 2024 than in interim 2023. As a ratio to net sales, total COGS increased irregularly from 2018 to 2022 then declined from 2022 to 2023, and was higher in interim 2024 than in interim 2023.

Table LP 3.14 shows that U.S. producers' aggregate gross profit increased from 2018 to 2019 then declined irregularly from 2019 to 2022 before increasing notably from 2022 to 2023. Overall, gross profit increased by *** percent from 2018 to 2023 because the increase in total net sales value was greater than the increase in total COGS. The industry's gross profit was lower in interim 2024 than in interim 2023 as the decline in net sales value was greater than the decline in COGS. The gross profit margin (gross profit as a ratio to net sales) exhibited the same trend as total gross profit. As shown in table LP 3.16, all firms except *** reported an overall decline in total gross profit from 2018 to 2022; all firms except *** reported an increase in gross profit from 2022 to 2023; while *** reported a lower gross profit in interim 2024 than in interim 2023.

SG&A expenses and operating income or loss

As shown in table LP 3.14, the U.S. industry's SG&A expenses declined irregularly from 2018 to 2021 then increased from 2021 to 2023 and were lower in interim 2024 than in interim 2023. SG&A expenses as a ratio to net sales declined irregularly from 2018 to 2020 then increased from 2020 to 2021 before declining from 2021 to 2023. SG&A expenses were lower in

²² ***. Email from ***, January 17, 2025.

interim 2024 than in interim 2023. As shown in table LP 3.16, all firms except *** reported an overall decline in SG&A expenses from 2018 to 2021; all firms except (***) reported an increase in SG&A expenses from 2021 or the first year of production to 2023. *** reported lower SG&A expenses in interim 2024 than in interim 2023.

Table LP 3.14 shows that U.S. producers' aggregate operating income increased from 2018 to 2019 then declined irregularly from 2019 to a loss in 2022 before increasing from a loss in 2022 to a positive operating income in 2023. Overall operating income declined by *** percent from 2018 to 2023. The industry's operating income was lower in interim 2024 than in interim 2023. The operating income margin (operating income as a ratio to net sales) exhibited the same trend as the operating income. As shown in table LP 3.16, all firms except *** reported an overall reduction in operating income from 2018 to a loss in 2022; all firms except *** reported an increase in operating income or improved/lower operating loss from 2022 to 2023; while *** reported lower operating income in interim 2024 than in interim 2023.

All other expenses and net income or loss

Interest expense, other expense, and other income are classified below the operating income level. In table LP 3.14, these items are aggregated and only the net amount is shown, which in these reviews are negative values from 2020 to 2023 and interim 2023 and 2024 reflecting net other income. Net other expenses declined from 2018 to 2019 then net other income irregularly increased from 2020 to 2023 and was lower in interim 2024 than in interim 2023.

As shown in table LP 3.14, net income increased from 2018 to 2019 then declined from 2019 to a loss in 2022 before improving from a net loss in 2022 to a positive net income in 2023. Overall net income increased by *** percent from 2018 to 2023. The industry's net income was lower in interim 2024 than in interim 2023. The net income margin (net income as a ratio to net sales) exhibited the same trend as the net income. As shown in table LP 3.16, all firms except *** reported an overall decline in net income or a worsening net loss from 2018 to 2022; all firms except *** reported

an overall increase in net income from 2022 to 2023; while *** reported lower net income in interim 2024 than in interim 2023.²³

Capital expenditures and research and development expenses

Table LP 3.18 presents capital expenditures, by firm, and table LP 3.20 presents R&D expenses, by firm. Tables LP 3.19 and LP 3.21 present the firms’ narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.²⁴

Table LP 3.18 LDW line pipe: U.S. producers’ capital expenditures, by firm and period

Value in 1,000 dollars; Interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
	*	*	*	*	*	*		
All firms	***	***	***	***	***	***	***	***

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

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

²³ A variance analysis is most useful for products that do not have substantial changes in cost structure and/or product mix over the period investigated, and the methodology is most sensitive at the plant or firm level, rather than the aggregated industry level. A variance analysis is not shown due to ***.

²⁴ ***.

Table LP 3.19 LDW line pipe: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures						
	*	*	*	*	*	*	*

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

Table LP 3.20 LDW line pipe: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars; Interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
***	***	***	***	***	***	***	***	***
All firms	***	***	***	***	***	***	***	***

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

Table LP 3.21 LDW line pipe: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
***	***

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

Assets and return on assets

Table LP 3.22 presents data on the U.S. producers' total net assets, while table LP 3.23 presents their operating ROA.²⁵ Table LP 3.24 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table LP 3.22 LDW line pipe: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars; Interim period is January to September

Firm	2018	2019	2020	2021	2022	2023
	*	*	*	*	*	*
All firms	***	***	***	***	***	***

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

Table LP 3.23 LDW line pipe: U.S. producers' ROA, by firm and period

Ratio in percent; Interim period is January to September

Firm	2018	2019	2020	2021	2022	2023
	*	*	*	*	*	*
All firms	***	***	***	***	***	***

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

²⁵ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table LP 3.24 LDW line pipe: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets						
	*	*	*	*	*	*	*

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

The Commission’s questionnaire requested companies to describe the effect of the COVID-19 pandemic or government actions to contain the spread of the COVID-19 virus on the firm’s financial performance since January 1, 2021. Industry responses are in table LP 3.25.

Table LP 3.25 LDW line pipe: U.S. producers’ reported effect of COVID-19 on financial performance

Firm	Narrative on COVID-19
	* * * * *

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

Line 4: U.S. imports and the foreign industries

U.S. import

Overview

The Commission issued questionnaires to 30 potential importers of LDW line pipe since 2018. Fifteen firms provided data and information in response to the questionnaires.¹ Based on official Commerce statistics for imports of LDW line pipe, importers' questionnaire data accounted for *** percent of total U.S. imports during 2023 but *** percent of subject imports during 2023. Staff believe U.S. imports of LDW line pipe from Canada, China, and Greece were less than 1.0 percent of total imports during 2023. Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports (as a share of official import statistics, by quantity) during 2023.

- *** percent of the subject imports from South Korea during 2023.
- There were no reported imports of LDW line pipe from Canada, China, Greece, India (subject and nonsubject), and Turkey (subject) in 2023.²

In light of the data coverage by the Commission's questionnaires, import data in this report are based on data submitted in response to Commission questionnaires and from official Commerce statistics adjusted using Proprietary, Census-edited Customs records with respect to Korea and Turkey.³ In the original investigations,⁴ South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai Steel ("Hyundai") and Husteel Co., Ltd., ("Husteel")). In the original investigations, Commerce found that foreign producers Hyundai and Husteel in South Korea had de minimis

¹ Despite numerous contacts by staff, Husteel and SeAH Steel did not respond to the Commission's U.S. importer questionnaire. These two affiliates of South Korean manufacturers/ exporters are believed to account for a substantial share of LDW line and structural pipe imports from *** and, by extension, ***.

² During January to September 2024, ***. These imports accounted for *** LDW line pipe imports from Greece during that period.

³ HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.500 cover only LDW line pipe within the scope of these reviews. U.S. imports from South Korea treat LDW line pipe 24 inches and less in outside diameter from Hyundai and Husteel as nonsubject and U.S. imports from Turkey treat LDW line pipe 24 inches and less in outside diameter as well as LDW line pipe from Borusan (all sizes) as nonsubject.

⁴ 80 FR 75056, December 1, 2015.

countervailing duty margins (presented in table LDWP 1.21), and that imports of LDW line pipe from these two suppliers in South Korea are considered to be nonsubject suppliers of LDW line pipe from South Korea for imports under the 24-inch outer diameter threshold.⁵

Separately, consistent with the original investigations, LDW line pipe under 24 inches in outer diameter from all suppliers in Turkey is considered to be nonsubject as there are existing antidumping and countervailing duty orders in place on that merchandise.⁶ In its final determinations, Commerce determined the subsidy rates for Borusan to be de minimis regarding the countervailing duty order on LDW pipe from Turkey.⁷ After the original investigations were completed in 2019, Commerce amended its estimated weighted-average dumping margins for Borusan and all other producers and exporters of subject merchandise, and Borusan was excluded from the antidumping duty order on LDW pipe from Turkey.⁸ As a result of these determinations regarding LDW pipe from Turkey, all LDW pipe produced by Borusan is excluded from both the antidumping and countervailing duty orders on Turkey.⁹

Imports from subject and nonsubject countries

Table LP 4.1 present information on U.S. imports of LDW line pipe from Canada, China, Greece, India, South Korea, Turkey, and all other sources over the period for which data were collected. U.S. imports from subject countries decreased from *** percent of total imports in 2018 to *** percent in 2023, based on quantity.¹⁰ U.S. imports from subject countries as a share of total imports were lower by *** percentage points in January to September 2024 than in January to September 2023. The quantity of total U.S. imports from subject sources of LDW line pipe decreased between 2018 and 2020, and then fluctuated year to year from 2021 to 2023, ending *** percent lower in 2023 than in 2018, and *** percent lower in January to September 2024 than in January to September 2023, based on quantity.

In 2023, the largest nonsubject sources for U.S. imports of LDW line pipe were Germany, Japan, and Mexico, based on quantity.

⁵ Original publication, p. IV-1.

⁶ 80 FR 75054 and 80 FR 75056, December 1, 2015.

⁷ 84 FR 18771, May 2, 2019.

⁸ 85 FR 35262, June 9, 2020.

⁹ The exclusions to the antidumping and countervailing duty orders regarding LDW pipe from Turkey specific to Borusan are also applicable to LDW structural pipe. However, as discussed in greater detail in Part Structural 4, Staff does not believe this exclusion impacts the data presented for LDW structural pipe.

¹⁰ U.S. imports of LDW line pipe from Canada and Greece are manufactured by ***, respectively. These firms provided foreign producers' questionnaire responses.

U.S. imports from subject countries as a share of total imports decreased from *** percent in 2018 to *** percent in 2023, based on value. U.S. imports from subject countries as a share of total imports were *** percentage points lower in January to September 2024 than in January to September 2023. The value of total U.S. imports from subject sources of LDW line pipe decreased between 2018 and 2020, and then fluctuated year to year from 2021 to 2023, and was lower in January to September 2024 than in January to September 2023, based on value.

Unit values for U.S. imports from subject sources, nonsubject sources, and all import sources all increased from 2018 to 2023, but were lower during January to September 2024 than during January to September 2023. The ratio of LDW line pipe from subject sources, nonsubject sources, and all import sources decreased from 2018 to 2023, but were higher during January to September 2024 than in January to September 2023.

Table LP 4.1 LDW line pipe: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; interim periods are January to September

Source	Measure	2018	2019	2020
Canada	Quantity	261,992	244,475	26,548
China	Quantity	4,651	—	165
Greece	Quantity	244,042	69,221	—
India	Quantity	4,657	18	7,032
South Korea, subject	Quantity	***	***	***
Turkey, subject	Quantity	***	***	***
Subject sources	Quantity	***	***	***
South Korea, nonsubject	Quantity	***	***	***
Turkey, nonsubject	Quantity	***	***	***
All other sources	Quantity	267,527	318,585	113,079
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	1,044,065	817,319	219,784
Canada	Value	354,184	335,853	30,064
China	Value	4,036	—	177
Greece	Value	235,185	82,655	—
India	Value	5,305	40	7,439
South Korea, subject	Value	***	***	***
Turkey, subject	Value	***	***	***
Subject sources	Value	***	***	***
South Korea, nonsubject	Value	***	***	***
Turkey, nonsubject	Value	***	***	***
All other sources	Value	351,368	396,425	138,902
Nonsubject sources	Value	***	***	***
All import sources	Value	1,228,028	1,015,825	233,091

Table continued.

Table LP 4.1 LDW line pipe (Continued): U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; interim periods are January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Canada	Quantity	21,787	138	200	80	1,444
China	Quantity	1,534	141	233	233	4,235
Greece	Quantity	5,576	—	—	—	10,522
India	Quantity	4	40,848	25,008	24,662	69
South Korea, subject	Quantity	***	***	***	***	***
Turkey, subject	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
South Korea, nonsubject	Quantity	***	***	***	***	***
Turkey, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	125,287	107,665	117,491	81,381	77,278
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	230,019	287,270	305,700	209,373	254,206
Canada	Value	28,133	53	538	386	1,778
China	Value	3,050	222	359	359	3,883
Greece	Value	6,126	—	—	—	15,421
India	Value	3	64,529	37,124	36,677	137
South Korea, subject	Value	***	***	***	***	***
Turkey, subject	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
South Korea, nonsubject	Value	***	***	***	***	***
Turkey, nonsubject	Value	***	***	***	***	***
All other sources	Value	146,280	186,458	208,894	144,671	112,539
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	263,607	484,070	469,333	319,337	331,921

Table continued

Table LP 4.1 LDW line pipe (Continued): Share of U.S. imports by source and period

Unit values in dollars per short ton; Share in percent; interim periods are January to September

Source	Measure	2018	2019	2020
Canada	Unit value	1,352	1,374	1,132
China	Unit value	868	—	1,074
Greece	Unit value	964	1,194	—
India	Unit value	1,139	2,259	1,058
South Korea, subject	Unit value	***	***	***
Turkey, subject	Unit value	***	***	***
Subject sources	Unit value	***	***	***
South Korea, nonsubject	Unit value	***	***	***
Turkey, nonsubject	Unit value	***	***	***
All other sources	Unit value	1,313	1,244	1,228
Nonsubject sources	Unit value	***	***	***
All import sources	Unit value	1,176	1,243	1,061
Canada	Share of quantity	25.1	29.9	12.1
China	Share of quantity	0.4	—	0.1
Greece	Share of quantity	23.4	8.5	—
India	Share of quantity	0.4	0.0	3.2
South Korea, subject	Share of quantity	***	***	***
Turkey, subject	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
South Korea, nonsubject	Share of quantity	***	***	***
Turkey, nonsubject	Share of quantity	***	***	***
All other sources	Share of quantity	25.6	39.0	51.5
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0

Table continued

Table LP 4.1 LDW line pipe (Continued): Share of U.S. imports by source and period

Unit values in dollars per short ton; Share in percent; interim periods are January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Canada	Unit value	1,291	387	2,693	4,844	1,231
China	Unit value	1,989	1,581	1,540	1,540	917
Greece	Unit value	1,099	—	—	—	1,466
India	Unit value	726	1,580	1,484	1,487	1,978
South Korea, subject	Unit value	***	***	***	***	***
Turkey, subject	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
South Korea, nonsubject	Unit value	***	***	***	***	***
Turkey, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	1,168	1,732	1,778	1,778	1,456
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	1,146	1,685	1,535	1,525	1,306
Canada	Share of quantity	9.5	0.0	0.1	0.0	0.6
China	Share of quantity	0.7	0.0	0.1	0.1	1.7
Greece	Share of quantity	2.4	—	—	—	4.1
India	Share of quantity	0.0	14.2	8.2	11.8	0.0
South Korea, subject	Share of quantity	***	***	***	***	***
Turkey, subject	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
South Korea, nonsubject	Share of quantity	***	***	***	***	***
Turkey, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	54.5	37.5	38.4	38.9	30.4
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued

Table LP 4.1 LDW line pipe (Continued): Share of U.S. imports by source and period

Shares and ratios in percent; ratios represent the ratio to U.S. production; interim period is January through September

Source	Measure	2018	2019	2020
Canada	Share of value	28.8	33.1	12.9
China	Share of value	0.3	—	0.1
Greece	Share of value	19.2	8.1	—
India	Share of value	0.4	0.0	3.2
South Korea, subject	Share of value	***	***	***
Turkey, subject	Share of value	***	***	***
Subject sources	Share of value	***	***	***
South Korea, nonsubject	Share of value	***	***	***
Turkey, nonsubject	Share of value	***	***	***
All other sources	Share of value	28.6	39.0	59.6
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	100.0	100.0	100.0
Canada	Ratio	18.4	13.7	2.5
China	Ratio	0.3	—	0.0
Greece	Ratio	17.1	3.9	—
India	Ratio	0.3	0.0	0.7
South Korea, subject	Ratio	***	***	***
Turkey, subject	Ratio	***	***	***
Subject sources	Ratio	***	***	***
South Korea, nonsubject	Ratio	***	***	***
Turkey, nonsubject	Ratio	***	***	***
All other sources	Ratio	18.8	17.8	10.8
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	73.2	45.7	20.9

Table continued

Table LP 4.1 LDW line pipe: (Continued): Share of U.S. imports by source and period

Shares and ratios in percent; ratios represent the ratio to U.S. production; interim periods are January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Canada	Share of value	10.7	0.0	0.1	0.1	0.5
China	Share of value	1.2	0.0	0.1	0.1	1.2
Greece	Share of value	2.3	—	—	—	4.6
India	Share of value	0.0	13.3	7.9	11.5	0.0
South Korea, subject	Share of value	***	***	***	***	***
Turkey, subject	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
South Korea, nonsubject	Share of value	***	***	***	***	***
Turkey, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	55.5	38.5	44.5	45.3	33.9
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Canada	Ratio	10.0	0.0	0.0	0.0	0.2
China	Ratio	0.7	0.0	0.0	0.0	0.7
Greece	Ratio	2.6	—	—	—	1.6
India	Ratio	0.0	9.6	2.3	3.4	0.0
South Korea, subject	Ratio	***	***	***	***	***
Turkey, subject	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
South Korea, nonsubject	Ratio	***	***	***	***	***
Turkey, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	57.6	25.3	10.8	11.1	11.9
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	105.7	67.4	28.1	28.6	39.1

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values.

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 "—". South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Figure LP 4.1 LDW line pipe: U.S. imports by source and period

* * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values

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 "---". South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Cumulation considerations

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

Part 2. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table LP 4.2 presents data on U.S. producers' and U.S. importers' U.S. shipments and reporting total shipments of LDW line pipe by grade (X-69 and below, X-70 to X-79, X-80 and above, and all other grades) during January 2023 through September 30, 2024. During this period, X-70 through X-79 grade for U.S. producers' U.S. shipments accounted for *** of all shipments by grade, while X-69 grade and below accounted for *** of U.S. importers' U.S. shipments during January 2023 through September 2024. The vast majority of U.S. importers' U.S. shipments of X-70 to X-79 grade LDW line pipe were by U.S. importer ***, which imported LDW line pipe of X-70 to X-79 grade from Greece during January to September 2024. *** accounted for much of U.S. producers' U.S. shipments of X-70 to X-79 grade LDW line pipe during January 2023 to September 2024.

Table LP 4.2 LDW line pipe: U.S. producers' and U.S. importers' U.S. shipments by grade, January 2023 through September 2024

Quantity in short tons;

Source	X-69 and below	X-70 to X-79	X-80 and above	All other grades	All grades
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
India	***	***	***	***	***
South Korea, subject	***	***	***	***	***
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued

Table LP 4.2 LDW line pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by grade, January 2023 through September 2024

Share across in percent

Source	X-69 and below	X-70 to X-79	X-80 and above	All other grades	All grades
U.S. producers	***	***	***	***	100.0
Canada	***	***	***	***	—
China	***	***	***	***	—
Greece	***	***	***	***	100.0
India	***	***	***	***	—
South Korea, subject	***	***	***	***	100.0
Turkey, subject	***	***	***	***	—
Subject sources	***	***	***	***	100.0
South Korea, nonsubject	***	***	***	***	100.0
Turkey, nonsubject	***	***	***	***	100.0
All other sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued

Table LP 4.2 LDW line pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by grade, January 2023 through September 2024

Share down in percent

Source	X-69 and below	X-70 to X-79	X-80 and above	All other grades	All grades
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
India	***	***	***	***	***
South Korea, subject	***	***	***	***	***
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

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

Figure LP 4.2 LDW line pipe: U.S. producers' and U.S. importers' U.S. shipments by grade, January 2023 through September 2024

* * * * *

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

Table LP 4.3 and figure LP 4.3 present data on U.S. producers' and U.S. importers' U.S. shipments and reporting total shipments of LDW line pipe by outer diameter ("OD") sizes during January 2023 through September 30, 2024. During this period, LDW line pipe with a >24" and <= 48" OD for U.S. producers' U.S. shipments accounted for *** of all shipments by grade, while LDW line pipe with a >16" and <=24" OD accounted for *** of U.S. importers' subject U.S. shipments during January 2023 through September 2024. ***, and it had the largest quantities of U.S. importers' U.S. shipments of LDW line pipe with >16" and <=24" OD during January 2023 through September 2024.¹¹ *** accounted for the vast majority of U.S. producers' U.S. shipments of LDW line pipe of >24" and <= 48" OD during January 2023 to September 2024.

¹¹ *** U.S. importer questionnaire response, section III-13d, and email correspondence with *** December 20, 2024.

Table LP 4.3 LDW line pipe: U.S. producers' and U.S. importers' U.S. shipments by outer diameter size, January 2023 through September 2024

Quantity in short tons;

Source	>16" and <=24"	>24" and <=48"	>48"	All outer diameter sizes
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
South Korea, subject	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
South Korea, nonsubject	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table LP 4.3 LDW line pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by outer diameter size, January 2023 through September 2024

Share across in percent

Source	>16" and <=24"	>24" and <=48"	>48"	All outer diameter sizes
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
South Korea, subject	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
South Korea, nonsubject	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table LP 4.3 LDW line pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by outer diameter size, January 2023 through September 2024

Share down in percent

Source	>16" and <=24"	>24" and <=48"	>48"	All outer diameter sizes
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
South Korea, subject	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
South Korea, nonsubject	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

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

Figure LP 4.3 LDW line pipe: U.S. producers' and U.S. importers' U.S. shipments outer diameter size, January 2023 through September 2024

* * * * *

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

Table LP 4.4 and figure LP 4.4 present data on U.S. producers' and U.S. importers' U.S. shipments and reporting total shipments of LDW line pipe by production method during January 2023 through September 30, 2024. During this period, LDW line pipe produced with the HSAW production method for U.S. producers' U.S. shipments accounted for *** of all shipments by production method, while LDW line pipe produced with the LSAW production method accounted for *** of U.S. importers' subject U.S. shipments during January 2023 through September 2024. *** had the largest quantities of U.S. producers' U.S. shipments of LDW line pipe produced by the HSAW method during January 2023 through September 2024.

Table LP 4.4 LDW line pipe: U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 through September 2024

Quantity in short tons;

Source	HSAW	LSAW	ERW	All production methods
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
South Korea, subject	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
South Korea, nonsubject	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table LP 4.4 LDW line pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 through September 2024

Share across in percent

Source	HSAW	LSAW	ERW	All production methods
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
South Korea, subject	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
South Korea, nonsubject	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table LP 4.4 LDW line pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 through September 2024

Share down in percent

Source	HSAW	LSAW	ERW	All production methods
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
South Korea, subject	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
South Korea, nonsubject	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

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

Figure LP 4.4 LDW line pipe: U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 through September 2024

* * * * *

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

Geographical markets

Table LP 4.5 and figure LP 4.5 present data on U.S. imports of LDW line pipe by source and by border of entry from January 2018 through September 2024, based on official statistics. There were no U.S. imports from Greece during 2023. Imports from subject sources in 2023 entered through all U.S. ports of entry, while imports from Canada entered through the Northern border of entry. During 2023, the largest share of imports of LDW line pipe entered via the Southern border of entry.

Table LP 4.5 LDW line pipe: U.S. imports by source and border of entry, 2023

Quantity in short tons

Source	East	North	South	West	All borders
Canada	—	200	—	—	200
China	41	—	—	192	233
Greece	—	—	—	—	—
India	—	22	24,986	—	25,008
South Korea, subject	***	***	***	***	***
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	1,523	2,070	278,383	23,723	305,700

Table continued

Table LP 4.5 LDW line pipe (Continued): U.S. imports by source and border of entry, 2023

Share across in percent

Source	East	North	South	West	All borders
Canada	—	100.0	—	—	100.0
China	17.7	—	—	82.3	100.0
Greece	—	—	—	—	100.0
India	—	0.1	99.9	—	100.0
South Korea, subject	***	***	***	***	100.0
Turkey, subject	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	0.5	0.7	91.1	7.8	100.0

Table continued

Table LP 4.5 LDW line pipe (Continued): U.S. imports by source and border of entry, 2023

Share down in percent

Source	East	North	South	West	All borders
Canada	—	9.7	—	—	0.1
China	2.7	—	—	0.8	0.1
Greece	—	—	—	—	—
India	—	1.1	9.0	—	8.2
South Korea, subject	***	***	***	***	***
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series.

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 "---". South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Presence in the market

Table LP 4.6 presents monthly data for U.S. imports of LDW line pipe from subject and nonsubject sources between January 2018 and September 2024. Imports from South Korea were reported in all months during this period. Imports from Greece and India were reported in more sporadically in the months starting after January 2020, imports from Canada were reported in the majority (55 of 81 months) of the months during this period. Imports from China were reported in 31 of 81 months, while imports from Turkey were reported in 26 of 81 months. Imports from Greece were reported in 16 of 81 months, while imports from India were reported in 22 of 81 months.

Table LP 4.6 LDW line pipe: U.S. imports by source and month, 2018 to 2023, and January to September 2024

Quantity in short tons

Year	Month	Canada	China	Greece	India	South Korea, subject	Turkey, subject
2018	January	14,522	962	12,437	436	***	***
2018	February	19,772	1,903	13,253	—	***	***
2018	March	20,958	220	18,498	41	***	***
2018	April	19,493	311	25,610	—	***	***
2018	May	6,861	94	31,809	394	***	***
2018	June	15,177	340	—	3,785	***	***
2018	July	15,905	3	52,394	—	***	***
2018	August	46,664	—	11,950	1	***	***
2018	September	14,245	730	13,153	—	***	***
2018	October	10,642	1	35,869	—	***	***
2018	November	29,641	88	13,348	—	***	***
2018	December	48,112	—	15,721	—	***	***
2019	January	35,959	—	30,135	7	***	***
2019	February	100,971	—	—	—	***	***
2019	March	32,919	—	—	—	***	***
2019	April	4,397	—	—	—	***	***
2019	May	82	—	—	—	***	***
2019	June	57	—	21,078	—	***	***
2019	July	—	—	18,007	—	***	***
2019	August	4,091	—	—	—	***	***
2019	September	22,520	—	—	—	***	***
2019	October	20,636	—	—	—	***	***
2019	November	12,172	—	—	5	***	***
2019	December	10,671	—	—	5	***	***

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018-2023

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2018	January	***	***	58,129
2018	February	***	***	58,299
2018	March	***	***	62,148
2018	April	***	***	81,879
2018	May	***	***	74,347
2018	June	***	***	65,176
2018	July	***	***	99,868
2018	August	***	***	101,516
2018	September	***	***	88,974
2018	October	***	***	107,412
2018	November	***	***	95,909
2018	December	***	***	150,408
2019	January	***	***	160,406
2019	February	***	***	136,844
2019	March	***	***	80,397
2019	April	***	***	48,801
2019	May	***	***	39,278
2019	June	***	***	47,837
2019	July	***	***	55,223
2019	August	***	***	63,308
2019	September	***	***	61,065
2019	October	***	***	44,308
2019	November	***	***	44,229
2019	December	***	***	35,623

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018 to 2023, January to September 2024

Quantity in short tons

Year	Month	Canada	China	Greece	India	South Korea, subject	Turkey, subject
2020	January	2,281	—	—	95	***	***
2020	February	3,252	—	—	8	***	***
2020	March	2,644	—	—	6,890	***	***
2020	April	—	7	—	—	***	***
2020	May	—	45	—	—	***	***
2020	June	—	—	—	—	***	***
2020	July	4,821	—	—	10	***	***
2020	August	6,842	—	—	—	***	***
2020	September	5,765	—	—	—	***	***
2020	October	891	113	—	—	***	***
2020	November	51	—	—	—	***	***
2020	December	—	—	—	29	***	***
2021	January	108	—	—	—	***	***
2021	February	—	—	—	—	***	***
2021	March	—	18	—	—	***	***
2021	April	—	487	—	—	***	***
2021	May	189	459	—	—	***	***
2021	June	—	151	—	4	***	***
2021	July	2,916	105	5,576	—	***	***
2021	August	9,901	—	—	—	***	***
2021	September	8,371	105	—	—	***	***
2021	October	302	70	—	—	***	***
2021	November	—	—	—	—	***	***
2021	December	—	140	—	—	***	***

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018 to 2023, January to September 2024

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2020	January	***	***	20,223
2020	February	***	***	21,982
2020	March	***	***	28,297
2020	April	***	***	14,233
2020	May	***	***	16,447
2020	June	***	***	18,202
2020	July	***	***	13,280
2020	August	***	***	24,503
2020	September	***	***	24,681
2020	October	***	***	12,291
2020	November	***	***	9,836
2020	December	***	***	15,810
2021	January	***	***	6,010
2021	February	***	***	25,530
2021	March	***	***	28,064
2021	April	***	***	27,800
2021	May	***	***	13,805
2021	June	***	***	28,410
2021	July	***	***	13,244
2021	August	***	***	18,356
2021	September	***	***	20,573
2021	October	***	***	14,135
2021	November	***	***	19,038
2021	December	***	***	15,053

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018 to 2023, January to September 2024

Quantity in short tons

Year	Month	Canada	China	Greece	India	South Korea, subject	Turkey, subject
2022	January	—	47	—	—	***	***
2022	February	—	—	—	—	***	***
2022	March	—	—	—	—	***	***
2022	April	—	—	—	—	***	***
2022	May	—	3	—	—	***	***
2022	June	—	—	—	536	***	***
2022	July	—	7	—	—	***	***
2022	August	53	—	—	—	***	***
2022	September	84	8	—	—	***	***
2022	October	1	76	—	21,599	***	***
2022	November	—	—	—	1	***	***
2022	December	—	—	—	18,712	***	***
2023	January	—	—	—	—	***	***
2023	February	—	—	—	24,659	***	***
2023	March	67	—	—	—	***	***
2023	April	—	187	—	—	***	***
2023	May	—	—	—	—	***	***
2023	June	—	—	—	—	***	***
2023	July	12	10	—	—	***	***
2023	August	—	—	—	3	***	***
2023	September	1	37	—	—	***	***
2023	October	21	—	—	—	***	***
2023	November	39	—	—	22	***	***
2023	December	60	—	—	324	***	***

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018 to 2023, January to September 2024

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2022	January	***	***	12,217
2022	February	***	***	6,881
2022	March	***	***	18,986
2022	April	***	***	13,474
2022	May	***	***	18,957
2022	June	***	***	29,885
2022	July	***	***	21,769
2022	August	***	***	12,534
2022	September	***	***	35,450
2022	October	***	***	35,639
2022	November	***	***	24,643
2022	December	***	***	56,834
2023	January	***	***	9,037
2023	February	***	***	43,681
2023	March	***	***	27,268
2023	April	***	***	14,687
2023	May	***	***	19,075
2023	June	***	***	32,742
2023	July	***	***	15,922
2023	August	***	***	19,463
2023	September	***	***	27,498
2023	October	***	***	15,786
2023	November	***	***	39,417
2023	December	***	***	41,123

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018 to 2023, January to September 2024

Quantity in short tons

Year	Month	Canada	China	Greece	India	South Korea, subject	Turkey, subject
2024	January	148	—	—	69	***	***
2024	February	271	—	—	—	***	***
2024	March	178	—	—	—	***	***
2024	April	147	4	—	—	***	***
2024	May	106	—	—	—	***	***
2024	June	23	—	10,522	—	***	***
2024	July	311	—	—	—	***	***
2024	August	81	4,231	—	—	***	***
2024	September	179	—	—	—	***	***

Table continued

Table LP 4.6 LDW line pipe (Continued): U.S. imports by source and month, 2018 to 2023, January to September 2024

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2024	January	***	***	43,809
2024	February	***	***	19,250
2024	March	***	***	22,796
2024	April	***	***	29,177
2024	May	***	***	37,288
2024	June	***	***	24,987
2024	July	***	***	28,788
2024	August	***	***	22,219
2024	September	***	***	25,892

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values.

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 "---". South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan. 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Figure LP 4.5 LDW line pipe: U.S. imports from individual subject sources, by month, January 2018 to September 2024

* * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values.

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 "---". South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

Figure LP 4.6 LDW line pipe: U.S. imports from aggregated subject sources and nonsubject sources, by month, January 2018 to September 2024

* * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 2, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Imports value data reflect landed-duty-paid values.

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 "---". South Korea, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for two Korean suppliers (Hyundai and Husteel). Turkey, nonsubject is defined as LDW line pipe from >16" to 24" in outside diameter (OD) reported under statistical reporting numbers 7305.11.1030, 7305.12.1030, and 7305.19.1030 for all suppliers in Turkey and other in-scope line pipe under the remaining HTS statistical reporting numbers by foreign producer Borusan.

U.S. importers’ imports subsequent to September 30, 2024

The Commission requested importers to indicate whether they had imported or arranged for the importation of LDW line pipe from Canada, China, Greece, India, South Korea, Turkey, and all other sources for delivery after September 30, 2024; such imports are presented in Table LP 4.7. There were no reported arranged imports of subject merchandise for delivery from Canada, China, Greece, India, or Turkey (subject) after September 30, 2024. The only subject source that had reported arranged imports after September 30, 2024 was South Korea. Three firms ***

*** reported that they had arranged LDW line pipe imports from South Korea (subject). Additionally, ***.

Table LP 4.7 LDW line pipe: U.S. importers' arranged imports, by source and period

Quantity in short tons

Source	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Total
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
India	***	***	***	***	***
South Korea, subject	***	***	***	***	***
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

U.S. inventories of imported merchandise

Table LP 4.8 presents data for inventories of U.S. imports of LDW line pipe from subject countries and all other sources held in the United States. There were no inventories LDW line pipe from Canada, China, Greece, India, South Korea, or Turkey during the period for which data were collected. *** held the largest share of end-of-period inventories in 2019 and 2023. These two years had the highest levels of end-of-period inventories (by any source) during the period for which data were collected. Two companies *** reported the largest quantities of LDW line pipe imports, but did not report any inventories (beginning or ending periods).

Table LP 4.8 LDW line pipe: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent; interim period is January through September

Measure	Source	2018	2019	2020
Inventories quantity	Subject sources	***	***	***
Ratio to imports	Subject sources	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***
Inventories quantity	All	***	***	***
Ratio to imports	All	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***
Ratio to total shipments of imports	All	***	***	***

Table continued

Table LP 4.8 LDW line pipe (Continued): U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2021	2022	2023	Interim 2023	Interim 2024
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

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

The industry in Canada

Overview

Table LP 4.9 presents information on the LDW line pipe operations of the responding producer and exporter in Canada. The major LDW line pipe producer in Canada (during the original investigations and in these reviews) is Evraz Inc., NA Canada, (“Evraz”).

During the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Evraz, which reportedly accounted for *** during 2017¹² and thereafter.

Table LP 4.9 LDW line pipe: Summary data for producers in Canada, 2023

Quantity in short tons

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Evraz	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table LP 4.10 presents events in Canada’s industry since January 1, 2018.

¹² Office of Investigations memorandum INV-QQ-137 (November 26, 2018), p. VII-3; and Original publication, p. VII-3.

Table LP 4.10 LDW line pipe: Developments in Canada's industry since 2018

Item	Firm	Event
***	***	***
Layoffs and shutdowns	Evrz North America	Around 100 steelworkers at the Evraz North America plant in Regina, Saskatchewan, were laid off in January 2023. A spokesperson for the large diameter welded pipe producer stated that unfairly traded imports negatively impacted the operations, making it difficult to continue operations. ***.
Qualifications	Evrz North America	In April 2023, Evraz North America announced the successful development and qualification of a 20" O.D. high-strength, high frequency welded (HFW) line pipe for use in the transportation of hydrogen at their Regina, Saskatchewan facility.

Sources: Global News, "Evrz says 'unfair' steel imports to blame for coming Regina layoffs", January 30, 2023 at <https://globalnews.ca/news/9446511/evraz-steel-imports-regina-layoffs/>; EVRAZ North America, "EVRAZ North America Qualifies High-Strength Line Pipe Steel for Hydrogen Transmission, Marking Industry Milestone," April 11, 2023 at https://www.evrazna.com/files/ugd/4b98ed_d35002ad13e645cab12d748f90b73bd9.pdf; ***, ***, January 18, 2025.

Changes in operations

The responding Canadian producer was asked to report any change in the character of their operations or organization relating to the production of LDW line pipe since 2018. Evraz indicated in its questionnaire that it had experienced such changes. Table LP 4.11 presents the changes identified by Evraz. In late 2019, Evraz permanently closed its LSAW mill in Camrose, Alberta, which had *** of installed production capacity.¹³ Since 2020, Evraz has idled four of its five HSAW mills located at its Regina, Saskatchewan facility, which represented *** short tons of installed capacity. The remaining HSAW mill (number 5), would take

¹³ Evraz (Respondents) posthearing brief, Appendix p. 7.

time (late 2025 or 2026) to ramp up, but it could potentially produce *** annually of LDW line pipe.¹⁴ Evraz indicated that its only LDWP mill that is operational is its ERW mill (also located at its Regina facility), which produces both in-scope LDW line pipe and out-of-scope small diameter welded pipe. Evraz further indicated that its ERW mill has *** of annual capacity to produce LDW line pipe.

At the Commission's hearing, Evraz indicated that it had not shipped LDW line pipe to the United States since 2021.¹⁵

Table LP 4.11 LDW line pipe: Reported changes in operations by Evraz, since January 1, 2018

Item	Firm name and narrative on changes in operations
Plant closings	***
Prolonged shutdowns	***
Weather related or force majeure events	***

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

Operations on LDW line pipe

Table LP 4.12 presents data on Evraz's installed capacity, practical capacity, and production on the same equipment. Evraz's installed overall capacity decreased *** during 2020, due to the shutdown of the Camrose LDW pipe facility in late 2019. Evraz's LDW line pipe production *** from 2018 to 2020 but decreased from ***. Installed overall capacity utilization decreased to *** percent in 2023, and remained above *** percent in every year including the interim periods. In its posthearing brief, Evraz indicated that it sources scrap for its LDW line pipe production from three scrapyards in the United States; Minot, North Dakota, Pueblo, Colorado, and Denver, Colorado. Evraz indicated that ***

¹⁴ Evraz (Respondents) posthearing brief, Appendix p. 7.

¹⁵ Hearing transcript, p. 24 (Lewis).

***.¹⁶ At the Commission’s hearing, Evraz indicated that 25 percent of its scrap metals are sourced from scrapyards in the United States.¹⁷

In its posthearing brief, Evraz indicated that many of its employees are members of United Steel Workers (“USW”) local 5890 union. Evraz indicated that it employs *** employees at its Regina, Saskatchewan facility, and that *** of those employees are members of the USW local 5890 union.¹⁸ Additionally, *** of those employees (members of the USW local 5890 union) are currently working in the ERW mill (24” mill that produces both LDW line pipe and out-of-scope, small diameter line pipe), and that it would need to add *** additional USW employees to that mill to reach full capacity utilization.

Table LP 4.12 LDW line pipe: Evraz’s overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2018	2019	2020
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical LDW line pipe capacity	Capacity	***	***	***
Practical LDW line pipe capacity	Production	***	***	***
Practical LDW line pipe capacity	Utilization	***	***	***

Table continued

¹⁶ Evraz (Respondents) posthearing brief, Appendix p. 28.

¹⁷ Hearing transcript, p. 165 (Coffin).

¹⁸ Evraz (Respondents) posthearing brief, Appendix p. 29.

Table LP 4.12 LDW line pipe (Continued): Evraz's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical LDW line pipe	Capacity	***	***	***	***	***
Practical LDW line pipe	Production	***	***	***	***	***
Practical LDW line pipe	Utilization	***	***	***	***	***

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

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

Table LP 4.13 presents Evraz's reported narratives regarding practical capacity constraints.

Table LP 4.13 LDW line pipe: Evraz's reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***
Other constraints	***

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

Table LP 4.14 presents data on industry in Canada. From 2018 to 2023, production in Canada by Evraz decreased from *** in 2023. The closure of Evraz LSAW mill in Camrose at the end of 2019, and the idling of Evraz Regina HSAW mills largely attributed to the decline in LDW line pipe production in Canada during this period. In 2024, Evraz ***. Capacity utilization remained above ***. The share of home shipments in Canada fluctuated from *** percent in 2018 and increased to *** percent in 2023. The primary destination for Canadian exports were the United States. The inventory to production ratio in Canada ***.

Table LP 4.14 LDW line pipe: Data on industry in Canada, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table LP 4.14 LDW line pipe (Continued): Data on industry in Canada, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table LP 4.14 LDW line pipe (Continued): Data on industry in Canada, by period

Unit values in dollars per short ton; shares in percent; interim period is January through September

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table LP 4.14 LDW line pipe (Continued): Data on industry in Canada, by period

Unit values in dollars per short ton; shares in percent; interim period is January through September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Evraz's total shipments, by grade, size (OD), and production method

Table LP 4.15 presents data on Evraz's shipments of LDW line pipe by grade (X-69 and below, X-70 to X-79, X-80 and above, and all other grades) during January 2023 through September 30. During January 2023 to September 2024, X-70 to X-79 grade accounted for *** reported shipments by grade.

Table LP 4.15 LDW line pipe: Evraz's total shipments, by period and grade

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent; interim period is January through September

Grade	Period	Quantity	Value	Unit value	Share of quantity
API-5/ Grade B	2023	***	***	***	***
X-69 and below	2023	***	***	***	***
X-70 to X-79	2023	***	***	***	***
X-80 and above	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
API-5/ Grade B	Interim 2024	***	***	***	***
X-69 and below	Interim 2024	***	***	***	***
X-70 to X-79	Interim 2024	***	***	***	***
X-80 and above	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

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

Table LP 4.16 presents data on Evraz's shipments of LDW line pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW line pipe with a >16" and <= 24" OD accounted for *** shipments by grade.

Table LP 4.16 LDW line pipe: Evraz's total shipments, by period and outer diameter

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent; interim period is January through September

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Table LP 4.17 presents data on Evraz's shipments of LDW line pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024. During January

2023 to September 2024, LDW line pipe produced with the ERW production method for Evraz's shipments accounted for ***, based on production method.

Table LP 4.17 LDW line pipe: Evraz's total shipments, by period and production method

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent; interim period is January through September

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Alternative products

As shown in Table LP 4.18, Evraz produced other products on the same equipment and machinery used to produce LDW line pipe. LDW line pipe accounted for at least *** percent of the Canadian producer's overall production during 2018 to 2020, but diminished thereafter.

Table LP 4.18 LDW pipe: Evraz's overall production on the same equipment as in-scope production, 2018 to 2023

Quantity in short tons; share and ratio in percent

Product type	Measure	2018	2019	2020
LDW line pipe	Quantity	***	***	***
LDW structural pipe	Quantity	***	***	***
Other products	Quantity	***	***	***
All out-of-scope products	Quantity	***	***	***
All products	Quantity	***	***	***
LDW line pipe	Share	***	***	***
LDW structural pipe	Share	***	***	***
Other products	Share	***	***	***
All out-of-scope products	Share	***	***	***
All products	Share	***	***	***

Table continued

Table LP 4.18 LDW pipe (Continued): Evraz's overall production on the same equipment as in-scope production, 2018 to 2023

Quantity in short tons; share and ratio in percent

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW line pipe	Quantity	***	***	***	***	***
LDW structural pipe	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
LDW line pipe	Share	***	***	***	***	***
LDW structural pipe	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

Exports

According to GTA, the leading export markets for LDW line pipe¹⁹ from Canada is the United States (Table LP 4.19). During 2023, the United States was the top export market for welded pipe greater than 16" in outer diameter from Canada, accounting for 100 percent.

¹⁹ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW line pipe and out-of-scope products.

Table LP 4.19 Welded pipe greater than 16" in diameter: Exports from Canada, by destination market and by period

Quantity in short tons; value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	329,391	177,330	26,844	21,852	286	2,135
All other destination markets	Quantity	9	—	411	—	19	1
All destination markets	Quantity	329,400	177,330	27,255	21,852	305	2,136
United States	Value	379,430	233,504	30,375	28,240	456	3,336
All other destination markets	Value	32	0	502	—	48	3
All destination markets	Value	379,462	233,504	30,876	28,240	504	3,339
United States	Unit value	1,151	1,316	1,131	1,292	1,593	1,562
All other destination markets	Unit value	3,551	—	1,220	—	2,532	2,990
All destination markets	Unit value	1,151	1,316	1,132	1,292	1,652	1,563
United States	Share of quantity	100.0	100.0	98.5	100.0	93.8	100.0
All other destination markets	Share of quantity	0.0	—	1.5	—	6.2	0.0
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.11, 7305.12, and 7305.19 as reported by Canada Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the top exporting countries in descending order of 2023 data. Data is likely overstating trade levels for subject products.

The industry in China

Overview

During the original investigations and in these reviews, the Commission did not receive a foreign producer/exporter questionnaire from any Chinese firms that produce/export LDW line pipe.

Recent developments

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

Exports

According to GTA, the leading export markets for LDW line pipe²⁰ from China are Saudi Arabia, Canada, and Nigeria (Table LP 4.20). From 2022 to 2023, there were virtually no exports of LDW line pipe from China to the United States. In 2023, Saudi Arabia was the top export market for LDW line pipe from China, accounting for 11.1 percent, followed by Canada, accounting for 8.7 percent and Nigeria, accounting for 8.6 percent.

²⁰ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW line pipe and out-of-scope products.

Table LP 4.20 Welded pipe greater than 16" in diameter: Exports from China, by market destination and period

Quantity in short tons; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	29,002	1,631	225	2,567	—	11
Saudi Arabia	Quantity	84,481	43,294	38,341	10,951	40,156	58,325
Canada	Quantity	74,181	72,767	58,947	17,450	23,951	46,069
Nigeria	Quantity	20,250	8,258	26,709	189,537	99,894	45,124
Tanzania	Quantity	6	790	340	—	95	37,088
Thailand	Quantity	3,397	5,519	3,947	3,038	10,790	35,949
Libya	Quantity	3,302	—	—	—	13	24,353
Brazil	Quantity	278	2,238	751	773	1,898	22,875
Indonesia	Quantity	1,739	7,363	3,824	3,398	14,245	21,938
Australia	Quantity	21,452	14,355	12,431	14,028	23,501	19,898
United Arab Emirates	Quantity	18,433	51,676	13,162	9,778	7,700	19,602
Chile	Quantity	12,538	14,738	14,171	9,310	5,070	13,979
All other destination markets	Quantity	477,327	500,654	302,046	257,057	275,890	181,550
Non-U.S. destination markets	Quantity	717,384	721,652	474,669	515,320	503,203	526,750
All destination markets	Quantity	746,386	723,283	474,894	517,887	503,203	526,761
United States	Value	19,667	1,427	124	3,251	—	11
Saudi Arabia	Value	57,828	29,476	27,080	13,528	37,024	66,732
Canada	Value	50,181	47,655	35,401	12,917	20,957	35,950
Nigeria	Value	18,545	6,426	19,211	142,523	83,944	43,964
Tanzania	Value	5	486	197	—	349	50,222
Thailand	Value	2,236	3,751	2,282	2,904	12,665	48,968
Libya	Value	2,517	—	—	—	43	25,835
Brazil	Value	219	1,826	618	633	2,256	25,298
Indonesia	Value	1,728	5,555	3,526	3,306	16,283	22,955
Australia	Value	16,012	10,199	7,743	13,767	23,586	18,220
United Arab Emirates	Value	14,508	40,165	9,308	9,731	8,448	18,273
Chile	Value	9,474	10,867	12,038	8,683	5,228	15,561
All other destination markets	Value	365,811	381,390	209,140	231,765	321,825	205,987
Non-U.S. destination markets	Value	539,065	537,798	326,543	439,757	532,608	577,966
All destination markets	Value	558,733	539,225	326,667	443,007	532,608	577,978

Table continued

Table LP 4.20 (Continued) Welded pipe greater than 16" in diameter: Exports from China, by market destination and period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	678	875	550	1,266	—	1,041
Saudi Arabia	Unit value	685	681	706	1,235	922	1,144
Canada	Unit value	676	655	601	740	875	780
Nigeria	Unit value	916	778	719	752	840	974
Tanzania	Unit value	756	615	578	—	3,675	1,354
Thailand	Unit value	658	680	578	956	1,174	1,362
Libya	Unit value	762	—	—	—	3,306	1,061
Brazil	Unit value	789	816	823	819	1,188	1,106
Indonesia	Unit value	994	754	922	973	1,143	1,046
Australia	Unit value	746	710	623	981	1,004	916
United Arab Emirates	Unit value	787	777	707	995	1,097	932
Chile	Unit value	756	737	849	933	1,031	1,113
All other destination markets	Unit value	766	762	692	902	1,166	1,135
Non-U.S. destination markets	Unit value	751	745	688	853	1,058	1,097
All destination markets	Unit value	749	746	688	855	1,058	1,097
United States	Share of quantity	3.9	0.2	0.0	0.5	—	0.0
Saudi Arabia	Share of quantity	11.3	6.0	8.1	2.1	8.0	11.1
Canada	Share of quantity	9.9	10.1	12.4	3.4	4.8	8.7
Nigeria	Share of quantity	2.7	1.1	5.6	36.6	19.9	8.6
Tanzania	Share of quantity	0.0	0.1	0.1	—	0.0	7.0
Thailand	Share of quantity	0.5	0.8	0.8	0.6	2.1	6.8
Libya	Share of quantity	0.4	—	—	—	0.0	4.6
Brazil	Share of quantity	0.0	0.3	0.2	0.1	0.4	4.3
Indonesia	Share of quantity	0.2	1.0	0.8	0.7	2.8	4.2
Australia	Share of quantity	2.9	2.0	2.6	2.7	4.7	3.8
United Arab Emirates	Share of quantity	2.5	7.1	2.8	1.9	1.5	3.7
Chile	Share of quantity	1.7	2.0	3.0	1.8	1.0	2.7
All other destination markets	Share of quantity	64.0	69.2	63.6	49.6	54.8	34.5
Non-U.S. destination markets	Share of quantity	96.1	99.8	100.0	99.5	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.11, 7305.12, and 7305.19 as reported by China Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the top exporting countries in descending order of 2023 data. Data is likely overstating trade levels for subject products.

The industry in Greece

Overview

Table LP 4.21 presents information on the LDW line pipe operations of the responding producer and exporter in Greece. The major LDW line pipe producer in Greece (during the original investigations and in these reviews) is Corinth Pipeworks Pipe Industry SA (“Corinth”).

During the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Corinth, which reported that it accounts for all subject LDW line pipe production in Greece and the vast majority of exports of the subject product to the United States during 2017.²¹

Table LP 4.21 LDW line pipe: Summary data for Corinth (Greece), 2023

Quantity in short tons

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Corinth	***	***	***	***	***	***
All firms	***	100.0	***	—	***	***

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

Corinth reported that ***.²²

Operations on LDW line pipe

Table LP 4.22 presents data on Corinth’s installed capacity, practical capacity, and production on the same equipment. Corinth’s installed overall capacity has ***. Corinth’s overall production decreased from ***. Installed overall capacity utilization decreased from *** percent in 2018 to *** percent in 2023. Practical LDW line pipe capacity, production, and capacity utilization also all decreased from 2018 to 2023, but were higher during interim period January to September 2024 compared to interim period January to September 2023. Corinth indicated ***.²³

²¹ Original publication, p. VII-11.

²² *** foreign producer questionnaire response, section III-2a.

²³ Corinth foreign producer questionnaire response, section II-2b.

Table LP 4.22 LDW line pipe: Corinth overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2018	2019	2020
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical LDW line pipe	Capacity	***	***	***
Practical LDW line pipe	Production	***	***	***
Practical LDW line pipe	Utilization	***	***	***

Table continued

Table LP 4.22 LDW line pipe (Continued): Corinth overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical LDW line pipe	Capacity	***	***	***	***	***
Practical LDW line pipe	Production	***	***	***	***	***
Practical LDW line pipe	Utilization	***	***	***	***	***

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

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

Table LP 4.23 presents Corinth reported narratives regarding practical capacity constraints.

Table LP 4.23 LDW line pipe: Corinth reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Existing labor force	***

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

Table LP 4.24 presents data on industry in Greece. From 2018 to 2023, production in Greece decreased from *** in 2023.²⁴ In 2021, Corinth ***.²⁵ At the Commission's hearing, Corinth Pipeworks indicated that it has shifted its focus recently on the specialization in deep off shore line pipe.²⁶ Additionally, Corinth indicated that it manufactures LDW line pipe with a wall thickness that is much thicker than can be produced in the United States or almost anywhere else in the world.²⁷ Capacity utilization decreased from 2018 to 2023 but was higher during the interim period January to September 2024 than in January to September 2023. The share of home shipments in Greece fluctuated but was consistently less than *** percent of its total shipments during 2018 to 2023. ***. The primary destination for Greek exports of LDW line pipe was the ***. The inventory to production ratio in Greece fluctuated but increased from 2018 to 2023.

²⁴ In 2019, the year the subject orders entered into effect with respect to LDW line pipe from Greece, Corinth's ***. Respondent Corinth's questionnaire (annual trends) and posthearing brief, Annex VI, p. 3 (product characteristics).

²⁵ In 2021, the only year subsequent to 2019 during which Corinth exported LDW line pipe to the United States until 2024, Corinth's ***. Respondent Corinth's questionnaire (annual trends) and posthearing brief, Annex VI, p. 1.

²⁶ Hearing transcript, p. 182 (Mentzelopoulos).

²⁷ Hearing transcript, p. 184 (Mentzelopoulos).

Table LP 4.24 LDW line pipe: Data on industry in Greece, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table LP 4.24 LDW line pipe (Continued): Data on industry in Greece, by period

Quantity in short tons; value in 1,000 dollars; interim periods are January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table LP 4.24 LDW line pipe (Continued): Data on industry in Greece, by period

Unit values in dollars per short ton; shares in percent; interim periods are January to September

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table LP 4.24 LDW line pipe (Continued): Data on industry in Greece, by period

Unit values in dollars per short ton; shares in percent; interim periods are January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Corinth's total shipments, by grade, size (OD), and production method

Table LP 4.25 presents data on Corinth's shipments of LDW line pipe by grade (X-69 and below, X-70 to X-79, X-80 and above, and all other grades) during January 2023 through September 30. During January 2023 to September 2024, X-69 and below and X-70 to X-79 grades each accounted for *** of reported shipments by grade during 2023, respectively; *** of Corinth's shipments during January to September 2024 were of X-69 and below.

Table LP 4.25 LDW line pipe: Corinth's total shipments, by period and grade

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Grade	Period	Quantity	Value	Unit value	Share of quantity
API-5/ Grade B	2023	***	***	***	***
X-69 and below	2023	***	***	***	***
X-70 to X-79	2023	***	***	***	***
X-80 and above	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
API-5/ Grade B	Interim 2024	***	***	***	***
X-69 and below	Interim 2024	***	***	***	***
X-70 to X-79	Interim 2024	***	***	***	***
X-80 and above	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

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

Table LP 4.26 presents data on Corinth's shipments of LDW line pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW line pipe with an >24" and <= 48" OD accounted for *** of Corinth's shipments.

Table LP 4.26 LDW line pipe: Corinth's total shipments, by period and outer diameter

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Table LP 4.27 presents data on Corinth's shipments of LDW line pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW line pipe produced with the LSAW production method for accounted for ***, of Corinth's shipments.

Table LP 4.27 LDW line pipe: Corinth's total shipments, by period and production method

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Table LP 4.28 presents data on Corinth's exports from Greece of LDW line pipe by destination market and period. During 2018, the United States was ***. From 2019 to 2023, the European Union was ***.

Table LP 4.28 LDW line pipe: Corinth's exports, by destination market and period

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; share in percent; interim period is January to September

Destination market	Measure	2018	2019	2020
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
All other destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
All other destination markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
All other destination markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***
United States	Share of quantity	***	***	***
European Union	Share of quantity	***	***	***
Asia	Share of quantity	***	***	***
All other destination markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
All other destination markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued

Table LP 4.28 LDW line pipe (Continued): Corinth's exports, by destination market and period

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; share in percent; interim period is January to September

Destination market	Measure	2021	2022	2023	Interim 2023	Interim 2024
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Alternative products

As shown in Table LP 4.29, Corinth produced other products on the same equipment and machinery used to produce LDW line pipe. LDW line pipe accounted for *** of the Greek producer's overall production during 2018 to 2023, while LDW structural pipe accounted for *** of product produced on the same equipment during 2018 to 2023. The other ***.

Table LP 4.29 LDW pipe: Corinth overall production on the same equipment as in-scope production, 2018 to 2023

Quantity in short tons; share and ratio in percent

Product type	Measure	2018	2019	2020
LDW line pipe	Quantity	***	***	***
LDW structural pipe	Quantity	***	***	***
Other products	Quantity	***	***	***
All out-of-scope products	Quantity	***	***	***
All products	Quantity	***	***	***
LDW line pipe	Share	***	***	***
LDW structural pipe	Share	***	***	***
Other products	Share	***	***	***
All out-of-scope products	Share	***	***	***
All products	Share	***	***	***

Table continued

Table LP 4.29 LDW pipe (Continued): Corinth overall production on the same equipment as in-scope production, 2018 to 2023

Quantity in short tons; share and ratio in percent

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW line pipe	Quantity	***	***	***	***	***
LDW structural pipe	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
LDW line pipe	Share	***	***	***	***	***
LDW structural pipe	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

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

Exports

According to GTA, the leading export markets for LDW line pipe²⁸ from Greece are Malaysia and Saudi Arabia (Table LP 4.30). During 2023, the United States was not an export market for welded pipe greater than 16" in outer diameter from Greece.

²⁸ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW line pipe and out-of-scope products.

Table LP 4.30 Welded pipe greater than 16" in diameter: Exports from Greece, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	261,728	39,086	1,289	5,576	—	—
Malaysia	Quantity	—	61	—	—	—	36,332
Saudi Arabia	Quantity	—	—	—	—	89,387	32,810
Argentina	Quantity	—	—	—	—	—	31,230
Italy	Quantity	14,768	76,211	80,232	42,850	17,220	20,362
United Kingdom	Quantity	1,360	163	40,533	7,554	5,304	19,417
France	Quantity	223	876	4,313	5,626	4,643	9,598
Libya	Quantity	—	—	—	—	—	3,208
Norway	Quantity	—	17	—	49	1,369	1,696
Israel	Quantity	4,917	—	43	3,488	63,318	1,135
All other destination markets	Quantity	161,291	79,048	187,112	30,897	24,406	2,532
Non-U.S. destination markets	Quantity	182,559	156,376	312,233	90,464	205,647	158,320
All destination markets	Quantity	444,287	195,462	313,522	96,040	205,647	158,320
United States	Value	230,874	44,894	1,093	5,477	—	—
Malaysia	Value	—	54	—	—	—	85,501
Saudi Arabia	Value	—	—	—	—	101,904	39,801
Argentina	Value	—	—	—	—	—	36,642
Italy	Value	15,073	85,637	88,449	38,408	20,263	32,771
United Kingdom	Value	1,933	153	23,106	4,178	5,569	32,496
France	Value	236	1,103	1,809	2,840	2,225	13,273
Libya	Value	—	—	—	—	—	5,137
Norway	Value	—	16	—	73	2,304	3,848
Israel	Value	6,309	—	34	4,547	37,828	3,991
All other destination markets	Value	138,822	76,888	176,091	27,639	31,471	4,330
Non-U.S. destination markets	Value	162,372	163,851	289,490	77,684	201,565	257,790
All destination markets	Value	393,246	208,745	290,583	83,161	201,565	257,790

Table continued

Table LP 4.30 Welded pipe greater than 16" in diameter (Continued): Exports from Greece, by destination market and by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	882	1,149	848	982	—	—
Malaysia	Unit value	—	893	—	—	—	2,353
Saudi Arabia	Unit value	—	—	—	—	1,140	1,213
Argentina	Unit value	—	—	—	—	—	1,173
Italy	Unit value	1,021	1,124	1,102	896	1,177	1,609
United Kingdom	Unit value	1,421	939	570	553	1,050	1,674
France	Unit value	1,057	1,259	419	505	479	1,383
Libya	Unit value	—	—	—	—	—	1,601
Norway	Unit value	—	927	—	1,483	1,683	2,269
Israel	Unit value	1,283	—	791	1,304	597	3,516
All other destination markets	Unit value	861	973	941	895	1,289	1,710
Non-U.S. destination markets	Unit value	889	1,048	927	859	980	1,628
All destination markets	Unit value	885	1,068	927	866	980	1,628
United States	Share of quantity	58.9	20.0	0.4	5.8	—	—
Malaysia	Share of quantity	—	0.0	—	—	—	22.9
Saudi Arabia	Share of quantity	—	—	—	—	43.5	20.7
Argentina	Share of quantity	—	—	—	—	—	19.7
Italy	Share of quantity	3.3	39.0	25.6	44.6	8.4	12.9
United Kingdom	Share of quantity	0.3	0.1	12.9	7.9	2.6	12.3
France	Share of quantity	0.1	0.4	1.4	5.9	2.3	6.1
Libya	Share of quantity	—	—	—	—	—	2.0
Norway	Share of quantity	—	0.0	—	0.1	0.7	1.1
Israel	Share of quantity	1.1	—	0.0	3.6	30.8	0.7
All other destination markets	Share of quantity	36.3	40.4	59.7	32.2	11.9	1.6
Non-U.S. destination markets	Share of quantity	41.1	80.0	99.6	94.2	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.11, 7305.12, and 7305.19 as reported by Greece Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the top exporting countries in descending order of 2023 data. Data is likely overstating trade levels for subject products.

The industry in India

Overview

During the original investigations and in these reviews, the Commission did not receive a foreign producer/exporter questionnaire from any Indian firms that produce/export LDW line pipe.

Recent developments

Table LP 4.31 presents events in India's industry since January 1, 2018.

Table LP 4.31 LDW line pipe: Developments in Indian industry since January 1, 2018

Item	Firm	Event
Rebrand	Welspun World	In 2023, Welspun rebranded the organization's name from Welspun Group to Welspun World.

Source: Financial Express, "Welspun Group rebranded as Welspun World," July 17, 2023 at <https://www.financialexpress.com/business/brandwagon-welspun-group-rebranded-as-welspun-world-3174163/>.

Exports

According to GTA, the leading export markets for LDW line pipe²⁹ from India are Saudi Arabia and Indonesia (Table LP 4.32). During 2023, the United States accounted for 0.1 percent of the market for LDW line pipe from India. Saudi Arabia was the top export market for welded pipe greater than 16" in outer diameter from India, accounting for 22.1 percent, followed by Morocco, accounting for 21.4 percent.

²⁹ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW line pipe and out-of-scope products.

Table LP 4.32 Welded pipe greater than 16" in diameter: Exports from India, by destination market and by period

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

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	24,340	77,435	4,492	14,748	64,689	945
Saudi Arabia	Quantity	1,321	59,951	117,323	20,014	1,797	140,699
Morocco	Quantity	—	—	—	—	—	135,707
United Arab Emirates	Quantity	288	17,789	12,937	30,029	9,593	71,444
Chile	Quantity	33,651	93,619	10,385	—	—	69,900
Indonesia	Quantity	235	32,363	134	—	18,000	60,363
Bangladesh	Quantity	45,976	29	52,521	2	1,615	42,817
Qatar	Quantity	562	—	3,875	10,995	908	26,962
Australia	Quantity	3	—	18,249	35,943	31	19,926
Iraq	Quantity	20,260	—	—	29,371	15,919	17,842
All other destination markets	Quantity	409,531	193,390	300,462	210,427	205,710	48,760
Non-U.S. destination markets	Quantity	511,827	397,141	515,886	336,781	253,573	634,420
All destination markets	Quantity	536,167	474,576	520,378	351,529	318,262	635,365
United States	Value	21,474	72,401	18,992	17,798	98,595	1,179
Saudi Arabia	Value	1,350	45,650	119,650	14,516	2,147	159,832
Morocco	Value	—	—	—	—	—	123,239
United Arab Emirates	Value	318	16,570	22,906	25,107	11,344	81,201
Chile	Value	35,292	81,945	13,279	—	—	82,500
Indonesia	Value	273	30,613	177	—	13,893	131,894
Bangladesh	Value	27,252	257	34,682	3	1,842	33,218
Qatar	Value	755	—	6,190	10,721	1,542	23,185
Australia	Value	9	—	13,957	28,489	71	33,567
Iraq	Value	23,511	0	—	39,340	17,713	22,447
All other destination markets	Value	295,650	239,088	369,032	184,450	249,318	66,120
Non-U.S. destination markets	Value	384,411	414,124	579,873	302,627	297,871	757,203
All destination markets	Value	405,885	486,525	598,865	320,424	396,465	758,382

Table continued

Table LP 4.32 Welded pipe greater than 16" in diameter (Continued): Exports from India, by destination market and by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	882	935	4,228	1,207	1,524	1,248
Saudi Arabia	Unit value	1,022	761	1,020	725	1,195	1,136
Morocco	Unit value	—	—	—	—	—	908
United Arab Emirates	Unit value	1,105	932	1,771	836	1,183	1,137
Chile	Unit value	1,049	875	1,279	—	—	1,180
Indonesia	Unit value	1,160	946	1,319	—	772	2,185
Bangladesh	Unit value	593	8,875	660	1,644	1,140	776
Qatar	Unit value	1,344	—	1,598	975	1,699	860
Australia	Unit value	3,005	—	765	793	2,301	1,685
Iraq	Unit value	1,160	—	—	1,339	1,113	1,258
All other destination markets	Unit value	722	1,236	1,228	877	1,212	1,356
Non-U.S. destination markets	Unit value	751	1,043	1,124	899	1,175	1,194
All destination markets	Unit value	757	1,025	1,151	912	1,246	1,194
United States	Share of quantity	4.5	16.3	0.9	4.2	20.3	0.1
Saudi Arabia	Share of quantity	0.2	12.6	22.5	5.7	0.6	22.1
Morocco	Share of quantity	—	—	—	—	—	21.4
United Arab Emirates	Share of quantity	0.1	3.7	2.5	8.5	3.0	11.2
Chile	Share of quantity	6.3	19.7	2.0	—	—	11.0
Indonesia	Share of quantity	0.0	6.8	0.0	—	5.7	9.5
Bangladesh	Share of quantity	8.6	0.0	10.1	0.0	0.5	6.7
Qatar	Share of quantity	0.1	—	0.7	3.1	0.3	4.2
Australia	Share of quantity	0.0	—	3.5	10.2	0.0	3.1
Iraq	Share of quantity	3.8	—	—	8.4	5.0	2.8
All other destination markets	Share of quantity	76.4	40.8	57.7	59.9	64.6	7.7
Non-U.S. destination markets	Share of quantity	95.5	83.7	99.1	95.8	79.7	99.9
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.11, 7305.12, and 7305.19 as reported by India Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the top exporting countries in descending order of 2023 data. Data is likely overstating trade levels for subject products.

The industry in South Korea

Overview

Table LP 4.33 presents information on the LDW line pipe operations of the responding producer and exporter in South Korea: EEW Korea Co., LTD., (“EEW”).

During the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, EEW and Husteel Co., Ltd. (“Husteel”). Husteel did respond to Commission inquiries to complete the foreign producer questionnaire in these reviews.³⁰

Table LP 4.33 LDW line pipe: Summary data for EEW (South Korea), 2023

Quantity in short tons

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
EEW	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Recent developments

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

The responding South Korean producer was asked to report any change in the character of their operations or organization relating to the production of LDW line pipe since 2018. EEW *** since January 1, 2018.

³⁰ Staff identified three additional South Korean producers/exporters that did not respond to the Commission’s inquiries. Husteel, Hyundai Steel, and SeAH did not complete foreign producer/exporter questionnaires, despite being identified as LDW pipe producers, based on the original investigations and the Commerce administrative reviews.

Operations on LDW line pipe

Table LP 4.34 presents data on EEW's installed capacity, practical capacity, and production on the same equipment. EEW's installed overall capacity ***, while its installed overall production fluctuated peaking in 2023. Installed overall capacity utilization increased by *** percentage points in 2023 compared to 2018 levels, but was noticeably lower in January to September 2024.

Table LP 4.34 LDW line pipe: EEW's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2018	2019	2020
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical LDW line pipe capacity	Capacity	***	***	***
Practical LDW line pipe capacity	Production	***	***	***
Practical LDW line pipe capacity	Utilization	***	***	***

Table continued

Table LP 4.34 LDW line pipe (Continued): EEW's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical LDW line pipe capacity	Capacity	***	***	***	***	***
Practical LDW line pipe capacity	Production	***	***	***	***	***
Practical LDW line pipe capacity	Utilization	***	***	***	***	***

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

Table LP 4.35 presents EEW's reported narratives regarding practical capacity constraints.

Table LP 4.35 LDW line pipe: EEW's reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***.
Existing labor force	***.
Supply or material inputs	***.
Storage capacity	***.

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

Table LP 4.36 presents data for EEW. From 2018 to 2023, capacity to produce LDW line pipe ***, while production fluctuated but *** from 2018 to 2023. Capacity utilization did not *** from 2018 to 2023 but was higher during the interim period January to September 2024 than in interim period January to September 2023. The share of home shipments fluctuated but was consistently less than *** percent of its total shipments during 2018 to 2023, and the share of internal consumption was *** percent in 2018 through 2023. ***.

***. The primary destination for EEW's exports of LDW line pipe was ***. The inventory to production ratio in South Korea fluctuated but increased from 2018 to 2023.

Table LP 4.36 LDW line pipe: Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table LP 4.36 LDW line pipe (Continued): Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table LP 4.36 LDW line pipe (Continued): Data on industry in South Korea, by period

Unit values in dollars per short ton; shares in percent; interim period is January to September

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table LP 4.36 LDW line pipe (Continued): Data on industry in South Korea, by period

Unit values in dollars per short ton; shares in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

EEW's total shipments, by grade, size (OD), and production method

Table LP 4.37 presents data on EEW's shipments of LDW line pipe by grade (X-69 and below, X-70 to X-79, X-80 and above, and all other grades) during January 2023 through September 30, 2024. During January 2023 to September 2024, X-69 and below grade accounted for *** of reported shipments by grade.

Table LP 4.37 LDW line pipe: EEW's total shipments, by period and grade

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Grade	Period	Quantity	Value	Unit value	Share of quantity
API-5/ Grade B	2023	***	***	***	***
X-69 and below	2023	***	***	***	***
X-70 to X-79	2023	***	***	***	***
X-80 and above	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
API-5/ Grade B	Interim 2024	***	***	***	***
X-69 and below	Interim 2024	***	***	***	***
X-70 to X-79	Interim 2024	***	***	***	***
X-80 and above	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

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

Table LP 4.38 presents data on EEW's shipments of LDW line pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW line pipe with an >24" and <= 48" OD accounted for *** of shipments by grade.

Table LP 4.38 LDW line pipe: EEW's total shipments, by period and outer diameter

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Table LP 4.39 presents data on EEW's shipments of LDW line pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024. During January 2023 to

September 2024, LDW line pipe produced with the LSAW production method accounted for *** of EEW's shipments.

Table LP 4.39 LDW line pipe: EEW's total shipments, by period and production method

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Table LP 4.40 presents EEW's exports of LDW line pipe to all destination markets. Additionally, EEW provided detailed exports of its LDW line pipe to all markets (country specific). *** was EEW's largest export destination for its LDW line pipe in 2023.³¹

³¹ Email correspondence with *** January 9, 2025.

Table LP 4.40 LDW pipe: EEW's exports from South Korea, by destination market and period

Quantities in short tons; value in 1,000 dollars; shares and ratios in percent; interim period is January to September

Destination market	Measure	2018	2019	2020
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
All other destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
All other destination markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
All other destination markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***
United States	Share of quantity	***	***	***
European Union	Share of quantity	***	***	***
Asia	Share of quantity	***	***	***
All other destination markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	100.0	100.0	100.0
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
All other destination markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued

Table LP 4.40 LDW pipe (continued): EEW's exports from South Korea, by destination market and period

Quantities in short tons; value in 1,000 dollars; shares and ratios in percent; interim period is Jan. to Sept.

Destination market	Measure	2021	2022	2023	Interim 2023	Interim 2024
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Alternative products

As shown in Table LP 4.41, EEW produced other products on the same equipment and machinery used to produce LDW line pipe. LDW line pipe accounted for *** of the South Korean producer's overall production during 2018 to 2023, while LDW structural pipe accounted for *** of product produced on the same equipment during 2018 to 2023.

Table LP 4.41 LDW pipe: EEW overall production on the same equipment as in-scope production, by period

Quantities in short tons; shares and ratios in percent; interim period is January to September

Product type	Measure	2018	2019	2020
LDW line pipe	Quantity	***	***	***
LDW structural pipe	Quantity	***	***	***
Other products	Quantity	***	***	***
All out-of-scope products	Quantity	***	***	***
All products	Quantity	***	***	***
LDW line pipe	Share	***	***	***
LDW structural pipe	Share	***	***	***
Other products	Share	***	***	***
All out-of-scope products	Share	***	***	***
All products	Share	***	***	***

Table continued

Table LP 4.41 LDW pipe (Continued): EEW overall production on the same equipment as in-scope production, by period

Quantities in short tons; shares and ratios in percent; interim period is January to September

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW line pipe	Quantity	***	***	***	***	***
LDW structural pipe	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
LDW line pipe	Share	***	***	***	***	***
LDW structural pipe	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

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

Exports

According to GTA, the leading export markets for LDW line pipe³² from South Korea are the United States and Canada (Table LP 4.42). During 2023, the United States was the top export market for LDW line pipe from South Korea, accounting for 40.0 percent, followed by Canada, accounting for 13.6 percent.

³² The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW line pipe and out-of-scope products.

Table LP 4.42 Welded pipe greater than 16" in diameter: Exports from South Korea, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	134,133	114,898	66,425	80,608	127,326	149,232
Canada	Quantity	57,697	65,603	24,554	44,938	94,685	50,739
Saudi Arabia	Quantity	2,155	10,751	11,955	1,785	6,061	45,468
Qatar	Quantity	3,456	1,248	7,069	3,555	22,741	21,171
Indonesia	Quantity	4,377	6,388	23,635	17,692	21,956	19,924
United Arab Emirates	Quantity	21,589	19,817	35,675	13,736	6,344	18,467
Taiwan	Quantity	5,009	3,120	6,089	3,131	8,375	14,627
Singapore	Quantity	12,199	12,103	16,482	4,790	15,155	14,471
Thailand	Quantity	5,690	3,034	2,450	1,659	11,913	5,469
Japan	Quantity	982	641	7,932	16,081	17,551	5,129
Vietnam	Quantity	2,991	11,551	17,627	981	3,208	4,406
Mexico	Quantity	8,760	4,721	6,726	274	61	3,752
All other destination markets	Quantity	177,973	125,052	69,462	39,524	37,032	20,674
Non-U.S. destination markets	Quantity	302,878	264,029	229,656	148,146	245,082	224,297
All destination markets	Quantity	437,011	378,927	296,081	228,754	372,408	373,529
United States	Value	116,133	99,769	46,857	85,608	199,878	173,092
Canada	Value	50,059	58,178	21,583	51,903	126,136	63,979
Saudi Arabia	Value	2,139	11,740	15,246	2,019	10,476	49,881
Qatar	Value	4,023	1,327	5,408	4,052	34,608	27,701
Indonesia	Value	3,805	4,832	18,358	14,638	27,158	23,938
United Arab Emirates	Value	19,118	21,137	39,778	15,542	9,052	25,061
Taiwan	Value	3,422	2,263	4,671	3,324	11,245	26,960
Singapore	Value	11,613	11,288	14,281	5,812	17,257	17,686
Thailand	Value	4,964	3,101	2,137	1,941	14,579	6,259
Japan	Value	925	861	8,147	15,287	18,240	5,243
Vietnam	Value	2,428	11,134	19,632	1,355	4,169	4,868
Mexico	Value	8,587	5,367	5,595	243	84	5,084
All other destination markets	Value	163,469	116,278	55,486	40,939	48,586	24,359
Non-U.S. destination markets	Value	274,552	247,506	210,324	157,055	321,590	281,019
All destination markets	Value	390,684	347,275	257,180	242,663	521,468	454,112

Table continued

Table LP 4.42 Welded pipe greater than 16" in diameter (Continued): Exports from South Korea, by destination market and period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	866	868	705	1,062	1,570	1,160
Canada	Unit value	868	887	879	1,155	1,332	1,261
Saudi Arabia	Unit value	992	1,092	1,275	1,131	1,728	1,097
Qatar	Unit value	1,164	1,063	765	1,140	1,522	1,308
Indonesia	Unit value	869	756	777	827	1,237	1,201
United Arab Emirates	Unit value	886	1,067	1,115	1,131	1,427	1,357
Taiwan	Unit value	683	725	767	1,062	1,343	1,843
Singapore	Unit value	952	933	866	1,213	1,139	1,222
Thailand	Unit value	872	1,022	872	1,170	1,224	1,145
Japan	Unit value	942	1,343	1,027	951	1,039	1,022
Vietnam	Unit value	812	964	1,114	1,381	1,300	1,105
Mexico	Unit value	980	1,137	832	888	1,384	1,355
All other destination markets	Unit value	919	930	799	1,036	1,312	1,178
Non-U.S. destination markets	Unit value	906	937	916	1,060	1,312	1,253
All destination markets	Unit value	894	916	869	1,061	1,400	1,216
United States	Share of quantity	30.7	30.3	22.4	35.2	34.2	40.0
Canada	Share of quantity	13.2	17.3	8.3	19.6	25.4	13.6
Saudi Arabia	Share of quantity	0.5	2.8	4.0	0.8	1.6	12.2
Qatar	Share of quantity	0.8	0.3	2.4	1.6	6.1	5.7
Indonesia	Share of quantity	1.0	1.7	8.0	7.7	5.9	5.3
United Arab Emirates	Share of quantity	4.9	5.2	12.0	6.0	1.7	4.9
Taiwan	Share of quantity	1.1	0.8	2.1	1.4	2.2	3.9
Singapore	Share of quantity	2.8	3.2	5.6	2.1	4.1	3.9
Thailand	Share of quantity	1.3	0.8	0.8	0.7	3.2	1.5
Japan	Share of quantity	0.2	0.2	2.7	7.0	4.7	1.4
Vietnam	Share of quantity	0.7	3.0	6.0	0.4	0.9	1.2
Mexico	Share of quantity	2.0	1.2	2.3	0.1	0.0	1.0
All other destination markets	Share of quantity	40.7	33.0	23.5	17.3	9.9	5.5
Non-U.S. destination markets	Share of quantity	69.3	69.7	77.6	64.8	65.8	60.0
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.11, 7305.12, and 7305.19 as reported by South Korea Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

The industry in Turkey

Overview

During the original investigations, the Commission received foreign producer/exporter questionnaires from five firms; in these reviews the Commission received one foreign producer/exporter questionnaire from Borusan Birlesik Boru Fabrikaları Sanayi ve Ticaret A.S., (“Borusan”).³³ Borusan’s reported LDW line pipe operations were not included with the industry in Turkey, due to its exclusions based on Commerce’s determinations regarding the AD and CVD orders (as described in Part LDWP 1).

Recent developments

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

Exports

According to GTA, the leading export markets for LDW line pipe³⁴ from Turkey are Iraq and the United States (Table LP 4.43). During 2023, the United States was the second biggest export market for LDW line pipe from Turkey, accounting for 33.4 percent, behind Iraq, accounting for 34.8 percent.

³³ Borusan’s exports to the United States are not subject to the orders for LDW line pipe based on its exclusion from both the AD and the CVD orders. Borusan’s exports to the United States are categorized as nonsubject imports of LDW line pipe.

³⁴ The GTA data represents welded pipe greater than 16” in diameter, a category that includes LDW line pipe and out-of-scope products.

Table LP 4.43 Welded pipe greater than 16" in diameter: Exports from Turkey, by destination market and period

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

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	163,424	—	1,176	—	—	48,891
Iraq	Quantity	295	76	178	762	1,399	51,007
Romania	Quantity	46,800	48,416	9,720	627	7,222	13,418
Serbia	Quantity	526	103	1,027	56	21,367	11,215
Croatia	Quantity	—	9,262	209	—	38	5,738
Bulgaria	Quantity	3,483	—	347	331	—	5,224
Italy	Quantity	872	382	2,570	6,071	1,202	2,929
Mexico	Quantity	—	24	—	—	35,446	2,882
Qatar	Quantity	—	15	—	8,141	8,111	1,939
Georgia	Quantity	10	103	298	211	771	1,050
France	Quantity	1,175	106	6,113	855	914	927
Greece	Quantity	136	—	1,280	772	244	676
All other destination markets	Quantity	39,696	66,563	82,584	39,946	25,223	638
Non-U.S. destination markets	Quantity	92,993	125,050	104,326	57,772	101,937	97,643
All destination markets	Quantity	256,417	125,050	105,502	57,772	101,937	146,534
United States	Value	152,443	—	1,246	—	—	58,799
Iraq	Value	250	59	171	726	1,879	75,795
Romania	Value	46,665	46,001	9,275	614	8,147	15,309
Serbia	Value	442	72	858	53	28,583	16,817
Croatia	Value	—	12,052	197	—	56	10,436
Bulgaria	Value	3,644	—	271	350	—	5,377
Italy	Value	695	813	2,344	7,393	1,498	3,108
Mexico	Value	—	73	—	—	48,943	3,927
Qatar	Value	—	13	—	8,145	10,446	2,238
Georgia	Value	9	61	181	182	704	1,006
France	Value	906	72	5,817	1,104	1,396	1,349
Greece	Value	298	—	1,046	658	323	723
All other destination markets	Value	28,758	59,105	70,834	39,407	33,150	1,186
Non-U.S. destination markets	Value	81,666	118,321	90,993	58,632	135,126	137,272
All destination markets	Value	234,110	118,321	92,239	58,632	135,126	196,071

Table continued

Table LP 4.43 Welded pipe greater than 16" in diameter (Continued): Exports from Turkey, by destination market and period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	933	—	1,059	—	—	1,203
Iraq	Unit value	846	780	959	953	1,343	1,486
Romania	Unit value	997	950	954	980	1,128	1,141
Serbia	Unit value	840	699	836	946	1,338	1,500
Croatia	Unit value	—	1,301	940	—	1,475	1,819
Bulgaria	Unit value	1,046	—	780	1,057	—	1,029
Italy	Unit value	797	2,129	912	1,218	1,246	1,061
Mexico	Unit value	—	3,045	—	—	1,381	1,363
Qatar	Unit value	—	840	—	1,001	1,288	1,154
Georgia	Unit value	933	590	608	864	913	959
France	Unit value	771	679	952	1,291	1,528	1,455
Greece	Unit value	2,192	—	817	852	1,323	1,070
All other destination markets	Unit value	724	888	858	986	1,314	1,859
Non-U.S. destination markets	Unit value	878	946	872	1,015	1,326	1,406
All destination markets	Unit value	913	946	874	1,015	1,326	1,338
United States	Share of quantity	63.7	—	1.1	—	—	33.4
Iraq	Share of quantity	0.1	0.1	0.2	1.3	1.4	34.8
Romania	Share of quantity	18.3	38.7	9.2	1.1	7.1	9.2
Serbia	Share of quantity	0.2	0.1	1.0	0.1	21.0	7.7
Croatia	Share of quantity	—	7.4	0.2	—	0.0	3.9
Bulgaria	Share of quantity	1.4	—	0.3	0.6	—	3.6
Italy	Share of quantity	0.3	0.3	2.4	10.5	1.2	2.0
Mexico	Share of quantity	—	0.0	—	—	34.8	2.0
Qatar	Share of quantity	—	0.0	—	14.1	8.0	1.3
Georgia	Share of quantity	0.0	0.1	0.3	0.4	0.8	0.7
France	Share of quantity	0.5	0.1	5.8	1.5	0.9	0.6
Greece	Share of quantity	0.1	—	1.2	1.3	0.2	0.5
All other destination markets	Share of quantity	15.5	53.2	78.3	69.1	24.7	0.4
Non-U.S. destination markets	Share of quantity	36.3	100.0	98.9	100.0	100.0	66.6
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.11, 7305.12, and 7305.19 as reported by Turkey Customs in the Global Trade Atlas Suite database, accessed December 7, 2024

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 "—". United States is shown at the top followed by the top exporting countries in descending order of 2023 data. Data is likely overstating trade levels for subject products.

Subject countries combined

Table LP 4.44 presents summary data on LDW line pipe operations of the reporting subject producers in the subject countries.

Table LP 4.44 LDW line pipe: Data on the aggregated industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table LP 4.44 LDW line pipe (Continued): Data on the aggregated industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table LP 4.44 LDW line pipe (Continued): Data on the aggregated industry in subject countries, by period

Unit values in dollars per short ton; shares and ratios in percent

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table LP 4.44 LDW line pipe (Continued): Data on the aggregated industry in subject countries, by period

Unit values in dollars per short ton; shares and ratios in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Table LP 4.45 presents summary data on LDW line pipe operations of the reporting subject producers in the combined subject countries of their shipments of LDW line pipe by grade (X-69 and below, X-70 to X-79, X-80 and above, and all other grades) during January 2023 through September 30, 2024. Among the reporting firms, X-69 and below was largest-volume grade of LDW line pipe shipped during January 2023 to September 2024.

Table LP 4.45 LDW line pipe: Data on the aggregated industry in subject countries, by grade and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares and ratios in percent; interim period is January to September

Grade	Period	Quantity	Value	Unit value	Share of quantity
API-5/ Grade B	2023	***	***	***	***
X-69 and below	2023	***	***	***	***
X-70 to X-79	2023	***	***	***	***
X-80 and above	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
API-5/ Grade B	Interim 2024	***	***	***	***
X-69 and below	Interim 2024	***	***	***	***
X-70 to X-79	Interim 2024	***	***	***	***
X-80 and above	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

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

Table LP 4.46 presents summary data on LDW line pipe operations of the reporting subject producers in the combined subject countries of their shipments of LDW line pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 through September 30, 2024. Among the reporting firms, >24" and <=48" was largest-volume size range of LDW line pipe shipped during January 2023 to September 2024.

Table LP 4.46 LDW line pipe: Data on the aggregated industry in subject countries, by outer diameter and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares and ratios in percent; interim period is January to September

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Table LP 4.47 presents summary data on LDW line pipe operations of the reporting subject producers in the combined subject countries of their shipments of LDW line pipe by production method (ERW, HSAW, or LSAW) during January 2023 through September 30, 2024. Among the reporting firms, LSAW was largest-volume size production method of LDW line pipe shipped during January 2023 to September 2024.

Table LP 4.47 LDW line pipe: Data on the aggregated industry in subject countries, by production method and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares and ratios in percent; interim period is January to September

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Third-country trade actions

Canada imposed anti-dumping measures on certain imports of certain large diameter carbon and alloy steel line pipe (including LDWP) from China in October 2016. Imports of HS subheading 7305.11, 7305.12, and 7305.19 are subject to a 95 percent duty rate in Canada.³⁵

Global market

Table LP 4.48 presents global export data for LDW line pipe. Germany, India, China, South Korea, and Saudia Arabia, were the leading sources of exports in 2023, by quantity, accounting for 20.6 percent, 16.9 percent, 14.0 percent, 9.9 percent, and 5.4 percent, respectively, of total global exports. These top five exporters accounted for a combined 66.7 percent of global exports in 2023. Subject country India was the second leading exporter of LDW line pipe, while subject country China was the third leading exporter in 2023. Overall LDW line pipe exports in 2023 were 37.9 percent higher) than the level in 2022.

Since 2018, subject countries China, India, Turkey and South Korea all increased their share of exports of LDW line pipe. Chinese exports of LDW line pipe increased by 3.6 percent, India increased exports by 9.4 percent, Turkey increased exports by 0.3 percent, and South Korea increased total exports of LDW line pipe by 3.8 percent. Subject countries, including Canada and Greece, made up 48.9 percent of total global exports of LDW line pipe in 2023.

³⁵ “Large line pipe: Measures in Force,” Government of Canada. Retrieved April 2, 2024 at [Large line pipe: Measures in force \(cbsa-asfc.gc.ca\)](https://www.cbsa-asfc.gc.ca)

Table LP 4.48 Welded pipe greater than 16" in diameter: Global exports, by reporting country and period

Quantity in short tons; Value in 1,000 dollars

Exporting country	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	35,735	49,472	41,669	64,557	77,922	101,649
Canada	Quantity	329,400	177,330	27,255	21,852	305	2,136
China	Quantity	746,386	723,283	474,894	517,887	503,203	526,761
Greece	Quantity	444,287	195,462	313,522	96,040	205,647	158,320
India	Quantity	536,167	474,576	520,378	351,529	318,262	635,365
South Korea	Quantity	437,011	378,927	296,081	228,754	372,408	373,529
Turkey	Quantity	256,417	125,050	105,502	57,772	101,937	146,534
Subject exporters	Quantity	2,749,668	2,074,628	1,737,632	1,273,834	1,501,762	1,842,645
Germany	Quantity	848,888	391,255	298,995	445,537	346,365	775,041
Saudi Arabia	Quantity	62,391	43,560	35,137	14,674	—	204,897
Malaysia	Quantity	8,734	68,004	28,157	80,641	2,729	197,701
Brazil	Quantity	315,923	10,568	24,135	200	22,693	187,535
Indonesia	Quantity	15,903	34,954	15,418	17,164	89,013	152,614
Japan	Quantity	533,103	450,071	320,463	206,135	128,043	150,156
Singapore	Quantity	23,851	38,274	49,108	32,686	37,043	52,862
United Kingdom	Quantity	53,773	50,033	287,903	188,388	14,745	13,230
All other exporters	Quantity	2,532,359	3,908,200	913,496	387,292	120,439	91,117
All reporting exporters	Quantity	7,180,328	7,119,019	3,752,113	2,711,108	2,340,754	3,769,447
United States	Value	58,700	58,778	53,831	82,656	129,440	205,260
Canada	Value	379,462	233,504	30,876	28,240	504	3,339
China	Value	558,733	539,225	326,667	443,007	532,608	577,978
Greece	Value	393,246	208,745	290,583	83,161	201,565	257,790
India	Value	405,885	486,525	598,865	320,424	396,465	758,382
South Korea	Value	390,684	347,275	257,180	242,663	521,468	454,112
Turkey	Value	234,110	118,321	92,239	58,632	135,126	196,071
Subject exporters	Value	2,362,120	1,933,594	1,596,411	1,176,128	1,787,736	2,247,672
Germany	Value	842,578	746,280	420,596	486,290	660,434	1,425,964
Saudi Arabia	Value	65,800	44,372	35,833	13,259	—	228,990
Malaysia	Value	11,373	64,445	49,142	61,016	3,396	156,607
Brazil	Value	386,324	16,224	35,369	393	53,978	329,695
Indonesia	Value	6,741	30,861	9,591	58,689	152,676	261,448
Japan	Value	463,138	429,557	348,976	208,597	203,571	197,913
Singapore	Value	34,176	62,737	62,266	54,557	70,447	103,165
United Kingdom	Value	90,950	61,213	167,801	163,865	28,383	103,261
All other exporters	Value	2,657,718	3,277,330	912,523	515,216	174,664	162,345
All reporting exporters	Value	6,979,618	6,725,391	3,692,339	2,820,667	3,264,726	5,422,320

Table LP 4.48 (continued) Welded pipe greater than 16" in diameter: Global exports, by reporting country and period

Unit values in dollars per short ton; shares in percent

Exporting country	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	1,643	1,188	1,292	1,280	1,661	2,019
Canada	Unit value	1,152	1,317	1,133	1,292	1,652	1,563
China	Unit value	749	746	688	855	1,058	1,097
Greece	Unit value	885	1,068	927	866	980	1,628
India	Unit value	757	1,025	1,151	912	1,246	1,194
South Korea	Unit value	894	916	869	1,061	1,400	1,216
Turkey	Unit value	913	946	874	1,015	1,326	1,338
Subject exporters	Unit value	859	932	919	923	1,190	1,220
Germany	Unit value	993	1,907	1,407	1,091	1,907	1,840
Saudi Arabia	Unit value	1,055	1,019	1,020	904	—	1,118
Malaysia	Unit value	1,302	948	1,745	757	1,244	792
Brazil	Unit value	1,223	1,535	1,465	1,965	2,379	1,758
Indonesia	Unit value	424	883	622	3,419	1,715	1,713
Japan	Unit value	869	954	1,089	1,012	1,590	1,318
Singapore	Unit value	1,433	1,639	1,268	1,669	1,902	1,952
United Kingdom	Unit value	1,691	1,223	583	870	1,925	7,805
All other exporters	Unit value	1,050	839	999	1,330	1,450	1,782
All reporting exporters	Unit value	972	945	984	1,040	1,395	1,438
United States	Share of quantity	0.5	0.7	1.1	2.4	3.3	2.7
Canada	Share of quantity	4.6	2.5	0.7	0.8	0.0	0.1
China	Share of quantity	10.4	10.2	12.7	19.1	21.5	14.0
Greece	Share of quantity	6.2	2.7	8.4	3.5	8.8	4.2
India	Share of quantity	7.5	6.7	13.9	13.0	13.6	16.9
South Korea	Share of quantity	6.1	5.3	7.9	8.4	15.9	9.9
Turkey	Share of quantity	3.6	1.8	2.8	2.1	4.4	3.9
Subject exporters	Share of quantity	38.3	29.1	46.3	47.0	64.2	48.9
Germany	Share of quantity	11.8	5.5	8.0	16.4	14.8	20.6
Saudi Arabia	Share of quantity	0.9	0.6	0.9	0.5	—	5.4
Malaysia	Share of quantity	0.1	1.0	0.8	3.0	0.1	5.2
Brazil	Share of quantity	4.4	0.1	0.6	0.0	1.0	5.0
Indonesia	Share of quantity	0.2	0.5	0.4	0.6	3.8	4.0
Japan	Share of quantity	7.4	6.3	8.5	7.6	5.5	4.0
Singapore	Share of quantity	0.3	0.5	1.3	1.2	1.6	1.4
United Kingdom	Share of quantity	0.7	0.7	7.7	6.9	0.6	0.4
All other exporters	Share of quantity	35.3	54.9	24.3	14.3	5.1	2.4
All reporting exporters	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7305.11, 7305.12, and 7305.19 as reported by various national statistical authorities, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the countries under order, all remaining top exporting countries in descending order of 2023 data. Data is likely overstating trade levels for subject products.

Line 5: Pricing data

Factors affecting prices

Raw material costs

The primary raw material used in the production of LDW line pipe differs according to the method of production. For ERW pipe, hot-rolled steel coil (“HRC”) is the principal raw material. For SAW pipe, the principal raw materials are cut-to-length (“CTL”) plate (for LSAW) or hot-rolled steel coil (for HSAW).¹ For LDW line pipe, raw material costs accounted for more than 65 percent of total costs of goods sold throughout the period for which data were collected, with steel coils comprising the majority of raw material costs.

Prices for cut-to-length plate were higher than those for hot-rolled coil, except in 2021. (figure LP 5.1 and table LP 5.1). HRC prices increased from early 2018 until mid-2018, then generally declined, reaching a point *** percent below the January 2018 price in July 2020. From July 2020 through September 2021, HRC prices increased by *** percent. Since that time, they have generally decreased, although in the spring of 2022, 2023, and 2024 there were small price spikes. The price of HRC was *** percent lower in December 2024 than the peak in September 2021, or *** percent lower than its price in January 2018. Prices for CTL plate followed a somewhat similar trajectory declining early in the period (by *** percent from January 2018 to August 2020, then increasing sharply (by *** percent at the peak in December 2022), and generally falling since that time (*** by December 2024). Because of the smaller percentage decline in CTL plate prices than HRC prices, prices for CTL plate were *** percent higher in September 2024 than January 2018.

¹ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, V-1.

Figure LP 5.1 Raw materials: Prices per short ton of hot-rolled coil and cut-to-length plate, monthly, January 2018 to December 2024

* * * * *

Source: ***, various monthly issues. ***.

Table LP 5.1 Raw materials: Prices per short ton of hot-rolled coil and cut-to-length plate, monthly, January 2018 to December 2024

Hot-rolled coil (dollars per short ton)							
Month	2018	2019	2020	2021	2022	2023	2024
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***

Table continued.

Table LP 5.1 (Continued) Raw materials: Prices per short ton of hot-rolled coil and cut-to-length plate, monthly, January 2018 to December 2024

Cut-to-length plate (dollars per short ton)							
Month	2018	2019	2020	2021	2022	2023	2024
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***

Source: ***, various monthly issues. ***

Most producers and importers noted that raw material costs had either fluctuated upward or were the same at beginning and end of the period for which data were collected (table LP 5.2). Looking forward, all responding firms anticipate that raw material costs will either steadily increase or fluctuate upward. A large majority of purchasers also reported being familiar with prices of raw materials used to produce LDW line pipe. Nineteen of 27 LDW line pipe purchasers stated that the raw material costs affected contracts or negotiations to purchase LDW line pipe. Purchasers reported that raw material prices either directly affect pipe prices or affect timing of purchases, and one purchaser (***) stated they have increased the need to explore alternative commitment options like letters of intent. Purchaser *** stated that pricing did not follow hot-rolled coil prices during the COVID-19 pandemic.

Table LP 5.2 Raw material prices: Count of firms' responses regarding raw material price changes since January 1, 2018, and anticipated raw material price changes, by firm type

Item	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
Raw material prices	U.S. producers	0	4	2	0	0
Raw material prices	Importers	***	***	***	***	***
Anticipated raw material prices	U.S. producers	0	2	0	0	0
Anticipated raw material prices	Importers	***	***	***	***	***

Source: Compiled from responses to Commission questionnaires

Note: Two domestic producers, *** reported "fluctuated upward" and "fluctuated downward" in response to this question.

Transportation costs to the U.S. market

Transportation costs for LDW line pipe shipped from subject countries to the United States averaged 0.2 percent for shipments from Canada, 6.4 percent from China, 6.7 percent from Greece, 3.8 percent from India, 7.9 percent from South Korea, and 12.3 percent from Turkey during 2023.² These estimates were derived from official import data and represent the transportation and other charges on imports.³

U.S. inland transportation costs

All six responding U.S. producers and all but two responding importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 8 to 15 percent while most responding importers of product from subject countries reported costs of between 3 and 15 percent.⁴

Pricing practices

Pricing methods

All U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, and some also reported setting prices via contracts (table LP 5.3). One producer also noted other ways of selling LDW line pipe.

Table LP 5.3 LDW line pipe: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Importers
Transaction-by-transaction	6	***
Contract	4	***
Set price list	1	***
Other	1	***
Responding firms	6	***

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

² Data for South Korea and Turkey include both subject and nonsubject imports for relevant HTS statistical reporting numbers.

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2023 and then dividing by the customs value based on the HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed November 22, 2024.

⁴ This does not include responses of 0 and 0.005 percent reported by two importers.

U.S. producers reported selling their LDW line pipe in a variety of methods, but responding importers sold mainly via spot sales (table LP 5.4).

Table LP 5.4 LDW line pipe: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2023

Share in percent

Type of sale	U.S. producers	Importers
Long-term contracts	40.8	***
Annual contracts	—	***
Short-term contracts	25.0	***
Spot sales	34.2	***
Total	100.0	100.0

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

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

Producers' short-term contracts lasted between 60 and 180 days and responding importers' short-term contracts lasted 42 to 180 days. Long-term contracts by U.S. producers were noted to typically last 450 to 550 days.⁵ Typical short-term U.S. producer and importer contracts do not allow for price renegotiation, fix both price and quantity, and are not indexed to raw material price changes. Two producers reported characteristics of their long-term contracts, noting ***. Two importers reported characteristics of their long-term contracts, and those characteristics ***.

Three purchasers reported that they purchase product daily, 2 purchase weekly, 9 purchase monthly, 7 purchase quarterly, 1 purchases annually, and 8 purchase with some other frequency, mostly on an as-needed basis. On average, purchasers contact 2 to 6 suppliers before making a purchase, with about half contacting as few as 1, and one purchaser contacting as many as 15 potential suppliers.

⁵ *** indicated that if they have long-term contracts, typically they would be 540 to 550 days.

Sales terms and discounts

U.S. producers and importers typically quote prices on a delivered basis. Four of six U.S. producers and all responding importers do not offer discounts. Two producers and one importer offer early payment discounts, at least for some sales. *** described its rebate program with ***, but noted that the program ended in 2020.

Price leadership

Six purchasers reported that there were no price leaders in the LDW line pipe market, while four reported that American Steel Pipe (ACIPCO) was a leader, two reported that Jindal, Welspun, and SeAH were price leaders, and one purchaser noted that Borusan Berg, Dura-Bond, and Hyundai were price leaders. Purchaser *** stated that American Steel Pipe can drive pricing when there is a U.S. requirement, and that SeAH is widely accepted as an imported product. Purchaser *** stated that American Steel is a leader in upward price movements, and *** reported that its products are “most widely accepted.” Purchaser *** noted that “SeAH is accepted via end-user AMLs and is the primary leader in setting the import price floor for what we consider Tier 1 mills.”

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following LDW line pipe products shipped to unrelated U.S. customers during January 2018 to September 2024.

Product 1.— Line pipe, coated, 42” OD, 0.600”- 1.000” wall, API 5L X52-X70, regardless of length

Product 2.—Line pipe, coated, 32”- 36” OD, 0.350”- 0.800” wall, API 5L X52-X70, regardless of length

Product 3.—Line pipe, coated, 26”- 30” OD, 0.350”- 0.800” wall, API 5L X52-X70, regardless of length

Product 4.—Line pipe, coated, 20”- 24” OD, 0.300”- 0.500” wall, API 5L X60-X70, regardless of length

Five U.S. producers and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁶ Pricing data reported by these firms accounted for approximately 79.5 percent of U.S. producers' U.S. commercial shipments of LDW line pipe, *** percent of U.S. commercial shipments of imports from South Korea, and 0.0 percent of U.S. commercial shipments from the remaining subject sources in 2023.⁷ Price data for products 1 to 4 are presented in tables 5.5 to 5.8 and figures 5.2 to 5.5.

⁶ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

⁷ Only *** had shipments of LDW line pipe in 2023. Pricing coverage is based on U.S. shipments reported in questionnaires.

Table LP 5.5 LDW line pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2018 Q1	***	***	—	0	—
2018 Q2	***	***	—	0	—
2018 Q3	***	***	—	0	—
2018 Q4	***	***	—	0	—
2019 Q1	***	***	—	0	—
2019 Q2	***	***	—	0	—
2019 Q3	—	0	—	0	—
2019 Q4	***	***	—	0	—
2020 Q1	***	***	—	0	—
2020 Q2	***	***	—	0	—
2020 Q3	***	***	—	0	—
2020 Q4	***	***	—	0	—
2021 Q1	—	0	—	0	—
2021 Q2	—	0	—	0	—
2021 Q3	—	0	—	0	—
2021 Q4	—	0	—	0	—
2022 Q1	***	***	—	0	—
2022 Q2	***	***	—	0	—
2022 Q3	—	0	—	0	—
2022 Q4	***	***	—	0	—
2023 Q1	***	***	—	0	—
2023 Q2	***	***	—	0	—
2023 Q3	***	***	—	0	—
2023 Q4	***	***	—	0	—
2024 Q1	***	***	—	0	—
2024 Q2	—	0	—	0	—
2024 Q3	***	***	—	0	—

Table continued.

Table LP 5.5 LDW line pipe (Continued): Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Greece price	Greece quantity	Greece margin	South Korea (subject) price	South Korea (subject) quantity	South Korea (subject) margin
2018 Q1	—	0	—	---	0	---
2018 Q2	—	0	—	***	***	***
2018 Q3	—	0	—	***	***	***
2018 Q4	—	0	—	---	0	---
2019 Q1	—	0	—	***	***	***
2019 Q2	—	0	—	***	***	***
2019 Q3	—	0	—	***	***	---
2019 Q4	—	0	—	***	***	***
2020 Q1	—	0	—	---	0	---
2020 Q2	—	0	—	---	0	---
2020 Q3	—	0	—	---	0	---
2020 Q4	—	0	—	---	0	---
2021 Q1	—	0	—	---	0	---
2021 Q2	—	0	—	***	***	---
2021 Q3	—	0	—	***	***	---
2021 Q4	—	0	—	***	***	---
2022 Q1	—	0	—	---	0	---
2022 Q2	—	0	—	---	0	---
2022 Q3	—	0	—	***	***	---
2022 Q4	—	0	—	***	***	***
2023 Q1	—	0	—	---	0	---
2023 Q2	—	0	—	---	0	---
2023 Q3	—	0	—	---	0	---
2023 Q4	—	0	—	---	0	---
2024 Q1	—	0	—	---	0	---
2024 Q2	—	0	—	---	0	---
2024 Q3	—	0	—	---	0	---

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

Note: Product 1: Line pipe, coated, 42" OD, 0.600"- 1.000" wall, API 5L X52-X70, regardless of length.

Note: The elevated *** price in the first quarter of 2022 relates to a single low-volume sale from *** during a time when CTL plate prices were high. Email from ***, January 24, 2025.

Table LP 5.6 LDW line pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	—	0	—
2019 Q3	***	***	—	0	—
2019 Q4	***	***	—	0	—
2020 Q1	***	***	—	0	—
2020 Q2	***	***	—	0	—
2020 Q3	***	***	—	0	—
2020 Q4	***	***	—	0	—
2021 Q1	***	***	—	0	—
2021 Q2	***	***	—	0	—
2021 Q3	***	***	—	0	—
2021 Q4	***	***	—	0	—
2022 Q1	***	***	—	0	—
2022 Q2	***	***	—	0	—
2022 Q3	***	***	—	0	—
2022 Q4	***	***	—	0	—
2023 Q1	***	***	—	0	—
2023 Q2	***	***	—	0	—
2023 Q3	***	***	—	0	—
2023 Q4	***	***	—	0	—
2024 Q1	***	***	—	0	—
2024 Q2	***	***	—	0	—
2024 Q3	***	***	—	0	—

Table continued.

Table LP 5.6 LDW line pipe (Continued): Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Greece price	Greece quantity	Greece margin	South Korea (subject) price	South Korea (subject) quantity	South Korea (subject) margin
2018 Q1	—	0	—	---	0	---
2018 Q2	—	0	—	***	***	***
2018 Q3	—	0	—	***	***	***
2018 Q4	—	0	—	---	0	---
2019 Q1	—	0	—	***	***	***
2019 Q2	—	0	—	***	***	***
2019 Q3	—	0	—	***	***	***
2019 Q4	—	0	—	***	***	***
2020 Q1	—	0	—	---	0	---
2020 Q2	—	0	—	---	0	---
2020 Q3	—	0	—	***	***	***
2020 Q4	—	0	—	---	0	---
2021 Q1	—	0	—	---	0	---
2021 Q2	—	0	—	***	***	***
2021 Q3	—	0	—	***	***	***
2021 Q4	—	0	—	***	***	***
2022 Q1	—	0	—	***	***	***
2022 Q2	—	0	—	***	***	***
2022 Q3	—	0	—	***	***	***
2022 Q4	—	0	—	***	***	***
2023 Q1	—	0	—	---	0	---
2023 Q2	—	0	—	---	0	---
2023 Q3	—	0	—	---	0	---
2023 Q4	—	0	—	***	***	***
2024 Q1	—	0	—	***	***	***
2024 Q2	—	0	—	---	0	---
2024 Q3	—	0	—	***	***	***

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

Note: Product 2: Line pipe, coated, 32"- 36" OD, 0.350"- 0.800" wall, API 5L X52-X70, regardless of length.

Table LP 5.7 LDW line pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2018 Q1	***	***	—	0	—
2018 Q2	***	***	—	0	—
2018 Q3	***	***	—	0	—
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	—	0	—
2020 Q3	***	***	—	0	—
2020 Q4	***	***	—	0	—
2021 Q1	***	***	—	0	—
2021 Q2	***	***	—	0	—
2021 Q3	***	***	—	0	—
2021 Q4	***	***	—	0	—
2022 Q1	***	***	—	0	—
2022 Q2	***	***	—	0	—
2022 Q3	***	***	—	0	—
2022 Q4	***	***	—	0	—
2023 Q1	***	***	—	0	—
2023 Q2	***	***	—	0	—
2023 Q3	***	***	—	0	—
2023 Q4	***	***	—	0	—
2024 Q1	***	***	—	0	—
2024 Q2	***	***	—	0	—
2024 Q3	***	***	—	0	—

Table continued.

Table LP 5.7 LDW line pipe (Continued): Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Greece price	Greece quantity	Greece margin	South Korea (subject) price	South Korea (subject) quantity	South Korea (subject) margin
2018 Q1	—	0	—	***	***	***
2018 Q2	—	0	—	***	***	***
2018 Q3	***	***	***	***	***	***
2018 Q4	***	***	***	---	0	---
2019 Q1	***	***	***	***	***	***
2019 Q2	—	0	—	***	***	***
2019 Q3	—	0	—	***	***	***
2019 Q4	—	0	—	***	***	***
2020 Q1	—	0	—	***	***	***
2020 Q2	—	0	—	---	0	---
2020 Q3	—	0	—	***	***	***
2020 Q4	—	0	—	---	0	---
2021 Q1	—	0	—	---	0	---
2021 Q2	—	0	—	***	***	***
2021 Q3	—	0	—	***	***	***
2021 Q4	—	0	—	***	***	***
2022 Q1	—	0	—	***	***	***
2022 Q2	—	0	—	***	***	***
2022 Q3	—	0	—	***	***	***
2022 Q4	—	0	—	***	***	***
2023 Q1	—	0	—	***	***	***
2023 Q2	—	0	—	***	***	***
2023 Q3	—	0	—	---	0	---
2023 Q4	—	0	—	---	0	---
2024 Q1	—	0	—	---	0	---
2024 Q2	—	0	—	---	0	---
2024 Q3	—	0	—	***	***	***

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

Note: Product 3: Line pipe, coated, 26"- 30" OD, 0.350"- 0.800" wall, API 5L X52-X70, regardless of length.

Table LP 5.8 LDW line pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2018 Q1	1,136	69,770	***	***	***
2018 Q2	1,135	206,334	***	***	***
2018 Q3	1,197	225,432	***	***	***
2018 Q4	1,383	172,780	***	***	***
2019 Q1	1,591	120,858	---	0	---
2019 Q2	1,587	144,351	---	0	---
2019 Q3	***	***	---	0	---
2019 Q4	1,414	80,595	***	***	***
2020 Q1	1,216	158,243	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	1,201	40,435	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	---	0	---
2021 Q2	***	***	***	***	***
2021 Q3	1,873	12,031	***	***	***
2021 Q4	1,870	4,434	---	0	---
2022 Q1	***	***	---	0	---
2022 Q2	***	***	---	0	---
2022 Q3	1,901	26,360	---	0	---
2022 Q4	1,917	34,547	---	0	---
2023 Q1	***	***	---	0	---
2023 Q2	***	***	---	0	---
2023 Q3	***	***	---	0	---
2023 Q4	***	***	---	0	---
2024 Q1	***	***	---	0	---
2024 Q2	***	***	---	0	---
2024 Q3	***	***	---	0	---

Table continued.

Table LP 5.8 LDW line pipe (Continued): Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Greece price	Greece quantity	Greece margin	South Korea (subject) price	South Korea (subject) quantity	South Korea (subject) margin
2018 Q1	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***
2018 Q3	---	0	---	***	***	***
2018 Q4	---	0	---	---	0	---
2019 Q1	---	0	---	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	---	0	---
2020 Q1	---	0	---	---	0	---
2020 Q2	---	0	---	---	0	---
2020 Q3	---	0	---	---	0	---
2020 Q4	---	0	---	---	0	---
2021 Q1	---	0	---	---	0	---
2021 Q2	---	0	---	---	0	---
2021 Q3	---	0	---	---	0	---
2021 Q4	---	0	---	---	0	---
2022 Q1	---	0	---	---	0	---
2022 Q2	---	0	---	---	0	---
2022 Q3	---	0	---	---	0	---
2022 Q4	---	0	---	---	0	---
2023 Q1	---	0	---	---	0	---
2023 Q2	---	0	---	---	0	---
2023 Q3	---	0	---	---	0	---
2023 Q4	---	0	---	---	0	---
2024 Q1	---	0	---	---	0	---
2024 Q2	---	0	---	***	***	***
2024 Q3	---	0	---	---	0	---

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

Note: Product 4: Line pipe, coated, 20"- 24" OD, 0.300"- 0.500" wall, API 5L X60-X70, regardless of length.

Figure LP 5.2 LDW line pipe: Weighted-average prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: Line pipe, coated, 42" OD, 0.600"- 1.000" wall, API 5L X52-X70, regardless of length.

Figure LP 5.3 LDW line pipe: Weighted-average prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

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

Note: Product 2: Line pipe, coated, 32"- 36" OD, 0.350"- 0.800" wall, API 5L X52-X70, regardless of length.

Figure LP 5.4 LDW line pipe: Weighted-average prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

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

Note: Product 3: Line pipe, coated, 26"- 30" OD, 0.350"- 0.800" wall, API 5L X52-X70, regardless of length.

Figure LP 5.5 LDW line pipe: Weighted-average prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

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

Note: Product 4: Line pipe, coated, 20" - 24" OD, 0.300" - 0.500" wall, API 5L X60-X70, regardless of length.

Price trends

In general, prices increased during January 2018 to September 2024 for domestic producers, and subject sources did not have sufficient shipments to determine a trend over the period. Table LP 5.9 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent from the first quarter 2018 to the third quarter of 2024.

Table LP 5.9 LDW line pipe: Summary of price data, by product and source, January 2018 to September 2024

Quantity in short tons, price in dollars per short ton

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	20	***	***	***	***	***	***
Product 1	Canada	0	0	—	—	—	—	—
Product 1	Greece	0	0	—	—	—	—	—
Product 1	South Korea (subject)	11	***	***	***	—	—	—
Product 2	United States	27	***	***	***	***	***	***
Product 2	Canada	5	***	***	***	***	—	—
Product 2	Greece	0	0	—	—	—	—	—
Product 2	South Korea (subject)	17	***	***	***	—	—	—
Product 3	United States	27	***	***	***	***	***	***
Product 3	Canada	6	***	***	***	—	—	—
Product 3	Greece	3	***	***	***	—	—	—
Product 3	South Korea (subject)	19	***	***	***	***	—	—
Product 4	United States	27	***	***	***	***	***	***
Product 4	Canada	11	***	***	***	***	—	—
Product 4	Greece	5	***	***	***	***	—	—
Product 4	South Korea (subject)	7	***	***	***	***	—	—

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

Note: Percent change column is percentage change from the first quarter 2018 to the last quarter in 2024.

Price comparisons⁸

As shown in table LP 5.10, prices for LDW line pipe imported from Canada, Greece, and South Korea (subject) were below those for U.S.-produced product in 41 of 79 instances; margins of underselling ranged from *** to *** percent. In the remaining 38 instances, prices for LDW line pipe from these countries were between *** and *** percent above prices for the domestic product. Table LP5.11 shows that imports from Canada mainly oversold domestic product (17 of 22 quarters), while imports from South Korea mainly undersold domestic product (31 of 49 quarters), and despite few observations, imports from Greece tended toward underselling. Comparisons based on quantity of imported product show similar trends, though more pronounced for imports from Greece. The majority of comparisons occurred 2018 and 2019, as shown in table LP 5.12.

⁸ In the original investigations, quarterly pricing data were not collected. Instead, only bid data were collected from purchasers. Regarding line pipe bids, bids from subject import sources were lower than those from domestic sources in 60 of 101 instances, and higher in 41. Bids involving subject imports from China, Greece, India, and Turkey were more frequently lower than bids from the United States. Bids from Canada and South Korea were slightly more frequently higher than bids from the United States (17 vs. 15 for Canada and 9 vs. 7 for South Korea (subject)). On average, subject imports underbid domestic product by 19.1 percent, compared with an average overbidding percentage of 10.6 percent. *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. V-6.

Table LP 5.10 LDW line pipe: Instances of underselling and overselling and the range and average of margins, by product

Quantity in short tons; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	5	***	***	***	***
Product 2	Underselling	7	***	***	***	***
Product 3	Underselling	19	***	***	***	***
Product 4	Underselling	10	***	***	***	***
Total, all products	Underselling	41	***	***	***	***
Product 1	Overselling	1	***	***	***	***
Product 2	Overselling	15	***	***	***	***
Product 3	Overselling	9	***	***	***	***
Product 4	Overselling	13	***	***	***	***
Total, all products	Overselling	38	***	***	***	***

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

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

Table LP 5.11 LDW line pipe: Instances of underselling and overselling and the range and average of margins, by source

Quantity in short tons; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Canada	Underselling	5	***	***	***	***
Greece	Underselling	5	***	***	***	***
South Korea (subject)	Underselling	31	***	***	***	***
Total, all subject sources	Underselling	41	***	***	***	***
Canada	Overselling	17	***	***	***	***
Greece	Overselling	3	***	***	***	***
South Korea (subject)	Overselling	18	***	***	***	***
Total, all subject sources	Overselling	38	***	***	***	***

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

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

Table LP 5.12 LDW line pipe: Instances of underselling and overselling and the range and average of margins, by year

Quantity in short tons; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2018	Underselling	14	***	***	***	***
2019	Underselling	12	***	***	***	***
2020	Underselling	2	***	***	***	***
2021	Underselling	4	***	***	***	***
2022	Underselling	5	***	***	***	***
2023	Underselling	2	***	***	***	***
2024	Underselling	2	***	***	***	***
Total, all years	Underselling	41	***	***	***	***
2018	Overselling	9	***	***	***	***
2019	Overselling	12	***	***	***	***
2020	Overselling	6	***	***	***	***
2021	Overselling	4	***	***	***	***
2022	Overselling	4	***	***	***	***
2023	Overselling	1	***	***	***	***
2024	Overselling	2	***	***	***	***
Total, all years	Overselling	38	***	***	***	***

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

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

Bid data

Sixteen of 27 LDW line pipe purchasers indicated that they purchase pipe using a bidding process and described a variety of processes by which they invite bidders to the bidding process. Seven of 17 responding LDW line pipe purchasers rarely or never allow bidders more than one opportunity to submit bids, 6 sometimes do, and 4 frequently do. Nearly all (15 of 16) rarely or never discuss competing bids with suppliers. Six of 16 responding LDW line pipe purchasers rarely or never allow invitees to bid on a project with an offer that includes exceptions to their product specifications or alternative LDW pipe products, 4 sometimes do, 4 frequently do, and 2 always do. Some of the purchasers that at least sometimes allow exceptions or alternatives provided descriptions of the alternatives or exceptions and other factors that influence whether they allow it. For example, they noted the alternatives must meet technical requirements, be appropriate to meet the engineered aspects of the project, could have an alternate wall thickness that costs less, the reliability of the supplier offering the alternative/exception, delivery dates, pricing, and timing of available material. Half (8 of 16) of

responding purchasers indicated that they sometimes change the size, quantity, and/or grade requested for a project after the project has been awarded, and 6 indicated that they would rarely or never change.

Since January 1, 2021, ten purchasers have issued 369 projects for bid. As shown in table LP 5.13, mills from the United States bid on nearly all of these projects. LDW line pipe imported from Greece was also involved in 2 bidding events.⁹ Bids were received for five and seven events for product from Canada and South Korea (subject), respectively. Seven purchasers indicated that they had projects which had bids from both domestic firms and subject countries. In total, this encompassed at least 63 events.

These purchasers were asked for details about their five largest bidding events in which domestic and subject sources bid. Detail regarding the 18 bidding events submitted to the Commission is presented in Appendix E. Eight of the bidding events only involved suppliers of domestic product, with one being a single-source event due to ***. The 11 remaining bidding events encompassed data from four purchasers. In these events, the lowest bidder won in 8 of 11 bids. Reasons provided for not selecting the lowest-priced bid included being unable to meet the delivery schedule, the lowest-cost bidder not being qualified yet, not enough quantity available, and not meeting technical specifications (thickness). Domestic product won 10 of the 11 bidding events. Product from a supplier in Canada was noted in five bidding events, it was not the lowest price option in any event, and it won none of the events. In three events, the Canadian supplier was reported to be “not the best overall option” and in two events, one purchaser reported the cost was too high. In one final bid, the Canadian supplier submitted a budgetary quote, but did not complete an analysis.

⁹ Not included in the tabulation are *** bidding events involving possible imports from Greece reported by *** which were purchases through distributors of small sections of line pipe (less than ten miles). Its *** bidding events larger than this were mill-direct bidding events and are included in the tabulation; it invited domestic producers to these events. It maintains an approved manufacturer list (“AML”), and for the *** non-mill bidding events, it prefers that its distributors purchase from domestic mills but will purchase LDW line pipe from any manufacturer on its AML. It reported that its non-mill bidding events included Greece, Germany, and Japan because they are on the AML. Email from ***, February 28, 2025. Also not included are *** non-mill direct bidding events noted by purchaser ***. *** stated its LDW line pipe purchase quantities are “***” so it purchases “***.” It’s *** largest events are presented in Appendix E, *** include bids from distributors which noted they would use LDW line pipe from South Korea. Purchaser *** presented in Appendix E is included in the tabulation.

Two events included pipe produced in Greece as part of the possible bids. For one event, the Greek producer declined to bid, and for the other event, Greek large diameter line pipe was product from four possible countries from which a distributor might have sourced product. With respect to the three bidding events including product from South Korea that purchasers submitted, South Korean imports were priced higher than the winning bid in one event, the offered pipe did not meet wall thickness requirements in another, and in the third event, two of four distributors offered product from South Korea to fulfill a *** bid and one of these distributors won the event. This bid was the lowest-priced bid submitted.

Table LP 5.13 LDW line pipe: Number of times domestic, subject, and nonsubject sources have bid on projects since January 1, 2021

United States	Canada	China	Greece	India	South Korea (subject)	Turkey (subject)	Nonsubject sources
369	5	0	2	0	7	0	55

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

Note: Countries from which bids were received include Germany, Italy, Japan, Mexico, and the United Kingdom.

Note: Data for Greece and other sources excludes *** non-mill-direct bidding events

Note: Purchaser *** reported that its purchases are too small for mill-direct bidding, so it purchases through distributors. Its largest bidding event was valued at approximately ***.

Note: Purchaser *** did not report how many of its *** bidding events involved bids from Canada but listed *** in its detailed responses. These were included in these tabulations.

Structural 1: Introduction

U.S. market participants

U.S. producers

During the original investigations, 15 firms supplied the Commission with information on their U.S. operations with respect to all LDW pipe, nine of which indicated that they had produced LDW structural pipe: ACIPCO, Atlas Tube, Berg, Dura-Bond, Jindal Bay St. Louis, Nucor, Skyline, Stupp, and Trinity. These 9 producers accounted for the vast majority of U.S. production of LDW structural pipe in 2017.¹ In these current proceedings, the Commission issued U.S. producers' questionnaires to 15 firms, 11 of which provided the Commission with information on their product operations (which includes 9 firms that indicated LDW structural pipe production).^{2 3} These 9 firms are believed to account for the vast majority of U.S. production of LDW structural pipe in 2023. Presented in table SP 1.1 is a list of current and former domestic producers of LDW structural pipe and each company's position on continuation of the orders, production locations, and share of reported production of LDW structural pipe in 2023.⁴

¹ Original publication, III-1.

² ***. *** indicated its LDW structural pipe production *** during 2022 was due to the lack of LDW line pipe production, ***. *** U.S. producer questionnaire response, section II-2a

³ ***.

⁴ ***. ***. U.S producer questionnaire response, section IV-2a.

Table SP 1.1 LDW structural pipe: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2023
Share in percent

Firm	Position on continuation of the orders	Production location(s)	Share of production
ACIPCO	***	Birmingham, AL	***
Atlas	***	Chicago, IL Blytheville, AR	***
Berg	***	Panama City, FL Mobile, AL	***
Dura-Bond	***	Steelton, PA McKeesport, PA	***
Jindal	***	Bay St. Louis, MS Baytown, TX	***
Nucor	***	Fontana, CA	***
Skyline	***	Iuka, MS Morrisville, PA Newton, IL Longview, WA Camp Hill, PA	***
Stupp	***	Baton Rouge, LA	***
Trinity	***	Saint Charles, MO	***
All firms	Various	Various	100.0

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

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

As indicated in table SP 1.2, one U.S. producer (***) is related to a foreign producer of the subject merchandise.⁵ In addition, as discussed in greater detail in Part 3, one U.S. producer, ***, purchases the subject merchandise from U.S. importers.

⁵ As indicated in Table SP 1.2, *** indicated that it is related to importer ***. *** did not report imports of subject merchandise during the period of review.

Table SP 1.2 LDW structural pipe: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued

Table SP 1.2 LDW structural pipe (Continued): U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

U.S. importers

In the original investigations, the Commission received U.S. importer questionnaires from 35 firms, which accounted for nearly 60 percent of LDW structural pipe from all sources)⁶ and nearly 90 percent of total U.S. imports from Canada, China, Greece, India, South Korea and Turkey during 2017.⁷ Import data presented in the original investigations were based on official Commerce statistics and questionnaire responses.

In the current proceedings, the Commission issued U.S. importers' questionnaires to 30 firms believed to be importers of LDW line and LDW structural pipe, as well as to all U.S. producers of both LDW line and LDW structural pipe.⁸ Usable questionnaire responses were received from 15 firms, representing *** percent of LDW structural pipe imports from Canada in 2023, and *** percent of LDW structural pipe imports from South Korea during 2023, and representing *** percent of LDW structural pipe imports from China during 2023, and *** of LDW structural pipe imports from Turkey during 2023.⁹ ¹⁰ Table 1.3 lists all responding U.S. importers of LDW structural pipe from Canada, China, South Korea, and Turkey, and all other sources, their locations, and their shares of U.S. imports of LDW structural pipe in 2023.

⁶ In the original investigations, the Commission received 35 total U.S. importer questionnaire responses from firms that had imported LDW line pipe, LDW structural pipe, and LDW stainless steel pipe. Original publication, p. IV-1.

⁷ Original publication, p. IV-1.

⁸ In these reviews, the orders specific to LDW structural pipe are applicable to only LDW structural pipe from Canada, China, South Korea, and Turkey.

⁹ One firm *** reported in its U.S. importer questionnaire that they had imported LDW structural pipe from Turkey. This firm's reported U.S. imports of LDW structural pipe in 2023 accounted for *** of LDW structural pipe from Turkey. The reported LDW structural pipe imports by *** the 179 short tons of LDW structural pipe that was reported for 2023, based on official import statistics. ***. Despite not being classified under the four primary HTS statistical reporting numbers for LDW structural pipe, staff has included these imports of LDW structural pipe within the presented data. Email correspondence with counsel for *** March 10, 2025.

¹⁰ Due to Borusan's exclusions (described in part LDWP 1), Borusan's reported exports to the United States based on its foreign producer questionnaire responses are excluded. Staff did not adjust the coverage or data presented because there were no reported imports of LDW structural pipe by Borusan.

Table SP 1.3 LDW structural pipe: U.S. importers, their headquarters, and share of imports within each source, 2023

Share in percent

Firm	Head-quarters	Canada	China	South Korea	Turkey	Subject sources	Non-subject sources	All import sources
Corpac	Aventura, FL	***	***	***	***	***	***	***
Evraz NA	Rm Of Sherwood And Camrose, SK	***	***	***	***	***	***	***
Fortis	Houston, TX	***	***	***	***	***	***	***
Hyundai Steel	Ulsan,	***	***	***	***	***	***	***
Master Pipe	Los Angeles, CA	***	***	***	***	***	***	***
Pipe & Piling	Seneca, IL	***	***	***	***	***	***	***
Rushmore	Baytown, TX	***	***	***	***	***	***	***
Sixgen	Houston, TX	***	***	***	***	***	***	***
All firms	Various	100.0	—	100.0	100.0	100.0	—	100.0

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

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

U.S. purchasers

The Commission received 15 indicating that firms had purchased LDW structural pipe in 2023. Nine are distributors, four are construction end users, and two are other end users. The largest purchases of LDW structural pipe in 2023 were reported by ***, each of which reported purchasing more than *** short tons that year. Most purchasers reported selling to construction contractors, distributors, and end users.

Apparent U.S. consumption and market shares

Quantity

Table SP 1.4 and figure SP 1.1 present data on apparent U.S. consumption and U.S. market shares by quantity for LDW structural pipe. Apparent U.S. consumption based on quantity increased by *** percent from 2018 to 2023. Apparent U.S. consumption by quantity was *** percent higher in January to September 2024 than in January to September 2023. U.S.

producers' market share based on quantity increased by *** percentage points from 2018 to 2023 but was *** percentage points lower in January to September 2024 than in January to September 2023. Subject import market share decreased by *** percentage points from 2018 to 2023 and was lower by *** percentage points in January to September 2024 than in January to September 2023.

Table SP 1.4 LDW structural pipe: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent; interim is January to September

Source	Measure	2018	2019	2020
U.S. producers	Quantity	181,633	210,711	202,083
Canada	Quantity	4,311	2,123	3,998
China	Quantity	9,422	1,892	300
South Korea	Quantity	16,272	5,871	4,275
Turkey	Quantity	***	***	***
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	34,195	29,721	13,923
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
Canada	Share	***	***	***
China	Share	***	***	***
South Korea	Share	***	***	***
Turkey	Share	***	***	***
Subject sources	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

Table continued

Table SP 1.4 LDW structural pipe (Continued): Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent; interim periods include January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	155,387	206,266	233,702	172,640	185,467
Canada	Quantity	1,709	1,063	1,946	1,923	1,094
China	Quantity	2,086	29	132	128	80
South Korea	Quantity	1,129	6,801	12,492	7,229	9,238
Turkey	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	20,323	15,828	14,220	12,546	27,188
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024, and from data submitted in response to Commission questionnaires. ***. Imports are based on the imports for consumption data series.

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

Figure SP 1.1 LDW structural pipe: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024, and from data submitted in response to Commission questionnaires. ***. Imports are based on the imports for consumption data series.

Value

Table SP 1.5 and figure SP 1.2 present data on apparent U.S. consumption and U.S. market shares by value for LDW structural pipe. Apparent U.S. consumption based on value increased by *** percent from 2018 to 2023. Apparent U.S. consumption was *** percent higher in January to September 2024 than in January to September 2023. U.S. producers' market share based on value increased by *** percentage points from 2018 to 2023 but was *** percentage points lower in January to September 2024 than in January to September 2023. In addition, subject imports market shares decreased by *** percent from 2018 to 2023, and were lower by *** percent in January to September 2024 than during January to September 2023. Conversely, nonsubject import market share decreased by *** percentage points from 2018 to 2023 but was *** percentage points higher in January to September 2024 than in January to September 2023.

Table SP 1.5 LDW structural pipe: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim period is January to September

Source	Measure	2018	2019	2020
U.S. producers	Value	190,028	225,362	211,322
Canada	Value	3,088	1,979	3,952
China	Value	11,054	2,236	1,401
South Korea	Value	15,706	6,639	4,641
Turkey	Value	***	***	***
Subject sources	Value	***	***	***
Nonsubject sources	Value	60,461	125,869	13,549
All import sources	Value	***	***	***
All sources	Value	***	***	***
U.S. producers	Share	***	***	***
Canada	Share	***	***	***
China	Share	***	***	***
South Korea	Share	***	***	***
Turkey	Share	***	***	***
Subject sources	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

Table continued

Table SP 1.5 LDW structural pipe (Continued): Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim period is January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Value	218,078	356,771	370,963	267,486	272,765
Canada	Value	2,403	1,865	7,363	7,330	1,498
China	Value	13,462	268	168	115	424
South Korea	Value	1,178	10,042	16,898	10,195	11,134
Turkey	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	17,380	24,402	17,234	14,487	85,780
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024, and from data submitted in response to Commission questionnaires. ***. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Figure SP 1.2 LDW structural pipe: Apparent U.S. consumption based on value, by source and period

* * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024, and from data submitted in response to Commission questionnaires. ***. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Structural 2: Conditions of competition in the market

U.S. market characteristics

LDW structural pipe is used in structural applications, the most common of which is pilings, and is used in projects such as bridges, stadiums, and deepwater ports.¹ LDW structural pipe is produced mainly from hot-rolled coil but can also be produced from cut-to-length plate. LDW structural pipe used in structural applications is produced to the American Society for Testing and Materials ("ASTM") specifications.²

Five of 7 U.S. producers, *** importers, and 5 of 12 purchasers³ indicated that the market was subject to distinctive conditions of competition. Specifically, firms noted that the market for LDW structural pipe is influenced by construction and infrastructure projects and government funding of such projects, steel demand overall insofar as it affects booking and scheduling on LDW structural pipe mills, mill exclusivity, business relationships and support, job material specifications and mill certifications, an increasing number of distributors, a more limited supply than smaller-diameter structural pipe, and quotas⁴ on South Korea which affect supplier selection. In addition, producer *** observed that "{If the} line pipe market slows down it can mean more competition in the structural pipe producers' market."

Firms in the market were asked to assess the level of integration in the North American market for LDW structural pipe. Table SP 2.1 demonstrates that most firms do not view the North American market as very integrated. Seventeen of 25 responding producers, importers, and purchasers consider the North American market to be somewhat or slightly integrated.

Table SP 2.1 Level of integration of the North American LDW structural pipe market

Firm type	Extremely	Very	Moderately	Somewhat	Slightly
Producer	0	0	1	7	0
Importer	0	0	2	3	1
Purchaser	2	1	3	1	5

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

¹ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. II-1.

² Ibid.

³ In limited instances, and typically for 1 to 3 purchasers, certain firms provided responses based on general knowledge of tubular products rather than 2023 purchases of line and/or structural pipe.

⁴ See Part LDWP 1 for more information regarding the changing nature of import quotas for South Korea.

Apparent U.S. consumption of LDW structural pipe has fluctuated somewhat since January 1, 2018. Apparent U.S. consumption in 2019 was about the same as in 2018 but was *** percent lower in 2021 than in 2019. Since that time, apparent U.S. consumption of LDW structural pipe has increased, and was *** percent higher in 2023 than in 2021. Overall, apparent U.S. consumption increased by *** percent between 2018 and 2023. U.S. apparent consumption was *** percent higher in January to September (“interim”) 2024 than in interim 2023, however.

Purchasers

Purchaser questionnaires were sent to 80 purchasers of LDW pipe, whether LDW line pipe or LDW structural pipe. The Commission received 34 responses from these purchasers, with 14 indicating that firms had purchased LDW structural pipe in 2023.⁵ Eight are distributors, four are construction end users, and two are other end users. The largest purchases of LDW structural pipe in 2023 were reported by ***, each of which reported purchasing more than *** short tons that year. Four of ten distributing purchasers reported competing with their suppliers for sales. Most purchasers reported selling to construction contractors, distributors, and end users. One purchaser (***) reported smaller sales to customers making bollards, culverts, fence posts, and other structural components.

⁵ These purchasers were ***.

Impact of section 301 and section 232 measures

U.S. producers, importers, purchasers, and foreign producers were asked if the section 301 tariffs had an effect on the LDW structural pipe market. All six responding U.S. producers, both responding foreign producers, and four of six responding importers⁶ reported that the section 301 tariffs had no effect on the LDW structural pipe market. In contrast, six of seven responding purchasers reported that section 301 tariffs had an effect. *** stated that the section 301 tariffs had a major impact on imports from China. *** stated that, along with the antidumping margins, section 301 duties “effectively killed supply chain from China,” and *** stated it has led to less supply of, and zero demand for, LDW structural pipe imports from China. Four purchasers noted that it had an effect on or increased prices in the LDW structural pipe market, with purchaser *** stating that it keeps higher prices for domestic producers. As it stated with relation to the effect of section 301 duties on the LDW structural pipe market *** noted that the measures led to increased U.S. investment in capacity and profits.

U.S. producers, importers, and purchasers were asked if the section 232 tariffs had an effect on the LDW structural pipe market. All six responding U.S. producers, five of six responding importers, all seven responding purchasers, and one of the two responding foreign producers reported that they had. The reported impacts of these included: prices have increased, raw material prices have increased,⁷ a tangible reduction in supply/limited supply, increased difficulty in acquiring projects for foreign producers, sizes produced by domestic manufacturers do not get approved for imports, and extended backlogs at U.S. mills.

Purchasers were asked to report any changes in availability caused by the section 232 tariffs. Seven purchasers responded noting the following impacts:⁸ “fewer dedicated USA mills for this type of material which has restricted supply,” extended U.S. mill backlogs, lesser availability of certain product sizes, limited availability, and the reintroduction or addition of new domestic capacity in the market.

⁶ One producer and two importers did not know whether there was any impact.

⁷ Producer *** added that the “delta between costs and selling price{s} stayed about the same.” Importer *** stated that the effect has been that end users have passed on the costs of the increased tariffs on to U.S. consumers.

⁸ One indicated there was no impact on availability, and one noted it has limited experience purchasing domestically.

Channels of distribution

U.S. producers and importers sold LDW structural pipe mainly to construction end users as shown in table SP 2.2 for most of the years, although a substantial portion of domestic sales were to distributors as well. In 2023, the share sold to distributors was higher than the share sold to construction end users. Since 2020, *** sales of LDW structural pipe imported from Canada, China, and Turkey were sold to construction end users.

Table SP 2.2 LDW structural pipe: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January to September

Source	Channel	2018	2019	2020
United States	Distributors	34.4	30.9	29.1
United States	Construction end users	48.0	52.8	51.9
United States	All other end users	17.6	16.3	19.0
Canada	Distributors	***	***	***
Canada	Construction end users	***	***	***
Canada	All other end users	***	***	***
China	Distributors	***	***	***
China	Construction end users	***	***	***
China	All other end users	***	***	***
South Korea	Distributors	***	***	***
South Korea	Construction end users	***	***	***
South Korea	All other end users	***	***	***
Turkey	Distributors	***	***	***
Turkey	Construction end users	***	***	***
Turkey	All other end users	***	***	***
Subject sources	Distributors	***	***	***
Subject sources	Construction end users	***	***	***
Subject sources	All other end users	***	***	***
Nonsubject sources	Distributors	***	***	***
Nonsubject sources	Construction end users	***	***	***
Nonsubject sources	All other end users	***	***	***
All import sources	Distributors	24.8	12.9	10.0
All import sources	Construction end users	75.1	87.1	90.0
All import sources	All other end users	0.0	0.0	—

Table continued.

Table SP 2.2 (Continued) LDW structural pipe: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January to September

Source	Channel	2021	2022	2023	Interim 2023	Interim 2024
United States	Distributors	29.0	40.0	47.3	47.4	25.9
United States	Construction end users	55.2	43.1	38.3	38.9	54.1
United States	All other end users	15.8	16.9	14.4	13.7	20.0
Canada	Distributors	***	***	***	***	***
Canada	Construction end users	***	***	***	***	—
Canada	All other end users	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Construction end users	***	***	***	***	***
China	All other end users	***	***	***	***	***
South Korea	Distributors	***	***	***	***	***
South Korea	Construction end users	***	***	***	***	***
South Korea	All other end users	***	***	***	***	***
Turkey	Distributors	***	***	***	***	***
Turkey	Construction end users	***	***	***	***	***
Turkey	All other end users	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***
Subject sources	Construction end users	***	***	***	***	***
Subject sources	All other end users	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***
Nonsubject sources	Construction end users	***	***	***	***	***
Nonsubject sources	All other end users	***	***	***	***	***
All import sources	Distributors	9.0	5.1	11.3	15.4	11.2
All import sources	Construction end users	91.0	94.9	88.7	84.6	88.8
All import sources	All other end users	—	—	—	—	—

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

Geographic distribution

U.S. producers reported selling LDW structural pipe to all regions in the contiguous United States (table SP 2.3). Importers reported selling product imported from Canada to ***, product imported from Turkey to *** regions, and product imported from South Korea to *** regions. For U.S. producers, 9.5 percent of sales were within 100 miles of their production facility, 73.7 percent were between 101 and 1,000 miles, and 16.9 percent were over 1,000 miles. Importers sold the large majority within 100 miles of their U.S. point of shipment and the remainder between 101 and 1,000 miles.

Table SP 2.3 LDW structural pipe: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	Canada	China	South Korea	Turkey	Subject sources
Northeast	5	***	0	***	***	3
Midwest	5	***	0	***	***	1
Southeast	7	***	0	***	***	3
Central Southwest	6	***	0	***	***	7
Mountain	5	***	0	***	***	1
Pacific Coast	5	***	0	***	***	5
Other	2	***	0	***	***	1
All regions (except Other)	4	***	0	***	***	0
Reporting firms	7	***	0	***	***	8

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table SP 2.4 provides a summary of the supply factors regarding LDW structural pipe from U.S. producers and from subject countries.

Table SP 2.4 LDW structural pipe: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	United States	Canada	China	South Korea	Turkey	Subject total
Capacity 2018	Quantity	556,409	***	***	***	***	***
Capacity 2023	Quantity	563,969	***	***	***	***	***
Capacity utilization 2018	Ratio	36.8	***	***	***	***	***
Capacity utilization 2023	Ratio	43.4	***	***	***	***	***
Inventories to total shipments 2018	Ratio	***	***	***	***	***	***
Inventories to total shipments 2023	Ratio	***	***	***	***	***	***
Home market shipments 2023	Share	***	***	***	***	***	***
Non-US export market shipments 2023	Share	***	***	***	***	***	***
Ability to shift production (firms reporting "yes")	Count	***	***	***	***	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of LDW structural pipe in 2023. There were no imports of subject merchandise from China in 2023. Reporting foreign producers accounted for virtually all U.S. imports of LDW structural pipe imported from Canada and less than five percent of U.S. imports of LDW structural pipe from South Korea during 2023. There were no responding foreign producers from Turkey. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part LDWP 1, "Summary Data and Data Sources." Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Domestic production

Based on available information, U.S. producers of LDW structural pipe have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced LDW structural pipe to the U.S. market. The main contributing factors to this degree of responsiveness of supply are large amounts of unused capacity and the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include little ability to shift shipments from alternate markets, and the produced-to-order nature of the product limiting inventory usage to fill spot orders.

Domestic production capacity decreased between 2018 and 2023. Capacity utilization increased somewhat during that period, but producers reported substantial levels of unused capacity in 2023. The single principal export market noted by domestic producers was Canada. Other products that producers reportedly can produce on the same equipment as LDW structural pipe are LDW line pipe, smaller diameter pipe products, and, for one producer, ***. Although most purchasers had noted that availability had increased in the

United States, some purchasers noted that there are certain products they have difficulty sourcing domestically within certain time frames, or at all.

Subject imports

Based on available information, producers of LDW structural pipe from the industry in Canada have a small-to-moderate ability to respond to changes in demand due to reported closures of large LDW structural pipe mills.⁹ Without these closures, however, they would have the ability to respond to U.S. price changes with moderate-to-large quantities of LDW structural pipe. The industry in South Korea has the ability to respond with large changes in quantities shipped to the United States. No foreign producer responded to the USITC's questionnaire from China or Turkey. In the original investigation in 2018, the staff report noted that the industry in China and Turkey could respond to price changes with large changes in shipments of imports based on available capacity and the ability to ship from third-country markets.¹⁰ Combined, subject imports have a moderate-to-large ability to respond to U.S. price changes.

The main contributing factors to this degree of responsiveness of supply for the industry in Canada was that its largest producer (which accounted for *** of practical LDW structural pipe capacity in 2018) has no online practical LDW structural pipe capacity¹¹ and a relatively low total level of inventories, but the smaller responding producer reported capacity utilization of *** percent in 2023, and *** percent in interim 2024 (compared with *** percent in interim 2023).¹² Overall, the industry in Canada reported practical LDW structural pipe capacity decreasing by *** percent between 2018 and 2023. All its 2023 shipments were made to its home market. Canadian producer Pipe and Piling reported *** and Evraz reported ***

South Korean producer EEW noted increased capacity utilization (from *** percent in 2018 to *** percent in 2023 with the same amount of total capacity. Between interim periods, however, its production was *** percent lower with the same production capacity

⁹ See Part Structural 4 for more detail.

¹⁰ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, pp. II-8 and II-10.

¹¹ Domestic producers stated that the idled mills could be restarted quickly, but Evraz reported that last time it took 18 months to re-hire employees after an idling. Hearing transcript, pp. 27 and 147 (Brightbill and Coffin).

¹² The increase in inventory ratio is due to substantially lower shipments, not higher inventories. Ending inventories in 2018 were *** short tons, and in 2023 they were *** short tons.

and reflects an ability for it to increase production. Its inventory ratio decreased over the period, from *** to *** percent. Both of these trends indicate somewhat smaller ability to ship to the United States in 2023 than in 2018. The firm's exports to the United States were constrained by section 232 quotas in place. *** of its 2024 shipments were of exports to third-country markets. Although ***, U.S. imports of subject product from South Korea increased irregularly from *** short tons in 2018 to *** short tons in 2023 after reaching a period low of *** short tons in 2021. The Commission did not receive foreign producer responses from Husteel or SeAH. SeAH alone accounted for *** percent of subject imports of LDW line pipe and LDW structural pipe combined from South Korea in 2017.¹³

No Turkish producer subject to the antidumping duty or countervailing duty orders responded to the Commission's questionnaire. In the original investigations, LDW structural pipe producers reported more than *** short tons of shared capacity in 2017 in Turkey, of which slightly more than *** was actively in production, manufacturing primarily structural pipe (approximately *** of its production) as well as line pipe and other products (approximately *** of its production). Notably, *** indicated that it only produced LDW structural pipe. In 2017, ***. As a share of total reported LDW structural pipe production from the combined Turkish producers, *** alone accounted for *** percent of the total LDW structural pipe production in Turkey, during 2017.¹⁴ Turkish producer Borusan closed its mill in 2024 after purchasing Berg Pipe.¹⁵ Turkish producer HDM Steel Pipe appears to be currently producing LDWP which may include structural pipe; its website lists a 108,000 tons per year capacity of spiral welded steel pipe, profile pipe, and welding wire, and is 100 percent export-oriented.¹⁶ During 2015–17, exports accounted for *** percent of total Turkish LDW structural pipe shipments (predominantly to markets other than the United States) and inventories were equivalent to *** percent of total Turkish LDW structural pipe shipments.¹⁷

Overall, reported capacity for subject suppliers decreased by *** from 2018 to 2023 and capacity utilization remained at *** percent or below until 2022 before

¹³ Original confidential report, INV-QQ-137, p. IV-3.

¹⁴ Ibid., Table VII-25 and p. IV-45 n.52.

¹⁵ Hearing transcript, p. 31 (Onbasi).

¹⁶ HDM Steel Pipe, <https://www.hdm.com.tr/en/production-facilities/19/turkey-hdm-steel-pipe>, retrieved March 18, 2025.

¹⁷ Ibid., Table G-6.

increasing to *** percent in 2023. It was *** percent in interim 2024, compared with *** percent in interim 2023, however. The ratio of inventories to total shipments decreased by *** percentage points to *** percent in 2023 for the responding subject suppliers. Two subject suppliers reported that *** were made to *** in 2023, while *** noted some exports to the United States.

Imports from nonsubject sources

Nonsubject imports accounted for approximately half of total U.S. imports of LDW structural pipe in 2023. The largest sources of nonsubject imports in 2023 were Mexico, Italy, and Japan. Combined, these countries accounted for the vast majority percent of nonsubject imports in 2023.

Supply constraints

No responding U.S. producers but *** responding importers and 3 of 13 responding purchasers reported that they had experienced supply constraints since January 1, 2018. Importer *** stated that it declines to quote on a weekly basis due to a lack of supply stemming from a limited manufacturing base and the section 232 quota¹⁸ on product from South Korea. Importer *** also reported that the quota restrictions constrain their ability to supply the market. Purchaser *** also stated that quotas on imports from South Korea constrain supply, as does capacity at several South Korean mills which are forcing large diameter capacity only to be available with the purchases of smaller diameter pipe. It further relayed that some mills are not accepting orders due to the amount of capacity that is already sold. These issues have reportedly caused shortages and delivery issues. Purchaser *** also reported some suppliers being unable to meet project schedule requirements.

Producers, importers, and purchasers were asked if there have been changes in the availability of LDW structural pipe from domestic, subject, and nonsubject sources since January 1, 2018, and whether they anticipate future changes. All producers noted that there had not been any changes in the availability of supply from the United States, but importers and purchasers were evenly split as to whether or not there had been any changes in domestic supply availability (table SP 2.5). Firms responded similarly for anticipated changes though two of the six producers did not anticipate any changes in supply availability from domestic or

¹⁸ See Part LDWP 1 for more information regarding recent changes in import quotas for South Korea.

subject sources.¹⁹ With respect to subject imports, all producers observed a change in the availability of supply since January 1, 2018, and a majority anticipate changes in the future as well. Producers mostly noted increased availability of domestic supply and decreased supply of subject imports was due to the antidumping and countervailing duty orders under review. With respect to nonsubject import supply, domestic producers were mixed, but none anticipate changes in the supply of nonsubject imported LDW structural pipe. Importer response with respect to both subject and nonsubject product was mixed. Importer *** stated that section 232 measures affected the availability of subject imports, and *** stated that China does not participate in the U.S. market now and “Evraz is a shambles since Russian measures.” A majority of purchasers noted no changes in the availability of supply of subject or nonsubject imported LDW structural pipe since January 1, 2018, nor did they anticipate any upcoming changes in supply availability. Purchaser *** reported that it only has seen success from exports from Turkey while purchaser *** noted “continued oversupply from South Korea relative to demand.” Anticipated changes from domestic producers and importers mostly focused on whether duties remain in place. Purchasers which noted anticipated changes focused on South Korea, Turkey, and tariffs/duties.

¹⁹ An equal number of U.S. producers anticipated nonsubject supply changes as did not expect them.

Table SP 2.5 LDW structural pipe: Count of firms' responses regarding changes in availability of supply since January 1, 2018, by firm type

Source of product	Firm type	No, since January 1, 2018	Yes, since January 1, 2018	No, anticipated change	Yes, anticipated change
U.S.-produced product	U.S. producers	0	6	2	4
U.S.-produced product	Importers	***	***	***	***
U.S.-produced product	Purchasers	6	7	5	6
Subject imports	U.S. producers	0	6	2	4
Subject imports	Importers	***	***	***	***
Subject imports	Purchasers	8	3	7	4
Nonsubject imports	U.S. producers	3	3	6	0
Nonsubject imports	Importers	***	***	***	***
Nonsubject imports	Purchasers	7	2	8	3

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

In addition, foreign producers were asked if there were any changes in factors affecting import supply to the United States since January 1, 2018. Two of three firms stated that changes occurred. ***.²⁰ Two of three foreign producers do not anticipate changes in the availability of LDW structural pipe from their home country. *** anticipated a decrease, and its ***.²¹

New suppliers

Five of 14 purchasers indicated that new suppliers entered the U.S. market since January 1, 2018, and 4 expect additional entrants.²² One entrant noted by purchasers was Forza Steel in Monterrey, Mexico and purchaser *** noted it has seen some interest in the U.S. market by Vietnamese firms.

²⁰ ***.

²¹ ***.

²² Two domestic firms noted by purchasers, however, were Nucor Skyline, which has been producing LDW structural pipe since before the period under review, and Bull Moose Tubular, which does not make large diameter pipe.

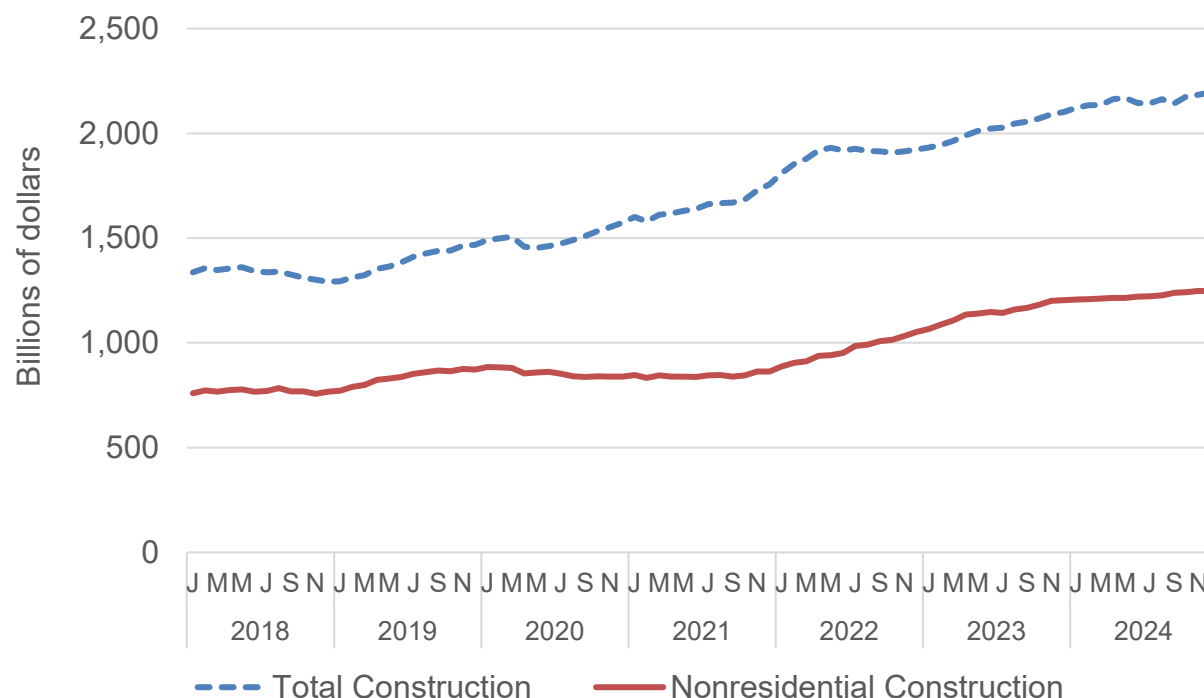
U.S. demand

Based on available information, the overall demand for LDW structural pipe is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the relatively small to moderate cost share of LDW structural pipe in most of its end use applications.

Since LDW structural pipe is used as an intermediate product, demand for LDW structural pipe depends on the price of and demand for the end product for which it is used. Most LDW structural pipe is used in the construction sector, usually for large projects such as marine or bridge foundations, ferry landings, railroads, and sign pole structures.²³ The value of U.S. nonresidential construction increased 62.6 percent from \$759.0 billion in January 2018 to \$1,247.2 billion in December 2024 (figure SP 2.1). This increase in the value of nonresidential construction put in place accelerated through 2022 and 2023 (increasing 35.5 percent from January 2022 to December 2023) but increased only 3.6 percent between December 2023 and December 2024.

²³ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. II-14.

Figure 2.1 U.S. construction spending: Value of total and nonresidential construction put in place, seasonally adjusted, monthly, January 2018 to December 2024



Source: Source: U.S. Census Bureau, Construction Spending (Seasonally Adjusted), https://www.census.gov/construction/c30/historical_data.html, retrieved January 23, 2025.

Note: Data for September and October 2024 are revised data, and November 2024 data are preliminary.

Table SP 2.6 U.S. construction spending: Value of total and nonresidential construction put in place, seasonally adjusted, monthly, January 2018 to December 2024

Total construction spending

Billions of dollars

Month	2018	2019	2020	2021	2022	2023	2024
January	1,337	1,295	1,491	1,601	1,810	1,932	2,122
February	1,356	1,312	1,498	1,580	1,853	1,945	2,134
March	1,347	1,323	1,506	1,611	1,879	1,965	2,136
April	1,355	1,353	1,459	1,617	1,918	1,990	2,163
May	1,361	1,364	1,452	1,630	1,931	2,012	2,168
June	1,343	1,384	1,461	1,640	1,918	2,023	2,144
July	1,337	1,412	1,474	1,661	1,926	2,027	2,143
August	1,340	1,427	1,491	1,667	1,915	2,047	2,162
September	1,325	1,439	1,510	1,670	1,914	2,055	2,142
October	1,310	1,441	1,534	1,685	1,908	2,071	2,176
November	1,301	1,463	1,552	1,728	1,913	2,091	2,185
December	1,292	1,468	1,574	1,757	1,922	2,101	2,196

Table continued.

Table SP 2.6 (Continued) U.S. construction spending: Value of total and nonresidential construction put in place, seasonally adjusted, monthly, January 2018 to December 2024

Nonresidential construction spending

Billions of dollars

Month	2018	2019	2020	2021	2022	2023	2024
January	759	772	885	847	888	1,067	1,207
February	773	790	883	833	905	1,087	1,208
March	767	799	881	845	913	1,107	1,212
April	774	824	854	838	938	1,135	1,214
May	778	829	859	839	940	1,139	1,215
June	768	837	861	838	952	1,147	1,220
July	771	853	853	844	985	1,142	1,222
August	783	860	840	846	991	1,160	1,227
September	768	867	837	839	1,008	1,167	1,238
October	768	865	840	845	1,014	1,182	1,242
November	757	875	839	863	1,033	1,201	1,248
December	766	873	838	863	1,052	1,204	1,247

Source: Source: U.S. Census Bureau, Construction Spending, January 2, 2025, https://www.census.gov/construction/c30/historical_data.html, retrieved March 18, 2025.

Note: Data for November and December 2024 are revised data.

End uses and cost share

As noted, U.S. demand for LDW structural pipe depends on the demand for U.S.-produced downstream products. Reported end uses from the initial investigations, along with their cost share in those end uses include bridges (2 to 5 percent), pipe pilings (20 to 90 percent), sign pole structures (65 percent), deep water ports (2 to 60 percent), docks and ferry landings (25 to 35 percent), railroad projects (10 percent), and roads (2 percent). None of the eight U.S. producers, seven responding importers, or nine responding purchasers reported any change in end uses since January 1, 2018. In the original investigations, LDW structural pipe was reported to account for a small-to-moderate share of the cost of the end-use products in which it is used. None of the foreign producers indicated that the end uses for LDW structural pipe differ between their home market and the U.S. or other markets, nor did they note changes in end uses since January 1, 2018.²⁴ *** noted LDW structural pipe is being used for green global initiatives like carbon capture and hydrogen transportation. All foreign producers have indicated having the same product range for their home market as other markets.

²⁴ One Turkish pipe producer, Borusan, responded to the Commission's questionnaire, but this firm is not subject to either the countervailing or antidumping duty orders on LDW line and structural pipe from Turkey.

Business cycles

Two of 7 U.S. producers, *** importers, and 9 of 12 purchasers indicated that the market was subject to business cycles. The majority of responding firms reported that demand for LDW structural pipe is linked to the construction industry. Purchaser *** relayed that the COVID-19 pandemic slowed demand considerably, but recovery from it caused strong demand in 2021 and 2022, which has fallen in 2023 and 2024. Purchaser *** noted that demand is tied closely to government funding of infrastructure. Purchaser *** noted demand is cyclical both within and across years, and that an unexpected stock market collapse would reduce available capital to carry out planned projects involving LDW structural pipe. One purchaser, ***, also noted that demand for LDW structural pipe peaks in the second quarter of each year, corresponding to summer pipeline projects. Purchaser *** noted that easier installation of pilings in the summer months increases demand during that period. In general, *** also stated that it follows a commodity-based business cycle — expanding during periods of high demand and infrastructure spending and contracting when demand weakens and there are fewer infrastructure jobs and less infrastructure spending. Other factors that were noted by purchasers included interest rates and construction permitting.

Demand trends

There is little consensus among firms participating in the LDW structural pipe market on how U.S. demand has changed since January 1, 2018 (table SP 2.7). In the construction market, pluralities of U.S. producers, importers, and purchasers indicated that demand either did not change or fluctuated but remained at around the same level in 2024 as it was in 2018. A number of producers and purchasers indicated that demand had either steadily increased or fluctuated upward than fluctuated downward or steadily decreased. Similar trends were apparent for demand for end uses other than construction, with most responses noting demand being at a level similar to that at the beginning of the period of study, but slightly fewer responses noting increasing demand.²⁵ Nearly all responding firms (U.S. producers, importers, purchasers, and foreign producers) indicated that overall LDW structural pipe demand had either increased or was at similar levels at the start and end of the period. As many purchasers indicated that demand for their end-use products incorporating LDW structural pipe had either fluctuated upward or increased steadily since 2018 as those that reported demand ending at a similar level. Four of eight responding purchasers noted that this

²⁵ One firm, ***, indicated that the other market it referred to in its answer is dredging.

change affected their demand for LDW structural pipe and was based on the number of projects awarded. Most firms in the LDW structural pipe market anticipate flat to growing demand in both domestic and foreign markets (table SP 2.8).

Table SP 2.7 LDW structural pipe: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2018, by firm type

Market	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
U.S. demand, construction	U.S. producers	1	1	3	1	0
U.S. demand, construction	Importers	***	***	***	***	***
U.S. demand, construction	Purchasers	4	2	4	2	0
U.S. demand, other	U.S. producers	0	2	2	1	0
U.S. demand, other	Importers	***	***	***	***	***
U.S. demand, other	Purchasers	2	1	5	0	0
U.S. demand, overall	U.S. producers	1	1	2	1	0
U.S. demand, overall	Importers	***	***	***	***	***
U.S. demand, overall	Purchasers	2	1	5	1	0
U.S. demand, overall	Foreign producers	0	0	0	0	0
Foreign demand	U.S. producers	0	1	0	0	0
Foreign demand	Importers	***	***	***	***	***
Foreign demand	Purchasers	1	1	3	0	1
Demand in subject country	Foreign producers	0	0	0	0	0
Demand in other export markets	Foreign producers	0	0	0	0	0
Demand for end use products	Purchasers	2	2	4	1	0

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

Note: The foreign producer indicating a steady decrease in its home market, ***, described that its home market, ***.

Note: Questions regarding demand for foreign producers focused generally on overall country markets, not portions of the markets within those countries.

Table SP 2.8 LDW structural pipe: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type

Market	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
U.S. demand, construction	U.S. producers	1	3	1	1	1
U.S. demand, construction	Importers	***	***	***	***	***
U.S. demand, construction	Purchasers	4	2	4	2	0
U.S. demand, other	U.S. producers	0	2	2	1	0
U.S. demand, other	Importers	***	***	***	***	***
U.S. demand, other	Purchasers	2	2	5	0	0
U.S. demand, overall	U.S. producers	1	1	2	1	0
U.S. demand, overall	Importers	***	***	***	***	***
U.S. demand, overall	Purchasers	1	3	4	0	0
U.S. demand, overall	Foreign producers	0	***	0	0	0
Foreign demand	U.S. producers	0	1	0	0	0
Foreign demand	Importers	***	***	***	***	***
Foreign demand	Purchasers	1	1	4	0	0
Demand in subject country	Foreign producers	0	0	0	0	0
Demand in other export markets	Foreign producers	0	***	0	0	0

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

Substitute products

Substitutes for LDW structural pipe are limited.²⁶ Seven of eight U.S. producers, seven of eight responding importers, and all responding purchasers and foreign producers reported that there had not been change in substitutes since 2018 nor did they anticipate any future changes in substitutes. However, *** stated that “{n}on-steel deep foundations are always working to innovate and optimize designs,” and *** noted that concrete is a less expensive alternative that is increasingly being considered.

²⁶ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. II-15. The vast majority of responding firms indicated that there were no substitutes for LDWP. Three of 15 U.S. producers, 3 of 32 responding importers, and 1 of 42 purchasers indicated that there were substitutes for LDWP. Substitutes listed in those investigations were seamless pipe and ductile iron pipe.

Substitutability issues

This section assesses the degree to which U.S.-produced LDW structural pipe and imports of LDW structural pipe from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of LDW structural pipe from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced LDW structural pipe and LDW structural pipe imported from subject sources.²⁷ Factors contributing to this level of substitutability include broad comparability on a number of non-price factors, reported interchangeability between domestic and subject imports, similar ability to meet quality specifications, and somewhat limited significant factors other than price. Factors reducing substitutability include differences in lead times for domestic and imported product due to the produced-to-order nature of LDW structural pipe, certain types of LDW pipe being available from certain sources, limited availability from South Korea due to import quotas or domestic capacity availability, and domestic content requirements.

Factors affecting purchasing decisions²⁸

Purchaser decisions based on source and/or method of manufacture

As shown in table SP 2.9, most purchasers and their customers sometimes or usually make purchasing decisions based on the country of origin and/or method of manufacture. Purchasers were more evenly split between usually and never making decisions based on producer, and their customers sometimes or never make decisions based on the producer. Purchasers that provided detail on why they make decisions based on producer pointed to reasons such as being an approved supplier, relationships or previous experience with the supplier (including quality, price, and ability to deliver on time), job specifications, the producer's backlog and proximity to the project location. Purchasers noted that a certain

²⁷ The degree of substitution between domestic and imported LDW structural pipe depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced LDW structural pipe to the LDW structural pipe imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

²⁸ Fourteen purchasers indicated they had marketing/pricing knowledge of domestic product, ten of product imported from Canada, seven of product imported from China, eight of product imported from South Korea, seven of product imported from Turkey, and five of product from nonsubject countries.

method of manufacture may not be acceptable for a certain job. For example, purchaser *** noted a preference for ERW if the intended use is for deep foundations. *** stated that federal projects may require a certain method of manufacture. Purchasers that at least sometimes make decisions based on the country of origin noted factors like product mix needs, trying to meet approved countries with the purchaser's customer base, delivery times, country preferences, preferring product made in the USA, and compliance with Buy America and other legal requirements.

Table SP 2.9 LDW structural pipe: Count of purchasers' responses regarding frequency of purchasing decisions based on producer, method of manufacture, and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	2	5	2	5
Customer	Producer	1	2	6	4
Purchaser	Method of manufacture	2	4	5	2
Customer	Method of manufacture	2	3	5	1
Purchaser	Country	2	6	5	1
Customer	Country	3	4	4	1

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

Purchasers were asked how interchangeable pipe using different methods of manufacture (ERW, HSAW, and LSAW) was for two different sizes—16 to 24" and above 24". Purchasers generally noted that ERW is preferred and most common for pipe that is 24" in diameter or less. Three of four purchasers describing interchangeability in each range noted that HSAW and/or LSAW could be interchangeable with ERW. Purchaser *** stated that ERW is not interchangeable for LSAW or HSAW, and for LDW structural pipe greater than 24 inches in diameter, it noted that ERW does not exist.²⁹ Other purchasers noted that DSAW, LSAW, and HSAW were preferred for projects requiring pipe greater than 24 inches in diameter.

Four purchasers noted that 100 percent of their purchases are required to be domestically sourced, and six others reported that at least 10 percent of their purchases are required to be domestic. Overall, 50.6 percent of reported 2023 purchases were required to be domestic by law, and a further 7.7 percent were required to be domestic due to customer preferences. The remaining 41.7 percent (reported by nine purchasers) had no domestic content requirements.

²⁹ Most ERW production in the United States does not exceed 24 inches in diameter although Jindal's new Baytown, Texas facility and certain producers outside the United States do produce ERW pipe in diameters up to 26 inches.

Only 2 of 11 responding purchasers indicated that certain sizes/types/grades of LDW structural pipe were available from only one source. Purchasers *** stated that very large diameter (60-inch) pipe or pipe over 1-inch thick or very large diameter is not often produced domestically, as these are usually produced in smaller runs and *** noted 30-inch straight-seam is produced by few U.S. mills. Distributor *** only buys from mills that have ***.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for LDW structural pipe were price (14 firms), availability/delivery/lead times/schedule (11 firms), and quality/meeting technical specifications/product acceptance (8 firms) as shown in table SP 2.10. Price was the most frequently cited first-most important factor (cited by 8 firms); availability aspects were the most frequently reported second-most important factor (7 firms); and price and quality aspects were the most frequently reported third-most important factors (3 firms each).

Table SP 2.10 LDW structural pipe: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price/cost	8	3	3	14
Availability/delivery/lead times/schedule	3	7	1	11
Quality/meet technical specifications/acceptance	3	2	3	8
Terms	0	1	2	3
Product range	0	0	2	2
Supplier reliability	1	0	0	1
Contracts	0	0	1	1
Traditional supplier	0	0	1	1

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

Note: Some firms reported more than one factor and some reported more than their top three factors. In addition to factors listed, two purchasers listed quality and delivery or lead time as other important factors, and one purchaser each listed terms, traditional supplier, warranty, and "whether product is certified to ASTM standard or limited service (uncertified material)."

The majority of purchasers (10 of 14) reported that they usually purchase the lowest-priced product. Three reported always purchasing the lowest-priced product and two sometimes purchased the lowest-priced product.³⁰

³⁰ One purchaser, ***, indicated that it either always or usually purchases the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 22 factors in their purchasing decisions (table SP 2.11). Two factors were rated as very important by all responding purchasers: price and quality meets industry standards. The other factors rated as very important by more than half of responding purchasers were delivery time (13 firms), product consistency and reliability of supply (12 firms each), availability and project specification (11 firms each), availability of size >16" to ≤24" (10 firms), and producer available capacity (9 firms), and availability of size >24" to ≤48", delivery terms, and payment terms (8 firms each).

Table SP 2.11 LDW structural pipe: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Price	14	0	0
Quality meets industry standards	14	0	0
Delivery time	13	2	0
Product consistency	12	2	0
Reliability of supply	12	2	0
Availability	11	2	0
Project specification	11	2	1
Availability of size >16" to ≤24"	10	4	1
Producer available capacity	9	6	0
Availability of size >24" to ≤48"	8	5	1
Delivery terms	8	4	3
Payment terms	8	3	3
Discounts offered	7	6	2
Availability of weld type (HSAW, LSAW, ERW)	7	4	4
Minimum quantity requirements	6	8	0
Technical support/service	6	8	1
Quality exceeds industry standards	6	7	1
U.S. transportation costs	6	7	2
Availability of size >48"	5	7	1
Product range	5	7	1
Total installation costs	4	7	4
Packaging	2	5	7

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

Note: *** responded both very and somewhat Important for delivery time and discounts offered.

Lead times

LDW structural pipe is primarily produced-to-order. U.S. producers reported that 87.3 percent of their commercial shipments were produced-to-order, with lead times averaging 3 months. The remaining 12.7 percent of their commercial shipments came from inventories, with lead times averaging about two weeks. Importers reported that 99.8 percent of their commercial shipments were produced-to-order, with lead times averaging four and a half months. The remaining 0.2 percent of their commercial shipments came from foreign inventories, with lead times averaging 3 months.

Supplier certification

Most responding purchasers (9 of 14) do not require their suppliers to become certified or qualified to sell LDW structural pipe to their firm. Purchasers reported that the time to qualify a new supplier ranged from 20 to 300 days. No purchaser reported that any supplier had failed in its attempt to qualify LDW structural pipe or had lost its approved status since 2018.

Quality specifications

As presented in table SP 2.12, all responding purchasers reported that LDW structural pipe from all sources was able to meet minimum quality specifications, except two purchasers noted that product imported from China sometimes or rarely/never met minimum quality specifications.³¹

Table SP 2.12 LDW structural pipe: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	8	6	0	0	2
Canada	4	6	0	0	4
China	2	3	1	1	9
South Korea	4	3	0	0	7
Turkey	3	4	0	0	7
Nonsubject sources	2	1	0	0	7

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

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

Ten of 12 responding purchasers reported that at least part of what helped that determine quality was either meeting specifications, ASTM standards like A/SA53, A252, and A500, or certifications like ISO. Other factors listed included: physical characteristics (appearance/surface condition, and product damage like dents or holes), the age of the steel, results of production (integrity of weld seams, dimensional tolerances, and yield strength), and submitting results of mill test reports.

Changes in purchasing patterns

Seven of 14 purchasers reported that they had changed suppliers since January 1, 2018,. Four purchasers noted their new suppliers: *** added a European source; purchaser *** added ERW sources that are not affected by quotas like its prior source has been (i.e., South Korea); purchaser *** added *** and dropped *** based on price; purchaser *** added ***; purchaser *** noted it does not have a set list of suppliers, but rather makes decisions based on price, availability, ability to comply with client and legal requirements, and contractual terms when the material is needed. Purchasers *** noted selecting suppliers based on availability, price, and in the sizes required.

³¹ Imports from China also elicited the largest number of "don't know" responses.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2018 (table SP 2.13). Purchasers reported changing purchases of U.S.-produced product mainly because of changes in the number of projects they were awarded. Purchaser *** began buying larger lots of pipe and started working with an increased number of vendors, which had the effect of increasing its domestic and nonsubject purchases (European and Indian sources). Purchaser *** noted that section 232, section 301, antidumping, and countervailing duties eliminated supply of LDW structural pipe from China and the section 232 duties on Turkey decreased its competitiveness.

Table SP 2.13 LDW structural pipe: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease	Did not purchase
United States	5	2	4	1	0	0
Canada	0	1	5	0	1	5
China	0	0	2	0	1	9
South Korea	0	2	3	0	0	8
Turkey	1	0	2	1	0	8
Nonsubject sources	0	2	3	0	0	7
Sources unknown	0	0	5	0	0	8

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

Changes in purchasing patterns

Ten purchasers had purchased LDW structural pipe from subject sources before the subject orders entered into effect. Those purchasers were asked how their purchases from the subject sources had changed after the orders went into effect (table SP 2.14). A majority of purchasers indicated that the subject orders did not change their purchasing behavior. Purchasers most frequently discontinued purchases of imported LDW structural pipe from China (for 4 of 10 purchasers). Purchaser *** reduced its purchases from Canada and South Korea, *** reduced its purchases from Turkey, and *** reduced its purchases from China due to the orders. Of the six responding purchasers, five noted their purchasing patterns with respect to LDW structural pipe imported from nonsubject sources did not change with the imposition of the subject duty orders. Purchaser *** noted that it purchased a small amount of *** product due to “low supply of sizes domestically and material {being} at a good price.”

Table SP 2.14 LDW structural pipe: Count of purchasers' responses regarding changes in purchase patterns from subject and nonsubject sources due to the subject orders and other reasons

Source of purchases	No change	Discontinued due to the order	Reduced due to the order	Changed patterns for other reasons
Canada	8	0	1	0
China	6	4	1	0
South Korea	7	1	1	0
Turkey	8	0	1	0

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

Note: *** indicated that it reduced and discontinued purchases from China. Only its discontinued response was used in this tabulation.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing LDW structural pipe produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 22 factors (table SP 2.15) for which they were asked to rate the importance.

A plurality of purchasers reported U.S. LDW structural pipe and LDW structural pipe imported from Canada were comparable for all factors other than three availability factors (structural pipe of outer diameters >16" to ≤24", >24" to ≤48", and >48"), delivery terms, and U.S. transportation costs — all of which the U.S. was most frequently rated superior — and price, for which the U.S. was rated inferior. U.S. LDW structural pipe was rated as superior to LDW structural pipe imported from China by a plurality of purchasers for availability, delivery terms, delivery time, quality meets and exceeds specifications, and technical support/ service and inferior on price. A plurality rated the two as comparable on all other factors.

U.S.-produced product was rated as comparable to that imported from South Korea for all factors except delivery time (U.S. superior), price (U.S. inferior), and availability of product greater than 48" in diameter and (U.S. comparable/inferior).

U.S.-produced product was also rated inferior on price when compared with imports of LDW structural pipe from Turkey, but superior on delivery terms, delivery time, and payment terms; on all other factors purchasers rated the two sources as comparable. Similarly, purchasers rated the U.S. superior to nonsubject sources on delivery time and delivery terms and inferior to nonsubject sources on price but comparable on all other factors.

Table SP 2.15 LDW structural pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Canada	5	3	0
Availability of size >16" to ≤24"	U.S. v. Canada	4	4	0
Availability of size >24" to ≤48"	U.S. v. Canada	4	3	0
Availability of size >48"	U.S. v. Canada	4	3	0
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Canada	3	4	0
Delivery terms	U.S. v. Canada	4	3	0
Delivery time	U.S. v. Canada	4	4	0
Discounts offered	U.S. v. Canada	2	4	1
Minimum quantity requirements	U.S. v. Canada	2	5	0
Packaging	U.S. v. Canada	2	5	0
Payment terms	U.S. v. Canada	2	5	0
Price	U.S. v. Canada	2	2	3
Producer available capacity	U.S. v. Canada	3	4	0
Product consistency	U.S. v. Canada	3	5	0
Product range	U.S. v. Canada	3	5	0
Project specification	U.S. v. Canada	3	4	0
Quality meets industry standards	U.S. v. Canada	2	6	0
Quality exceeds industry standards	U.S. v. Canada	2	6	0
Reliability of supply	U.S. v. Canada	3	5	0
Technical support/service	U.S. v. Canada	2	6	0
Total installation costs	U.S. v. Canada	2	4	1
U.S. transportation costs	U.S. v. Canada	5	1	1

Table continued.

Table SP 2.15 (Continued) LDW structural pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. China	2	1	0
Availability of size >16" to ≤24"	U.S. v. China	1	1	1
Availability of size >24" to ≤48"	U.S. v. China	1	1	1
Availability of size >48"	U.S. v. China	1	1	1
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. China	1	1	1
Delivery terms	U.S. v. China	2	1	0
Delivery time	U.S. v. China	3	0	0
Discounts offered	U.S. v. China	1	2	0
Minimum quantity requirements	U.S. v. China	1	2	0
Packaging	U.S. v. China	1	2	0
Payment terms	U.S. v. China	1	2	0
Price	U.S. v. China	1	0	2
Producer available capacity	U.S. v. China	1	2	0
Product consistency	U.S. v. China	1	2	0
Product range	U.S. v. China	1	2	0
Project specification	U.S. v. China	1	2	0
Quality meets industry standards	U.S. v. China	1	2	0
Quality exceeds industry standards	U.S. v. China	2	0	1
Reliability of supply	U.S. v. China	2	1	0
Technical support/service	U.S. v. China	2	1	0
Total installation costs	U.S. v. China	1	2	0
U.S. transportation costs	U.S. v. China	1	1	1

Table continued.

Table SP 2.15 (Continued) LDW structural pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. South Korea	1	4	2
Availability of size >16" to ≤24"	U.S. v. South Korea	0	5	1
Availability of size >24" to ≤48"	U.S. v. South Korea	0	4	2
Availability of size >48"	U.S. v. South Korea	0	3	3
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. South Korea	0	5	1
Delivery terms	U.S. v. South Korea	2	4	0
Delivery time	U.S. v. South Korea	4	2	0
Discounts offered	U.S. v. South Korea	0	4	1
Minimum quantity requirements	U.S. v. South Korea	0	4	2
Packaging	U.S. v. South Korea	0	5	1
Payment terms	U.S. v. South Korea	1	5	0
Price	U.S. v. South Korea	0	1	5
Producer available capacity	U.S. v. South Korea	0	4	2
Product consistency	U.S. v. South Korea	1	4	1
Product range	U.S. v. South Korea	0	5	1
Project specification	U.S. v. South Korea	1	5	0
Quality meets industry standards	U.S. v. South Korea	1	5	0
Quality exceeds industry standards	U.S. v. South Korea	1	5	0
Reliability of supply	U.S. v. South Korea	2	4	0
Technical support/service	U.S. v. South Korea	1	5	0
Total installation costs	U.S. v. South Korea	1	4	1
U.S. transportation costs	U.S. v. South Korea	2	3	1

Table continued.

Table SP 2.15 (Continued) LDW structural pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Turkey	3	3	1
Availability of size >16" to ≤24"	U.S. v. Turkey	3	4	0
Availability of size >24" to ≤48"	U.S. v. Turkey	2	4	1
Availability of size >48"	U.S. v. Turkey	1	4	2
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Turkey	2	5	0
Delivery terms	U.S. v. Turkey	4	3	0
Delivery time	U.S. v. Turkey	5	2	0
Discounts offered	U.S. v. Turkey	1	5	1
Minimum quantity requirements	U.S. v. Turkey	1	6	0
Packaging	U.S. v. Turkey	1	6	0
Payment terms	U.S. v. Turkey	4	3	0
Price	U.S. v. Turkey	1	1	5
Producer available capacity	U.S. v. Turkey	2	4	1
Product consistency	U.S. v. Turkey	1	6	0
Product range	U.S. v. Turkey	1	5	1
Project specification	U.S. v. Turkey	1	6	0
Quality meets industry standards	U.S. v. Turkey	1	6	0
Quality exceeds industry standards	U.S. v. Turkey	2	5	0
Reliability of supply	U.S. v. Turkey	2	5	0
Technical support/service	U.S. v. Turkey	1	6	0
Total installation costs	U.S. v. Turkey	1	5	1
U.S. transportation costs	U.S. v. Turkey	2	4	1

Table continued.

Table SP 2.15 (Continued) LDW structural pipe: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	1	1	1
Availability of size >16" to ≤24"	U.S. v. Nonsubject	1	2	0
Availability of size >24" to ≤48"	U.S. v. Nonsubject	1	2	0
Availability of size >48"	U.S. v. Nonsubject	1	1	1
Availability of weld type (HSAW, LSAW, ERW)	U.S. v. Nonsubject	0	3	0
Delivery terms	U.S. v. Nonsubject	2	1	0
Delivery time	U.S. v. Nonsubject	3	0	0
Discounts offered	U.S. v. Nonsubject	0	3	0
Minimum quantity requirements	U.S. v. Nonsubject	1	2	0
Packaging	U.S. v. Nonsubject	0	3	0
Payment terms	U.S. v. Nonsubject	0	3	0
Price	U.S. v. Nonsubject	1	0	2
Producer available capacity	U.S. v. Nonsubject	0	2	1
Product consistency	U.S. v. Nonsubject	0	3	0
Product range	U.S. v. Nonsubject	0	2	1
Project specification	U.S. v. Nonsubject	0	3	0
Quality meets industry standards	U.S. v. Nonsubject	0	3	0
Quality exceeds industry standards	U.S. v. Nonsubject	1	1	1
Reliability of supply	U.S. v. Nonsubject	1	2	0
Technical support/service	U.S. v. Nonsubject	1	2	0
Total installation costs	U.S. v. Nonsubject	1	2	0
U.S. transportation costs	U.S. v. Nonsubject	1	1	1

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

Note: With respect to cost/price factors, a rating of superior means that the cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported LDW structural pipe

In order to determine whether U.S.-produced LDW structural pipe can generally be used in the same applications as imports from Canada, China, South Korea, and/or Turkey, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. All seven U.S. producers indicated that all LDW structural pipe is always interchangeable between any of the countries. As shown in tables 2.16, a majority of importers rated product from all sources as always interchangeable as well, with the exception of United States vs. South Korea, for which it was ***. Table SP 2.17 shows that most purchasers believe that structural pipe from domestic and subject sources is always or frequently interchangeable with pipe from other subject sources. Nonsubject LDW structural pipe was most frequently rated as frequently interchangeable with that from domestic or subject sources.

Table SP 2.16 LDW structural pipe: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	***	***	***	***
United States vs. China	***	***	***	***
United States vs. South Korea	***	***	***	***
United States vs. Turkey	***	***	***	***
Canada vs. China	***	***	***	***
Canada vs. South Korea	***	***	***	***
Canada vs. Turkey	***	***	***	***
China vs. South Korea	***	***	***	***
China vs. Turkey	***	***	***	***
South Korea vs. Turkey	***	***	***	***
United States vs. Other	***	***	***	***
Canada vs. Other	***	***	***	***
China vs. Other	***	***	***	***
South Korea vs. Other	***	***	***	***
Turkey vs. Other	***	***	***	***

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

Table SP 2.17 LDW structural pipe: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	5	4	0	0
United States vs. China	2	3	1	0
United States vs. South Korea	4	4	0	0
United States vs. Turkey	3	5	1	0
Canada vs. China	2	2	1	0
Canada vs. South Korea	4	3	0	0
Canada vs. Turkey	3	4	1	0
China vs. South Korea	3	1	1	0
China vs. Turkey	2	1	2	0
South Korea vs. Turkey	2	3	1	0
United States vs. Other	1	4	0	0
Canada vs. Other	1	3	0	0
China vs. Other	1	1	1	0
South Korea vs. Other	1	2	0	0
Turkey vs. Other	1	1	0	1

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of LDW structural pipe from the United States, subject, or nonsubject countries. As seen in table SP 2.18, five of seven producers indicated there are never any factors other than price that are significant. Table SP 2.19 show importers views were spread broadly and table SP 2.20 shows that at least half of purchasers indicated that factors other than price are sometimes or never significant in their purchasing decisions. Importers' responses were very mixed with one or two indicating there are always factors other than price that are important in their sales of product from various sources and one or two for which there are sometimes or never non-price factors that are important.³² Responses purchasers gave regarding the importance of factors other than price centered around "sometimes" across nearly all comparisons. Purchaser *** noted, "Pipe sourced from foreign suppliers often presents logistical challenges in terms of delivery timeline as well as cost associated. This can result in long lead times from placement of order to receiving materials on site. As a result, flexibility in adjusting orders as the project goes on diminishes."

Table SP 2.18 LDW structural pipe: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	0	0	2	5
United States vs. China	0	0	2	5
United States vs. South Korea	0	0	2	5
United States vs. Turkey	0	0	2	5
Canada vs. China	0	0	2	5
Canada vs. South Korea	0	0	2	5
Canada vs. Turkey	0	0	2	5
China vs. South Korea	0	0	2	5
China vs. Turkey	0	0	2	5
South Korea vs. Turkey	0	0	2	5
United States vs. Other	0	0	2	5
Canada vs. Other	0	0	2	5
China vs. Other	0	0	2	5
South Korea vs. Other	0	0	2	5
Turkey vs. Other	0	0	2	5

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

³² Importer *** referenced API line pipe in describing its "sometimes" response with respect to its United States vs South Korea response. It also used the same description in its response with respect to LDW line pipe.

Table SP 2.19 LDW structural pipe: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	***	***	***	***
United States vs. China	***	***	***	***
United States vs. South Korea	***	***	***	***
United States vs. Turkey	***	***	***	***
Canada vs. China	***	***	***	***
Canada vs. South Korea	***	***	***	***
Canada vs. Turkey	***	***	***	***
China vs. South Korea	***	***	***	***
China vs. Turkey	***	***	***	***
South Korea vs. Turkey	***	***	***	***
United States vs. Other	***	***	***	***
Canada vs. Other	***	***	***	***
China vs. Other	***	***	***	***
South Korea vs. Other	***	***	***	***
Turkey vs. Other	***	***	***	***

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

Table SP 2.20 LDW structural pipe: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	1	2	4	2
United States vs. China	0	1	3	0
United States vs. South Korea	1	0	3	3
United States vs. Turkey	1	1	4	2
Canada vs. China	0	0	4	0
Canada vs. South Korea	1	0	2	3
Canada vs. Turkey	1	1	3	2
China vs. South Korea	1	0	2	0
China vs. Turkey	1	0	2	0
South Korea vs. Turkey	2	0	2	1
United States vs. Other	0	0	2	0
Canada vs. Other	0	0	3	0
China vs. Other	0	0	1	0
South Korea vs. Other	0	0	1	0
Turkey vs. Other	0	0	1	0

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

Foreign producers were asked how easily they can shift their sales between the U.S. and third-country markets. *** replied that each project is unique and its LDW structural pipe (***) is produced-to-order.³³

Elasticity estimates

This section discusses supply, demand, and substitution elasticity estimates in the LDW structural pipe market.³⁴

U.S. supply elasticity

The domestic supply elasticity for LDW structural pipe measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of LDW structural pipe. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced LDW structural pipe. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 6 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for LDW structural pipe measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of LDW structural pipe. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the LDW structural pipe in the production of any downstream products. As noted earlier, there are few, if any, substitutes for LDWP. In addition, the cost component of LDWP is variable, but often a relatively small, though still important share of the total cost of an infrastructure project. Based on the available information, the aggregate demand for LDW structural pipe is likely to be inelastic; a range of -0.25 to -0.50 is suggested.

³³ ***

³⁴ No party commented on the estimates that were presented in the prehearing report.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.³⁵ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced LDW structural pipe and imported LDW structural pipe is likely to be in the range of 3 to 5. This estimate of substitution elasticity is driven by a number of factors including broad comparability of pipe between sources, reported interchangeability, similar ability to meet quality standards, differences in lead times, quotas for product from South Korea, substantial domestic content requirements, certain types of LDW pipe being available from certain sources, and some purchasers' preferences for producers or country of origin.

³⁵ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Structural 3: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission’s questionnaires. Nine firms, which accounted for the vast majority of U.S. production of LDW structural pipe during 2023, supplied information on their operations in these reviews on LDW structural pipe.^{1 2}

Overview

Table SP 3.1 presents events in the U.S. industry since January 1, 2018.

¹ Atlas Tube, Skyline, and Trinity primarily produced LDW structural pipe, while ACICPO, Berg, Dura-Bond, Jindal, Nucor, and Stupp generally produce LDW line pipe, but at times downgraded pipe that did not meet the specifications for line pipe or to utilize capacity during periods of uncertain energy markets.

² ***, produced *** of LDW structural pipe, and accounted for *** of ***.

Table SP 3.1 LDW structural pipe: Developments in the U.S. industry since January 1, 2018

Item	Firm	Event
Opening	Atlas Tube (Zekelman Industries)	In May 2022, Atlas Tube, a division of Zekelman Industries, opened a steel mill in Blytheville, AR that produces Jumbo Hollow Structural Sections (“HSS”) with a maximum OD of 24”.
Opening	JD Fields HDM	In October 2022, JD Fields/HDM opened a steel mill in Houston, Texas that produces spiral weld steel pipe, and includes 72,000 tons of annual capacity.
***	***	***
***	***	***
***	***	***

Source: PR Newswire, “Atlas Tube opens the doors to the world’s largest ERW mill in Blytheville, Arkansas,” May 4, 2022, at <https://www.prnewswire.com/news-releases/atlas-tube-opens-the-doors-to-the-worlds-largest-erw-mill-in-blytheville-arkansas-301539862.html>; ***.

JD Fields/HDM webpage, accessed March 26, 2025. <https://www.hdm.com.tr/en/production-facilities/21/usa-jd-fields-hdm-spiralweld-mill-llc>.

***’s producer questionnaire response, section 4.2a; and ***’s producer questionnaire response, section 4.2a.

Changes experienced by the industry

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of LDW structural pipe since January 1, 2018. Eight of the nine responding producers indicated in their questionnaires that they had experienced such changes.³ Table SP 3.2 presents the changes identified by these producers.

³ As presented in table SP 3.2, an additional U.S. producer *** outside of the 9 U.S. producers that provided complete questionnaire responses also provided a response to this question (on its closure).

Table SP 3.2 LDW structural pipe: Reported changes in operations since January 1, 2018

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Plant closings	***
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Relocations	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Acquisitions	***
Weather related or force majeure events	***
Other	***
Other	***

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

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of LDW structural pipe. Two of the responding firms *** indicated that they had anticipated changes in operations.⁴ Their responses appear in table SP 3.3. At the Commission’s hearing, Berg indicated its intent to invest \$68 million dollars to modernize its Panama City, Florida LDWP facility.⁵

Table SP 3.3 LDW structural pipe: Anticipated changes in operations

Firm name	Narrative on anticipated changes in operations
***	***
***	***

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

U.S. production, capacity, and capacity utilization

Table SP 3.4 presents U.S. producers’ installed and practical capacity and production on the same equipment. Installed overall capacity remained at the same levels from 2018 to 2021, year to year, but both installed and practical capacity decreased in 2023 compared to levels in 2018, and both measures were lower in January to September 2024 compared to levels in January to September 2023. Similarly, overall production fluctuated from 2018 to 2023, year to year, but ultimately decreased in 2023 compared to levels in 2018, but was higher in January to September 2024 than in January to September 2023.⁶ The decreases in capacity were due to the ***. Capacity utilization for both practical overall and practical LDW structural pipe both increased from 2018 to 2023. *** installed overall capacity and practical overall capacity were reported at ***.

⁴ ***.

⁵ Hearing transcript, p. 37 (Onbasi).

⁶ At the Commission’s hearing, Skyline, ***, indicated that it manufactures LDW structural pipe in outer diameter sizes ranging from 16” to 24” using the ERW, HSAW, and LSAW production processes. Hearing transcript, p. 52 (Barney).

***. In their posthearing brief, the domestic interested parties reported that Stupp's pipe making assets have been sold off and removed from the former manufacturing site.⁷

Table SP 3.4 LDW structural pipe: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; Interim period is January through September

Item	Measure	2018	2019	2020
Installed overall	Capacity	4,739,796	4,739,796	4,739,796
Installed overall	Production	1,388,233	1,775,127	1,427,780
Installed overall	Utilization	29.3	37.5	30.1
Practical overall	Capacity	3,642,488	3,642,488	3,167,688
Practical overall	Production	1,388,233	1,775,127	1,427,780
Practical overall	Utilization	38.1	48.7	45.1
Practical LDW structural pipe	Capacity	556,409	557,722	555,482
Practical LDW structural pipe	Production	204,981	215,595	192,547
Practical LDW structural pipe	Utilization	36.8	38.7	34.7

Table continued.

Table SP 3.4 (Continued) LDW structural pipe: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; Interim period is January through September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	4,739,796	5,229,196	4,413,848	3,373,716	2,800,646
Installed overall	Production	668,529	853,164	1,188,796	814,913	868,260
Installed overall	Utilization	14.1	16.3	26.9	24.2	31.0
Practical overall	Capacity	3,167,488	3,556,974	2,991,562	2,276,100	2,160,420
Practical overall	Production	668,529	853,164	1,188,796	814,913	868,260
Practical overall	Utilization	21.1	24.0	39.7	35.8	40.2
Practical LDW structural pipe	Capacity	537,803	691,514	563,969	431,229	413,657
Practical LDW structural pipe	Production	138,715	204,800	244,978	173,727	197,163
Practical LDW structural pipe	Utilization	25.8	29.6	43.4	40.3	47.7

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

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

⁷ Domestic interested parties' posthearing brief, Exhibit 1, p. 89.

Table SP 3.5 and figure 3.1 present U.S. producers’ production, capacity, and capacity utilization for LDW structural pipe, by firm. U.S. producers’ practical capacity for LDW structural pipe practical capacity increased slightly from 2018 to 2023, ***. LDW structural pipe production increased by 19.5 percent from 2018 to 2023, and was higher by 13.5 percent in January to September 2024 than it was in January to September 2023. *** shifted its production capacity to LDW structural pipe and was calculated at ***. LDW structural pipe producers’ capacity utilization increased from 2018 to 2023 by 6.6 percentage points, and was higher in January to September 2024 than in January to September 2023 (or in any of the six prior years).

Table SP 3.5 LDW structural pipe: U.S. producers’ output, by firm and period
Practical capacity

Capacity in short tons; Interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	556,409	557,722	555,482

Table continued.

Table SP 3.5 (Continued) LDW structural pipe: U.S. producers' output, by firm and period
Practical capacity

Capacity in short tons; Interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	*	*	*	*	*
All firms	537,803	691,514	563,969	431,229	413,657

Table continued.

Table SP 3.5 (Continued) LDW structural pipe: U.S. producers' output, by firm and period**Production**

Production in short tons; Interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	204,981	215,595	192,547

Table continued.

Table SP (Continued) 3.5 LDW structural pipe: U.S. producers' output, by firm and period**Production**

Production in short tons; Interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	* *	* *	*	*	
All firms	138,715	204,800	244,978	173,727	197,163

Table continued.

Table SP 3.5 (Continued) LDW structural pipe: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; Interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	36.8	38.7	34.7

Table continued.

Table SP 3.5 (Continued) LDW structural pipe: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; Interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	* *	* *	*	*	
All firms	25.8	29.6	43.4	40.3	47.7

Table continued.

Table SP 3.5 (Continued) LDW structural pipe: U.S. producers' output, by firm and period
Share of production

Share of production in percent; Interim period is January through September

Firm	2018	2019	2020
* * * *	* *	*	
All firms	100.0	100.0	100.0

Table continued.

Table SP 3.5 (Continued) LDW structural pipe: U.S. producers' output, by firm and period
Share of production

Share of production in percent; Interim period is January through September

Firm	2021	2022	2023	Interim 2023	Interim 2024
* *	* *	* *	*		
All firms	100.0	100.0	100.0	100.0	100.0

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

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

Figure 3.1 LDW structural pipe: U.S. producers’ capacity, production, and capacity utilization, by period

* * * * *

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

Constraints on capacity

Table SP 3.6 presents U.S. producers’ reported narratives regarding practical capacity constraints. Six of the responding LDW structural pipe producers reported constraints on capacity.

Table SP 3.6 LDW structural pipe: U.S. producers’ reported capacity constraints since January 1, 2018

Type of constraint	Firm name and narrative on constraints to practical overall capacity
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Alternative products

As shown in Table SP 3.7, less than a quarter of the product produced during 2018 to 2023 by U.S. producers was LDW structural pipe. The production of products other than LDW structural and line pipe (including out-of-scope small diameter welded line pipe and OCTG) accounted for approximately one quarter of all product produced on the same equipment during 2023, while LDW line pipe accounted for the majority of product produced on the same equipment in 2023 and in all calendar years except 2021 to 2022.

Table SP 3.7 LDW structural pipe: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; share in percent; Interim period is January through September

Product type	Measure	2018	2019	2020
LDW structural pipe	Quantity	204,981	215,595	192,547
LDW line pipe	Quantity	921,972	1,205,457	806,719
Other products	Quantity	261,280	354,075	428,514
All out-of-scope products	Quantity	1,183,252	1,559,532	1,235,233
All products	Quantity	1,388,233	1,775,127	1,427,780
LDW structural pipe	Share	14.8	12.1	13.5
LDW line pipe	Share	66.4	67.9	56.5
Other products	Share	18.8	19.9	30.0
All out-of-scope products	Share	85.2	87.9	86.5
All products	Share	100.0	100.0	100.0

Table continued.

Table SP 3.7 (Continued) LDW structural pipe: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; share in percent; Interim period is January through September

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW structural pipe	Quantity	138,715	204,800	244,978	173,727	197,163
LDW line pipe	Quantity	191,557	264,983	631,964	381,022	450,223
Other products	Quantity	338,257	383,381	311,854	260,164	220,874
All out-of-scope products	Quantity	529,814	648,364	943,818	641,186	671,097
All products	Quantity	668,529	853,164	1,188,796	814,913	868,260
LDW structural pipe	Share	20.7	24.0	20.6	21.3	22.7
LDW line pipe	Share	28.7	31.1	53.2	46.8	51.9
Other products	Share	50.6	44.9	26.2	31.9	25.4
All out-of-scope products	Share	79.3	76.0	79.4	78.7	77.3
All products	Share	100.0	100.0	100.0	100.0	100.0

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

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

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

Table SP 3.8 presents U.S. producers' U.S. shipments, export shipments, and total shipments for LDW structural pipe. U.S. shipments accounted for (i.e., more than *** percent) of total shipments in every year from 2018 to 2023 and in the interim periods January to September 2023 and January to September 2024.⁸ The quantity of U.S. shipments fluctuated year-to-year, but increased overall by 28.7 percent from 2018 to 2023, and was 7.4 percent higher in January to September 2024 than in January to September 2023. The value of U.S. producers' U.S. shipments increased overall by 95.2 percent from 2018 to 2023, and was 2.0 percent higher in January to September 2024 than in January to September 2023.

The average unit value of U.S. producers' U.S. shipments fluctuated year to year, increasing overall by 51.7 percent from 2018 to 2023. It was 5.1 percent lower in January to September 2024 than in January to September 2023.

By quantity, export shipments accounted for a minor share of U.S. producers' total shipments throughout the period for which data were collected.⁹ The quantity and value of

⁸ *** was the only responding firm that reported *** internal consumption, while there were no reported transfers to related firms.

⁹ Two of the nine firms (***) reported exports during 2018 to 2023, and interim periods January to September 2023 and January to September 2024, with ***.

exports declined irregularly between 2018 and 2023 but were higher in January to September 2024 than in January to September 2023.

Table SP 3.8 LDW structural pipe: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent; Interim period is January through September

Item	Measure	2018	2019	2020
U.S. shipments	Quantity	181,633	210,711	202,083
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	190,028	225,362	211,322
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	1,046	1,070	1,046
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	100.0	100.0	100.0

Table continued.

Table SP 3.8 (Continued) LDW structural pipe: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent; Interim period is January through September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. shipments	Quantity	155,387	206,266	233,702	172,640	185,467
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	218,078	356,771	370,963	267,486	272,765
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	1,403	1,730	1,587	1,549	1,471
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

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 "—".

U.S. producers' inventories

Table SP 3.9 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' end-of-period inventories fluctuated year-to-year but decreased by 31.0 percent from 2018 to 2023. Inventories were 77.4 percent higher in September 2024 than in September 2023. The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments each fluctuated from 2018 to 2023, although each of these measures decreased in 2023 compared to 2018 levels. The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments were all higher in January to September 2024 than in January to September 2023. ***.

Table SP 3.9 LDW structural pipe: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio in percent; Interim period is January through September

Item	Measure	2018	2019	2020
End-of-period inventory	Quantity	64,639	66,872	55,223
Inventory to U.S. production	Ratio	31.5	31.0	28.7
Inventory to U.S. shipments	Ratio	35.6	31.7	27.3
Inventory to total shipments	Ratio	***	***	***

Table continued.

Table SP 3.9 (Continued) LDW structural pipe: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio in percent; Interim period is January through September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
End-of-period inventory	Quantity	35,194	34,257	44,605	32,242	57,185
Inventory to U.S. production	Ratio	25.4	16.7	18.2	13.9	21.8
Inventory to U.S. shipments	Ratio	22.6	16.6	19.1	14.0	23.1
Inventory to total shipments	Ratio	***	***	***	***	***

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

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

U.S. producers' purchases from subject sources

U.S. producers' purchases of LDW structural pipe are presented in table SP 3.10. *** purchased LDW structural pipe from Canada and Turkey in 2018 through 2020. This subject LDW structural pipe was purchased by *** from ***,¹⁰ an importer of LDW structural pipe from Canada. *** did not purchase any LDW structural pipe from subject sources after 2020. ***¹¹ purchases of LDW structural pipe from subject sources.

¹⁰ *** did not import from Turkey during 2018 through 2023.

¹¹ Email correspondence with *** March 21, 2025.

Table SP 3.10 LDW structural pipe: * purchases of subject U.S. imports, and ratio of purchases to supplier imports and overall imports, by source and period**

Quantity in short tons; ratio in percent; Interim period is January through September

Item	Measure	2018	2019	2020
***'s U.S. purchases of imports from subject sources ***	Quantity	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***
***'s U.S. purchases of imports from *** to overall U.S. imports from ***	Ratio	***	***	***

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

U.S. employment, wages, and productivity

Table SP 3.11 shows U.S. producers' employment-related data. Production and related workers fluctuated year-to-year but increased by 19.4 percent from 2018 to 2023 and were 17.4 percent higher in January to September 2024 than in January to September 2023. Hours worked also fluctuated year-to-year but increased by 23.8 percent from 2018 to 2023 and were 11.6 percent higher in January to September 2024 than in January to September 2023. Wages paid fluctuated year-to-year but increased by 66.2 percent from 2018 to 2023 and were 16.5 percent higher in January to September 2024 than in January to September 2023.¹² Productivity decreased by 3.4 percent from 2018 to 2023, but was 1.7 percent higher in January to September 2024 than in January to September 2023. Increasing wage rates without commensurate increases in productivity resulted in unit labor costs that were 39.1 percent higher in 2023 than in 2018 and 2.7 percent higher in January to September 2024 than in January to September 2023.

Table SP 3.11 LDW structural pipe: U.S. producers' employment related information, by period

Interim period is January through September

Item	2018	2019	2020
Production and related workers (PRWs) (number)	278	294	293
Total hours worked (1,000 hours)	606	697	685
Hours worked per PRW (hours)	2,180	2,371	2,338
Wages paid (\$1,000)	15,342	17,123	18,969
Hourly wages (dollars per hour)	\$25.32	\$24.57	\$27.69
Productivity (short tons per 1,000 hours)	338.3	309.3	281.1
Unit labor costs (dollars per short ton)	\$74.85	\$79.42	\$98.52

Table continued.

¹² ***. In addition, Jindal ***.

Table SP 3.11 (Continued) LDW structural pipe: U.S. producers' employment related information, by period

Interim period is January through September

Item	2021	2022	2023	Interim 2023	Interim 2024
Production and related workers (PRWs) (number)	321	434	332	344	404
Total hours worked (1,000 hours)	575	894	750	619	691
Hours worked per PRW (hours)	1,791	2,060	2,259	1,799	1,710
Wages paid (\$1,000)	15,909	27,764	25,498	20,519	23,908
Hourly wages (dollars per hour)	\$27.67	\$31.06	\$34.00	\$33.15	\$34.60
Productivity (short tons per 1,000 hours)	241.2	229.1	326.6	280.7	285.3
Unit labor costs (dollars per short ton)	\$114.69	\$135.57	\$104.08	\$118.11	\$121.26

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

Financial experience of U.S. LDW structural pipe producers

Background¹³

Nine U.S. producers provided usable financial results on their LDW structural pipe operations: ACIPCO, Atlas, Berg, Dura-Bond, Jindal, Nucor, Skyline, Stupp, and Trinity.¹⁴ All U.S. producers reported financial data for a fiscal year ending December 31.¹⁵ All of the responding U.S. producers provided their financial data on the basis of GAAP. Revenue primarily reflects commercial sales, but also includes a minimal volume of internal consumption which accounted for *** percent of net sales quantity during the reporting period and is not shown separately in this section of the report.¹⁶

Figure SP 3.2 presents each responding firm's share of the total reported net sales quantity in 2023, when eight firms reported sales of U.S. produced LDW structural pipe.¹⁷

¹³ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

¹⁴ ***.

¹⁵ ***. U.S. Producers' questionnaire response, question 5-2.

¹⁶ ***. U.S. producers' questionnaire response of ***, question 4-2a. ***. U.S. producers' questionnaire response of ***, question 4-2a. ***. U.S. producers' questionnaire response of ***, question 3-2a. ***. U.S. producers' questionnaire response of ***, question 3-2a. ***. U.S. producers' questionnaire response of ***, question 4-2a.

¹⁷ ***. U.S. producers' questionnaire responses of ***, question 3-2a. ***. Email from ***, January 23, 2025.

Figure SP 3.2 LDW structural pipe: U.S. producers' share of net sales quantity in 2023, by firm

* * * * *

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

Note: ***.

Operations on LDW structural pipe

Table SP 3.12 presents aggregated data on U.S. producers' operations in relation to LDW structural pipe, while table SP 3.13 presents corresponding changes in AUVs. Table SP 3.14 presents selected company-specific financial data.

Table SP 3.12 LDW structural pipe: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent; interim period is January to September

Item	Measure	2018	2019	2020
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
COGS: Raw materials	Value	***	***	***
COGS: Direct labor	Value	***	***	***
COGS: Other factory	Value	***	***	***
COGS: Total	Value	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Other expense / (income), net	Value	***	***	***
Net income or (loss)	Value	***	***	***
Depreciation/amortization	Value	***	***	***
Cash flow	Value	***	***	***
COGS: Raw materials	Ratio to NS	79.2	82.7	80.5
COGS: Direct labor	Ratio to NS	6.6	5.7	6.6
COGS: Other factory	Ratio to NS	6.3	5.4	5.8
COGS: Total	Ratio to NS	92.1	93.7	92.9
Gross profit	Ratio to NS	7.9	6.3	7.1
SG&A expense	Ratio to NS	6.5	5.2	6.0
Operating income or (loss)	Ratio to NS	1.3	1.1	1.1
Net income or (loss)	Ratio to NS	1.2	1.1	1.1

Table continued.

Table SP 3.12 (Continued) LDW structural pipe: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	79.0	74.1	69.3	69.4	76.4
COGS: Direct labor	Ratio to NS	9.4	8.6	6.6	7.1	7.5
COGS: Other factory	Ratio to NS	8.0	9.8	8.9	10.4	6.9
COGS: Total	Ratio to NS	96.3	92.5	84.8	86.9	90.7
Gross profit	Ratio to NS	3.7	7.5	15.2	13.1	9.3
SG&A expense	Ratio to NS	7.7	6.7	3.9	3.8	4.1
Operating income or (loss)	Ratio to NS	(4.0)	0.8	11.3	9.3	5.2
Net income or (loss)	Ratio to NS	(1.8)	1.1	11.3	9.2	5.0

Table continued.

Table SP 3.12 (Continued) LDW structural pipe: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting; interim period is January to September

Item	Measure	2018	2019	2020
COGS: Raw materials	Share	86.0	88.2	86.6
COGS: Direct labor	Share	7.1	6.1	7.1
COGS: Other factory	Share	6.9	5.7	6.2
COGS: Total	Share	100.0	100.0	100.0
Total net sales	Unit value	1,049	1,071	1,047
COGS: Raw materials	Unit value	831	885	842
COGS: Direct labor	Unit value	69	61	69
COGS: Other factory	Unit value	66	57	60
COGS: Total	Unit value	967	1,003	972
Gross profit or (loss)	Unit value	83	67	74
SG&A expenses	Unit value	69	55	63
Operating income or (loss)	Unit value	14	12	12
Net income or (loss)	Unit value	12	12	12
Operating losses	Count	4	4	4
Net losses	Count	4	4	4
Data	Count	8	9	7

Table continued.

Table SP 3.12 (Continued) LDW structural pipe: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
COGS: Raw materials	Share	82.0	80.2	81.7	79.9	84.2
COGS: Direct labor	Share	9.7	9.3	7.8	8.2	8.3
COGS: Other factory	Share	8.3	10.5	10.5	11.9	7.6
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	1,411	1,730	1,587	1,549	1,469
COGS: Raw materials	Unit value	1,114	1,283	1,100	1,075	1,122
COGS: Direct labor	Unit value	132	149	105	110	110
COGS: Other factory	Unit value	112	169	141	161	101
COGS: Total	Unit value	1,359	1,600	1,346	1,346	1,333
Gross profit or (loss)	Unit value	52	130	241	203	136
SG&A expenses	Unit value	109	116	61	59	60
Operating income or (loss)	Unit value	(57)	13	180	144	76
Net income or (loss)	Unit value	(25)	18	179	143	73
Operating losses	Count	5	5	2	3	3
Net losses	Count	4	5	2	4	4
Data	Count	8	9	8	8	8

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

Note: Shares represent the share of COGS. Count reflects ***.

Table SP 3.13 LDW structural pipe: Changes in AUVs between comparison periods

Changes in percent; interim period is January to September

Item	2018 to 2023	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲51.2	▲2.1	▼(2.3)	▲34.8	▲22.6	▼(8.3)	▼(5.2)
COGS: Raw materials	▲32.3	▲6.5	▼(4.8)	▲32.3	▲15.1	▼(14.3)	▲4.4
COGS: Direct labor	▲53.0	▼(11.3)	▲13.5	▲90.2	▲12.7	▼(29.1)	▼(0.3)
COGS: Other factory	▲112.0	▼(13.7)	▲5.5	▲85.6	▲50.5	▼(16.6)	▼(37.2)
COGS: Total	▲39.2	▲3.8	▼(3.1)	▲39.8	▲17.8	▼(15.9)	▼(1.0)

Table continued.

Table SP 3.13 (Continued) LDW structural pipe: Changes in AUVs between comparison periods

Changes in dollars per short ton; interim period is January to September

Item	2018 to 2023	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲537	▲22	▼(24)	▼(537)	▲319	▼(143)	▼(80)
COGS: Raw materials	▲268	▲54	▼(43)	▼(268)	▲168	▼(183)	▲47
COGS: Direct labor	▲37	▼(8)	▲8	▼(37)	▲17	▼(43)	▼(0)
COGS: Other factory	▲74	▼(9)	▲3	▼(74)	▲57	▼(28)	▼(60)
COGS: Total	▲379	▲37	▼(31)	▼(379)	▲242	▼(254)	▼(13)
Gross profit or (loss)	▲158	▼(15)	▲7	▼(158)	▲78	▲111	▼(67)
SG&A expense	▼(7)	▼(13)	▲7	▲7	▲8	▼(55)	▲1
Operating income or (loss)	▲166	▼(2)	▼(0)	▼(166)	▲70	▲166	▼(67)
Net income or (loss)	▲167	▼(1)	▼(0)	▼(167)	▲44	▲161	▼(70)

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

Note: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table SP 3.14 LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	***	***	***	***	***	***	***	***

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	92.1	93.7	92.9	96.3	92.5	84.8	86.9	90.7

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	7.9	6.3	7.1	3.7	7.5	15.2	13.1	9.3

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	6.5	5.2	6.0	7.7	6.7	3.9	3.8	4.1

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	1.3	1.1	1.1	(4.0)	0.8	11.3	9.3	5.2

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	1.2	1.1	1.1	(1.8)	1.1	11.3	9.2	5.0

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	1,049	1,071	1,047	1,411	1,730	1,587	1,549	1,469

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	831	885	842	1,114	1,283	1,100	1,075	1,122

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	69	61	69	132	149	105	110	110

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	66	57	60	112	169	141	161	101

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	967	1,003	972	1,359	1,600	1,346	1,346	1,333

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	83	67	74	52	130	241	203	136

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	69	55	63	109	116	61	59	60

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
* * * * *								
All firms	14	12	12	(57)	13	180	144	76

Table continued.

Table SP 3.14 (Continued) LDW structural pipe: U.S. producers’ sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
		*	*	*	*	*	*	
All firms	12	12	12	(25)	18	179	143	73

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

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

Net sales

Total net sales quantity irregularly increased from 2018 to 2020 then declined from 2020 to 2021 before increasing from 2021 to 2023. Overall, net sales quantity increased by *** percent from 2018 to 2023. Total net sales value increased irregularly by *** percent from 2018 to 2023. Net sales quantity and value were higher in interim 2024 than in interim 2023.

As shown in table SP 3.14, U.S. producers *** reported an overall decline in net sales quantity from 2018 to 2021; all firms except *** reported an overall increase in net sales quantity from 2021 to 2023 or the last full year of production; and *** reported a higher net sales quantity in interim 2024 than in interim 2023. All firms except *** reported an overall increase in net sales value from 2018 to 2023 or the last full year of production and *** reported a higher net sales value in interim 2024 than in interim 2023.¹⁸

The average unit sales value moved within a relatively narrow range from 2018 to 2020, then increased irregularly from 2020 to 2023 and was lower in interim 2024 than in interim 2023. As shown in table SP 3.14, all firms except *** reported an overall increase in unit sales value from 2018 or the first year of production to 2023 or the last full year of production. All firms except *** reported lower unit sales value in interim 2024 than in interim 2023.¹⁹

Cost of goods sold and gross profit or loss

As shown in table SP 3.12, raw materials represent the single largest component of total COGS and ranged from 79.9 percent of total COGS in interim 2023 to 88.2 percent of total COGS in 2019. Per-unit raw material costs increased irregularly from 2018 to 2023 and were higher in interim 2024 than in interim 2023. As shown in table SP 3.14, all firms except *** reported an overall increase in per-unit raw material costs from 2018 or

¹⁸ ***. U.S. producers' questionnaire response of ***, question 4-2a and email from ***, January 23, 2025.

¹⁹ ***. Email from ***, January 23, 2025. ***. Email from ***, January 23, 2025.

the first year of production to 2023 or the last full year of production, and U.S. producers *** reported higher per-unit raw material costs in interim 2024 than in interim 2023. As a ratio to net sales, raw material costs increased from 2018 to 2019 then declined from 2019 to 2023 and were higher in interim 2024 than in interim 2023.

Raw materials consisted of steel plate, steel coils, and other material inputs. The “other material inputs” category included ***. Table SP 3.15 presents raw materials, by type.²⁰

Table SP 3.15 LDW structural pipe: U.S. producers’ raw material costs in 2023

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Steel coils	***	***
Steel plate	***	***
All raw materials	***	100.0

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

As a share of total COGS, direct labor costs ranged from 6.1 percent in 2019 to 9.7 percent in 2021, while other factory costs ranged from 5.7 percent in 2019 to 11.9 percent in interim 2023. On a per unit basis and as a ratio to net sales, direct labor costs moved within a relatively narrow range from 2018 to 2020 then notably increased from 2020 to 2021 before declining from 2021 to 2023, other factory costs declined irregularly from 2018 to 2020 then notably increased from 2020 to 2021 before increasing irregularly from 2021 to 2023, and both direct labor costs and other factory costs were lower in interim 2024 than in interim 2023.²¹

Total COGS increased irregularly from 2018 to 2023 and was higher in interim 2024 than in interim 2023. Per-unit COGS moved within a relatively narrow range from 2018 to 2020 then increased irregularly from 2020 to 2023 and was somewhat lower in interim 2024 than in interim 2023. As a ratio to net sales, total COGS increased irregularly from 2018 to 2021 then

²⁰ ***. U.S. producers’ questionnaire response of ***, question 5-6.

²¹ ***. Email from ***, January 23, 2025. ***. Email from ***, March 10, 2025.

declined from 2021 to 2023 and was higher in interim 2024 than in interim 2023. As shown in table SP 3.14, all firms except *** reported an overall increase in total COGS from 2018 or the first year of production to 2023 or the last full year of production. All firms except *** reported a notable increase in total COGS from 2021 to 2022 and *** reported higher total COGS in interim 2024 than in interim 2023.

Table SP 3.12 shows that U.S. producers' aggregate gross profit declined overall from 2018 to 2021 then increased from 2021 to 2023 and was lower in interim 2024 than in interim 2023. In general, the overall gross profit increased from 2018 to 2023 because the increase in total net sales value was greater than the increase in total COGS. The industry's gross profit was lower in interim 2024 than in interim 2023 as the increase in total COGS was greater than the increase in total net sales value. The gross profit margin (gross profit as a ratio to net sales) declined irregularly from 2018 to 2021 then increased from 2021 to 2023 and was lower in interim 2024 than in interim 2023. As shown in table SP 3.14, all firms except *** reported an overall increase in total gross profit or an improved loss from 2018 or the first year of production to 2023 or the last full year of production. *** reported a lower gross profit or a higher gross loss in interim 2024 than in interim 2023. The gross profits are depressed because of the losses from five of the seven LDW line pipe producers (***) which produce structural incidentally, either to fill the mill or from downgrading. ***, in contrast, had gross profits in every single period.

SG&A expenses and operating income or loss

As shown in table SP 3.12, the U.S. industry's SG&A expenses increased irregularly from 2018 to 2022 then declined from 2022 to 2023 and were somewhat higher in interim 2024 than in interim 2023. As a ratio to net sales, SG&A expenses irregularly declined from 2018 to 2020 then increased from 2020 to 2021 before declining from 2021 to 2023 and were higher in interim 2024 than in interim 2023. As shown in table SP 3.14, all firms except *** reported an overall increase in SG&A expenses from 2018 to 2022, U.S. producers *** reported a decline in SG&A expenses from 2022 to 2023, and *** reported higher SG&A expenses in interim 2024 than in interim 2023.

Table SP 3.12 shows that U.S. producers' aggregate operating income declined from 2018 to a loss in 2021 then increased from a loss in 2021 to a positive operating income in 2022 and 2023. Overall operating income increased from 2018 to 2023. The industry's operating

income was lower in interim 2024 than in interim 2023. The operating income margin (operating income as a ratio to net sales) exhibited the same trend as the operating income. As shown in table SP 3.14, 2021 was the only year that the industry as a whole failed to generate operating income, although the dedicated structural pipe producers (***) generated operating income. *** reported an overall decline in operating income from 2018 to 2021 and *** reported an increase in operating loss in the same period. All firms except *** reported an increase in operating income or improved/lower operating loss from 2021 to 2023 or the last full year of production. U.S. producers *** reported lower operating income or worsened/higher operating loss in interim 2024 than in interim 2023.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income. In table SP 3.12, these items are aggregated and only the net amount is shown, which in these reviews are negative values from 2021 to 2022 reflecting net other income. Net other expenses declined from 2018 to 2020 then net other income declined from 2021 to 2022 and net other expenses were reported in 2023. Net other expenses were higher in interim 2024 than in interim 2023.

As shown in table SP 3.12, net income increased overall from 2018 to 2020, fell to a net loss in 2021 then increased to a positive net income in 2022 and 2023. Overall net income increased from 2018 to 2023. The industry's net income was lower in interim 2024 than in interim 2023. The net income margin (net income as a ratio to net sales) declined from 2018 to a net loss margin in 2021 then increased to a positive net income margin in 2022 and 2023. The net income margin was lower in interim 2024 than in interim 2023. As shown in table SP 3.14, U.S. producers *** reported an overall increase in net income or an improving net loss from 2018 to 2020; *** reported a decline in net income or worsening net loss from 2020 to 2021; all firms except *** reported an overall increase in net income or improving net loss from 2021 to 2023 or the last full year of production. U.S. producers *** reported a lower net income or worsening net loss in interim 2024 than in interim 2023.²²

²² A variance analysis is most useful for products that do not have substantial changes in cost structure and/or product mix over the period investigated, and the methodology is most sensitive at the plant or firm level, rather than the aggregated industry level. A variance analysis is not shown due to ***.

Capital expenditures and research and development expenses

Table SP 3.16 presents capital expenditures, by firm, and table SP 3.18 presents R&D expenses, by firm. Tables SP 3.17 and SP 3.19 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table SP 3.16 LDW structural pipe: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
	*	*	*	*	*	*		
All firms	***	***	***	***	***	***	***	***

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

Table SP 3.17 LDW structural pipe: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures						
	*	*	*	*	*	*	*

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

Table SP 3.18 LDW structural pipe: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023	Interim 2023	Interim 2024
	*	*	*	*	*	*		
All firms	***	***	***	***	***	***	***	***

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

Table SP 3.19 LDW structural pipe: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
***	***
***	***
***	***

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

Assets and return on assets

Table SP 3.20 presents data on the U.S. producers' total net assets, while table SP 3.21 presents their operating ROA.²³ Table SP 3.22 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table SP 3.20 LDW structural pipe: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023
	*	*	*	*	*	*
All firms	***	***	***	***	***	***

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

Note: ***. U.S. producers' questionnaire response of ***, question VII-3b. *** accounted for *** percent of total net sales quantity during the reporting period.

²³ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table SP 3.21 LDW structural pipe: U.S. producers' ROA, by firm and period

Ratio in percent; interim period is January to September

Firm	2018	2019	2020	2021	2022	2023
	*	*	*	*	*	*
All firms	***	***	***	***	***	***

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

Table SP 3.22 LDW structural pipe: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets					
	*	*	*	*	*	*

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

The Commission’s questionnaire requested companies to describe the effect of the COVID-19 pandemic or government actions to contain the spread of the COVID-19 virus on the firm’s financial performance since January 1, 2021. Industry responses are in table SP 3.23.

Table SP 3.23 LDW structural pipe: U.S. producers’ reported effect of COVID-19 on financial performance

Firm	Narrative on COVID-19
	* * * * *

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

Structural 4: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 30 potential importers of LDW structural pipe since 2018. Fifteen firms provided data and information in response to the questionnaires.¹ Based on official Commerce statistics for imports of LDW structural pipe, importers' questionnaire data accounted for approximately one-third of subject, nonsubject, and total imports in 2023.² Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports (as a share of official import statistics, by quantity) during 2023.

- *** percent of the subject imports from Canada during 2023.
- *** percent of the subject imports from China during 2023.
- *** percent of the subject imports from South Korea during 2023.

¹ Despite numerous attempts by staff, Husteel and SeAh Steel, two importers of LDW structural pipe from *** did not respond to the Commission's inquiries and did not provide a U.S. importer questionnaire.

² ***, ***." These imports did not arrive under the primary HTS statistical reporting numbers for LDW structural pipe, and therefore are not attributed to the 179 short tons of LDW structural pipe that arrived from Turkey in 2023, based on official import statistics. ***, ***. Despite not being classified under the four primary HTS statistical reporting numbers for LDW structural pipe, staff has included these imports of LDW structural pipe within these data.

- *** subject imports from Turkey during 2023.³

In light of the data coverage by the Commission's questionnaires, import data in this report are based on data submitted in response to Commission questionnaires and from official Commerce statistics.⁴

In its final determinations, Commerce determined the subsidy rates for Turkish LDW pipe producer Borusan to be de minimis with respect to the countervailing duty order on LDW pipe from Turkey.⁵ After the original investigations were completed in 2019, Commerce amended its estimated weighted-average dumping margins for Borusan and all other producers and exporters of subject merchandise, and Borusan was excluded from the antidumping duty order on LDW pipe from Turkey.⁶ Accordingly, all LDW pipe (both line and structural) produced by Borusan is excluded from both the antidumping and countervailing duty orders on Turkey and considered for purposes of data presentation as nonsubject. However, this exclusion is not believed to impact the volume of subject imports of LDW structural pipe from Turkey.

Imports from subject and nonsubject countries

Table SP 4.1 and figure SP 4.1 present information on U.S. imports of LDW structural pipe from Canada, China, South Korea, Turkey, and all other sources over the period for which data were collected. U.S. imports from subject countries by a share of total imports increased from *** percent in 2018 to *** percent in 2023, a *** percentage point increase, based on quantity.⁷ U.S. imports from subject countries by a share of total imports was lower by *** percentage points in interim 2024 than in interim 2023. The quantity of total U.S. imports from subject sources of LDW structural pipe decreased between 2018 and 2021, and then increased year to year from 2021 to 2023, ending *** percent lower in 2023 than in 2018, and was *** percent higher in interim 2024 than in interim 2023, based on quantity.

In 2023, the largest nonsubject sources for U.S. imports of LDW structural pipe were Mexico, Italy, and Vietnam, based on quantity, while Turkey was the largest subject source.

³ There were no reported subject imports of LDW structural pipe from Turkey during 2018-23, other than *** reported subject imports that were reported under HTS statistical reporting number 7308.90.9590.

⁴ HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000 and 7305.39.5000 cover LDW structural pipe products, while HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.500 cover LDW line pipe within the scope of these reviews.

⁵ 84 FR 18771, May 2, 2019.

⁶ 85 FR 35262, June 9, 2020.

⁷ U.S. imports of LDW structural pipe from Canada are manufactured by Evraz NA. Evraz NA provided a foreign producers' questionnaire response for both LDW line pipe and LDW structural pipe.

U.S. imports from subject countries by a share of total imports increased from *** percent in 2018 to *** percent in 2023, based on value. U.S. imports from subject countries by a share of total imports were *** percentage points lower in interim 2024 than in interim 2023. The value of total U.S. imports from subject sources of LDW line pipe decreased between 2018 and 2021, and then increased from 2022 to 2023, but was lower in Interim 2024 than in Interim 2023, based on value.

Unit values for U.S. imports from subject sources, nonsubject sources, and all import sources all increased from 2018 to 2023, while unit values from subject sources were lower during January to September 2024 than during January to September 2023. The ratio to production compared to U.S. imports of LDW structural pipe from subject sources, nonsubject sources, and all import sources decreased from 2018 to 2023, but were higher during interim 2024 than in interim 2023.

Table SP 4.1 LDW structural pipe: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; interim periods are January to September

Source	Measure	2018	2019	2020
Canada	Quantity	4,311	2,123	3,998
China	Quantity	9,422	1,892	300
South Korea	Quantity	16,272	5,871	4,275
Turkey	Quantity	***	***	***
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	34,195	29,721	13,923
All import sources	Quantity	***	***	***
Canada	Value	3,088	1,979	3,952
China	Value	11,054	2,236	1,401
South Korea	Value	15,706	6,639	4,641
Turkey	Value	***	***	***
Subject sources	Value	***	***	***
Nonsubject sources	Value	60,461	125,869	13,549
All import sources	Value	***	***	***
Canada	Unit value	716	932	989
China	Unit value	1,173	1,182	4,674
South Korea	Unit value	965	1,131	1,086
Turkey	Unit value	***	***	***
Subject sources	Unit value	***	***	***
Nonsubject sources	Unit value	1,768	4,235	973
All import sources	Unit value	***	***	***

Table continued.

Table SP 4.1 LDW structural pipe (Continued): U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; interim periods are January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Canada	Quantity	1,709	1,063	1,946	1,923	1,094
China	Quantity	2,086	29	132	128	80
South Korea	Quantity	1,129	6,801	12,492	7,229	9,238
Turkey	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	20,323	15,828	14,220	12,546	27,188
All import sources	Quantity	***	***	***	***	***
Canada	Value	2,403	1,865	7,363	7,330	1,498
China	Value	13,462	268	168	115	424
South Korea	Value	1,178	10,042	16,898	10,195	11,134
Turkey	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	17,380	24,402	17,234	14,487	85,780
All import sources	Value	***	***	***	***	***
Canada	Unit value	1,406	1,754	3,785	3,812	1,369
China	Unit value	6,453	9,305	1,275	895	5,334
South Korea	Unit value	1,044	1,477	1,353	1,410	1,205
Turkey	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	855	1,542	1,212	1,155	3,155
All import sources	Unit value	***	***	***	***	***

Table continued

Table SP 4.1 LDW structural pipe (Continued): U.S. imports by source and period

Shares in ratio and percent; ratios represent the ratio to U.S. production; interim periods are January to September

Source	Measure	2018	2019	2020
Canada	Share of quantity	***	***	***
China	Share of quantity	***	***	***
South Korea	Share of quantity	***	***	***
Turkey	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0
Canada	Share of value	***	***	***
China	Share of value	***	***	***
South Korea	Share of value	***	***	***
Turkey	Share of value	***	***	***
Subject sources	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	100.0	100.0	100.0
Canada	Ratio	2.1	1.0	2.1
China	Ratio	4.6	0.9	0.2
South Korea	Ratio	7.9	2.7	2.2
Turkey	Ratio	***	***	***
Subject sources	Ratio	***	***	***
Nonsubject sources	Ratio	16.7	13.8	7.2
All import sources	Ratio	***	***	***

Table continued

Table SP 4.1 LDW structural pipe (Continued): U.S. imports by source and period

Shares in ratio and percent; ratios represent the ratio to U.S. production; interim periods are January to September

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Canada	Share of quantity	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
South Korea	Share of quantity	***	***	***	***	***
Turkey	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Canada	Share of value	***	***	***	***	***
China	Share of value	***	***	***	***	***
South Korea	Share of value	***	***	***	***	***
Turkey	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Canada	Ratio	1.2	0.5	0.8	1.1	0.6
China	Ratio	1.5	0.0	0.1	0.1	0.0
South Korea	Ratio	0.8	3.3	5.1	4.2	4.7
Turkey	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	14.7	7.7	5.8	7.2	13.8
All import sources	Ratio	***	***	***	***	***

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024 and from data submitted in response to Commission questionnaires. ***. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

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

Figure SP 4.1 LDW structural pipe: U.S. imports by source and period

Cumulation considerations

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

Fungibility

Table SP 4.2 and figure SP 4.2 present data on U.S. producers’ and U.S. importers’ U.S. shipments and reporting total shipments of LDW structural pipe by grade (ASTM 500, ASTM 252, ASTM A53, and all other grades) during January 2023 to September 30, 2024. During this period, ASTM 252 grade for U.S. producers and U.S. importers’ U.S. shipments accounted for *** of all shipments by grade, while all other grades accounted for *** of U.S. producers and U.S. importers’ U.S. shipments during January 2023 to September 2024. ***.⁸

Table SP 4.2 LDW structural pipe: U.S. producers’ and U.S. importers’ U.S. shipments by grade, January 2023 to September 2024

Quantity in short tons;

Source	ASTM A500	ASTM A252	ASTM A53	All other grades	All grades
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
South Korea	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued

⁸ *** U.S. importer questionnaire response, section IV-7c.

Table SP 4.2 LDW structural pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by grade, January 2023 to September 2024

Share across in percent;

Source	ASTM A500	ASTM A252	ASTM A53	All other grades	All grades
U.S. producers	***	***	***	***	100.0
Canada	***	***	***	***	100.0
China	***	***	***	***	100.0
South Korea	***	***	***	***	100.0
Turkey	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued

Table SP 4.2 LDW structural pipe (Continued): U.S. producers’ and U.S. importers’ U.S. shipments by grade, January 2023 to September 2024

Share down in percent

Source	ASTM A500	ASTM A252	ASTM A53	All other grades	All grades
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
South Korea	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

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

Figure SP 4.2 LDW structural pipe: U.S. producers’ and U.S. importers’ U.S. shipments by grade, January 2023 to September 2024

* * * * *

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

Table SP 4.3 and figure SP 4.3 present data on U.S. producers' and U.S. importers' U.S. shipments and reporting total shipments of LDW structural pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During this period, LDW structural pipe with a >16" and <= 24" OD for U.S. producers' U.S. shipments accounted for *** of all shipments by grade, while LDW structural pipe with a >24" and <=48" OD accounted for *** of U.S. importers' U.S. shipments during January 2023 to September 2024. *** accounted for the majority of U.S. producers' U.S. shipments of LDW structural pipe of >16" and <= 24" OD during January 2023 to September 2024, while *** accounted for the majority of U.S. producers' U.S. shipments of LDW structural pipe of >24" and <=48" OD during January 2023 to September 2024.

Table SP 4.3 LDW structural pipe: U.S. producers' and U.S. importers' U.S. shipments by outer diameter size, January 2023 to September 2024

Quantity in short tons;

Source	>16" and <=24"	>24" and <=48"	>48"	All outer diameter sizes
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
South Korea	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table SP 4.3 LDW structural pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by outer diameter size, January 2023 to September 2024

Share across in percent;

Source	>16" and <=24"	>24" and <=48"	>48"	All outer diameter sizes
U.S. producers	***	***	***	100.0
Canada	***	***	***	100.0
China	***	***	***	100.0
South Korea	***	***	***	100.0
Turkey	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued

Table SP 4.3 LDW structural pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by outer diameter size, January 2023 to September 2024

Share down in percent;

Source	>16" and <=24"	>24" and <=48"	>48"	All outer diameter sizes
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
South Korea	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

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

Figure SP 4.3 LDW structural pipe: U.S. producers’ and U.S. importers’ U.S. shipments by outer diameter, January 2023 to September 2024

* * * * *

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

Table SP 4.4 and figure SP 4.4 present data on U.S. producers’ and U.S. importers’ U.S. shipments and reporting total shipments of LDW structural pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024. During this period, LDW structural pipe produced with the ERW production method for U.S. producers U.S. shipments accounted for *** while the HSAW production method for U.S. importers’ U.S. shipments accounted for *** of all shipments by production method, and LDW structural pipe produced with the ERW production method accounted for *** of U.S. importers’ U.S. shipments during January 2023 to September 2024. *** had the largest quantities of U.S. producers’ U.S. shipments of LDW structural pipe produced by the HSAW method during January 2023 to September 2024, while *** had the largest quantities of U.S. producers’ U.S. shipments of LDW structural pipe produced by the ERW method during January 2023 to September 2024.

Table SP 4.4 LDW structural pipe: U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 to September 2024

Quantity in short tons;

Source	HSAW	LSAW	ERW	All production methods
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
South Korea	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table SP 4.4 LDW structural pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 to September 2024

Share across in percent;

Source	HSAW	LSAW	ERW	All production methods
U.S. producers	***	***	***	100.0
Canada	***	***	***	100.0
China	***	***	***	100.0
South Korea	***	***	***	100.0
Turkey	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued

Table SP 4.4 LDW structural pipe (Continued): U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 to September 2024

Share down in percent

Source	HSAW	LSAW	ERW	All production methods
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
South Korea	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

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

Figure SP 4.4 LDW structural pipe: U.S. producers' and U.S. importers' U.S. shipments by production method, January 2023 to September 2024

* * * * *

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

Geographical markets

Table SP 4.5 Figure SP 4.5 present data on U.S. imports of LDW structural pipe by source and by border of entry during 2023 based on official statistics. Imports from subject sources in 2023 entered through all U.S. ports of entry, particularly through the Southern and Western borders, although imports from Canada entered primarily through the Northern border and secondarily the Eastern border.

Table SP 4.5 LDW structural pipe: U.S. imports by source and border of entry, 2023

Quantity in short tons

Source	East	North	South	West	All borders
Canada	654	1,358	5	162	2,179
China	—	—	684	—	684
South Korea	690	—	6,188	5,614	12,492
Turkey	24	—	—	554	578
Subject sources	1,368	1,358	6,877	6,330	15,933
Nonsubject sources	763	46	5,592	7,902	14,302
All import sources	2,131	1,404	12,469	14,232	30,236

Table continued

Table SP 4.5 LDW structural pipe (Continued): U.S. imports by source and border of entry, 2023

Share across in percent

Source	East	North	South	West	All borders
Canada	30.0	62.3	0.2	7.5	100.0
China	—	—	100.0	—	100.0
South Korea	5.5	—	49.5	44.9	100.0
Turkey	4.1	—	—	95.9	100.0
Subject sources	8.6	8.5	43.2	39.7	100.0
Nonsubject sources	5.3	0.3	39.1	55.2	100.0
All import sources	7.0	4.6	41.2	47.1	100.0

Table continued

Table SP 4.5 LDW structural pipe (Continued): U.S. imports by source and border of entry, 2023

Share down in percent

Source	East	North	South	West	All borders
Canada	30.7	96.7	0.0	1.1	7.2
China	—	—	5.5	—	2.3
South Korea	32.4	—	49.6	39.4	41.3
Turkey	1.1	—	—	3.9	1.9
Subject sources	64.2	96.7	55.2	44.5	52.7
Nonsubject sources	35.8	3.3	44.8	55.5	47.3
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024. Imports are based on the imports for consumption data series.

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 "—".

Presence in the market

Table SP 4.6 presents monthly data for U.S. imports of LDW structural pipe from subject and nonsubject sources between January 2018 and September 2024. Imports from Canada and South Korea were reported in the majority of all months during this period. Imports from China and Turkey were reported in more sporadically in the months starting after January 2020. Imports from Canada arrived in all but five months of the 81 months of reporting (76 months). Imports from China arrived in more than half of the 81 months of reporting (47 months). Imports from South Korea arrived in all but eight months of the total 81 months of reporting (73 months). Imports from Turkey arrived in five of the 81 months of reporting.⁹

⁹ U.S. imports of LDW structural pipe do not include fabricated or partially fabricated LDW structural pipe from Turkey.

Table SP 4.6 LDW structural pipe: U.S. imports by source and month, 2018 to 2023, and January to September 2024

Quantity in short tons

Year	Month	Canada	China	South Korea	Turkey
2018	January	542	94	3,771	—
2018	February	471	80	2,471	—
2018	March	1,073	3,213	3,380	4,111
2018	April	597	267	2,394	—
2018	May	636	576	992	—
2018	June	78	1,792	609	—
2018	July	250	2,032	—	—
2018	August	249	448	1,224	—
2018	September	162	532	—	—
2018	October	248	1,006	410	—
2018	November	18	—	863	—
2018	December	2	211	158	—
2019	January	1	144	957	10
2019	February	—	401	574	—
2019	March	21	356	839	—
2019	April	128	264	333	—
2019	May	17	449	733	—
2019	June	184	44	26	—
2019	July	662	105	539	—
2019	August	48	176	472	—
2019	September	177	108	538	—
2019	October	369	39	187	—
2019	November	263	4	253	—
2019	December	256	180	419	—

Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2018	January	4,407	2,198	6,605
2018	February	3,022	4,667	7,689
2018	March	11,777	1,258	13,035
2018	April	3,258	530	3,788
2018	May	2,205	3,066	5,271
2018	June	2,478	243	2,721
2018	July	2,282	457	2,739
2018	August	1,920	1,784	3,704
2018	September	694	6,018	6,711
2018	October	1,664	3,779	5,443
2018	November	881	5,894	6,775
2018	December	371	4,577	4,947
2019	January	1,111	2,541	3,652
2019	February	975	2,478	3,454
2019	March	1,216	2,034	3,250
2019	April	725	3,963	4,688
2019	May	1,199	3,801	5,001
2019	June	254	2,082	2,336
2019	July	1,306	3,122	4,429
2019	August	696	3,772	4,468
2019	September	823	3,835	4,657
2019	October	595	1,704	2,299
2019	November	520	533	1,053
2019	December	854	913	1,767

Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024

Quantity in short tons

Year	Month	Canada	China	South Korea	Turkey
2020	January	563	—	1	—
2020	February	365	400	57	—
2020	March	354	—	224	—
2020	April	578	—	888	—
2020	May	275	—	321	—
2020	June	121	—	312	—
2020	July	167	—	20	—
2020	August	176	—	1,857	—
2020	September	547	—	386	—
2020	October	557	—	209	—
2020	November	283	14	—	—
2020	December	10	—	—	—
2021	January	64	—	—	—
2021	February	26	16	2	—
2021	March	—	20	—	—
2021	April	62	—	71	—
2021	May	60	—	210	—
2021	June	161	—	360	—
2021	July	149	—	18	—
2021	August	56	5	67	—
2021	September	495	—	—	—
2021	October	363	—	—	—
2021	November	141	2	131	—
2021	December	133	2,068	270	—

Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2020	January	564	1,005	1,570
2020	February	822	581	1,403
2020	March	578	1,789	2,367
2020	April	1,466	1,752	3,218
2020	May	596	142	738
2020	June	433	635	1,068
2020	July	187	1,026	1,214
2020	August	2,033	916	2,948
2020	September	934	1,288	2,222
2020	October	766	3,144	3,910
2020	November	296	1,255	1,552
2020	December	10	773	783
2021	January	64	1,373	1,437
2021	February	44	1,776	1,819
2021	March	20	2,004	2,024
2021	April	133	2,171	2,304
2021	May	270	1,634	1,904
2021	June	521	1,969	2,490
2021	July	168	1,682	1,849
2021	August	128	858	987
2021	September	495	263	757
2021	October	363	2,424	2,788
2021	November	273	2,851	3,124
2021	December	2,471	2,097	4,568

Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024

Quantity in short tons

Year	Month	Canada	China	South Korea	Turkey
2022	January	113	—	22	—
2022	February	78	—	646	—
2022	March	81	225	7	—
2022	April	21	—	48	—
2022	May	115	38	218	—
2022	June	14	—	501	—
2022	July	—	48	301	—
2022	August	102	105	281	—
2022	September	11	—	1,009	—
2022	October	342	10	436	—
2022	November	137	—	1,986	—
2022	December	57	—	1,344	—
2023	January	192	128	466	—
2023	February	277	—	540	—
2023	March	406	—	515	—
2023	April	269	—	720	—
2023	May	503	—	604	554
2023	June	271	2	1,561	—
2023	July	7	—	70	—
2023	August	23	212	564	—
2023	September	1	—	2,189	—
2023	October	20	—	1,900	—
2023	November	210	338	2,763	10
2023	December	—	4	600	14

Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024
Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2022	January	136	1,779	1,915
2022	February	725	907	1,632
2022	March	314	1,049	1,363
2022	April	69	369	437
2022	May	371	2,602	2,973
2022	June	516	2,126	2,642
2022	July	349	567	916
2022	August	488	1,152	1,640
2022	September	1,020	1,193	2,212
2022	October	788	1,209	1,997
2022	November	2,123	1,279	3,402
2022	December	1,401	1,619	3,020
2023	January	787	1,212	1,999
2023	February	816	564	1,380
2023	March	921	1,682	2,603
2023	April	988	1,032	2,021
2023	May	1,661	2,784	4,445
2023	June	1,835	1,439	3,273
2023	July	77	2,937	3,014
2023	August	799	615	1,414
2023	September	2,190	349	2,539
2023	October	1,920	517	2,437
2023	November	3,321	644	3,965
2023	December	618	527	1,145

Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024
Quantity in short tons

Year	Month	Canada	China	South Korea	Turkey
2024	January	259	—	1,683	—
2024	February	251	6	992	—
2024	March	23	9	1,513	—
2024	April	24	434	172	—
2024	May	29	201	1,457	—
2024	June	340	317	960	—
2024	July	272	16	237	—
2024	August	192	—	1,818	—
2024	September	455	280	406	—

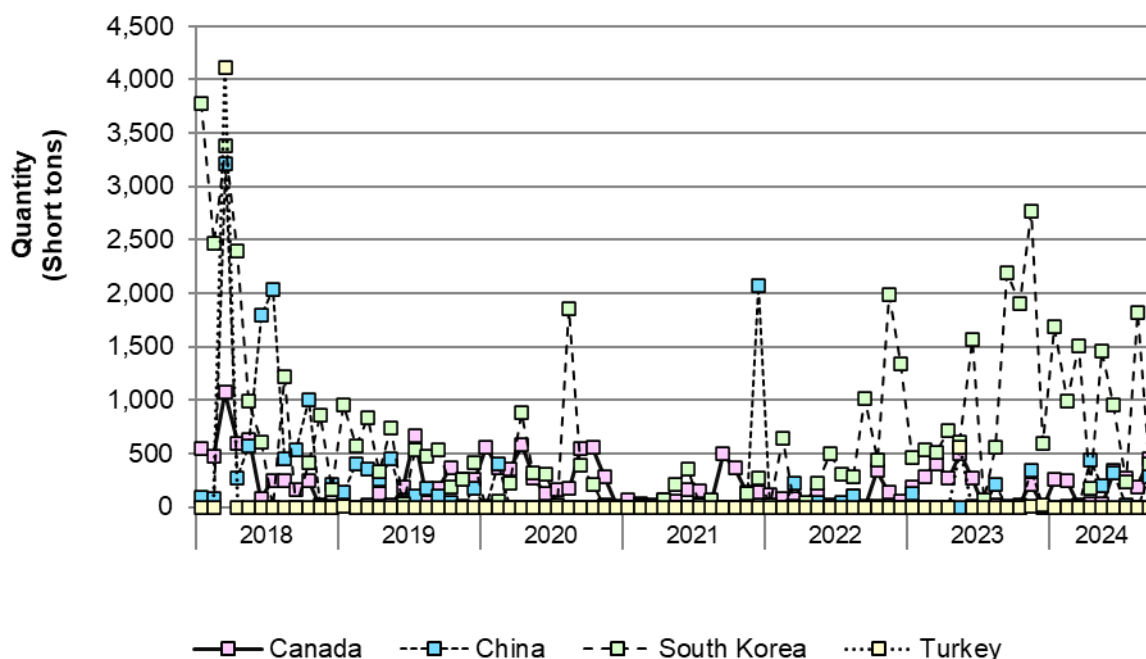
Table continued

Table SP 4.6 LDW structural pipe (Continued): U.S. imports by source and month, 2018 to 2023, and January to September 2024
Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2024	January	1,942	2,051	3,993
2024	February	1,249	1,592	2,841
2024	March	1,545	1,826	3,371
2024	April	631	2,478	3,109
2024	May	1,686	3,063	4,749
2024	June	1,617	3,190	4,807
2024	July	525	1,323	1,848
2024	August	2,010	2,011	4,021
2024	September	1,141	12,933	14,075
2024	October	1,615	16,102	17,716
2024	November	222	14,214	14,436
2024	December	1,812	20,904	22,716

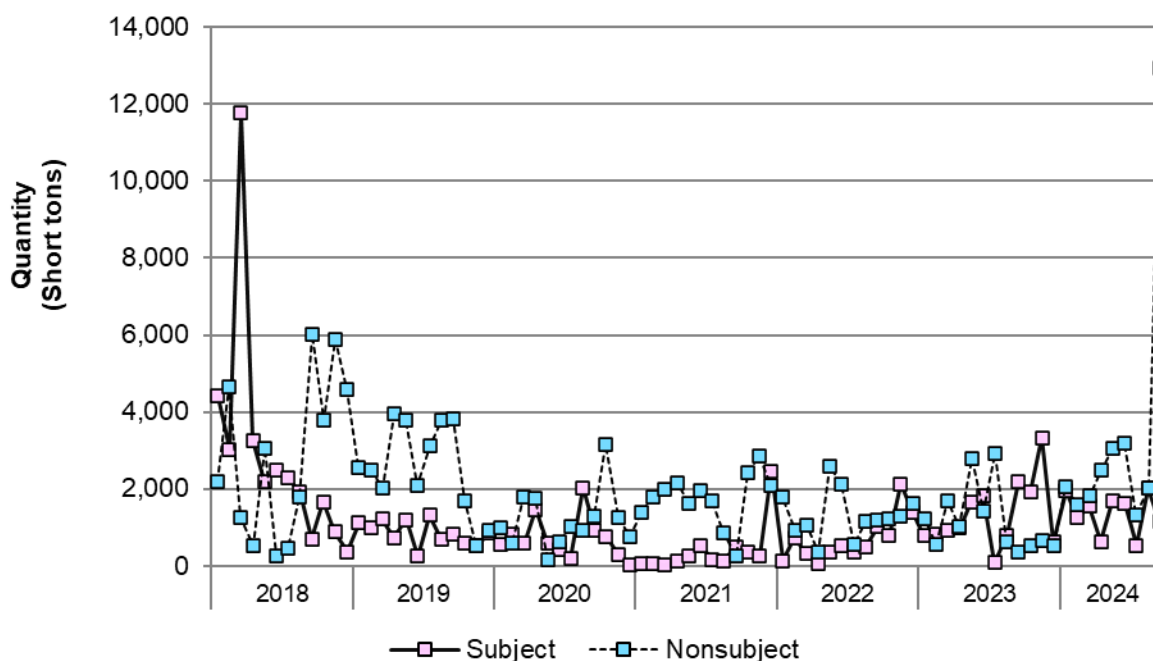
Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024. Imports are based on the imports for consumption data series.

Figure SP 4.4 LDW structural pipe: U.S. imports from individual subject sources, by month, January 2018 to September 2024



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024. Imports are based on the imports for consumption data series.

Figure SP 4.5 LDW structural pipe: U.S. imports from aggregated subject sources and nonsubject sources, by month, January 2018 to September 2024



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 2, 2024. Imports are based on the imports for consumption data series.

U.S. importers' imports subsequent to September 30, 2024

The Commission requested importers to indicate whether they had imported or arranged for the importation of LDW structural pipe from Canada, China, South Korea, Turkey, and all other sources for delivery after September 30, 2024; such imports are presented in Table SP 4.7. There were no reported arranged imports of subject merchandise for delivery from Canada or China after September 30, 2024. The only subject sources that had reported arranged imports after September 30, 2024 were South Korea and Turkey. Four firms *** reported that they had arranged LDW structural pipe imports from South Korea and Turkey (subject).¹⁰

¹⁰ The ***.

Table SP 4.7 LDW structural pipe: U.S. importers' arranged imports, by source and period

Quantity in short tons

Source	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Total
Canada	***	***	***	***	***
China	***	***	***	***	***
South Korea	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubect sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

U.S. inventories of imported merchandise

Table SP 4.8 presents data for inventories of U.S. imports of LDW structural pipe from subject countries and all other sources held in the United States. In 2023, there were no inventories LDW structural pipe from Canada or Turkey during the period for which data were collected. In 2023, *** held the largest share (***) of end-of-period inventories and in 2023, with subject imports from both South Korea and Turkey. ***.

Table SP 4.8 LDW structural pipe: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2018	2019	2020
Inventories quantity	Canada	***	***	***
Ratio to imports	Canada	***	***	***
Ratio to U.S. shipments of imports	Canada	***	***	***
Ratio to total shipments of imports	Canada	***	***	***
Inventories quantity	China	***	***	***
Ratio to imports	China	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***
Ratio to total shipments of imports	China	***	***	***
Inventories quantity	South Korea	***	***	***
Ratio to imports	South Korea	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***
Inventories quantity	Turkey	***	***	***
Ratio to imports	Turkey	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***
Inventories quantity	Subject sources	***	***	***
Ratio to imports	Subject sources	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***
Inventories quantity	All	***	***	***
Ratio to imports	All	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***
Ratio to total shipments of imports	All	***	***	***

Table continued

Table SP 4.8 LDW structural pipe (Continued): U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2021	2022	2023	Interim 2023	Interim 2024
Inventories quantity	Canada	***	***	***	***	***
Ratio to imports	Canada	***	***	***	***	***
Ratio to U.S. shipments of imports	Canada	***	***	***	***	***
Ratio to total shipments of imports	Canada	***	***	***	***	***
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	South Korea	***	***	***	***	***
Ratio to imports	South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***	***	***
Inventories quantity	Turkey	***	***	***	***	***
Ratio to imports	Turkey	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

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

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

The industry in Canada

Overview

Table SP 4.9 presents information on the LDW structural pipe operations of the responding producer and exporter in Canada. The major LDW structural pipe producer in Canada during the original investigations was Evraz Inc., NA Canada (“Evraz NA”).¹¹ In these reviews, both Evraz NA and Pipe and Piling Supplies, Ltd., (“Pipe and Piling”) completed a foreign producer/exporter questionnaire.

Table SP 4.9 LDW line pipe: Summary data for producers in Canada, 2023

Quantity in short tons

Producers	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Evraz	***	***	***	***	***	***
Pipe and Piling Supplies Ltd.	***	***	***	***	***	***
All producers	***	***	***	***	***	***

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

Recent developments

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

Changes in operations

The responding Canadian producers were asked to report any change in the character of their operations or organization relating to the production of LDW structural pipe since 2018. Evraz indicated in its questionnaire that it had experienced such changes. Table SP 4.10 presents the changes identified by Evraz.

¹¹ Original publication, p. VII-3.

Table SP 4.10 LDW line pipe: Reported changes in operations by Evraz, since January 1, 2018

Item	Firm name and narrative on changes in operations
Plant closings	***.
Prolonged shutdowns	***
Other	***

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

Operations on LDW structural pipe

Table SP 4.11 presents data on Canada's combined installed capacity, practical capacity, and production on the same equipment. Installed overall capacity decreased *** during 2020, due to the shutdown of the Camrose LDW pipe facility in late 2019.¹² Canadian LDW structural pipe production *** from 2018 to 2020 but decreased from ***. Installed overall capacity and practical LDW structural pipe capacity utilization increased to *** in 2023. Pipe and Piling indicated that it ***. ***.¹³

Table SP 4.11 LDW structural pipe: Producers in Canada overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2018	2019	2020
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical LDW structural pipe capacity	Capacity	***	***	***
Practical LDW structural pipe capacity	Production	***	***	***
Practical LDW structural pipe capacity	Utilization	***	***	***

Table continued

¹² Evraz (Respondents) posthearing brief, p. 6.

¹³ Pipe and Piling indicated that ***. Pipe and Piling described these products as fabricated LDW structural pipe, meant for large infrastructure projects. In 2023, Pipe and Piling ***. Email correspondence with *** March 7, 2025. The firm indicated that it *** on these entries.

Table SP 4.11 LDW structural pipe (Continued): Canada's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical LDW structural pipe	Capacity	***	***	***	***	***
Practical LDW structural pipe	Production	***	***	***	***	***
Practical LDW structural pipe	Utilization	***	***	***	***	***

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

Table SP 4.12 presents Evraz reported additional information regarding practical capacity constraints.

Table SP 4.12 LDW structural pipe: Evraz reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Other constraints	***

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

Table SP 4.13 presents data on industry in Canada. From 2018 to 2023, production in Canada decreased overall, but was higher during interim 2024 than during interim 2023. In 2024, Evraz ***. Capacity utilization remained at approximately *** percent, but *** percent in 2023. The share of home shipments in Canada fluctuated *** percent in 2018 through 2023 and the share of internal consumption was *** percent in 2019 through 2023. The primary destination for Canadian exports were the United States. The inventory to production ratio in Canada ***. Due to the fabrication of its LDW structural pipe exported to the United States, ***

***for 2018 to 2023 including the interim periods of January to September 2023 and January to September 2024.¹⁴

¹⁴ ***.

Table SP 4.13 LDW structural pipe: Data on industry in Canada, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table SP 4.13 LDW structural pipe (Continued): Data on industry in Canada, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table SP 4.13 LDW structural pipe (Continued): Data on industry in Canada, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table SP 4.13 LDW structural pipe (Continued): Data on industry in Canada, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; ratio and share in percent

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Table SP 4.14 presents data on Canadian producers' shipments and reporting total shipments of LDW structural pipe by grade (ASTM 500, ASTM 252, ASTM A53, and all other grades) during January 2023 to September 30, 2024. During January 2023 to September 2024, ASTM 252 grade accounted for *** reported shipments by grade.

Table SP 4.14 LDW structural pipe: Foreign producers' in Canada total shipments, by period and grade

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Grade	Period	Quantity	Value	Unit value	Share of quantity
ASTM A500	2023	***	***	***	***
ASTM A252	2023	***	***	***	***
ASTM A53	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
ASTM A500	Interim 2024	***	***	***	***
ASTM A252	Interim 2024	***	***	***	***
ASTM A53	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

Table SP 4.15 presents data on Canadian producers' shipments of LDW structural pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW structural pipe with a >16" and <= 24" OD shipments accounted for *** of all shipments by grade. ***.¹⁵

Table SP 4.15 LDW structural pipe: Foreign producers' in Canada total shipments, by period and outer diameter

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Zeros, null values, and undefined calculations are suppressed and shown as "—".

Table SP 4.16 presents data on Canadian producers' shipments of LDW structural pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024.

¹⁵ Email correspondence with *** March 7, 2025.

During January 2023 to September 2024, LDW structural pipe produced with the HSAW production method accounted for ***, based on production method.¹⁶ At the Commission's hearing, Evraz indicated that its Regina, Saskatchewan facility consists of one ERW mill and five HSAW mills, and that all five of these HSAW mills have been currently idled and have been idled for extended periods.¹⁷

Table SP 4.16 LDW structural pipe: Foreign producers' in Canada total shipments, by period and production method

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Table SP 4.17 presents data on Canadian producers' and resellers' exports of LDW structural pipe. The United States was the only destination market for Canadian producers' exports.

¹⁶ ***.

¹⁷ Hearing transcript, p. 160 (Cassise).

Table SP 4.17 LDW structural pipe: Foreign producers' in Canada

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Destination market	Measure	2018	2019	2020
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
All other destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
All other destination markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
All other destination markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***
United States	Share of quantity	***	***	***
European Union	Share of quantity	***	***	***
Asia	Share of quantity	***	***	***
All other destination markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	100.0	100.0	100.0
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
All other destination markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued

Table SP 4.17 LDW structural pipe (continued): Foreign producers' in Canada

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Destination market	Measure	2021	2022	2023	Interim 2023	Interim 2024
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	100.0	—	100.0	100.0	—
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Alternative products

As shown in Table SP 4.18, Canadian producers produced other products on the same equipment and machinery used to produce LDW structural pipe. LDW line pipe was the primary product that Evraz sought to produce. At the Commission's hearing, Evraz company officials indicated that Evraz never produces structural pipe on purpose, and that the very small volumes of structural pipe that Evraz produces consists of LDW pipe that did not meet the specifications for line pipe.¹⁸ Additionally, Pipe and Piling largely produced LDW structural pipe. LDW structural pipe accounted for *** of the Canadian producer's overall production during 2018 to 2022, but during 2023 accounted for *** of LDW structural pipe produced on the same equipment as all other products. ***. The other products (other than LDW line pipe and LDW structural pipe) include ***.

¹⁸ Hearing transcript, p. 165 (Coffin).

Table SP 4.18 LDW pipe: Canadian producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; share and ratio in percent

Product type	Measure	2018	2019	2020
LDW structural pipe	Quantity	***	***	***
LDW line pipe	Quantity	***	***	***
Other products	Quantity	***	***	***
Out-of-scope products	Quantity	***	***	***
All products	Quantity	***	***	***
LDW structural pipe	Share	***	***	***
LDW line pipe	Share	***	***	***
Other products	Share	***	***	***
Out-of-scope products	Share	***	***	***
All products	Share	100.0	100.0	100.0

Table continued

Table SP 4.18 LDW pipe (Continued): Canadian producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; share and ratio in percent

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW structural pipe	Quantity	***	***	***	***	***
LDW line pipe	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
LDW structural pipe	Share	***	***	***	***	***
LDW line pipe	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

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

Exports

According to GTA, the leading export market for LDW structural pipe¹⁹ from Canada is the United States (Table SP 4.19). During 2023, the United States was the primary export market for LDW structural pipe from Canada, accounting for 88.5 percent of the total, followed by Chile, accounting for 7.5 percent.

¹⁹ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW structural pipe and out-of-scope products.

Table SP 4.19 Welded pipe greater than 16" in diameter: Exports from Canada, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	6,132	3,436	4,102	2,311	5,152	3,252
Chile	Quantity	600	126	9	19	77	276
Burkina Faso	Quantity	24	52	33	26	53	109
Peru	Quantity	466	13	7	33	29	12
All other destination markets	Quantity	3,966	380	180	180	489	24
Non-U.S. destination markets	Quantity	5,056	571	229	258	648	421
All destination markets	Quantity	11,188	4,007	4,331	2,569	5,800	3,673
United States	Value	4,752	3,550	4,044	2,922	7,823	8,824
Chile	Value	689	205	22	50	250	824
Burkina Faso	Value	28	67	95	76	134	271
Peru	Value	551	22	20	85	103	36
All other destination markets	Value	4,387	883	489	547	780	68
Non-U.S. destination markets	Value	5,654	1,177	626	759	1,266	1,200
All destination markets	Value	10,406	4,726	4,671	3,681	9,088	10,024

Table continued

Table SP 4.19 Welded pipe greater than 16" in diameter (Continued): Exports from Canada, by destination market and period

Unit value in dollars per short tons; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	775	1,033	986	1,265	1,518	2,714
Chile	Unit value	1,148	1,624	2,479	2,655	3,243	2,985
Burkina Faso	Unit value	1,164	1,296	2,885	2,922	2,523	2,490
Peru	Unit value	1,181	1,670	2,817	2,582	3,537	3,030
All other destination markets	Unit value	1,106	2,323	2,716	3,038	1,595	2,829
Non-U.S. destination markets	Unit value	1,118	2,061	2,734	2,940	1,953	2,849
All destination markets	Unit value	930	1,180	1,078	1,433	1,567	2,729
United States	Share of quantity	54.8	85.7	94.7	90.0	88.8	88.5
Chile	Share of quantity	5.4	3.1	0.2	0.7	1.3	7.5
Burkina Faso	Share of quantity	0.2	1.3	0.8	1.0	0.9	3.0
Peru	Share of quantity	4.2	0.3	0.2	1.3	0.5	0.3
All other destination markets	Share of quantity	35.4	9.5	4.2	7.0	8.4	0.7
Non-U.S. destination markets	Share of quantity	45.2	14.3	5.3	10.0	11.2	11.5
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.31 and 7305.39 as reported by Canada Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "---". United States is shown at the top followed by the primary exporting countries in descending order of 2021 data. Data is likely overstating trade levels for subject products.

The industry in China

In the original investigations, China was found to be the leading exporter of LDWP. In these reviews, China is the second leading exporter of LDW structural pipe, with industry exports from China increasing by 11.8 percent since 2018.

Recent developments

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

Exports

According to GTA, the leading export markets for LDW structural pipe²⁰ from China are Hong Kong and Indonesia (Table SP 4.20). During 2023, the United States accounted for 0.4 percent of the total export market for LDW structural pipe from China. Hong Kong was the leading export market for LDW structural pipe from China, accounting for 18.7 percent of the total, followed by Indonesia, accounting for 16.7 percent.

²⁰ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW structural pipe and out-of-scope products.

Table SP 4.20 Welded pipe greater than 16" in diameter: Exports from China, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	2,386	1,714	120	639	981	1,787
Hong Kong	Quantity	38,371	33,557	19,155	59,010	58,435	78,954
Indonesia	Quantity	13,237	32,778	20,250	49,119	50,025	70,260
United Arab Emirates	Quantity	1,115	2,417	16,002	18,388	6,359	33,490
Canada	Quantity	8,187	3,866	18,844	22,550	32,656	29,061
Belgium	Quantity	101	904	2,714	327	12,072	28,395
Netherlands	Quantity	8,983	172	185	80	6,575	18,295
Saudi Arabia	Quantity	601	2,322	216	11,946	23,404	17,903
Ecuador	Quantity	939	—	28	8	3,869	15,324
Chile	Quantity	—	359	5,461	3,174	3,534	12,261
Vietnam	Quantity	6,182	4,264	2,112	3,910	3,215	9,459
All other destination markets	Quantity	60,689	64,140	89,802	114,006	150,965	106,361
Non-U.S. destination markets	Quantity	138,405	144,779	174,769	282,518	351,109	419,763
All destination markets	Quantity	140,791	146,493	174,889	283,157	352,090	421,550
United States	Value	9,076	9,244	490	1,457	924	2,739
Hong Kong	Value	28,352	25,418	13,778	56,945	56,825	62,932
Indonesia	Value	14,905	31,504	17,104	59,742	78,602	85,824
United Arab Emirates	Value	1,539	2,128	13,373	16,203	9,227	29,530
Canada	Value	5,232	2,468	11,169	16,002	24,593	18,480
Belgium	Value	291	742	1,737	205	9,689	19,827
Netherlands	Value	7,825	174	258	112	4,710	13,363
Saudi Arabia	Value	2,133	3,889	785	17,693	35,415	22,658
Ecuador	Value	749	—	18	16	4,427	15,822
Chile	Value	—	531	3,737	3,576	3,570	8,587
Vietnam	Value	5,522	6,039	2,420	6,381	4,704	12,013
All other destination markets	Value	73,393	73,972	102,138	116,508	198,429	129,617
Non-U.S. destination markets	Value	139,941	146,865	166,515	293,383	430,190	418,653
All destination markets	Value	149,017	156,109	167,005	294,840	431,113	421,392

Table continued

Table SP 4.20 Welded pipe greater than 16" in diameter (Continued): Exports from China, by destination market and period

Unit value in dollars per short tons; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	3,804	5,393	4,083	2,281	942	1,533
Hong Kong	Unit value	739	757	719	965	972	797
Indonesia	Unit value	1,126	961	845	1,216	1,571	1,222
United Arab Emirates	Unit value	1,381	880	836	881	1,451	882
Canada	Unit value	639	638	593	710	753	636
Belgium	Unit value	2,886	821	640	628	803	698
Netherlands	Unit value	871	1,011	1,393	1,396	716	730
Saudi Arabia	Unit value	3,549	1,675	3,633	1,481	1,513	1,266
Ecuador	Unit value	798	—	627	2,055	1,144	1,033
Chile	Unit value	—	1,480	684	1,127	1,010	700
Vietnam	Unit value	893	1,416	1,146	1,632	1,463	1,270
All other destination markets	Unit value	1,209	1,153	1,137	1,022	1,314	1,219
Non-U.S. destination markets	Unit value	1,011	1,014	953	1,038	1,225	997
All destination markets	Unit value	1,058	1,066	955	1,041	1,224	1,000
United States	Share of quantity	1.7	1.2	0.1	0.2	0.3	0.4
Hong Kong	Share of quantity	27.3	22.9	11.0	20.8	16.6	18.7
Indonesia	Share of quantity	9.4	22.4	11.6	17.3	14.2	16.7
United Arab Emirates	Share of quantity	0.8	1.6	9.1	6.5	1.8	7.9
Canada	Share of quantity	5.8	2.6	10.8	8.0	9.3	6.9
Belgium	Share of quantity	0.1	0.6	1.6	0.1	3.4	6.7
Netherlands	Share of quantity	6.4	0.1	0.1	0.0	1.9	4.3
Saudi Arabia	Share of quantity	0.4	1.6	0.1	4.2	6.6	4.2
Ecuador	Share of quantity	0.7	—	0.0	0.0	1.1	3.6
Chile	Share of quantity	—	0.2	3.1	1.1	1.0	2.9
Vietnam	Share of quantity	4.4	2.9	1.2	1.4	0.9	2.2
All other destination markets	Share of quantity	43.1	43.8	51.3	40.3	42.9	25.2
Non-U.S. destination markets	Share of quantity	98.3	98.8	99.9	99.8	99.7	99.6
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.31 and 7305.39 as reported by China Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the primary exporting countries in descending order of 2021 data. Data is likely overstating trade levels for subject products.

The industry in South Korea

Overview

Table SP 4.21 presents information on the LDW structural pipe operations of the responding producer and exporter in South Korea; EEW.

During the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, EEW and Husteel Co., Ltd. (“Husteel”). Husteel did respond to Commission inquiries to complete the foreign producer questionnaire in these reviews.²¹

Table SP 4.21 LDW structural pipe: Summary data for EEW (South Korea), 2023

Quantity in short tons

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
EEW	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Recent developments

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

Operations on LDW structural pipe

Table SP 4.22 presents data on EEW installed capacity, practical capacity, and production on the same equipment. EEW installed overall capacity ***, while its installed overall production fluctuated but ultimately increased from 2018 to 2023, but was lower during interim period Interim 2024 than in Interim 2023. Installed overall capacity utilization decreased to *** percentage points in 2023 compared to 2018 levels, but was lower during January to September 2024 than during January to September 2023.

²¹ Staff identified three additional South Korean producers/exporters that did not respond to the Commission’s inquiries. Husteel, Hyundai Steel, and SeAh did not complete foreign producer/exporter questionnaires, despite being identified as LDW pipe producers, based on the original investigations and the Commerce administrative reviews. In contrast, EEW completed both LDW line pipe and LDW structural pipe questionnaires.

Table SP 4.22 LDW structural pipe: EEW overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2018	2019	2020
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical LDW structural pipe capacity	Capacity	***	***	***
Practical LDW structural pipe capacity	Production	***	***	***
Practical LDW structural pipe capacity	Utilization	***	***	***

Table continued

Table SP 4.22 LDW structural pipe (Continued): EEW overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical LDW structural pipe capacity	Capacity	***	***	***	***	***
Practical LDW structural pipe capacity	Production	***	***	***	***	***
Practical LDW structural pipe capacity	Utilization	***	***	***	***	***

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

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

Table SP 4.23 presents EEW reported additional information regarding practical capacity constraints.

Table SP 4.23 LDW structural pipe: EEW reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Storage capacity	***

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

Table SP 4.24 presents data on South Korean producer EEW. From 2018 to 2023, capacity to produce LDW structural pipe ***, while production in South Korea by EEW fluctuated from 2018 to 2023 but increased overall by *** percent. Capacity utilization did not *** from 2018 to 2023 and was higher during the interim period January to September 2024 than in interim period January to September 2023. The share of home shipments in South Korea by EEW fluctuated but was consistently less than *** percent of its total shipments during 2018 to 2023, and the share of internal consumption was *** percent in 2018 through 2023. ***. The primary destination for South Korea exports of LDW structural pipe by EEW was ***,²² EEW's inventory to production ratio in South Korea fluctuated but increased from 2018 to 2023.

²² EEW provided detailed exports of its LDW structural pipe to all markets (country specific). *** was EEW's largest export destination for its LDW structural pipe in 2023. Email correspondence with *** January 9, 2025.

Table SP 4.24 LDW structural pipe: Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table SP 4.24 LDW structural pipe (Continued): Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table SP 4.24 LDW structural pipe (Continued): Data on industry in South Korea, by period

Unit values in in dollars per short ton; shares in percent; interim period is January to September

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table SP 4.24 LDW structural pipe (Continued): Data on industry in South Korea, by period

Unit values in in dollars per short ton; shares in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Table SP 4.25 presents data on EEW's shipments and reporting total shipments of LDW structural pipe by grade (ASTM 500, ASTM 252, ASTM A53, and all other grades) during January 2023 to September 30, 2024. During January 2023 to September 2024, all other grades for EEW accounted for *** reported shipments by grade, which EEW indicated includes ***.

Table SP 4.25 LDW structural pipe: Foreign producers' in South Korea total shipments, by period and grade

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Grade	Period	Quantity	Value	Unit value	Share of quantity
ASTM A500	2023	***	***	***	***
ASTM A252	2023	***	***	***	***
ASTM A53	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
ASTM A500	Interim 2024	***	***	***	***
ASTM A252	Interim 2024	***	***	***	***
ASTM A53	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

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

Table SP 4.26 presents data on EEW's shipments of LDW structural pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW structural pipe with a >24" and <= 48" OD accounted for *** of all shipments by grade.

Table SP 4.26 LDW structural pipe: EEW's total shipments, by period and outer diameter

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Table SP 4.27 presents data on EEW's shipments of LDW structural pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW structural pipe produced with the LSAW production method accounted for *** production, based on production method.

Table SP 4.27 LDW structural pipe: EEW's total shipments, by period and production method

Quantity in short tons; Value in 1,000 dollars; unit value in dollars per short ton; ratio and share in percent

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Table SP 4.28 presents EEW's exports of LDW structural pipe to all destination markets. Additionally, EEW provided detailed exports of its LDW structural pipe to all markets (country specific). *** was EEW's largest export destination for its LDW structural pipe in 2023.²³

²³ Email correspondence with *** January 9, 2025.

Table SP 4.28 LDW structural pipe: EEW's exports from South Korea, by destination market and period

Quantities in short tons; value in 1,000 dollars; shares and ratios in percent; interim period is January to September

Destination market	Measure	2018	2019	2020
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
All other destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
All other destination markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
All other destination markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***
United States	Share of quantity	***	***	***
European Union	Share of quantity	***	***	***
Asia	Share of quantity	***	***	***
All other destination markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
All other destination markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued

Table SP 4.28 LDW structural pipe (continued): EEW's exports from South Korea, by destination market and period

Quantities in short tons; value in 1,000 dollars; shares and ratios in percent; interim period is January to September

Destination market	Measure	2021	2022	2023	Interim 2023	Interim 2024
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

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

Alternative products

As shown in Table SP 4.29, EEW produced other products on the same equipment and machinery used to produce LDW structural pipe. LDW structural pipe accounted for *** of the responding South Korean producer's overall production during 2018 to 2023, while LDW line pipe accounted for *** of product produced on the same equipment during 2018 to 2023.

Table SP 4.29 LDW pipe: EEW overall production on the same equipment as in-scope production, by period

Quantities in short tons; shares and ratios in percent; interim period is January to September

Product type	Measure	2018	2019	2020
LDW structural pipe	Quantity	***	***	***
LDW line pipe	Quantity	***	***	***
Other products	Quantity	***	***	***
Out-of-scope products	Quantity	***	***	***
All products	Quantity	***	***	***
LDW structural pipe	Share	***	***	***
LDW line pipe	Share	***	***	***
Other products	Share	***	***	***
Out-of-scope products	Share	***	***	***
All products	Share	100.0	100.0	100.0

Table continued

Table SP 4.29 LDW pipe (Continued): EEW overall production on the same equipment as in-scope production, by period

Quantities in short tons; shares and ratios in percent; interim period is January to September

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
LDW structural pipe	Quantity	***	***	***	***	***
LDW line pipe	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
LDW structural pipe	Share	***	***	***	***	***
LDW line pipe	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

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

Exports

According to GTA, the leading export markets for LDW structural pipe²⁴ from South Korea are Oman and India (Table SP 4.30). During 2023, the United States was the eighth largest export market for LDW structural pipe from South Korea, accounting for 5.5 percent of the total. Oman was the primary export market for LDW structural pipe from South Korea, accounting for 22.2 percent, followed by India, accounting for 10.2 percent.

²⁴ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW structural pipe and out-of-scope products.

Table SP 4.30 Welded pipe greater than 16" in diameter: Exports from South Korea, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	9,710	4,085	4,325	1,086	4,015	11,783
Oman	Quantity	912	5,957	7,165	1,749	6,508	47,637
India	Quantity	5,840	21,075	5,698	4,565	13,900	21,828
Saudi Arabia	Quantity	11,129	10,403	1,344	2,369	13,747	21,559
United Arab Emirates	Quantity	60,321	33,844	17,323	14,889	15,474	20,722
Qatar	Quantity	7,181	17	1,807	3,042	5,002	19,667
Taiwan	Quantity	—	12,990	13,879	8,031	1,836	13,495
Indonesia	Quantity	3,821	45,924	79,732	50,586	38,976	12,319
Vietnam	Quantity	5,988	9,588	19,382	15,253	9,592	8,431
Singapore	Quantity	1,959	5,346	10,107	4,541	8,672	7,296
Thailand	Quantity	3,669	8,211	8,771	4,177	2,111	3,735
All other destination markets	Quantity	85,823	75,256	106,507	33,808	43,221	25,925
Non-U.S. destination markets	Quantity	186,643	228,611	271,715	143,010	159,039	202,614
All destination markets	Quantity	196,353	232,696	276,040	144,096	163,054	214,397
United States	Value	9,529	3,767	4,735	1,415	6,683	15,671
Oman	Value	695	6,099	7,422	1,972	6,175	57,024
India	Value	4,643	20,249	5,330	6,074	17,114	26,841
Saudi Arabia	Value	11,964	10,313	1,487	2,850	21,748	35,968
United Arab Emirates	Value	52,988	39,217	21,950	8,122	16,768	27,439
Qatar	Value	14,166	26	2,296	4,331	8,786	31,607
Taiwan	Value	—	14,966	20,619	9,726	2,527	22,212
Indonesia	Value	4,174	51,460	83,575	59,539	60,648	18,886
Vietnam	Value	6,754	9,478	18,911	12,079	14,213	10,442
Singapore	Value	2,204	5,282	10,759	5,083	14,228	12,025
Thailand	Value	3,676	8,960	19,227	5,750	4,296	5,538
All other destination markets	Value	94,998	80,869	96,455	33,185	61,565	36,959
Non-U.S. destination markets	Value	196,261	246,920	288,031	148,712	228,068	284,941
All destination markets	Value	205,790	250,687	292,766	150,127	234,751	300,612

Table continued

Table SP 4.30 Welded pipe greater than 16" in diameter (Continued): Exports from South Korea, by destination market and period

Unit value in dollars per short tons; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	981	922	1,095	1,303	1,664	1,330
Oman	Unit value	762	1,024	1,036	1,127	949	1,197
India	Unit value	795	961	935	1,331	1,231	1,230
Saudi Arabia	Unit value	1,075	991	1,106	1,203	1,582	1,668
United Arab Emirates	Unit value	878	1,159	1,267	546	1,084	1,324
Qatar	Unit value	1,973	1,538	1,270	1,424	1,757	1,607
Taiwan	Unit value	—	1,152	1,486	1,211	1,376	1,646
Indonesia	Unit value	1,092	1,121	1,048	1,177	1,556	1,533
Vietnam	Unit value	1,128	989	976	792	1,482	1,239
Singapore	Unit value	1,125	988	1,065	1,119	1,641	1,648
Thailand	Unit value	1,002	1,091	2,192	1,377	2,035	1,483
All other destination markets	Unit value	1,107	1,075	906	982	1,424	1,426
Non-U.S. destination markets	Unit value	1,052	1,080	1,060	1,040	1,434	1,406
All destination markets	Unit value	1,048	1,077	1,061	1,042	1,440	1,402
United States	Share of quantity	4.9	1.8	1.6	0.8	2.5	5.5
Oman	Share of quantity	0.5	2.6	2.6	1.2	4.0	22.2
India	Share of quantity	3.0	9.1	2.1	3.2	8.5	10.2
Saudi Arabia	Share of quantity	5.7	4.5	0.5	1.6	8.4	10.1
United Arab Emirates	Share of quantity	30.7	14.5	6.3	10.3	9.5	9.7
Qatar	Share of quantity	3.7	0.0	0.7	2.1	3.1	9.2
Taiwan	Share of quantity	—	5.6	5.0	5.6	1.1	6.3
Indonesia	Share of quantity	1.9	19.7	28.9	35.1	23.9	5.7
Vietnam	Share of quantity	3.0	4.1	7.0	10.6	5.9	3.9
Singapore	Share of quantity	1.0	2.3	3.7	3.2	5.3	3.4
Thailand	Share of quantity	1.9	3.5	3.2	2.9	1.3	1.7
All other destination markets	Share of quantity	43.7	32.3	38.6	23.5	26.5	12.1
Non-U.S. destination markets	Share of quantity	95.1	98.2	98.4	99.2	97.5	94.5
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.31 and 7305.39 as reported by South Korea Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the primary exporting countries in descending order of 2021 data. Data is likely overstating trade levels for subject products.

The industry in Turkey

Overview

During the original investigations, the Commission received foreign producer/exporter questionnaires from five firms; in these reviews the Commission received one foreign producer/exporter questionnaire from Borusan which, as noted, is not considered subject to these reviews.²⁵ Turkey, which is the leading exporter of LDW structural pipe in 2023, increased exports of LDW structural pipe by 10.5 percent since 2018.

Recent developments

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

The responding Turkish producer was asked to report any change in the character of its operations or organization relating to the production of LDW structural pipe since 2018. Nonsubject supplier Borusan *** since January 1, 2018 presented in Table SP 4.31.

Turkish LDW structural pipe producer HDM Steel Pipe (“HDM”) is producer and exporter of LDW structural pipe from Turkey. HDM (a mandatory respondent in Commerce’s administrative reviews) produces LDW structural pipe, and partially fabricates the LDW structural pipe. This fabrication allows HDM to categorize its exports of LDW structural pipe under a separate HTS statistical reporting number (7308 subheading). HDM has approximately 108,000 tons of annual capacity, produces spirally welded steel pipe, and is 100 percent export oriented.²⁶

Table SP 4.31 LDW structural pipe: Reported changes in operations by Borusan, since January 1, 2018

Item	Firm name and narrative on changes in operations
Plant closings	***
Acquisitions	***
Other	***

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

²⁵ Borusan’s exports to the United States are not under the orders for LDW structural pipe based on its exclusion from both the AD and the CVD orders.

²⁶ HDM website; <https://www.hdm.com.tr/en/>. Accessed March 17, 2025.

According to GTA, the leading export markets for LDW structural pipe²⁷ from Turkey are Morocco and Egypt (Table SP 4.32). During 2023, the United States accounted for 0.2 percent of the total export market for LDW structural pipe from Turkey. The largest export market for LDW structural pipe from Turkey was Morocco, accounting for 46.2 percent, followed by Egypt, accounting for 9.1 percent.

²⁷ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW structural pipe and out-of-scope products.

Table SP 4.32 Welded pipe greater than 16" in diameter: Exports from Turkey, by destination market and period

Quantity in short tons; value in 1,000s of dollars

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	12,219	—	—	1,569	1,566	1,035
Morocco	Quantity	11,229	43,547	53,340	17,669	35,176	196,572
Egypt	Quantity	7,441	1	3,180	29,171	101,855	38,625
Italy	Quantity	8,555	6,620	2,681	8,498	16,170	25,407
Netherlands	Quantity	18,681	5,253	514	3,846	8,361	23,644
United Kingdom	Quantity	1,726	6,646	1,712	1,867	2,179	21,852
Israel	Quantity	23,648	16,974	23,736	23,421	43,950	21,074
Saudi Arabia	Quantity	2,772	3,317	10,611	1,289	3,662	18,509
Turkmenistan	Quantity	10	98	54	5,456	149	10,794
France	Quantity	8,088	1,669	1,864	6,703	8,507	10,119
Georgia	Quantity	7,232	6,310	1,933	2,165	2,419	9,965
All other destination markets	Quantity	59,262	89,053	107,858	36,015	50,645	48,227
Non-U.S. destination markets	Quantity	148,644	179,488	207,483	136,100	273,073	424,788
All destination markets	Quantity	160,863	179,488	207,483	137,669	274,639	425,823
United States	Value	11,577	1	—	2,135	1,857	1,027
Morocco	Value	8,081	29,744	34,870	17,646	40,301	194,174
Egypt	Value	4,853	18	2,156	31,394	106,238	36,401
Italy	Value	7,486	4,867	1,799	9,437	17,951	26,695
Netherlands	Value	13,326	3,891	297	3,036	9,137	23,766
United Kingdom	Value	1,459	4,859	986	2,039	3,184	26,669
Israel	Value	18,115	11,779	17,658	19,508	48,305	18,814
Saudi Arabia	Value	1,867	3,336	10,856	1,148	3,215	17,920
Turkmenistan	Value	34	152	32	6,172	392	11,528
France	Value	7,265	1,295	1,291	6,286	8,680	10,031
Georgia	Value	6,110	4,601	1,422	2,178	2,598	9,293
All other destination markets	Value	44,650	73,671	84,251	33,644	52,214	56,142
Non-U.S. destination markets	Value	113,247	138,212	155,618	132,487	292,215	431,435
All destination markets	Value	124,825	138,213	155,618	134,621	294,073	432,462

Table continued

Table SP 4.32 Welded pipe greater than 16" in diameter (Continued): Exports from Turkey, by destination market and period

Unit value in dollars per short tons; share in percent

Destination market	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	947	—	—	1,360	1,186	993
Morocco	Unit value	720	683	654	999	1,146	988
Egypt	Unit value	652	18,106	678	1,076	1,043	942
Italy	Unit value	875	735	671	1,111	1,110	1,051
Netherlands	Unit value	713	741	578	789	1,093	1,005
United Kingdom	Unit value	845	731	576	1,092	1,461	1,220
Israel	Unit value	766	694	744	833	1,099	893
Saudi Arabia	Unit value	674	1,006	1,023	891	878	968
Turkmenistan	Unit value	3,376	1,550	586	1,131	2,631	1,068
France	Unit value	898	776	693	938	1,020	991
Georgia	Unit value	845	729	736	1,006	1,074	933
All other destination markets	Unit value	753	827	781	934	1,031	1,164
Non-U.S. destination markets	Unit value	762	770	750	973	1,070	1,016
All destination markets	Unit value	776	770	750	978	1,071	1,016
United States	Share of quantity	7.6	—	—	1.1	0.6	0.2
Morocco	Share of quantity	7.0	24.3	25.7	12.8	12.8	46.2
Egypt	Share of quantity	4.6	0.0	1.5	21.2	37.1	9.1
Italy	Share of quantity	5.3	3.7	1.3	6.2	5.9	6.0
Netherlands	Share of quantity	11.6	2.9	0.2	2.8	3.0	5.6
United Kingdom	Share of quantity	1.1	3.7	0.8	1.4	0.8	5.1
Israel	Share of quantity	14.7	9.5	11.4	17.0	16.0	4.9
Saudi Arabia	Share of quantity	1.7	1.8	5.1	0.9	1.3	4.3
Turkmenistan	Share of quantity	0.0	0.1	0.0	4.0	0.1	2.5
France	Share of quantity	5.0	0.9	0.9	4.9	3.1	2.4
Georgia	Share of quantity	4.5	3.5	0.9	1.6	0.9	2.3
All other destination markets	Share of quantity	36.8	49.6	52.0	26.2	18.4	11.3
Non-U.S. destination markets	Share of quantity	92.4	100.0	100.0	98.9	99.4	99.8
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7305.31 and 7305.39 as reported by Turkey Customs in the Global Trade Atlas Suite database, accessed December 7, 2024.

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 "—". United States is shown at the top followed by the primary exporting countries in descending order of 2021 data. Data is likely overstating trade levels for subject products.

Subject countries combined

Table SP 4.33 presents information on the LDW structural pipe operations of the responding producers and exporters in subject countries.

Table SP 4.33 LDW structural pipe: Data on the aggregated industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2018	2019	2020
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued

Table SP 4.33 LDW structural pipe (Continued): Data on the aggregated industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued

Table SP 4.33 LDW structural pipe (Continued): Data on the aggregated industry in subject countries, by period

Unit values in dollars per short ton; shares and ratios in percent; interim period is January to September

Item	Measure	2018	2019	2020
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued

Table SP 4.33 LDW structural pipe (Continued): Data on the aggregated industry in subject countries, by period

Unit values in dollars per short ton; shares and ratios in percent; interim period is January to September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

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

Table SP 4.34 presents information on the combined LDW structural pipe operations of the responding producers and exporters in subject countries for LDW structural pipe by grade (ASTM 500, ASTM 252, ASTM A53, and all other grades).

Table SP 4.34 LDW structural pipe: Data on the aggregated industry in subject countries, by pipe grade and period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Grade	Period	Quantity	Value	Unit value	Share of quantity
ASTM A500	2023	***	***	***	***
ASTM A252	2023	***	***	***	***
ASTM A53	2023	***	***	***	***
All other grades	2023	***	***	***	***
All grades	2023	***	***	***	100.0
ASTM A500	Interim 2024	***	***	***	***
ASTM A252	Interim 2024	***	***	***	***
ASTM A53	Interim 2024	***	***	***	***
All other grades	Interim 2024	***	***	***	***
All grades	Interim 2024	***	***	***	100.0

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

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

Table SP 4.35 presents information on the combined LDW structural pipe operations of the responding producers and exporters in subject countries for LDW structural pipe by outer diameter ("OD") sizes (>16" and <=24" OD, >24" and <= 48" OD, and >48" OD) during January 2023 to September 30, 2024. During January 2023 to September 2024, LDW structural pipe with a >24" and <= 48" OD combined subject producers' shipments accounted for *** of all shipments by grade.

Table SP 4.35 LDW structural pipe: Data on the aggregated industry in subject countries, by outer diameter and period

Quantity in short tons; value in 1,000 dollars; interim period is January to September

Outer diameter	Period	Quantity	Value	Unit value	Share of quantity
>16" and <=24"	2023	***	***	***	***
>24" and <=48"	2023	***	***	***	***
>48"	2023	***	***	***	***
All outer diameter sizes	2023	***	***	***	100.0
>16" and <=24"	Interim 2024	***	***	***	***
>24" and <=48"	Interim 2024	***	***	***	***
>48"	Interim 2024	***	***	***	***
All outer diameter sizes	Interim 2024	***	***	***	100.0

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

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

Table SP 4.36 presents data on the combined subject producers' shipments of LDW structural pipe by production method (HSAW, LSAW, or ERW) during January 2023 to September 30, 2024. During January 2023 to September 2024, the LDW structural pipe produced with the HSAW production method for the combined subject producers' shipments accounted for ***, based on production method.

Table SP 4.36 LDW structural pipe: Data on the aggregated industry in subject countries, by production method and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; interim period is January to September

Production method	Period	Quantity	Value	Unit value	Share of quantity
HSAW	2023	***	***	***	***
LSAW	2023	***	***	***	***
ERW	2023	***	***	***	***
All production methods	2023	***	***	***	100.0
HSAW	Interim 2024	***	***	***	***
LSAW	Interim 2024	***	***	***	***
ERW	Interim 2024	***	***	***	***
All production methods	Interim 2024	***	***	***	100.0

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

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

Third-country trade actions

Based on available information, LDW structural pipe from Canada, China, South Korea and Turkey has not been subject to other antidumping or countervailing duty investigations outside the United States.

Global market

Table SP 4.37 presents global export data for LDW structural pipe.²⁸ Turkey, China, Germany, South Korea, and Chile, were the leading exporters in 2023, by quantity, accounting for 22.3 percent, 22.1 percent, 16.0 percent, 11.3 percent, and 6.6 percent, respectively, of total global exports. These primary five exporters accounted for a combined 78.3 percent of global exports in 2023. Subject country Turkey was the leading exporter of LDW structural pipe, while China was the second leading exporter of LDW structural pipe, and subject country South Korea was the fourth leading exporter in 2023. Overall LDW structural pipe exports in 2023 were 31.7 percent higher than the level in 2022.

²⁸ The GTA data represents welded pipe greater than 16" in diameter, a category that includes LDW structural pipe and out-of-scope products.

Table SP 4.37 Welded pipe greater than 16" in diameter: Global exports, by reporting country and period

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2018	2019	2020	2021	2022	2023
United States	Quantity	11,191	16,980	15,442	21,615	23,032	13,747
Canada	Quantity	11,188	4,007	4,331	2,569	5,800	3,673
China	Quantity	140,791	146,493	174,889	283,157	352,090	421,550
South Korea	Quantity	196,353	232,696	276,040	144,096	163,054	214,397
Turkey	Quantity	160,863	179,488	207,483	137,669	274,639	425,823
Subject exporters	Quantity	509,195	562,684	662,743	567,491	795,583	1,065,443
Germany	Quantity	200,778	188,574	362,415	286,286	87,264	305,403
Chile	Quantity	—	385	16,031	22	6,867	124,968
Netherlands	Quantity	89,373	71,858	73,541	96,070	238,367	116,254
Slovakia	Quantity	61,042	55,420	57,827	55,013	55,399	54,841
Spain	Quantity	18,113	15,890	21,614	6,840	15,909	31,235
Belgium	Quantity	27,858	37,075	23,139	10,379	12,426	27,677
Poland	Quantity	18,556	24,112	21,688	17,518	24,912	24,491
All other exporters	Quantity	429,493	385,459	389,923	353,206	187,989	141,912
All reporting exporters	Quantity	1,365,599	1,358,437	1,644,363	1,414,440	1,447,748	1,905,971
United States	Value	25,573	39,637	36,436	39,744	55,635	55,063
Canada	Value	10,406	4,726	4,671	3,681	9,088	10,024
China	Value	149,017	156,109	167,005	294,840	431,113	421,392
South Korea	Value	205,790	250,687	292,766	150,127	234,751	300,612
Turkey	Value	124,825	138,213	155,618	134,621	294,073	432,462
Subject exporters	Value	490,037	549,735	620,060	583,269	969,025	1,164,490
Germany	Value	296,875	279,883	547,211	466,768	174,053	715,906
Chile	Value	—	7	263	3	124	872
Netherlands	Value	94,910	88,686	73,346	108,324	90,994	121,269
Slovakia	Value	45,828	38,037	38,593	55,704	63,547	53,982
Spain	Value	18,751	18,219	22,741	10,803	29,258	55,418
Belgium	Value	41,303	45,164	25,223	15,433	21,746	37,704
Poland	Value	20,432	23,052	22,330	26,117	42,073	39,528
All other exporters	Value	424,686	379,103	429,107	424,186	359,798	325,049
All reporting exporters	Value	1,458,394	1,461,524	1,815,311	1,730,352	1,806,252	2,569,280

Table continued

Table SP 4.37 Welded pipe greater than 16" in diameter (Continued): Global exports, by reporting country and period

Unit value in dollars per short ton; share in percent

Exporting country	Measure	2018	2019	2020	2021	2022	2023
United States	Unit value	2,285	2,334	2,360	1,839	2,416	4,005
Canada	Unit value	930	1,180	1,078	1,433	1,567	2,729
China	Unit value	1,058	1,066	955	1,041	1,224	1,000
South Korea	Unit value	1,048	1,077	1,061	1,042	1,440	1,402
Turkey	Unit value	776	770	750	978	1,071	1,016
Subject exporters	Unit value	962	977	936	1,028	1,218	1,093
Germany	Unit value	1,479	1,484	1,510	1,630	1,995	2,344
Chile	Unit value	—	18	16	149	18	7
Netherlands	Unit value	1,062	1,234	997	1,128	382	1,043
Slovakia	Unit value	751	686	667	1,013	1,147	984
Spain	Unit value	1,035	1,147	1,052	1,579	1,839	1,774
Belgium	Unit value	1,483	1,218	1,090	1,487	1,750	1,362
Poland	Unit value	1,101	956	1,030	1,491	1,689	1,614
All other exporters	Unit value	989	984	1,100	1,201	1,914	2,290
Reporting Total	Unit value	1,068	1,076	1,104	1,223	1,248	1,348
United States	Share of quantity	0.8	1.2	0.9	1.5	1.6	0.7
Canada	Share of quantity	0.8	0.3	0.3	0.2	0.4	0.2
China	Share of quantity	10.3	10.8	10.6	20.0	24.3	22.1
South Korea	Share of quantity	14.4	17.1	16.8	10.2	11.3	11.2
Turkey	Share of quantity	11.8	13.2	12.6	9.7	19.0	22.3
Subject exporters	Share of quantity	37.3	41.4	40.3	40.1	55.0	55.9
Germany	Share of quantity	14.7	13.9	22.0	20.2	6.0	16.0
Chile	Share of quantity	—	0.0	1.0	0.0	0.5	6.6
Netherlands	Share of quantity	6.5	5.3	4.5	6.8	16.5	6.1
Slovakia	Share of quantity	4.5	4.1	3.5	3.9	3.8	2.9
Spain	Share of quantity	1.3	1.2	1.3	0.5	1.1	1.6
Belgium	Share of quantity	2.0	2.7	1.4	0.7	0.9	1.5
Poland	Share of quantity	1.4	1.8	1.3	1.2	1.7	1.3
All other exporters	Share of quantity	31.5	28.4	23.7	25.0	13.0	7.4
Reporting Total	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7305.31 and 7305.39 as reported by various national statistical authorities, accessed December 7, 2024.

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 "---". United States is shown at the top followed by the primary exporting countries in descending order of 2021 data. Data is likely overstating trade levels for subject products.

Structural 5: Pricing data

Factors affecting prices

Raw material costs

The primary raw material used in the production of LDW structural pipe differs according to the method of production. For ERW pipe, hot-rolled steel coil (“HRC”) is the principal raw material. For SAW pipe, the principal raw materials are cut-to-length (“CTL”) plate (for LSAW) or hot-rolled steel coil (for HSAW).¹ For LDW structural pipe, raw material costs accounted for more than 80 percent of total costs of goods sold throughout the period for which data were collected, with steel coils comprising the substantial majority of raw material costs.

Prices for cut-to-length plate were higher than those for hot-rolled coil, except in 2021. (figure SP 5.1 and table SP 5.1). HRC prices increased from the early 2018 until mid-2018, then generally declined, reaching a point *** percent below the January 2018 price in July 2020. From July 2020 through September 2021, HRC prices increased by *** percent. Since that time, they have generally decreased, although in the spring of 2022, 2023, and 2024 there were small price spikes. The price of HRC was *** percent lower in December 2024 than the peak in September 2021, or *** percent lower than its price in January 2018. Prices for CTL plate followed a somewhat similar trajectory, declining early in the period (by *** percent, then increasing sharply (by *** percent at the peak in December 2021), and generally falling since that time (*** by December 2024). Because of the smaller percentage decline in CTL plate prices than HRC prices, prices for CTL plate were *** percent higher in December 2024 than January 2018.

¹ *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, V-1.

Figure SP 5.1 Raw materials: Prices per short ton of hot-rolled coil and cut-to-length plate, monthly, January 2018 to December 2024

* * * * *

Source: ***, various monthly issues. ***.

Table SP 5.1 Raw materials: Prices per short ton of hot-rolled coil and cut-to-length plate, monthly, January 2018 to December 2024

Hot-rolled coil (dollars per short ton)							
Month	2018	2019	2020	2021	2022	2023	2024
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***

Table continued.

Table SP 5.1 (Continued) Raw materials: Prices per short ton of hot-rolled coil and cut-to-length plate, monthly, January 2018 to December 2024

Cut-to-length plate (dollars per short ton)							
Month	2018	2019	2020	2021	2022	2023	2024
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***

Source: ***, various monthly issues. ***

Two of three producers and *** importers noted that raw material costs were the same at the beginning and end of the period for which data were collected (table SP 5.2). *** responding firms noted that prices of raw materials had either increased steadily or fluctuated upward. Producers and importers indicated they expect a continued rise in raw material prices. A large majority of purchasers (11 of 13) also reported being familiar with prices of raw materials used to produce LDW structural pipe. Three of the six responding LDW structural pipe purchasers stated that the raw material costs affected their contracts or negotiations to purchase LDW structural pipe. These purchasers noted that hot-rolled coil prices affect negotiations, one noted that LSAW prices are driven off the price of less-volatile CTL plate prices, and one purchaser (***) reported looking at steel scrap prices. This purchaser stated that LDW structural pipe prices lag behind those in the scrap steel market.

Table SP 5.2 Raw material prices: Count of firms' responses regarding raw material price changes since January 1, 2018, and anticipated raw material price changes, by firm type

Item	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
Raw material prices	U.S. producers	1	0	2	0	0
Raw material prices	Importers	***	***	***	***	***
Anticipated raw material prices	U.S. producers	0	1	1	0	0
Anticipated raw material prices	Importers	***	***	***	***	***

Source: Compiled from responses to Commission questionnaires.

Transportation costs to the U.S. market

Transportation costs for LDW structural pipe shipped from subject countries to the United States averaged 4.4 percent for shipments from Canada, 8.5 percent for shipments from China, 7.6 percent for shipments from South Korea, and 18.7 percent for shipments from Turkey during 2023. These estimates were derived from official import data and represent the transportation and other charges on imports.²

U.S. inland transportation costs

All eight responding U.S. producers and *** responding importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 3.7 to 15 percent while *** responding importers of product from subject countries reported costs of *** percent.³

Pricing practices

Pricing methods

All U.S. producers and all responding importers reported setting prices using transaction-by-transaction negotiations. One producer also reported setting prices via contracts (table SP 5.3).

Table SP 5.3 LDW structural pipe: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Importers
Transaction-by-transaction	7	***
Contract	1	***
Set price list	0	***
Other	0	***
Responding firms	7	***

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

² The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2023 and then dividing by the customs value based on the HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 9, 2024.

³ This does not include responses of 0, 0.015, and 100 percent reported by three importers.

Responding U.S. producers and importers reported selling LDW structural pipe almost exclusively on the spot market (table SP 5.4). The *** importers reporting short-term contracts indicated that such contracts typically lasted four to five months, fixed price and quantity, with prices not indexed to raw materials nor able to be renegotiated.

Table SP 5.4 LDW structural pipe: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2023

Share in percent

Type of sale	U.S. producers	Importers
Long-term contracts	—	—
Annual contracts	—	—
Short-term contracts	—	***
Spot sales	100.0	***
Total	100.0	100.0

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

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

Two purchasers reported that they purchase product daily, one purchases weekly, four purchase monthly, one purchases quarterly, six purchase with some other frequency, mostly on an as-needed basis. On average, purchasers contact 2 to 4 suppliers before making a purchase, with 8 of 14 contacting as few as one, and one purchaser contacting as many as ten.

Sales terms and discounts

The majority of U.S. producers and importers typically quote prices on a delivered basis. Five of seven U.S. producers and *** importers do not offer discounts. One producer offers an early payment discount and one negotiates discounts on a per-project basis.

Price leadership

Seven of nine purchasers that named a market leader in the LDW structural pipe market listed Nucor/Skyline as at least one of the market leaders. Purchasers listed Nucor/Skyline as being widely accepted, having a low or consistently competitive price and available material, and sending notifications of price changes before other firms. Seven other firms were reported to be leaders in the LDW structural pipe market: Atlas, Gerdau, JD Fields, Pipe & Pile, SDI, SeAH, and Trinity. South Korean producer SeAH was noted as being a leader in market price adjustments.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following LDW structural pipe products shipped to unrelated U.S. customers during January 2018 to September 2024.⁴

Product 5.— Structural pipe, 18”- 24” OD, 0.375”- 0.750” wall, ASTM A252, A1035, or similar, regardless of length

Product 6.— Structural pipe, >24”- 32” OD, 0.500”- 1.000” wall, ASTM A252, A1035, or similar, regardless of length

Six U.S. producers and *** importers provided usable pricing data for sales of the requested products,⁵ although not all firms reported pricing for all products for all quarters.⁶ Pricing data reported by these firms accounted for approximately 73.4 percent of U.S. producers’ U.S. shipments of LDW structural pipe, *** percent of shipments of U.S. imports from South Korea, *** percent of shipments of U.S. imports from Turkey and 0.0 percent of shipments from Canada and China in 2023. Price data for products 5 and 6 are presented in tables 5.5 and 5.6 and figures 5.2 and 5.3.

⁴ Products 1 to 4 were presented in Part LP 5 of this report.

⁵ One other producer provided data which was not incorporated. “***.” Email from ***, January 13, 2025.

⁶ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

Table SP 5.5 LDW structural pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2018 Q1	953	19,997	***	***	***
2018 Q2	1,051	18,866	***	***	***
2018 Q3	1,110	25,998	—	0	—
2018 Q4	1,112	21,000	—	0	—
2019 Q1	1,112	22,136	—	0	—
2019 Q2	1,097	21,894	—	0	—
2019 Q3	1,110	17,431	—	0	—
2019 Q4	1,075	19,664	—	0	—
2020 Q1	1,042	19,614	—	0	—
2020 Q2	1,034	19,383	—	0	—
2020 Q3	1,020	22,546	—	0	—
2020 Q4	1,043	18,032	—	0	—
2021 Q1	1,180	16,267	—	0	—
2021 Q2	1,268	11,216	—	0	—
2021 Q3	1,499	13,327	—	0	—
2021 Q4	1,869	12,779	—	0	—
2022 Q1	1,810	16,702	—	0	—
2022 Q2	1,887	15,514	—	0	—
2022 Q3	1,863	15,568	—	0	—
2022 Q4	1,551	27,761	—	0	—
2023 Q1	1,602	25,626	—	0	—
2023 Q2	1,632	22,590	—	0	—
2023 Q3	1,528	53,913	—	0	—
2023 Q4	1,506	38,306	—	0	—
2024 Q1	1,501	21,473	—	0	—
2024 Q2	1,496	27,351	—	0	—
2024 Q3	1,403	22,185	—	0	—

Table continued.

Table SP 5.5 LDW structural pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by source and quarter

Period	South Korea price	South Korea quantity	South Korea margin	Turkey price	Turkey quantity	Turkey margin
2018 Q1	***	***	***	—	0	—
2018 Q2	***	***	***	—	0	—
2018 Q3	—	0	—	—	0	—
2018 Q4	***	***	***	—	0	—
2019 Q1	***	***	***	—	0	—
2019 Q2	***	***	***	—	0	—
2019 Q3	***	***	***	—	0	—
2019 Q4	***	***	***	—	0	—
2020 Q1	***	***	***	—	0	—
2020 Q2	***	***	***	—	0	—
2020 Q3	***	***	***	—	0	—
2020 Q4	***	***	***	—	0	—
2021 Q1	—	0	—	—	0	—
2021 Q2	—	0	—	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	—	0	—	—	0	—
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	—	0	—
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	—	0	—
2023 Q4	***	***	***	—	0	—
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***
2024 Q3	***	***	***	—	0	—

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

Note: Structural pipe, 18"- 24" OD, 0.375"- 0.750" wall, ASTM A252, A1035, or similar, regardless of length.

Note: According to ***, the sales in the first two quarters of 2018 were "a very small quantity of low-quality, sub-prime structural pipe." Email from ***, January 18, 2025.

Note: Data for Turkey are for product that has been processed or partially transformed.

Table SP 5.6 LDW structural pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2018 Q1	***	***	—	0	—
2018 Q2	***	***	—	0	—
2018 Q3	***	***	—	0	—
2018 Q4	***	***	—	0	—
2019 Q1	***	***	—	0	—
2019 Q2	***	***	***	***	***
2019 Q3	***	***	—	0	—
2019 Q4	***	***	—	0	—
2020 Q1	***	***	—	0	—
2020 Q2	***	***	—	0	—
2020 Q3	***	***	—	0	—
2020 Q4	***	***	—	0	—
2021 Q1	***	***	—	0	—
2021 Q2	***	***	—	0	—
2021 Q3	***	***	—	0	—
2021 Q4	***	***	—	0	—
2022 Q1	***	***	—	0	—
2022 Q2	***	***	—	0	—
2022 Q3	***	***	—	0	—
2022 Q4	***	***	—	0	—
2023 Q1	***	***	—	0	—
2023 Q2	***	***	—	0	—
2023 Q3	***	***	—	0	—
2023 Q4	***	***	—	0	—
2024 Q1	***	***	—	0	—
2024 Q2	***	***	—	0	—
2024 Q3	***	***	—	0	—

Table continued.

Table SP 5.6 LDW structural pipe: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter

Period	South Korea price	South Korea quantity	South Korea margin	Turkey price	Turkey quantity	Turkey margin
2018 Q1	—	0	—	—	0	—
2018 Q2	—	0	—	—	0	—
2018 Q3	—	0	—	—	0	—
2018 Q4	—	0	—	—	0	—
2019 Q1	—	0	—	—	0	—
2019 Q2	***	***	***	—	0	—
2019 Q3	—	0	—	—	0	—
2019 Q4	***	***	***	—	0	—
2020 Q1	—	0	—	—	0	—
2020 Q2	—	0	—	—	0	—
2020 Q3	—	0	—	—	0	—
2020 Q4	—	0	—	—	0	—
2021 Q1	—	0	—	—	0	—
2021 Q2	—	0	—	***	***	***
2021 Q3	—	0	—	***	***	***
2021 Q4	—	0	—	***	***	***
2022 Q1	—	0	—	—	0	—
2022 Q2	—	0	—	—	0	—
2022 Q3	—	0	—	***	***	***
2022 Q4	—	0	—	***	***	***
2023 Q1	***	***	***	—	0	—
2023 Q2	—	0	—	—	0	—
2023 Q3	—	0	—	—	0	—
2023 Q4	—	0	—	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	—	0	—	***	***	***
2024 Q3	—	0	—	—	0	—

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

Note: Product 6: Structural pipe, >24"- 32" OD, 0.500"- 1.000" wall, ASTM A252, A1035, or similar, regardless of length.

Note: *** stated that its quarter 3, 2023 pricing related to an established customer who bought a large quantity of structural pipe from its overrun inventory and received a volume discount versus a new customer with no credit history who purchased a small quantity of pipe.

Note: Data for Turkey are for product that has been processed or partially transformed.

Figure SP 5.2 LDW structural pipe: Weighted-average prices and quantities of domestic and imported product 5, by source and quarter

Price of product 5

* * * * *

Volume of product 5

* * * * *

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

Note: Structural pipe, 18"- 24" OD, 0.375"- 0.750" wall, ASTM A252, A1035, or similar, regardless of length.

Figure SP 5.3 LDW structural pipe: Weighted-average prices and quantities of domestic and imported product 6, by source and quarter

Price of product 6

* * * * *

Volume of product 6

* * * * *

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

Note: Product 6: Structural pipe, >24"- 32" OD, 0.500"- 1.000" wall, ASTM A252, A1035, or similar, regardless of length.

Price trends

In general, prices increased during January 2018 to September 2024 for domestic producers, and there was insufficient data to determine a trend for subject sources over the period. Table SP 5.7 summarizes the price trends, by country and by product. As shown in the table, domestic price increases were 47.2 and 56.9 percent from the first quarter 2018 to the third quarter of 2024.

Table SP 5.7 LDW structural pipe: Summary of price data, by product and source, January 2018 to September 2024

Quantity in short tons, price in dollars per short ton

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 5	United States	27	587,139	953	1,887	953	1,403	47.2
Product 5	Canada	2	***	***	***	***	—	---
Product 5	South Korea	23	***	***	***	***	***	***
Product 5	Turkey	9	***	***	***	—	***	---
Product 6	United States	27	***	***	***	***	***	56.9
Product 6	Canada	1	***	***	***	—	—	---
Product 6	South Korea	4	***	***	***	—	—	---
Product 6	Turkey	8	***	***	***	—	***	---

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

Note: Percent change column is percentage change from the first quarter 2018 to the last quarter in 2024.

Price comparisons⁷

As shown in table SP 5.8, prices for LDW structural pipe imported from Canada, South Korea, and Turkey were below those for U.S.-produced product in 26 of 47 instances; margins of underselling ranged from *** to *** percent. In the remaining 21 instances, prices for LDW structural pipe from these countries were between *** and *** percent above prices for the domestic product. Underselling was more prevalent in product 5.

⁷ In the original investigations, quarterly pricing data were not collected. Instead, only bid data were collected from purchasers. Regarding structural pipe bids, bids from subject import sources were lower than those from domestic sources in six of nine instances, and higher in three. All instances of bidding lower were of product imported from China. *Large Diameter Welded Pipe from China, and India, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019, p. V-6.

Table SP 5.8 LDW structural pipe: Instances of underselling and overselling and the range and average of margins, by product

Quantity in short tons; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 5	Underselling	22	***	***	***	***
Product 6	Underselling	4	***	***	***	***
Total, all products	Underselling	26	***	***	***	***
Product 5	Overselling	12	***	***	***	***
Product 6	Overselling	9	***	***	***	***
Total, all products	Overselling	21	***	***	***	***

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

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

As presented in table SP 5.9, South Korea accounted for most of the quarters of comparison (27 of 41) and quarters of underselling (***). Imports from Turkey accounted for the majority of volumes of underselling (*** short tons) and overselling (*** short tons), and also the majority of the number of quarters of overselling (13 of 21). Trends among underselling and overselling fluctuated, but equal numbers of quarters of overselling and underselling occurred in 2023 and 2024 (four quarters of each in both years), as shown in table SP 5.10. Underselling was most pronounced in 2018 and 2021.

Table SP 5.9 LDW structural pipe: Instances of underselling and overselling and the range and average of margins, by source

Quantity in short tons; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Canada	Underselling	2	***	***	***	***
South Korea	Underselling	20	***	***	***	***
Turkey	Underselling	4	***	***	***	***
Total, all subject sources	Underselling	26	***	***	***	***
Canada	Overselling	1	***	***	***	***
South Korea	Overselling	7	***	***	***	***
Turkey	Overselling	13	***	***	***	***
Total, all subject sources	Overselling	21	***	***	***	***

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

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

Table SP 5.10 LDW structural pipe: Instances of underselling and overselling and the range and average of margins, by year

Quantity in short tons; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2018	Underselling	4	***	***	***	***
2019	Underselling	2	***	***	***	***
2020	Underselling	4	***	***	***	***
2021	Underselling	6	***	***	***	***
2022	Underselling	2	***	***	***	***
2023	Underselling	4	***	***	***	***
2024	Underselling	4	***	***	***	***
Total, all years	Underselling	26	***	***	***	***
2018	Overselling	1	***	***	***	***
2019	Overselling	5	***	***	***	***
2020	Overselling	0	0	—	—	—
2021	Overselling	2	***	***	***	***
2022	Overselling	5	***	***	***	***
2023	Overselling	4	***	***	***	***
2024	Overselling	4	***	***	***	***
Total, all years	Overselling	21	***	***	***	***

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

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

Bid data

Eight of 14 LDW structural pipe purchasers indicated that they purchase structural pipe using a bidding process and described a variety of processes by which they invite bidders to the bidding process. Two-thirds of responding purchasers (four of six) rarely or never allow bidders more than one opportunity to submit bids, one always does (***), and one frequently does (***). Four of six responding LDW structural pipe purchasers also rarely or never discuss competing bids with suppliers (*** always does and *** sometimes does). Three of six responding LDW structural pipe purchasers sometimes allow invitees to bid on a project with an offer that includes exceptions to their product specifications or alternative LDW structural products and one each always, frequently, and rarely or never does. Factors considered by purchasers in evaluating bids with differing specifications include ASTM, availability, cost, engineering soundness, improved performance, likelihood of acceptance, materials, pipe manufacture type, production timing, and quality. Five of six responding purchasers indicated

that they sometimes change the size, quantity, and/or grade requested for a project after the project has been awarded, and one indicated that it would rarely or never change.

Since January 1, 2021, six LDW structural purchasers have put out 82 projects for bid.⁸ As shown in table SP 5.11, mills from the United States bid on 76 of these projects. Three of the six only had bids from U.S. producers, accounting for 60 of the projects. Among subject countries, only LDW structural pipe from South Korea was also involved in more than 10 bidding events, and there were no imports from nonsubject sources that were involved in structural pipe bids. Only one of the six purchasers of LDW structural pipe noted that its bidding events involved both domestic and subject imports (***). One purchaser which had 14 bidding events (*** reported 8 that included domestic product, and 6 that included product from Canada, South Korea, and Turkey. It indicated that none of its bidding events included both domestic and subject product. Another purchaser (*** had one bidding event including domestic LDW structural pipe and six with South Korean LDW structural pipe, but indicated no bids including product from both sources.

As requested, *** provided details regarding its five largest bidding events, which are presented in Appendix G.⁹ Two of the bidding events only involved suppliers of domestic product. The other three involved bids from ***, with all three won by ***; each winning bidder was the lowest bid. In the hearing, a representative of U.S. producer Trinity stated that it competed for structural pipe projects against Canadian company Pipe & Piling numerous times, noting specifically that it “recently lost a large project of 14,000 tons for the South Brooklyn Marine Terminal.”¹⁰

Table SP 5.11 LDW structural pipe: Number of times domestic, subject, and nonsubject sources have bid on projects since January 1, 2021

United States	Canada	China	South Korea	Turkey	Other sources
76	6	3	12	6	0

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

⁸ Responses from purchaser *** are omitted from this discussion, as it had no purchases of LDW structural pipe in 2023.

⁹ No other purchaser provided such information.

¹⁰ Hearing transcript, p. 50 (Griggs).

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 6499 February 1, 2024	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2024-02-01/pdf/2024-02001.pdf
89 FR 6543 February 1, 2024	<i>Large Diameter Welded Pipe From Canada, China, Greece, India, South Korea, and Turkey; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2024-02-01/pdf/2024-01933.pdf
89 FR 44960, May 22, 2024	<i>Large Diameter Welded Pipe From the Republic of Korea: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2024-05-22/pdf/2024-11208.pdf
89 FR 4461, May 22, 2024	<i>Large Diameter Welded Pipe From India: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2024-05-22/pdf/2024-11207.pdf
89 FR 46160, May 28, 2024	<i>Large Diameter Welded Pipe From Canada, China, Greece, India, South Korea, and Turkey; Notice of Commission Determination To Conduct Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2024-05-28/pdf/2024-11624.pdf

Citation	Title	Link
89 FR 48381, June 6, 2024	<i>Large Diameter Welded Pipe From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2024-06-06/pdf/2024-12409.pdf
89 FR 48558, June 7, 2024	<i>Large Diameter Welded Pipe From the People's Republic of China, India, Canada, Greece, the Republic of Korea, and the Republic of Türkiye: Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2024-06-07/pdf/2024-12514.pdf
89 FR 48561, June 7, 2024	<i>Large Diameter Welded Pipe From the Republic of Türkiye: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2024-06-07/pdf/2024-12521.pdf
89 FR 65932, August 13, 2024	<i>Large Diameter Welded Pipe From Canada, China, Greece, India, South Korea, and Turkey; Scheduling of Full Five-Year Reviews</i>	https://www.federalregister.gov/d/2024-18022

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

Subject: Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey

Inv. Nos.: 701-TA-593-596 and 731-TA-1401-1406 (Review)

Date and Time: February 25, 2025 - 9:30 a.m.

Sessions were held in connection with these reviews in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

CONGRESSIONAL APPEARANCE:

The Honorable Neal P. Dunn, United States Representative, 2nd District, Florida

EMBASSY APPEARANCE:

**Embassy of Greece
Washington, DC**

First Secretary Samouil Zisis, Head of the Office for Economic & Commercial Affairs

OPENING REMARKS:

In Support of Continuation (**Laura El-Sabaawi**, Wiley Rein LLP)
In Opposition to Continuation (**Craig A. Lewis**, Hogan Lovells US LLP
and **Kristin H. Mowry**, Mowry & Grimson, PLLC)

**In Support of the Continuation of the
Antidumping and Countervailing Duty Orders:**

Wiley Rein LLP
Washington, DC
on behalf of

American Line Pipe Producers Association ("ALPPA")

Don Barney, President, Skyline Steel, LLC

Robert Griggs, Chairman and Founder, Trinity Products Inc.

Jonathan Kirkland, Vice President, Sales and Logistics,

Berg Pipe Panama City Corp. and Berg Pipe Mobile Corp.

**In Support of the Continuation of the
Antidumping and Countervailing Duty Orders (continued):**

Jonathan Kirkland, Vice President, Sales and Logistics,
Berg Pipe Panama City Corp. and Berg Pipe Mobile Corp.

Jon Noland, Vice President, Sales, American Cast Iron Pipe Company

Jason Norris, President, Dura-Bond Pipe, LLC

Ugur Onbasi, President, Berg Pipe Panama City Corp. and Berg Pipe Mobile
Corp.

Todd Phillips, Vice President, N&S America Sales, Welspun Tubular LLC

Dr. Seth T. Kaplan, President, International Economic Research, LLC

Andrew Z. Szamosszegi, Principal, Capital Trade, Inc.

Timothy C. Brightbill)
Laura El-Sabaawi) – OF COUNSEL
Elizabeth S. Lee)

**In Opposition to the Continuation of the
Antidumping and Countervailing Duty Orders:**

Hogan Lovells US LLP
Washington, DC
on behalf of

Evraz Inc. NA Canada (“Evraz”)

Christopher Cassise, Legal Counsel, International Trade, Evraz Inc. NA Canada

David Coffin, Chief Commercial Officer, Evraz North America

Ryan Clark, Director of U.S. Sales, Tubular Products Group, Evraz North
America

Craig A. Lewis)
Michael G. Jacobson) – OF COUNSEL
Nicholas W. Laneville)

**In Opposition to the Continuation of the
Antidumping and Countervailing Duty Orders (continued):**

Mowry & Grimson, PLLC
Washington, DC
on behalf of

Corinth Pipeworks Pipe Industry S.A. ("CPW")
CPW America Co. ("CPWA")

George Mentzelopoulos, Deputy General Manager, CPW

Georgios Tsironis, Finance Director, CPW

Alexandra Tzanetopoulou, General Legal Counsel, CPW

Alejandro Barragan (remote witness), Vice President Sales and Marketing,
CPWA

Wyn Bellhouse, Senior Trade Economist, Mowry & Grimson, PLLC

Kristin H. Mowry) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**Timothy C. Brightbill**, Wiley Rein LLP)

In Opposition to Continuation (**Michael G. Jacobson**, Hogan Lovells US LLP
and **Kristin H. Mowry**, Mowry & Grimson, PLLC)

APPENDIX C
SUMMARY DATA

Table C-1: LDWP Line pipe: Summary data concerning the total U.S. market.....	C.3
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Table C-2: LDW Structural pipe: Summary data concerning the merchant U.S. market	C.15

Table C.1

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data							Interim 2024
	2018	2019	2020	2021	2022	2023	2023	
U.S. consumption quantity:								
Amount	2,400,117	2,561,544	1,312,851	485,427	591,362	1,408,159	867,298	966,612
Producers' share (fn1)	56.5	68.1	83.3	52.6	51.4	78.3	75.9	73.7
Importers' share (fn1):								
Canada	10.9	9.5	2.0	4.5	0.0	0.0	0.0	0.1
China	0.2	—	0.0	0.3	0.0	0.0	0.0	0.4
Greece	10.2	2.7	—	1.1	—	—	—	1.1
India	0.2	0.0	0.5	0.0	6.9	1.8	2.8	0.0
South Korea, subject	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	11.1	12.4	8.6	25.8	18.2	8.3	9.4	8.0
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	43.5	31.9	16.7	47.4	48.6	21.7	24.1	26.3
U.S. consumption value:								
Amount	3,013,998	3,686,723	1,595,919	570,726	1,036,830	2,338,438	1,469,908	1,486,824
Producers' share (fn1)	59.3	72.4	85.4	53.8	53.3	79.9	78.3	77.7
Importers' share (fn1):								
Canada	11.8	9.1	1.9	4.9	0.0	0.0	0.0	0.1
China	0.1	—	0.0	0.5	0.0	0.0	0.0	0.3
Greece	7.8	2.2	—	1.1	—	—	—	1.0
India	0.2	0.0	0.5	0.0	6.2	1.6	2.5	0.0
South Korea, subject	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	11.7	10.8	8.7	25.6	18.0	8.9	9.8	7.6
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	40.7	27.6	14.6	46.2	46.7	20.1	21.7	22.3
U.S. imports from:								
Canada:								
Quantity	261,992	244,475	26,548	21,787	138	200	80	1,444
Value	354,184	335,853	30,064	28,133	53	538	386	1,778
Unit value	\$1,352	\$1,374	\$1,132	\$1,291	\$387	\$2,693	\$4,844	\$1,231
Ending inventory quantity	***	***	***	***	***	***	***	***
China								
Quantity	4,651	—	165	1,534	141	233	233	4,235
Value	4,036	—	177	3,050	222	359	359	3,883
Unit value	\$868	—	\$1,074	\$1,989	\$1,581	\$1,540	\$1,540	\$917
Ending inventory quantity	***	***	***	***	***	***	***	***
Greece:								
Quantity	244,042	69,221	—	5,576	—	—	—	10,522
Value	235,185	82,655	—	6,126	—	—	—	15,421
Unit value	\$964	\$1,194	—	\$1,099	—	—	—	\$1,466
Ending inventory quantity	***	***	***	***	***	***	***	***
India:								
Quantity	4,657	18	7,032	4	40,848	25,008	24,662	69
Value	5,305	40	7,439	3	64,529	37,124	36,677	137
Unit value	\$1,139	\$2,259	\$1,058	\$726	\$1,580	\$1,484	\$1,487	\$1,978
Ending inventory quantity	***	***	***	***	***	***	***	***
South Korea, subject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***

Table continued.

Table C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	2019-20	2020-21	2021-22	2022-23	
U.S. consumption quantity:							
Amount	▼(41.3)	▲6.7	▼(48.7)	▼(63.0)	▲21.8	▲138.1	▲11.5
Producers' share (fn1)	▲21.8	▲11.6	▲15.2	▼(30.6)	▼(1.2)	▲26.9	▼(2.2)
Importers' share (fn1):							
Canada	▼(10.9)	▼(1.4)	▼(7.5)	▲2.5	▼(4.5)	▼(0.0)	▲0.1
China	▼(0.2)	▼(0.2)	▲0.0	▲0.3	▼(0.3)	▼(0.0)	▲0.4
Greece	▼(10.2)	▼(7.5)	▼(2.7)	▲1.1	▼(1.1)	—	▲1.1
India	▲1.6	▼(0.2)	▲0.5	▼(0.5)	▲6.9	▼(5.1)	▼(2.8)
South Korea, subject	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Turkey, subject	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Subject sources	▼***	▼***	▼***	▲***	▲***	▼***	▼***
South Korea, nonsubject	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Turkey, nonsubject	▼***	▼***	▼***	▲***	▲***	▲***	▲***
All other sources	▼(2.8)	▲1.3	▼(3.8)	▲17.2	▼(7.6)	▼(9.9)	▼(1.4)
Nonsubject sources	▼***	▼***	▼***	▲***	▼***	▼***	▲***
All import sources	▼(21.8)	▼(11.6)	▼(15.2)	▲30.6	▲1.2	▼(26.9)	▲2.2
U.S. consumption value:							
Amount	▼(22.4)	▲22.3	▼(56.7)	▼(64.2)	▲81.7	▲125.5	▲1.2
Producers' share (fn1)	▲20.7	▲13.2	▲12.9	▼(31.6)	▼(0.5)	▲26.6	▼(0.6)
Importers' share (fn1):							
Canada	▼(11.7)	▼(2.6)	▼(7.2)	▲3.0	▼(4.9)	▲0.0	▲0.1
China	▼(0.1)	▼(0.1)	▲0.0	▲0.5	▼(0.5)	▼(0.0)	▲0.2
Greece	▼(7.8)	▼(5.6)	▼(2.2)	▲1.1	▼(1.1)	—	▲1.0
India	▲1.4	▼(0.2)	▲0.5	▼(0.5)	▲6.2	▼(4.6)	▼(2.5)
South Korea, subject	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Turkey, subject	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Subject sources	▼***	▼***	▼***	▲***	▲***	▼***	▼***
South Korea, nonsubject	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Turkey, nonsubject	▼***	▼***	▼***	▲***	▲***	▲***	▲***
All other sources	▼(2.7)	▼(0.9)	▼(2.0)	▲16.9	▼(7.6)	▼(9.1)	▼(2.3)
Nonsubject sources	▼***	▼***	▼***	▲***	▼***	▼***	▲***
All import sources	▼(20.7)	▼(13.2)	▼(12.9)	▲31.6	▲0.5	▼(26.6)	▲0.6
U.S. imports from:							
Canada:							
Quantity	▼(99.9)	▼(6.7)	▼(89.1)	▼(17.9)	▼(99.4)	▲44.8	▲1,711.4
Value	▼(99.8)	▼(5.2)	▼(91.0)	▼(6.4)	▼(99.8)	▲907.9	▲360.4
Unit value	▲99.2	▲1.6	▼(17.6)	▲14.0	▼(70.0)	▲596.1	▼(74.6)
Ending inventory quantity	***	***	***	***	***	***	***
China							
Quantity	▼(95.0)	▼(100.0)	▲***	▲830.8	▼(90.8)	▲65.7	▲1,717.9
Value	▼(91.1)	▼(100.0)	▲***	▲1,623.2	▼(92.7)	▲61.5	▲981.9
Unit value	▲77.5	▼(100.0)	▲***	▲85.1	▼(20.5)	▼(2.5)	▼(40.5)
Ending inventory quantity	***	***	***	***	***	***	***
Greece:							
Quantity	▼(100.0)	▼(71.6)	▼(100.0)	▲***	▼(100.0)	—	▲***
Value	▼(100.0)	▼(64.9)	▼(100.0)	▲***	▼(100.0)	—	▲***
Unit value	▼(100.0)	▲23.9	▼(100.0)	▲***	▼(100.0)	—	▲***
Ending inventory quantity	***	***	***	***	***	***	***
India:							
Quantity	▲437.0	▼(99.6)	▲39,827.1	▼(99.9)	▲919,656.7	▼(38.8)	▼(99.7)
Value	▲599.8	▼(99.3)	▲18,599.9	▼(100.0)	▲2,001,433.7	▼(42.5)	▼(99.6)
Unit value	▲30.3	▲98.3	▼(53.2)	▼(31.4)	▲117.6	▼(6.0)	▲33.0
Ending inventory quantity	***	***	***	***	***	***	***
South Korea, subject:							
Quantity	▼***	▲***	▼***	▼***	▲***	▼***	▲***
Value	▲***	▲***	▼***	▼***	▲***	▼***	▼***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***

Table continued.

Table C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data						Interim	
	2018	2019	Calendar year		2022	2023	2023	2024
U.S. imports from: Continued								
Turkey, subject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
Subject sources:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
South Korea, nonsubject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
Turkey, nonsubject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
All other sources:								
Quantity	267,527	318,585	113,079	125,287	107,665	117,491	81,381	77,278
Value	351,368	396,425	138,902	146,280	186,458	208,894	144,671	112,539
Unit value	\$1,313	\$1,244	\$1,228	\$1,168	\$1,732	\$1,778	\$1,778	\$1,456
Ending inventory quantity	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
All import sources:								
Quantity	1,044,065	817,319	219,784	230,019	287,270	305,700	209,373	254,206
Value	1,228,028	1,015,825	233,091	263,607	484,070	469,333	319,337	331,921
Unit value	\$1,176	\$1,243	\$1,061	\$1,146	\$1,685	\$1,535	\$1,525	\$1,306
Ending inventory quantity	***	***	***	***	***	***	***	***

Table continued.

Table C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	2019-20	2020-21	2021-22	2022-23	
U.S. imports from: Continued							
Turkey, subject:							
Quantity	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Value	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Unit value	▲***	▲***	▲***	▼***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	***	***
Subject sources:							
Quantity	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Value	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***
South Korea, nonsubject:							
Quantity	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Value	▲***	▼***	▼***	▲***	▲***	▼***	▲***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***
Turkey, nonsubject:							
Quantity	▼***	▼***	▼***	▲***	▲***	▲***	▲***
Value	▼***	▼***	▼***	▲***	▲***	▲***	▲***
Unit value	▲***	▲***	▼***	▲***	▼***	▼***	▼***
Ending inventory quantity	▲***	***	***	***	***	▲***	***
All other sources:							
Quantity	▼(56.1)	▲19.1	▼(64.5)	▲10.8	▼(14.1)	▲9.1	▼(5.0)
Value	▼(40.5)	▲12.8	▼(65.0)	▲5.3	▲27.5	▲12.0	▼(22.2)
Unit value	▲35.4	▼(5.3)	▼(1.3)	▼(4.9)	▲48.3	▲2.7	▼(18.1)
Ending inventory quantity	▲***	▲***	▼***	***	▲***	▲***	▲***
Nonsubject sources:							
Quantity	▼***	▼***	▼***	▲***	▼***	▲***	▲***
Value	▼***	▼***	▼***	▲***	▲***	▲***	▲***
Unit value	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	▲***	▲***	▼***	***	▲***	▲***	▲***
All import sources:							
Quantity	▼(70.7)	▼(21.7)	▼(73.1)	▲4.7	▲24.9	▲6.4	▲21.4
Value	▼(61.8)	▼(17.3)	▼(77.1)	▲13.1	▲83.6	▼(3.0)	▲3.9
Unit value	▲30.5	▲5.7	▼(14.7)	▲8.1	▲47.0	▼(8.9)	▼(14.4)
Ending inventory quantity	▲***	▲***	▼***	***	▲***	▲***	▲***

Table continued.

Table C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data							Interim 2024
	2018	2019	Calendar year		2022	2023	2023	
			2020	2021				
U.S. producers':								
Practical capacity quantity	3,243,528	3,281,140	2,810,561	2,653,688	2,637,074	2,370,741	1,728,478	1,778,022
Production quantity	1,426,557	1,786,876	1,051,165	217,544	426,274	1,086,892	731,761	649,602
Capacity utilization (fn1)	44.0	54.5	37.4	8.2	16.2	45.8	42.3	36.5
U.S. shipments:								
Quantity	1,356,052	1,744,225	1,093,067	255,408	304,092	1,102,459	657,925	712,406
Value	1,785,970	2,670,898	1,362,828	307,119	552,760	1,869,105	1,150,571	1,154,903
Unit value	\$1,317	\$1,531	\$1,247	\$1,202	\$1,818	\$1,695	\$1,749	\$1,621
Export shipments:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	164,516	201,120	154,375	63,364	163,458	111,411	144,674	82,271
Inventories/total shipments (fn1)	***	***	***	***	***	***	***	***
Production workers	1,608	1,812	1,589	959	1,106	2,007	1,803	1,719
Hours worked (1,000s)	3,086	4,207	3,178	1,411	2,011	4,034	2,959	3,073
Wages paid (\$1,000)	102,948	138,280	97,938	37,335	61,052	128,352	92,689	93,931
Hourly wages (dollars per hour)	\$33.36	\$32.87	\$30.82	\$26.46	\$30.36	\$31.82	\$31.32	\$30.57
Productivity (short tons per 1,000 hours)	462.3	424.7	330.8	154.2	212.0	269.4	247.3	211.4
Unit labor costs	\$72	\$77	\$93	\$172	\$143	\$118	\$127	\$145
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)	***	***	***	***	***	***	***	***
Unit COGS	\$1,146	\$1,291	\$1,209	\$1,170	\$1,800	\$1,493	\$1,503	\$1,449
Unit SG&A expenses	\$95	\$95	\$87	\$162	\$204	\$146	\$167	\$126
Unit operating income or (loss) (fn2)	\$72	\$145	\$(49)	\$(111)	\$(142)	\$79	\$122	\$47
Unit net income or (loss) (fn2)	\$65	\$141	\$(43)	\$(9)	\$(118)	\$92	\$135	\$54
COGS/sales (fn1)	87.3	84.3	96.9	95.8	96.7	86.9	83.8	89.4
Operating income or (loss)/sales (fn1)	5.5	9.4	(4.0)	(9.1)	(7.6)	4.6	6.8	2.9
Net income or (loss)/sales (fn1)	5.0	9.2	(3.5)	(0.7)	(6.3)	5.3	7.5	3.4
Capital expenditures	***	***	***	***	***	***	***	***
Research and development expenses	***	***	***	***	***	***	***	***
Total assets	***	***	***	***	***	***	***	***

Table continued.

Table C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	Calendar year		2021-22	2022-23	
			2019-20	2020-21			
U.S. producers':							
Practical capacity quantity	▼(26.9)	▲1.2	▼(14.3)	▼(5.6)	▼(0.6)	▼(10.1)	▲2.9
Production quantity	▼(23.8)	▲25.3	▼(41.2)	▼(79.3)	▲95.9	▲155.0	▼(11.2)
Capacity utilization (fn1)	▲1.9	▲10.5	▼(17.1)	▼(29.2)	▲8.0	▲29.7	▼(5.8)
U.S. shipments:							
Quantity	▼(18.7)	▲28.6	▼(37.3)	▼(76.6)	▲19.1	▲262.5	▲8.3
Value	▲4.7	▲49.5	▼(49.0)	▼(77.5)	▲80.0	▲238.1	▲0.4
Unit value	▲28.7	▲16.3	▼(18.6)	▼(3.6)	▲51.2	▼(6.7)	▼(7.3)
Export shipments:							
Quantity	▲***	▼***	▼***	▲***	▼***	▲***	▼***
Value	▲***	▼***	▼***	▲***	▼***	▲***	▼***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	▼(32.3)	▲22.2	▼(23.2)	▼(59.0)	▲158.0	▼(31.8)	▼(43.1)
Inventories/total shipments (fn1)	▼***	▼***	▲***	▲***	▲***	▼***	▼***
Production workers	▲24.8	▲12.7	▼(12.3)	▼(39.6)	▲15.3	▲81.5	▼(4.7)
Hours worked (1,000s)	▲30.7	▲36.3	▼(24.5)	▼(55.6)	▲42.5	▲100.6	▲3.9
Wages paid (\$1,000)	▲24.7	▲34.3	▼(29.2)	▼(61.9)	▲63.5	▲110.2	▲1.3
Hourly wages (dollars per hour)	▼(4.6)	▼(1.5)	▼(6.2)	▼(14.1)	▲14.7	▲4.8	▼(2.4)
Productivity (short tons per hour)	▼(41.7)	▼(8.1)	▼(22.1)	▼(53.4)	▲37.5	▲27.1	▼(14.5)
Unit labor costs	▲63.6	▲7.2	▲20.4	▲84.2	▼(16.5)	▼(17.5)	▲14.2
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)	▲***	▲***	—	—	—	—	▼***
Unit COGS	▲30.2	▲12.6	▼(6.4)	▼(3.2)	▲53.8	▼(17.1)	▼(3.6)
Unit SG&A expenses	▲53.2	▲0.3	▼(8.3)	▲84.8	▲26.1	▼(28.5)	▼(24.7)
Unit operating income or (loss) (fn2)	▲9.8	▲100.9	—	—	—	—	▼(61.8)
Unit net income or (loss) (fn2)	▲40.7	▲116.8	—	—	—	—	▼(59.6)
COGS/sales (fn1)	▼(0.4)	▼(3.0)	▲12.6	▼(1.1)	▲0.9	▼(9.8)	▲5.5
Operating income or (loss)/sales (fn1)	▼(0.9)	▲4.0	▼(13.4)	▼(5.1)	▲1.4	▲12.2	▼(3.9)
Net income or (loss)/sales (fn1)	▲0.4	▲4.3	▼(12.7)	▲2.8	▼(5.6)	▲11.7	▼(4.2)
Capital expenditures	▼***	▲***	▼***	▼***	▲***	▲***	▲***
Research and development expenses	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Total assets	▲***	▲***	▼***	▼***	▲***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 02, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Import value data reflect landed, duty-paid values.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. 508 compliant tables for these data are contained in Parts 1, 3, and 4 of this report.

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.

Table ALT C.1

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data							
	Calendar year						Interim	
	2018	2019	2020	2021	2022	2023	2023	2024
U.S. consumption quantity:								
Amount	***	***	***	485,427	591,362	1,408,159	867,298	966,612
Producers' share (fn1)	***	***	***	52.6	51.4	78.3	75.9	73.7
Importers' share (fn1):								
Canada	***	***	***	4.5	0.0	0.0	0.0	0.1
China	***	***	***	0.3	0.0	0.0	0.0	0.4
Greece	***	***	***	1.1	—	—	—	1.1
India	***	***	***	0.0	6.9	1.8	2.8	0.0
South Korea, subject	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	***	***	***	25.8	18.2	8.3	9.4	8.0
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	47.4	48.6	21.7	24.1	26.3
U.S. consumption value:								
Amount	***	***	***	570,726	1,036,830	2,338,438	1,469,908	1,486,824
Producers' share (fn1)	***	***	***	53.8	53.3	79.9	78.3	77.7
Importers' share (fn1):								
Canada	***	***	***	4.9	0.0	0.0	0.0	0.1
China	***	***	***	0.5	0.0	0.0	0.0	0.3
Greece	***	***	***	1.1	—	—	—	1.0
India	***	***	***	0.0	6.2	1.6	2.5	0.0
South Korea, subject	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	***	***	***	25.6	18.0	8.9	9.8	7.6
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	46.2	46.7	20.1	21.7	22.3
U.S. imports from:								
Canada:								
Quantity	261,992	244,475	26,548	21,787	138	200	80	1,444
Value	354,184	335,853	30,064	28,133	53	538	386	1,778
Unit value	\$1,352	\$1,374	\$1,132	\$1,291	\$387	\$2,693	\$4,844	\$1,231
Ending inventory quantity	***	***	***	***	***	***	***	***
China								
Quantity	4,651	—	165	1,534	141	233	233	4,235
Value	4,036	—	177	3,050	222	359	359	3,883
Unit value	\$868	—	\$1,074	\$1,989	\$1,581	\$1,540	\$1,540	\$917
Ending inventory quantity	***	***	***	***	***	***	***	***
Greece:								
Quantity	244,042	69,221	—	5,576	—	—	—	10,522
Value	235,185	82,655	—	6,126	—	—	—	15,421
Unit value	\$964	\$1,194	—	\$1,099	—	—	—	\$1,466
Ending inventory quantity	***	***	***	***	***	***	***	***
India:								
Quantity	4,657	18	7,032	4	40,848	25,008	24,662	69
Value	5,305	40	7,439	3	64,529	37,124	36,677	137
Unit value	\$1,139	\$2,259	\$1,058	\$726	\$1,580	\$1,484	\$1,487	\$1,978
Ending inventory quantity	***	***	***	***	***	***	***	***
South Korea, subject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***

Table continued.

Table ALT C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	2019-20	2020-21	2021-22	2022-23	
U.S. consumption quantity:							
Amount	▼***	▲***	▼***	▼***	▲21.8	▲138.1	▲11.5
Producers' share (fn1)	▲***	▲***	▲***	▼***	▼(1.2)	▲26.9	▼(2.2)
Importers' share (fn1):							
Canada	▼***	▼***	▼***	▲***	▼(4.5)	▼(0.0)	▲0.1
China	▼***	▼***	▲***	▲***	▼(0.3)	▼(0.0)	▲0.4
Greece	▼***	▼***	▼***	▲***	▼(1.1)	—	▲1.1
India	▲***	▼***	▲***	▼***	▲6.9	▼(5.1)	▼(2.8)
South Korea, subject	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Turkey, subject	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Subject sources	▼***	▼***	▼***	▲***	▲***	▼***	▼***
South Korea, nonsubject	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Turkey, nonsubject	▼***	▼***	▼***	▲***	▲***	▲***	▲***
All other sources	▼***	▲***	▼***	▲***	▼(7.6)	▼(9.9)	▼(1.4)
Nonsubject sources	▼***	▼***	▼***	▲***	▼***	▼***	▲***
All import sources	▼***	▼***	▼***	▲***	▲1.2	▼(26.9)	▲2.2
U.S. consumption value:							
Amount	▼***	▲***	▼***	▼***	▲81.7	▲125.5	▲1.2
Producers' share (fn1)	▲***	▲***	▲***	▼***	▼(0.5)	▲26.6	▼(0.6)
Importers' share (fn1):							
Canada	▼***	▼***	▼***	▲***	▼(4.9)	▲0.0	▲0.1
China	▼***	▼***	▲***	▲***	▼(0.5)	▼(0.0)	▲0.2
Greece	▼***	▼***	▼***	▲***	▼(1.1)	—	▲1.0
India	▲***	▼***	▲***	▼***	▲6.2	▼(4.6)	▼(2.5)
South Korea, subject	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Turkey, subject	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Subject sources	▼***	▼***	▼***	▲***	▲***	▼***	▼***
South Korea, nonsubject	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Turkey, nonsubject	▼***	▼***	▼***	▲***	▲***	▲***	▲***
All other sources	▼***	▼***	▼***	▲***	▼(7.6)	▼(9.1)	▼(2.3)
Nonsubject sources	▼***	▼***	▼***	▲***	▼***	▼***	▲***
All import sources	▼***	▼***	▼***	▲***	▲0.5	▼(26.6)	▲0.6
U.S. imports from:							
Canada:							
Quantity	▼(99.9)	▼(6.7)	▼(89.1)	▼(17.9)	▼(99.4)	▲44.8	▲1,711.4
Value	▼(99.8)	▼(5.2)	▼(91.0)	▼(6.4)	▼(99.8)	▲907.9	▲360.4
Unit value	▲99.2	▲1.6	▼(17.6)	▲14.0	▼(70.0)	▲596.1	▼(74.6)
Ending inventory quantity	***	***	***	***	***	***	***
China							
Quantity	▼(95.0)	▼(100.0)	▲***	▲830.8	▼(90.8)	▲65.7	▲1,717.9
Value	▼(91.1)	▼(100.0)	▲***	▲1,623.2	▼(92.7)	▲61.5	▲981.9
Unit value	▲77.5	▼(100.0)	▲***	▲85.1	▼(20.5)	▼(2.5)	▼(40.5)
Ending inventory quantity	***	***	***	***	***	***	***
Greece:							
Quantity	▼(100.0)	▼(71.6)	▼(100.0)	▲***	▼(100.0)	—	▲***
Value	▼(100.0)	▼(64.9)	▼(100.0)	▲***	▼(100.0)	—	▲***
Unit value	▼(100.0)	▲23.9	▼(100.0)	▲***	▼(100.0)	—	▲***
Ending inventory quantity	***	***	***	***	***	***	***
India:							
Quantity	▲437.0	▼(99.6)	▲39,827.1	▼(99.9)	▲919,656.7	▼(38.8)	▼(99.7)
Value	▲599.8	▼(99.3)	▲18,599.9	▼(100.0)	▲2,001,433.7	▼(42.5)	▼(99.6)
Unit value	▲30.3	▲98.3	▼(53.2)	▼(31.4)	▲117.6	▼(6.0)	▲33.0
Ending inventory quantity	***	***	***	***	***	***	***
South Korea, subject:							
Quantity	▼***	▲***	▼***	▼***	▲***	▼***	▲***
Value	▲***	▲***	▼***	▼***	▲***	▼***	▼***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***

Table continued.

Table ALT C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

	Reported data							
Item	Calendar year						Interim	
	2018	2019	2020	2021	2022	2023	2023	2024
U.S. imports from: Continued								
Turkey, subject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
Subject sources:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
South Korea, nonsubject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
Turkey, nonsubject:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
All other sources:								
Quantity	267,527	318,585	113,079	125,287	107,665	117,491	81,381	77,278
Value	351,368	396,425	138,902	146,280	186,458	208,894	144,671	112,539
Unit value	\$1,313	\$1,244	\$1,228	\$1,168	\$1,732	\$1,778	\$1,778	\$1,456
Ending inventory quantity	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
All import sources:								
Quantity	1,044,065	817,319	219,784	230,019	287,270	305,700	209,373	254,206
Value	1,228,028	1,015,825	233,091	263,607	484,070	469,333	319,337	331,921
Unit value	\$1,176	\$1,243	\$1,061	\$1,146	\$1,685	\$1,535	\$1,525	\$1,306
Ending inventory quantity	***	***	***	***	***	***	***	***

Table continued.

Table ALT C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	2019-20	2020-21	2021-22	2022-23	
U.S. imports from: Continued							
Turkey, subject:							
Quantity	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Value	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Unit value	▲***	▲***	▲***	▼***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	***	***
Subject sources:							
Quantity	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Value	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***
South Korea, nonsubject:							
Quantity	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Value	▲***	▼***	▼***	▲***	▲***	▼***	▲***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***
Turkey, nonsubject:							
Quantity	▼***	▼***	▼***	▲***	▲***	▲***	▲***
Value	▼***	▼***	▼***	▲***	▲***	▲***	▲***
Unit value	▲***	▲***	▼***	▲***	▼***	▼***	▼***
Ending inventory quantity	▲***	***	***	***	***	▲***	***
All other sources:							
Quantity	▼(56.1)	▲19.1	▼(64.5)	▲10.8	▼(14.1)	▲9.1	▼(5.0)
Value	▼(40.5)	▲12.8	▼(65.0)	▲5.3	▲27.5	▲12.0	▼(22.2)
Unit value	▲35.4	▼(5.3)	▼(1.3)	▼(4.9)	▲48.3	▲2.7	▼(18.1)
Ending inventory quantity	▲***	▲***	▼***	***	▲***	▲***	▲***
Nonsubject sources:							
Quantity	▼***	▼***	▼***	▲***	▼***	▲***	▲***
Value	▼***	▼***	▼***	▲***	▲***	▲***	▲***
Unit value	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	▲***	▲***	▼***	***	▲***	▲***	▲***
All import sources:							
Quantity	▼(70.7)	▼(21.7)	▼(73.1)	▲4.7	▲24.9	▲6.4	▲21.4
Value	▼(61.8)	▼(17.3)	▼(77.1)	▲13.1	▲83.6	▼(3.0)	▲3.9
Unit value	▲30.5	▲5.7	▼(14.7)	▲8.1	▲47.0	▼(8.9)	▼(14.4)
Ending inventory quantity	▲***	▲***	▼***	***	▲***	▲***	▲***

Table continued.

Table ALT C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data							
	2018	2019	Calendar year		2022	2023	Interim	2024
			2020	2021			2023	
U.S. producers:								
Practical capacity quantity	***	***	***	2,653,688	2,637,074	2,370,741	1,728,478	1,778,022
Production quantity	***	***	***	217,544	426,274	1,086,892	731,761	649,602
Capacity utilization (fn1)	***	***	***	8.2	16.2	45.8	42.3	36.5
U.S. shipments:								
Quantity	***	***	***	255,408	304,092	1,102,459	657,925	712,406
Value	***	***	***	307,119	552,760	1,869,105	1,150,571	1,154,903
Unit value	***	***	***	\$1,202	\$1,818	\$1,695	\$1,749	\$1,621
Export shipments:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	63,364	163,458	111,411	144,674	82,271
Inventories/total shipments (fn1)	***	***	***	***	***	***	***	***
Production workers	***	***	***	959	1,106	2,007	1,803	1,719
Hours worked (1,000s)	***	***	***	1,411	2,011	4,034	2,959	3,073
Wages paid (\$1,000)	***	***	***	37,335	61,052	128,352	92,689	93,931
Hourly wages (dollars per hour)	***	***	***	\$26.46	\$30.36	\$31.82	\$31.32	\$30.57
Productivity (short tons per 1,000 hours)	***	***	***	154.2	212.0	269.4	247.3	211.4
Unit labor costs	***	***	***	\$172	\$143	\$118	\$127	\$145
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)	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	\$1,170	\$1,800	\$1,493	\$1,503	\$1,449
Unit SG&A expenses	***	***	***	\$162	\$204	\$146	\$167	\$126
Unit operating income or (loss) (fn2)	***	***	***	\$(111)	\$(142)	\$79	\$122	\$47
Unit net income or (loss) (fn2)	***	***	***	\$(9)	\$(118)	\$92	\$135	\$54
COGS/sales (fn1)	***	***	***	95.8	96.7	86.9	83.8	89.4
Operating income or (loss)/sales (fn1)	***	***	***	(9.1)	(7.6)	4.6	6.8	2.9
Net income or (loss)/sales (fn1)	***	***	***	(0.7)	(6.3)	5.3	7.5	3.4
Capital expenditures	***	***	***	***	***	***	***	***
Research and development expenses	***	***	***	***	***	***	***	***
Total assets	***	***	***	***	***	***	***	***

Table continued.

Table ALT C.1 Continued

LDW line pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January through September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	2019-20	2020-21	2021-22	2022-23	
U.S. producers:							
Practical capacity quantity	▼***	▲***	▼***	▼***	▼(0.6)	▼(10.1)	▲2.9
Production quantity	▼***	▲***	▼***	▼***	▲95.9	▲155.0	▼(11.2)
Capacity utilization (fn1)	▲***	▲***	▼***	▼***	▲8.0	▲29.7	▼(5.8)
U.S. shipments:							
Quantity	▼***	▲***	▼***	▼***	▲19.1	▲262.5	▲8.3
Value	▲***	▲***	▼***	▼***	▲80.0	▲238.1	▲0.4
Unit value	▲***	▲***	▼***	▼***	▲51.2	▼(6.7)	▼(7.3)
Export shipments:							
Quantity	▲***	▼***	▼***	▲***	▼***	▲***	▼***
Value	▲***	▼***	▼***	▲***	▼***	▲***	▼***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	▼***	▲***	▼***	▼***	▲158.0	▼(31.8)	▼(43.1)
Inventories/total shipments (fn1)	▼***	▲***	▲***	▲***	▲***	▼***	▼***
Production workers	▲***	▲***	▼***	▼***	▲15.3	▲81.5	▼(4.7)
Hours worked (1,000s)	▲***	▲***	▼***	▼***	▲42.5	▲100.6	▲3.9
Wages paid (\$1,000)	▲***	▲***	▼***	▼***	▲63.5	▲110.2	▲1.3
Hourly wages (dollars per hour)	▼***	▲***	▼***	▼***	▲14.7	▲4.8	▼(2.4)
Productivity (short tons per hour)	▼***	▼***	▼***	▼***	▲37.5	▲27.1	▼(14.5)
Unit labor costs	▲***	▲***	▲***	▲***	▼(16.5)	▼(17.5)	▲14.2
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)	▲***	▲***	▼***	▲***	▼***	▲***	▼***
Unit COGS	▲***	▲***	▼***	▼***	▲53.8	▼(17.1)	▼(3.6)
Unit SG&A expenses	▲***	▼***	▼***	▲***	▲26.1	▼(28.5)	▼(24.7)
Unit operating income or (loss) (fn2)	▲***	▲***	▼***	▼***	▼—	▲—	▼(61.8)
Unit net income or (loss) (fn2)	▲***	▲***	▼***	▲***	▼—	▲—	▼(59.6)
COGS/sales (fn1)	▼***	▼***	▲***	▼***	▲0.9	▼(9.8)	▲5.5
Operating income or (loss)/sales (fn1)	▼***	▲***	▼***	▼***	▲1.4	▲12.2	▼(3.9)
Net income or (loss)/sales (fn1)	▲***	▲***	▼***	▲***	▼(5.6)	▲11.7	▼(4.2)
Capital expenditures	▼***	▲***	▼***	▼***	▲***	▲***	▲***
Research and development expenses	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Total assets	▲***	▲***	▼***	▼***	▲***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed December 02, 2024 adjusted using Proprietary, Census-edited Customs records to report for both South Korea and Turkey subject vs. nonsubject. Imports are based on the imports for consumption data series. Import value data reflect landed, duty-paid values.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. 508 compliant tables for these data are contained in Parts 1, 3, and 4 of this report.

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.

Table C.2

LDW structural pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January to September

	Reported data							Interim
	Calendar year							
Item	2018	2019	2020	2021	2022	2023	2023	2024
U.S. consumption quantity:								
Amount	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***
Importers' share (fn1):								
Canada	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***
U.S. consumption value:								
Amount	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***
Importers' share (fn1):								
Canada	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***
U.S. imports from:								
Canada:								
Quantity	4,311	2,123	3,998	1,709	1,063	1,946	1,923	1,094
Value	3,088	1,979	3,952	2,403	1,865	7,363	7,330	1,498
Unit value	\$716	\$932	\$989	\$1,406	\$1,754	\$3,785	\$3,812	\$1,369
Ending inventory quantity	***	***	***	***	***	***	***	***
China								
Quantity	9,422	1,892	300	2,086	29	132	128	80
Value	11,054	2,236	1,401	13,462	268	168	115	424
Unit value	\$1,173	\$1,182	\$4,674	\$6,453	\$9,305	\$1,275	\$895	\$5,334
Ending inventory quantity	***	***	***	***	***	***	***	***
South Korea:								
Quantity	16,272	5,871	4,275	1,129	6,801	12,492	7,229	9,238
Value	15,706	6,639	4,641	1,178	10,042	16,898	10,195	11,134
Unit value	\$965	\$1,131	\$1,086	\$1,044	\$1,477	\$1,353	\$1,410	\$1,205
Ending inventory quantity	***	***	***	***	***	***	***	***
Turkey:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
Subject sources:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity	34,195	29,721	13,923	20,323	15,828	14,220	12,546	27,188
Value	60,461	125,869	13,549	17,380	24,402	17,234	14,487	85,780
Unit value	\$1,768	\$4,235	\$973	\$855	\$1,542	\$1,212	\$1,155	\$3,155
Ending inventory quantity	***	***	***	***	***	***	***	***
All import sources:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***

Table continued

Table C.2 Continued

LDW structural pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January to September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	Calendar year		2021-22	2022-23	
U.S. consumption quantity:							
Amount	▲***	▲***	▼***	▼***	▲***	▲***	▲***
Producers' share (fn1)	▲***	▲***	▲***	▼***	▲***	▲***	▼***
Importers' share (fn1):							
Canada	▼***	▼***	▲***	▼***	▼***	▲***	▼***
China	▼***	▼***	▼***	▲***	▼***	▲***	▼***
South Korea	▼***	▼***	▼***	▼***	▲***	▲***	▲***
Turkey	▲***	▲***	▲***	▲***	▼***	▼***	▲***
Subject sources	▼***	▼***	▲***	▲***	▼***	▼***	▲***
Nonsubject sources	▼***	▼***	▼***	▲***	▼***	▼***	▲***
All import sources	▼***	▼***	▼***	▲***	▼***	▼***	▲***
U.S. consumption value:							
Amount	▲***	▲***	▼***	▲***	▲***	▼***	▲***
Producers' share (fn1)	▲***	▼***	▲***	▼***	▲***	▲***	▼***
Importers' share (fn1):							
Canada	▲***	▼***	▲***	▼***	▼***	▲***	▼***
China	▼***	▼***	▼***	▲***	▼***	▼***	▲***
South Korea	▼***	▼***	▲***	▼***	▲***	▲***	▼***
Turkey	▼***	▲***	▲***	▲***	▼***	▼***	▲***
Subject sources	▼***	▼***	▲***	▲***	▼***	▼***	▼***
Nonsubject sources	▼***	▲***	▼***	▲***	▼***	▼***	▲***
All import sources	▼***	▲***	▼***	▲***	▼***	▼***	▲***
U.S. imports from:							
Canada:							
Quantity	▼(54.9)	▼(50.7)	▲88.3	▼(57.3)	▼(37.8)	▲83.0	▼(43.1)
Value	▲138.4	▼(35.9)	▲99.7	▼(39.2)	▼(22.4)	▲294.8	▼(79.6)
Unit value	▲428.2	▲30.1	▲6.1	▲42.2	▲24.7	▲115.7	▼(64.1)
Ending inventory quantity	▼***	***	▲***	▼***	***	▼***	***
China							
Quantity	▼(98.6)	▼(79.9)	▼(84.2)	▲595.8	▼(98.6)	▲358.8	▼(37.8)
Value	▼(98.5)	▼(79.8)	▼(37.3)	▲860.6	▼(98.0)	▼(37.2)	▲270.5
Unit value	▲8.6	▲0.7	▲295.5	▲38.1	▲44.2	▼(86.3)	▲496.1
Ending inventory quantity	▼***	▼***	▼***	▼***	▼***	▼***	▼***
South Korea:							
Quantity	▼(23.2)	▼(63.9)	▼(27.2)	▼(73.6)	▲502.4	▲83.7	▲27.8
Value	▲7.6	▼(57.7)	▼(30.1)	▼(74.6)	▲752.3	▲68.3	▲9.2
Unit value	▲40.1	▲17.2	▼(4.0)	▼(3.9)	▲41.5	▼(8.4)	▼(14.5)
Ending inventory quantity	▲***	▲***	▲***	▼***	▼***	▲***	▼***
Turkey:							
Quantity	▲***	▲***	▲***	▲***	▼***	▼***	▲***
Value	▲***	▲***	▲***	▲***	▼***	▼***	▲***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	***	***
Subject sources							
Quantity	▼***	▼***	▲***	▲***	▼***	▲***	▲***
Value	▲***	▼***	▲***	▲***	▼***	▼***	▲***
Unit value	▲***	▲***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Nonsubject sources:							
Quantity	▼(58.4)	▼(13.1)	▼(53.2)	▲46.0	▼(22.1)	▼(10.2)	▲116.7
Value	▼(71.5)	▲108.2	▼(89.2)	▲28.3	▲40.4	▼(29.4)	▲492.1
Unit value	▼(31.5)	▲139.5	▼(77.0)	▼(12.1)	▲80.3	▼(21.4)	▲173.2
Ending inventory quantity	▼***	▼***	▼***	▲***	▼***	▼***	▼***
All import sources:							
Quantity	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Value	▼***	▲***	▼***	▲***	▼***	▼***	▲***
Unit value	▼***	▲***	▼***	▲***	▲***	▼***	▲***
Ending inventory quantity	▼***	▲***	▼***	▼***	▼***	▼***	▼***

Table continued

Table C.2 Continued

LDW structural pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January to September

Item	Reported data							
	Calendar year							Interim
	2018	2019	2020	2021	2022	2023	2023	2024
U.S. producers ¹ :								
Practical capacity quantity	556,409	557,722	555,482	537,803	691,514	563,969	431,229	413,657
Production quantity	204,981	215,595	192,547	138,715	204,800	244,978	173,727	197,163
Capacity utilization (fn1)	36.8	38.7	34.7	25.8	29.6	43.4	40.3	47.7
U.S. shipments:								
Quantity	181,633	210,711	202,083	155,387	206,266	233,702	172,640	185,467
Value	190,028	225,362	211,322	218,078	356,771	370,963	267,486	272,765
Unit value	\$1,046	\$1,070	\$1,046	\$1,403	\$1,730	\$1,587	\$1,549	\$1,471
Export shipments:								
Quantity	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***
Ending inventory quantity	64,639	66,872	55,223	35,194	34,257	44,605	32,242	57,185
Inventories/total shipments (fn1)	***	***	***	***	***	***	***	***
Production workers	278	294	293	321	434	332	344	404
Hours worked (1,000s)	606	697	685	575	894	750	619	691
Wages paid (\$1,000)	15,342	17,123	18,969	15,909	27,764	25,498	20,519	23,908
Hourly wages (dollars per hour)	\$25.32	\$24.57	\$27.69	\$27.67	\$31.06	\$34.00	\$33.15	\$34.60
Productivity (short tons per 1,000 hours)	338.3	309.3	281.1	241.2	229.1	326.6	280.7	285.3
Unit labor costs	\$75	\$79	\$99	\$115	\$136	\$104	\$118	\$121
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)	***	***	***	***	***	***	***	***
Unit COGS	\$967	\$1,003	\$972	\$1,359	\$1,600	\$1,346	\$1,346	\$1,333
Unit SG&A expenses	\$69	\$55	\$63	\$109	\$116	\$61	\$59	\$60
Unit operating income or (loss) (fn2)	\$14	\$12	\$12	\$(57)	\$13	\$180	\$144	\$76
Unit net income or (loss) (fn2)	\$12	\$12	\$12	\$(25)	\$18	\$179	\$143	\$73
COGS/sales (fn1)	92.1	93.7	92.9	96.3	92.5	84.8	86.9	90.7
Operating income or (loss)/sales (fn1)	1.3	1.1	1.1	(4.0)	0.8	11.3	9.3	5.2
Net income or (loss)/sales (fn1)	1.2	1.1	1.1	(1.8)	1.1	11.3	9.2	5.0
Capital expenditures	***	***	***	***	***	***	***	***
Research and development expenses	***	***	***	***	***	***	***	***
Total assets	***	***	***	***	***	***	***	***

Table continued

Table C.2 Continued

LDW structural pipe: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted; Interim period is January to September

Item	Period changes						Interim 2023-24
	2018-23	2018-19	Calendar year		2021-22	2022-23	
			2019-20	2020-21			
U.S. producers ¹ :							
Practical capacity quantity	▲1.4	▲0.2	▼(0.4)	▼(3.2)	▲28.6	▼(18.4)	▼(4.1)
Production quantity	▲19.5	▲5.2	▼(10.7)	▼(28.0)	▲47.6	▲19.6	▲13.5
Capacity utilization (fn1)	▲17.9	▲4.9	▼(10.3)	▼(25.6)	▲14.8	▲46.7	▲18.3
U.S. shipments:							
Quantity	▲28.7	▲16.0	▼(4.1)	▼(23.1)	▲32.7	▲13.3	▲7.4
Value	▲95.2	▲18.6	▼(6.2)	▲3.2	▲63.6	▲4.0	▲2.0
Unit value	▲51.7	▲2.2	▼(2.2)	▲34.2	▲23.2	▼(8.2)	▼(5.1)
Export shipments:							
Quantity	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Value	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Unit value	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity	▼(31.0)	▲3.5	▼(17.4)	▼(36.3)	▼(2.7)	▲30.2	▲77.4
Inventories/total shipments (fn1)	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Production workers	▲19.4	▲5.8	▼(0.3)	▲9.6	▲35.2	▼(23.5)	▲17.4
Hours worked (1,000s)	▲23.8	▲15.0	▼(1.7)	▼(16.1)	▲55.5	▼(16.1)	▲11.6
Wages paid (\$1,000)	▲66.2	▲11.6	▲10.8	▼(16.1)	▲74.5	▼(8.2)	▲16.5
Hourly wages (dollars per hour)	▲34.3	▼(3.0)	▲12.7	▼(0.1)	▲12.2	▲9.5	▲4.4
Productivity (short tons per 1,000 hours)	▼(3.4)	▼(8.6)	▼(9.1)	▼(14.2)	▼(5.0)	▲42.6	▲1.7
Unit labor costs	▲39.1	▲6.1	▲24.0	▲16.4	▲18.2	▼(23.2)	▲2.7
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)	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Unit COGS	▲39.2	▲3.8	▼(3.1)	▲39.8	▲17.8	▼(15.9)	▼(1.0)
Unit SG&A expenses	▼(10.7)	▼(19.3)	▲13.5	▲73.3	▲7.0	▼(47.4)	▲1.1
Unit operating income or (loss) (fn2)	▲1,178.4	▼(15.4)	▼(1.8)	▼—	▲—	▲1,231.2	▼(47.0)
Unit net income or (loss) (fn2)	▲1,361.3	▼(4.7)	▼(1.2)	▼—	▲—	▲887.3	▼(48.8)
COGS/sales (fn1)	▼(7.3)	▲1.6	▼(0.8)	▲3.4	▼(3.8)	▼(7.7)	▲3.8
Operating income or (loss)/sales (fn1)	▲10.0	▼(0.2)	▲0.0	▼(5.1)	▲4.8	▲10.5	▼(4.1)
Net income or (loss)/sales (fn1)	▲10.1	▼(0.1)	▲0.0	▼(2.9)	▲2.9	▲10.3	▼(4.3)
Capital expenditures	▲***	▼***	▼***	▲***	▲***	▼***	▲***
Research and development expenses	▼***	▼***	▲***	▼***	▼***	▼***	▼***
Total assets	▲***	▼***	▼***	▲***	▲***	▼***	***

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed December 02, 2024. ***. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

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.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. 508 compliant tables for these data are contained in Parts 1, 3, and 4 of this report.

ORIGINAL INVESTIGATIONS (COMBINED)

Table C-1: Single like product: Summary data concerning all LDWP.....	C-3
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Table C-3: Split like product: Summary data concerning LDW structural pipe	C-7

Single like product, co-extensive: All LDWP

Table C-1

LDWP: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years		2016-17	Jan-Jun 2017-18
	2015	2016	2017	2017	2018	2015-17	2015-16		
U.S. consumption quantity:									
Amount.....	3,133,643	2,271,947	2,337,583	1,057,082	1,013,229	(25.4)	(27.5)	2.9	(4.1)
Producers' share (fn1).....	56.9	67.0	54.6	53.9	56.9	(2.4)	10.1	(12.5)	3.0
Importers' share (fn1):									
Canada.....	10.8	3.0	7.5	7.4	9.9	(3.3)	(7.8)	4.5	2.5
China.....	1.7	0.9	1.5	1.9	1.0	(0.2)	(0.7)	0.6	(0.9)
Greece.....	6.4	4.0	0.6	0.2	10.0	(5.8)	(2.4)	(3.4)	9.8
India.....	1.6	1.4	16.8	18.9	0.2	15.1	(0.2)	15.3	(18.8)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.1	5.3	2.7	3.5	0.5	(1.4)	1.2	(2.6)	(3.0)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	(0.0)	(0.0)	---
All other sources.....	10.5	9.9	7.7	6.3	9.4	(2.8)	(0.6)	(2.2)	3.2
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	43.1	33.0	45.4	46.1	43.1	2.4	(10.1)	12.5	(3.0)
U.S. consumption value:									
Amount.....	3,488,860	2,234,580	2,248,792	977,836	1,136,383	(35.5)	(36.0)	0.6	16.2
Producers' share (fn1).....	58.2	69.1	59.4	59.7	59.8	1.2	10.9	(9.7)	0.1
Importers' share (fn1):									
Canada.....	11.9	3.0	8.0	7.2	11.5	(3.8)	(8.9)	5.1	4.4
China.....	1.2	0.6	1.4	1.7	1.1	0.3	(0.5)	0.8	(0.6)
Greece.....	6.0	3.3	0.5	0.1	7.8	(5.5)	(2.7)	(2.8)	7.8
India.....	1.5	1.2	13.1	16.0	0.2	11.6	(0.3)	11.9	(15.8)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.5	5.8	2.7	3.7	0.5	(1.8)	1.3	(3.1)	(3.3)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	(0.0)	(0.0)	---
All other sources.....	10.9	9.6	7.6	5.8	9.8	(3.3)	(1.3)	(2.0)	4.0
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	41.8	30.9	40.6	40.3	40.2	(1.2)	(10.9)	9.7	(0.1)
U.S. imports from:									
Canada:									
Quantity.....	338,166	67,666	174,207	78,663	100,254	(48.5)	(80.0)	157.5	27.4
Value.....	413,856	66,067	180,984	70,109	131,217	(56.3)	(84.0)	173.9	87.2
Unit value.....	\$1,224	\$976	\$1,039	\$891	\$1,309	(15.1)	(20.2)	6.4	46.9
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
China:									
Quantity.....	52,301	20,991	35,339	20,334	9,967	(32.4)	(59.9)	68.4	(51.0)
Value.....	40,494	14,119	31,782	17,077	12,873	(21.5)	(65.1)	125.1	(24.8)
Unit value.....	\$774	\$673	\$899	\$840	\$1,292	16.2	(13.1)	33.7	53.8
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Greece:									
Quantity.....	201,344	90,802	13,854	2,097	101,607	(93.1)	(54.9)	(84.7)	4,744.3
Value.....	208,570	74,072	11,420	601	88,769	(94.5)	(64.5)	(84.6)	14,661.0
Unit value.....	\$1,036	\$816	\$824	\$287	\$874	(20.4)	(21.3)	1.0	204.7
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	51,091	32,719	392,135	200,292	1,887	667.5	(36.0)	1,098.5	(99.1)
Value.....	52,095	26,689	295,423	156,497	2,207	467.1	(48.8)	1,006.9	(98.6)
Unit value.....	\$1,020	\$816	\$753	\$781	\$1,169	(26.1)	(20.0)	(7.6)	49.7
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea subject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey subject:									
Quantity.....	127,233	119,570	62,490	36,953	4,985	(50.9)	(6.0)	(47.7)	(86.5)
Value.....	156,825	130,450	61,235	36,547	5,523	(60.9)	(16.7)	(53.1)	(84.9)
Unit value.....	\$1,231	\$1,091	\$980	\$989	\$1,108	(20.4)	(11.4)	(10.2)	12.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

LDWP: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

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

	Reported data					Period changes			
	Calendar year		January to June			Comparison years		Jan-Jun	
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
All other sources:									
Quantity.....	328,727	224,749	180,465	66,114	95,446	(45.1)	(31.6)	(19.7)	44.4
Value.....	379,887	214,552	170,122	56,896	111,427	(55.2)	(43.5)	(20.7)	95.8
Unit value.....	\$1,156	\$955	\$943	\$861	\$1,167	(18.4)	(17.4)	(1.3)	35.7
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	1,350,322	748,879	1,062,270	487,282	436,473	(21.3)	(44.5)	41.8	(10.4)
Value.....	1,458,843	690,154	912,361	394,420	456,725	(37.5)	(52.7)	32.2	15.8
Unit value.....	\$1,080	\$922	\$859	\$809	\$1,046	(20.5)	(14.7)	(6.8)	29.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
U.S. producers:									
Average capacity quantity.....	3,911,962	4,008,312	3,886,062	1,943,031	1,959,698	(0.7)	2.5	(3.0)	0.9
Production quantity.....	1,956,400	1,437,418	1,259,929	574,037	641,763	(35.8)	(26.5)	(12.3)	11.8
Capacity utilization (fn1).....	50.0	35.9	32.4	29.5	32.7	(17.8)	(14.1)	(3.4)	3.2
U.S. shipments:									
Quantity.....	1,783,321	1,523,068	1,275,313	569,800	576,756	(28.5)	(14.6)	(16.3)	1.2
Value.....	2,029,917	1,544,426	1,336,431	583,416	679,658	(34.2)	(23.9)	(13.5)	16.5
Unit value.....	\$1,138	\$1,014	\$1,048	\$1,024	\$1,178	(7.9)	(10.9)	3.3	15.1
Channels of distribution (fn1):									
to Distributors.....	13.0	12.5	22.1	26.5	23.1	9.2	(0.4)	9.6	(3.4)
to Oil and gas end users.....	80.3	81.3	69.3	65.5	68.5	(10.9)	1.0	(12.0)	3.0
to Other end users.....	6.7	6.1	8.5	8.0	8.4	1.8	(0.6)	2.4	0.4
Export shipments:									
Quantity.....	49,714	1,814	19,368	18,674	1,070	(61.0)	(96.4)	967.7	(94.3)
Value.....	59,672	2,655	21,951	20,254	1,560	(63.2)	(95.6)	726.8	(92.3)
Unit value.....	\$1,200	\$1,464	\$1,133	\$1,085	\$1,458	(5.6)	21.9	(22.6)	34.4
Ending inventory quantity.....	265,713	178,182	143,436	163,741	207,361	(46.0)	(32.9)	(19.5)	26.6
Inventories/total shipments (fn1).....	14.5	11.7	11.1	13.9	17.9	(3.4)	(2.8)	(0.6)	4.0
Production workers.....	3,275	2,651	2,372	2,138	2,049	(27.6)	(19.1)	(10.5)	(4.2)
Hours worked (1,000s).....	6,959	5,415	4,821	2,242	2,440	(30.7)	(22.2)	(11.0)	8.8
Wages paid (\$1,000).....	191,432	148,645	127,191	64,719	65,120	(33.8)	(22.4)	(14.4)	0.6
Hourly wages (dollars per hour).....	\$27.51	\$27.45	\$26.38	\$28.87	\$26.89	(4.1)	(0.2)	(3.9)	(7.5)
Productivity (short tons per 1,000 hours).....	281.1	265.5	261.3	256.0	263.0	(7.0)	(5.6)	(1.5)	2.7
Unit labor costs.....	\$97.85	\$103.41	\$100.95	\$112.74	\$101.47	3.2	5.7	(2.4)	(10.0)
Net sales:									
Quantity.....	1,833,035	1,524,882	1,294,681	588,474	577,826	(29.4)	(16.8)	(15.1)	(1.8)
Value.....	2,189,467	1,606,341	1,390,638	624,549	698,873	(36.5)	(26.6)	(13.4)	11.9
Unit value.....	\$1,194	\$1,053	\$1,074	\$1,061	\$1,209	(10.1)	(11.8)	2.0	14.0
Cost of goods sold (COGS).....	1,899,622	1,477,777	1,239,797	561,940	625,226	(34.7)	(22.2)	(16.1)	11.3
Gross profit or (loss).....	289,845	128,564	150,841	62,609	73,647	(48.0)	(55.6)	17.3	17.6
SG&A expenses.....	140,792	116,133	96,667	47,294	56,223	(31.3)	(17.5)	(16.8)	18.9
Operating income or (loss).....	149,053	12,431	54,174	15,315	17,424	(63.7)	(91.7)	335.8	13.8
Net income or (loss).....	26,760	(57,812)	29,417	4,427	(696)	9.9	fn2	fn2	fn2
Capital expenditures.....	88,368	48,108	24,088	13,239	8,349	(72.7)	(45.6)	(49.9)	(36.9)
Unit COGS.....	\$1,036	\$969	\$958	\$955	\$1,082	(7.6)	(6.5)	(1.2)	13.3
Unit SG&A expenses.....	\$77	\$76	\$75	\$80	\$97	(2.8)	(0.8)	(2.0)	21.1
Unit operating income or (loss).....	\$81	\$8	\$42	\$26	\$30	(48.5)	(90.0)	413.3	15.9
Unit net income or (loss).....	\$15	\$(38)	\$23	\$8	\$(1)	55.6	fn2	fn2	fn2
COGS/sales (fn1).....	86.8	92.0	89.2	90.0	89.5	2.4	5.2	(2.8)	(0.5)
Operating income or (loss)/sales (fn1).....	6.8	0.8	3.9	2.5	2.5	(2.9)	(6.0)	3.1	0.0
Net income or (loss)/sales (fn1).....	1.2	(3.6)	2.1	0.7	(0.1)	0.9	(4.8)	5.7	(0.8)

Notes:

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

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics and proprietary *** records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6010, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

Split like product: LDW line pipe

Table C-2

LDW line pipe: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years		Jan-Jun	
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	2,870,827	1,999,775	2,025,788	913,317	889,026	(29.4)	(30.3)	1.3	(2.7)
Producers' share (fn1).....	55.1	66.3	52.4	51.2	55.5	(2.7)	11.2	(13.8)	4.2
Importers' share (fn1):									
Canada.....	11.3	2.9	8.0	7.9	10.9	(3.3)	(8.4)	5.1	3.0
China.....	1.2	0.6	0.7	1.1	0.4	(0.5)	(0.6)	0.1	(0.6)
Greece.....	7.0	4.5	0.7	0.2	11.4	(6.3)	(2.5)	(3.9)	11.2
India.....	1.8	1.6	19.3	21.9	0.2	17.6	(0.1)	17.7	(21.8)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.4	5.8	2.3	3.4	0.1	(2.1)	1.4	(3.6)	(3.3)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	(0.0)	(0.0)	---
All other sources.....	10.8	9.8	7.6	6.2	9.3	(3.2)	(1.0)	(2.2)	3.1
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	44.9	33.7	47.6	48.8	44.5	2.7	(11.2)	13.8	(4.2)
U.S. consumption value:									
Amount.....	3,198,936	2,004,876	1,955,243	845,210	989,128	(38.9)	(37.3)	(2.5)	17.0
Producers' share (fn1).....	55.9	67.8	56.9	56.7	57.6	1.0	11.9	(10.9)	1.0
Importers' share (fn1):									
Canada.....	12.6	2.9	8.8	7.8	13.0	(3.9)	(9.7)	5.8	5.2
China.....	0.8	0.4	0.6	0.8	0.3	(0.2)	(0.4)	0.2	(0.4)
Greece.....	6.5	3.7	0.6	0.1	9.0	(5.9)	(2.8)	(3.1)	8.9
India.....	1.6	1.3	15.1	18.5	0.1	13.5	(0.3)	13.8	(18.4)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.8	6.4	2.3	3.7	0.2	(2.5)	1.5	(4.0)	(3.5)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	0.0	(0.0)	---
All other sources.....	11.2	9.3	7.5	5.8	9.2	(3.7)	(1.9)	(1.8)	3.3
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	44.1	32.2	43.1	43.3	42.4	(1.0)	(11.9)	10.9	(1.0)
U.S. imports from:									
Canada:									
Quantity.....	324,081	57,112	161,169	71,846	96,783	(50.3)	(82.4)	182.2	34.7
Value.....	403,449	58,762	171,292	65,627	128,425	(57.5)	(85.4)	191.5	95.7
Unit value.....	\$1,245	\$1,029	\$1,063	\$913	\$1,327	(14.6)	(17.4)	3.3	45.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
China:									
Quantity.....	34,013	12,263	14,442	9,704	3,829	(57.5)	(63.9)	17.8	(60.5)
Value.....	25,977	7,595	11,940	6,658	3,424	(54.0)	(70.8)	57.2	(48.6)
Unit value.....	\$764	\$619	\$827	\$686	\$894	8.3	(18.9)	33.5	30.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Greece:									
Quantity.....	201,344	90,802	13,811	2,054	101,607	(93.1)	(54.9)	(84.8)	4,847.0
Value.....	208,570	74,072	11,377	559	88,769	(94.5)	(64.5)	(84.6)	15,780.4
Unit value.....	\$1,036	\$816	\$824	\$272	\$874	(20.5)	(21.3)	1.0	221.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	51,072	32,693	391,976	200,292	1,492	667.5	(36.0)	1,099.0	(99.3)
Value.....	52,040	26,663	295,220	156,497	1,294	467.3	(48.8)	1,007.2	(99.2)
Unit value.....	\$1,019	\$816	\$753	\$781	\$868	(26.1)	(20.0)	(7.7)	11.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea subject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey subject:									
Quantity.....	125,951	116,311	45,720	31,201	874	(63.7)	(7.7)	(60.7)	(97.2)
Value.....	154,816	127,760	45,787	30,983	1,850	(70.4)	(17.5)	(64.2)	(94.0)
Unit value.....	\$1,229	\$1,098	\$1,001	\$993	\$2,117	(18.5)	(10.6)	(8.8)	113.2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-2--Continued

LDW line pipe: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

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

	Reported data					Period changes			
	Calendar year		January to June			Comparison years		2016-17	Jan-Jun 2017-18
	2015	2016	2017	2017	2018	2015-17	2015-16		
All other sources:									
Quantity.....	310,478	196,583	153,883	56,607	82,360	(50.4)	(36.7)	(21.7)	45.5
Value.....	358,566	186,232	146,169	49,217	90,557	(59.2)	(48.1)	(21.5)	84.0
Unit value.....	\$1,155	\$947	\$950	\$869	\$1,100	(17.8)	(18.0)	0.3	26.5
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	1,289,161	674,705	963,758	445,334	395,753	(25.2)	(47.7)	42.8	(11.1)
Value.....	1,410,835	645,289	843,181	366,233	419,028	(40.2)	(54.3)	30.7	14.4
Unit value.....	\$1,094	\$956	\$875	\$822	\$1,059	(20.1)	(12.6)	(8.5)	28.8
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
U.S. producers:									
Average capacity quantity.....	3,224,017	3,349,787	3,102,518	1,542,866	1,574,155	(3.8)	3.9	(7.4)	2.0
Production quantity.....	1,748,554	1,231,902	1,039,228	459,448	532,140	(40.8)	(29.5)	(15.6)	15.8
Capacity utilization (fn1).....	54.2	36.8	33.5	29.8	33.8	(20.7)	(17.5)	(3.3)	4.0
U.S. shipments:									
Quantity.....	1,581,666	1,325,070	1,062,030	467,983	493,273	(32.9)	(16.2)	(19.9)	5.4
Value.....	1,788,101	1,359,587	1,112,062	478,977	570,100	(37.8)	(24.0)	(18.2)	19.0
Unit value.....	\$1,131	\$1,026	\$1,047	\$1,023	\$1,156	(7.4)	(9.2)	2.1	12.9
Channels of distribution (fn1):									
to Distributors.....	9.9	7.3	17.8	21.9	21.2	7.9	(2.6)	10.5	(0.7)
to Oil and gas end users.....	89.5	92.7	82.2	78.1	78.8	(7.3)	3.2	(10.5)	0.7
to Other end users.....	0.6	---	---	---	---	(0.6)	(0.6)	---	---
Export shipments:									
Quantity.....	47,889	1,648	19,151	18,624	1,064	(60.0)	(96.6)	1,062.1	(94.3)
Value.....	57,626	1,718	20,196	19,596	1,553	(65.0)	(97.0)	1,075.6	(92.1)
Unit value.....	\$1,203	\$1,042	\$1,055	\$1,052	\$1,460	(12.4)	(13.4)	1.2	38.7
Ending inventory quantity.....	239,089	144,273	102,320	117,115	140,123	(57.2)	(39.7)	(29.1)	19.6
Inventories/total shipments (fn1).....	14.7	10.9	9.5	12.0	14.2	(5.2)	(3.8)	(1.4)	2.1
Production workers.....	2,618	1,979	1,725	1,497	1,454	(34.1)	(24.4)	(12.8)	(2.9)
Hours worked (1,000s).....	5,590	4,025	3,435	1,540	1,803	(38.6)	(28.0)	(14.7)	17.1
Wages paid (\$1,000).....	162,750	118,569	97,200	49,126	51,075	(40.3)	(27.1)	(18.0)	4.0
Hourly wages (dollars per hour).....	\$29.11	\$29.46	\$28.30	\$31.90	\$28.33	(2.8)	1.2	(3.9)	(11.2)
Productivity (short tons per 1,000 hours).....	312.8	306.1	302.5	298.3	295.1	(3.3)	(2.2)	(1.2)	(1.1)
Unit labor costs.....	\$93.08	\$96.25	\$93.53	\$106.92	\$95.98	0.5	3.4	(2.8)	(10.2)
Net sales:									
Quantity.....	1,629,555	1,326,718	1,081,181	486,607	494,337	(33.7)	(18.6)	(18.5)	1.6
Value.....	1,945,805	1,420,565	1,164,514	519,452	589,308	(40.1)	(27.0)	(18.0)	13.4
Unit value.....	\$1,194	\$1,071	\$1,077	\$1,067	\$1,192	(9.8)	(10.3)	0.8	11.7
Cost of goods sold (COGS).....	1,686,927	1,307,944	1,046,046	471,164	531,689	(38.0)	(22.5)	(20.0)	12.8
Gross profit or (loss).....	258,678	112,621	118,468	48,288	57,619	(54.2)	(56.5)	5.2	19.3
SG&A expenses.....	118,906	92,993	73,601	34,784	45,569	(38.1)	(21.8)	(20.9)	31.0
Operating income or (loss).....	139,772	19,628	44,867	13,504	12,050	(67.9)	(86.0)	128.6	(10.8)
Net income or (loss).....	20,543	(41,339)	24,406	5,244	(5,318)	18.8	fn2	fn2	fn2
Capital expenditures.....	85,265	28,170	12,634	6,188	6,355	(85.2)	(67.0)	(55.2)	2.7
Unit COGS.....	\$1,035	\$986	\$968	\$968	\$1,076	(6.5)	(4.8)	(1.9)	11.1
Unit SG&A expenses.....	\$73	\$70	\$68	\$71	\$92	(6.7)	(3.9)	(2.9)	29.0
Unit operating income or (loss).....	\$86	\$15	\$41	\$28	\$24	(51.6)	(82.8)	180.5	(12.2)
Unit net income or (loss).....	\$13	\$(31)	\$23	\$11	\$(11)	79.1	fn2	fn2	fn2
COGS/sales (fn1).....	86.7	92.1	89.8	90.7	90.2	3.1	5.4	(2.2)	(0.5)
Operating income or (loss)/sales (fn1).....	7.2	1.4	3.9	2.6	2.0	(3.3)	(5.8)	2.5	(0.6)
Net income or (loss)/sales (fn1).....	1.1	(2.9)	2.1	1.0	(0.9)	1.0	(4.0)	5.0	(1.9)

Notes:

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

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics and proprietary *** records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed September 19, 2018

Split like product: LDW structural pipe

Table C-3

LDW structural pipe: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years		Jan-Jun	
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	262,816	272,172	311,796	143,764	124,203	18.6	3.6	14.6	(13.6)
Producers' share (fn1).....	76.7	72.7	68.4	70.8	67.2	(8.3)	(4.0)	(4.3)	(3.6)
Importers' share (fn1):									
Canada.....	5.4	3.9	4.2	4.7	2.8	(1.2)	(1.5)	0.3	(1.9)
China.....	7.0	3.2	6.7	7.4	4.9	(0.3)	(3.8)	3.5	(2.5)
Greece.....	---	---	0.0	0.0	---	0.0	---	0.0	(0.0)
India.....	0.0	0.0	0.1	---	0.3	0.0	0.0	0.0	0.3
Korea.....	3.5	8.6	6.7	6.4	10.9	3.2	5.1	(1.9)	4.5
Turkey.....	0.5	1.2	5.4	4.0	3.3	4.9	0.7	4.2	(0.7)
Subject sources.....	16.3	16.9	23.1	22.6	22.2	6.7	0.6	6.2	(0.3)
Subject sources less India and Greece.....	16.3	16.9	23.0	22.5	21.9	6.7	0.6	6.1	(0.6)
Nonsubject sources.....	6.9	10.3	8.5	6.6	10.5	1.6	3.4	(1.8)	3.9
Nonsubject sources plus India and Greece.....	7.0	10.4	8.6	6.6	10.9	1.6	3.4	(1.8)	4.2
All import sources.....	23.3	27.3	31.6	29.2	32.8	8.3	4.0	4.3	3.6
U.S. consumption value:									
Amount.....	301,444	263,980	309,502	139,023	159,799	2.7	(12.4)	17.2	14.9
Producers' share (fn1).....	80.2	70.0	72.5	75.1	68.6	(7.7)	(10.2)	2.5	(6.6)
Importers' share (fn1):									
Canada.....	3.5	2.8	3.1	3.2	1.7	(0.3)	(0.7)	0.4	(1.5)
China.....	4.8	2.5	6.4	7.5	5.9	1.6	(2.3)	3.9	(1.6)
Greece.....	---	---	0.0	0.0	---	0.0	---	0.0	(0.0)
India.....	0.0	0.0	0.1	---	0.6	0.0	(0.0)	0.1	0.6
Korea.....	3.6	12.9	5.2	4.6	7.9	1.5	9.2	(7.7)	3.2
Turkey.....	0.8	1.2	5.0	4.0	2.3	4.2	0.4	3.8	(1.7)
Subject sources.....	12.7	19.3	19.8	19.4	18.4	7.1	6.5	0.5	(1.0)
Subject sources less India and Greece.....	12.7	19.2	19.7	19.3	17.8	7.0	6.6	0.4	(1.5)
Nonsubject sources.....	7.1	10.7	7.7	5.5	13.1	0.7	3.7	(3.0)	7.5
Nonsubject sources plus India and Greece.....	7.1	10.7	7.8	5.6	13.6	0.7	3.6	(2.9)	8.1
All import sources.....	19.8	30.0	27.5	24.9	31.4	7.7	10.2	(2.5)	6.6
U.S. imports from:									
Canada:									
Quantity.....	14,085	10,554	13,038	6,817	3,471	(7.4)	(25.1)	23.5	(49.1)
Value.....	10,407	7,304	9,692	4,482	2,792	(6.9)	(29.8)	32.7	(37.7)
Unit value.....	\$739	\$692	\$743	\$657	\$804	0.6	(6.3)	7.4	22.3
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
China:									
Quantity.....	18,288	8,728	20,897	10,629	6,137	14.3	(52.3)	139.4	(42.3)
Value.....	14,517	6,525	19,842	10,419	9,448	36.7	(55.1)	204.1	(9.3)
Unit value.....	\$794	\$748	\$950	\$980	\$1,539	19.6	(5.8)	27.0	57.1
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Greece:									
Quantity.....	---	---	44	44	---	fn2	fn2	fn2	(100.0)
Value.....	---	---	42	42	---	fn2	fn2	fn2	(100.0)
Unit value.....	---	---	\$974	\$974	---	fn2	fn2	fn2	(100.0)
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
India:									
Quantity.....	19	26	159	---	395	740.1	37.7	510.1	fn2
Value.....	54	26	202	---	912	273.7	(52.3)	683.8	fn2
Unit value.....	\$2,854	\$988	\$1,269	---	\$2,310	(55.5)	(65.4)	28.5	fn2
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Korea:									
Quantity.....	9,237	23,441	21,023	9,198	13,519	127.6	153.8	(10.3)	47.0
Value.....	10,958	33,924	15,954	6,397	12,545	45.6	209.6	(53.0)	96.1
Unit value.....	\$1,186	\$1,447	\$759	\$695	\$928	(36.0)	22.0	(47.6)	33.4
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Turkey:									
Quantity.....	1,282	3,259	16,770	5,752	4,111	1,207.9	154.2	414.6	(28.5)
Value.....	2,369	3,042	15,447	5,565	3,674	552.0	28.4	407.9	(34.0)
Unit value.....	\$1,848	\$933	\$921	\$968	\$894	(50.1)	(49.5)	(1.3)	(7.6)
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Subject sources:									
Quantity.....	42,912	46,008	71,931	32,440	27,634	67.6	7.2	56.3	(14.8)
Value.....	38,306	50,821	61,180	26,904	29,371	59.7	32.7	20.4	9.2
Unit value.....	\$893	\$1,105	\$851	\$829	\$1,063	(4.7)	23.7	(23.0)	28.2
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Subject sources less India and Greece:									
Quantity.....	42,893	45,982	71,728	32,396	27,239	67.2	7.2	56.0	(15.9)
Value.....	38,252	50,795	60,935	26,862	28,459	59.3	32.8	20.0	5.9
Unit value.....	\$892	\$1,105	\$850	\$829	\$1,045	(4.7)	23.9	(23.1)	26.0
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Nonsubject sources:									
Quantity.....	18,250	28,166	26,581	9,508	13,086	45.7	54.3	(5.6)	37.6
Value.....	21,321	28,321	23,953	7,679	20,870	12.3	32.8	(15.4)	171.8
Unit value.....	\$1,168	\$1,005	\$901	\$808	\$1,595	(22.9)	(13.9)	(10.4)	97.5
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
Nonsubject sources plus India and Greece:									
Quantity.....	18,269	28,192	26,784	9,551	13,481	46.6	54.3	(5.0)	41.1
Value.....	21,375	28,346	24,198	7,722	21,783	13.2	32.6	(14.6)	182.1
Unit value.....	\$1,170	\$1,005	\$903	\$808	\$1,616	(22.8)	(14.1)	(10.1)	99.9
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
All import sources:									
Quantity.....	61,161	74,174	98,513	41,947	40,720	61.1	21.3	32.8	(2.9)
Value.....	59,628	79,141	85,133	34,584	50,241	42.8	32.7	7.6	45.3
Unit value.....	\$975	\$1,067	\$864	\$824	\$1,234	(11.4)	9.4	(19.0)	49.7
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---

Table continued on next page.

Table C-3--Continued

LDW structural pipe: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

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

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. producers:									
Average capacity quantity.....	687,945	658,525	783,544	400,165	385,543	13.9	(4.3)	19.0	(3.7)
Production quantity.....	207,846	205,516	220,701	114,589	109,623	6.2	(1.1)	7.4	(4.3)
Capacity utilization (fn1).....	30.2	31.2	28.2	28.6	28.4	(2.0)	1.0	(3.0)	(0.2)
U.S. shipments:									
Quantity.....	201,655	197,998	213,283	101,817	83,483	5.8	(1.8)	7.7	(18.0)
Value.....	241,816	184,839	224,369	104,439	109,558	(7.2)	(23.6)	21.4	4.9
Unit value.....	\$1,199	\$934	\$1,052	\$1,026	\$1,312	(12.3)	(22.2)	12.7	27.9
Channels of distribution (fn1):									
to Distributors.....	36.7	47.6	43.6	47.8	34.4	6.9	10.9	(4.0)	(13.4)
to Oil and gas end users.....	8.4	5.4	5.5	7.0	6.2	(2.9)	(3.0)	0.1	(0.7)
to Other end users.....	54.9	47.0	50.9	45.2	59.3	(4.1)	(7.9)	3.8	14.1
Export shipments:									
Quantity.....	1,825	166	217	50	6	(88.1)	(90.9)	30.7	(88.0)
Value.....	2,046	937	1,755	658	7	(14.2)	(54.2)	87.3	(98.9)
Unit value.....	\$1,121	\$5,645	\$8,088	\$13,160	\$1,167	621.4	403.5	43.3	(91.1)
Ending inventory quantity.....	26,624	33,909	41,116	46,626	67,238	54.4	27.4	21.3	44.2
Inventories/total shipments (fn1).....	13.1	17.1	19.3	22.9	40.3	6.2	4.0	2.1	17.4
Production workers.....	657	672	647	641	595	(1.5)	2.3	(3.7)	(7.2)
Hours worked (1,000s).....	1,369	1,390	1,386	702	637	1.2	1.5	(0.3)	(9.3)
Wages paid (\$1,000).....	28,682	30,076	29,991	15,593	14,045	4.6	4.9	(0.3)	(9.9)
Hourly wages (dollars per hour).....	\$20.95	\$21.64	\$21.64	\$22.21	\$22.05	3.3	3.3	0.0	(0.7)
Productivity (short tons per 1,000 hours).....	151.8	147.9	159.2	163.2	172.1	4.9	(2.6)	7.7	5.4
Unit labor costs.....	\$138.00	\$146.34	\$135.89	\$136.08	\$128.12	(1.5)	6.0	(7.1)	(5.8)
Net sales:									
Quantity.....	203,480	198,164	213,500	101,867	83,489	4.9	(2.6)	7.7	(18.0)
Value.....	243,862	185,776	226,124	105,097	109,565	(7.3)	(23.8)	21.7	4.3
Unit value.....	\$1,198	\$937	\$1,059	\$1,032	\$1,312	(11.6)	(21.8)	13.0	27.2
Cost of goods sold (COGS).....	212,695	169,833	193,751	90,776	93,537	(8.9)	(20.2)	14.1	3.0
Gross profit or (loss).....	31,167	15,943	32,373	14,321	16,028	3.9	(48.8)	103.1	11.9
SG&A expenses.....	21,886	23,140	23,066	12,510	10,654	5.4	5.7	(0.3)	(14.8)
Operating income or (loss).....	9,281	(7,197)	9,307	1,811	5,374	0.3	fn2	fn2	196.7
Net income or (loss).....	6,217	(16,473)	5,011	(817)	4,622	(19.4)	fn2	fn2	fn2
Capital expenditures.....	3,103	19,938	11,454	7,051	1,994	269.1	542.5	(42.6)	(71.7)
Unit COGS.....	\$1,045	\$857	\$907	\$891	\$1,120	(13.2)	(18.0)	5.9	25.7
Unit SG&A expenses.....	\$108	\$117	\$108	\$123	\$128	0.4	8.6	(7.5)	3.9
Unit operating income or (loss).....	\$46	\$(36)	\$44	\$18	\$64	(4.4)	fn2	fn2	262.1
Unit net income or (loss).....	\$31	\$(83)	\$23	\$(8)	\$55	(23.2)	fn2	fn2	fn2
COGS/sales (fn1).....	87.2	91.4	85.7	86.4	85.4	(1.5)	4.2	(5.7)	(1.0)
Operating income or (loss)/sales (fn1).....	3.8	(3.9)	4.1	1.7	4.9	0.3	(7.7)	8.0	3.2
Net income or (loss)/sales (fn1).....	2.5	(8.9)	2.2	(0.8)	4.2	(0.3)	(11.4)	11.1	5.0

Notes:

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

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.31.4000, 7305.31.6010, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

ORIGINAL INVESTIGATIONS (TRAILING)

Table C-2 ALT: Related party exclusion: split like product: LDW line pipe.....	C-3
Table C-5 ALT: "...": split like product: LDW carbon and other alloy steel structural pipe.....	C-7

Related party exclusion: Split like product: LDW line pipe

Table ALT C-2

LDW line pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years		Jan-Jun	
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	2,870,827	1,999,775	2,025,788	913,317	889,026	(29.4)	(30.3)	1.3	(2.7)
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	55.1	66.3	52.4	51.2	55.5	(2.7)	11.2	(13.8)	4.2
Importers' share (fn1):									
Canada.....	11.3	2.9	8.0	7.9	10.9	(3.3)	(8.4)	5.1	3.0
China.....	1.2	0.6	0.7	1.1	0.4	(0.5)	(0.6)	0.1	(0.6)
Greece.....	7.0	4.5	0.7	0.2	11.4	(6.3)	(2.5)	(3.9)	11.2
India.....	1.8	1.6	19.3	21.9	0.2	17.6	(0.1)	17.7	(21.8)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.4	5.8	2.3	3.4	0.1	(2.1)	1.4	(3.6)	(3.3)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	(0.0)	(0.0)	---
All other sources.....	10.8	9.8	7.6	6.2	9.3	(3.2)	(1.0)	(2.2)	3.1
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	44.9	33.7	47.6	48.8	44.5	2.7	(11.2)	13.8	(4.2)
U.S. consumption value:									
Amount.....	3,198,936	2,004,876	1,955,243	845,210	989,128	(38.9)	(37.3)	(2.5)	17.0
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	55.9	67.8	56.9	56.7	57.6	1.0	11.9	(10.9)	1.0
Importers' share (fn1):									
Canada.....	12.6	2.9	8.8	7.8	13.0	(3.9)	(9.7)	5.8	5.2
China.....	0.8	0.4	0.6	0.8	0.3	(0.2)	(0.4)	0.2	(0.4)
Greece.....	6.5	3.7	0.6	0.1	9.0	(5.9)	(2.8)	(3.1)	8.9
India.....	1.6	1.3	15.1	18.5	0.1	13.5	(0.3)	13.8	(18.4)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.8	6.4	2.3	3.7	0.2	(2.5)	1.5	(4.0)	(3.5)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	0.0	(0.0)	---
All other sources.....	11.2	9.3	7.5	5.8	9.2	(3.7)	(1.9)	(1.8)	3.3
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	44.1	32.2	43.1	43.3	42.4	(1.0)	(11.9)	10.9	(1.0)
U.S. imports from:									
Canada:									
Quantity.....	324,081	57,112	161,169	71,846	96,783	(50.3)	(82.4)	182.2	34.7
Value.....	403,449	58,762	171,292	65,627	128,425	(57.5)	(85.4)	191.5	95.7
Unit value.....	\$1,245	\$1,029	\$1,063	\$913	\$1,327	(14.6)	(17.4)	3.3	45.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
China:									
Quantity.....	34,013	12,263	14,442	9,704	3,829	(57.5)	(63.9)	17.8	(60.5)
Value.....	25,977	7,595	11,940	6,658	3,424	(54.0)	(70.8)	57.2	(48.6)
Unit value.....	\$764	\$619	\$827	\$686	\$894	8.3	(18.9)	33.5	30.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Greece:									
Quantity.....	201,344	90,802	13,811	2,054	101,607	(93.1)	(54.9)	(84.8)	4,847.0
Value.....	208,570	74,072	11,377	559	88,769	(94.5)	(64.5)	(84.6)	15,780.4
Unit value.....	\$1,036	\$816	\$824	\$272	\$874	(20.5)	(21.3)	1.0	221.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	51,072	32,693	391,976	200,292	1,492	667.5	(36.0)	1,099.0	(99.3)
Value.....	52,040	26,663	295,220	156,497	1,294	467.3	(48.8)	1,007.2	(99.2)
Unit value.....	\$1,019	\$816	\$753	\$781	\$868	(26.1)	(20.0)	(7.7)	11.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea subject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey subject:									
Quantity.....	125,951	116,311	45,720	31,201	874	(63.7)	(7.7)	(60.7)	(97.2)
Value.....	154,816	127,760	45,787	30,983	1,850	(70.4)	(17.5)	(64.2)	(94.0)
Unit value.....	\$1,229	\$1,098	\$1,001	\$993	\$2,117	(18.5)	(10.6)	(8.8)	113.2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table ALT C-2--Continued

LDW line pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018

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

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
Korea nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity.....	310,478	196,583	153,883	56,607	82,360	(50.4)	(36.7)	(21.7)	45.5
Value.....	358,566	186,232	146,169	49,217	90,557	(59.2)	(48.1)	(21.5)	84.0
Unit value.....	\$1,155	\$947	\$950	\$869	\$1,100	(17.8)	(18.0)	0.3	26.5
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	1,289,161	674,705	963,758	445,334	395,753	(25.2)	(47.7)	42.8	(11.1)
Value.....	1,410,835	645,289	843,181	366,233	419,028	(40.2)	(54.3)	30.7	14.4
Unit value.....	\$1,094	\$956	\$875	\$822	\$1,059	(20.1)	(12.6)	(8.5)	28.8
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Included U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Channels of distribution (fn1):									
to Distributors.....	***	***	***	***	***	***	***	***	***
to Oil and gas end users.....	***	***	***	***	***	***	***	***	***
to Other end users.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

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

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics and proprietary *** records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed September 19, 2018

Related Party Exclusion: Split like product: LDW carbon and other alloy steel structural pipe

Table ALT C-5

LDW carbon and other alloy steel structural pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and India.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece and India.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and India.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece and India.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. imports from:									
Canada:									
Quantity.....	13,987	10,426	12,980	6,807	3,428	(7.2)	(25.5)	24.5	(49.6)
Value.....	9,651	6,495	9,234	4,396	2,405	(4.3)	(32.7)	42.2	(45.3)
Unit value.....	\$690	\$623	\$711	\$646	\$702	3.1	(9.7)	14.2	8.6
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
China:									
Quantity.....	18,288	8,659	20,496	10,261	5,960	12.1	(52.7)	136.7	(41.9)
Value.....	14,517	6,272	17,507	8,405	8,311	20.6	(56.8)	179.1	(1.1)
Unit value.....	\$794	\$724	\$854	\$819	\$1,394	7.6	(8.8)	17.9	70.2
Ending inventory quantity.....	8,484	3,428	1,120	1,120	320	(86.8)	(59.6)	(67.3)	(71.4)
Greece:									
Quantity.....	---	---	44	44	---	fn2	fn2	fn2	(100.0)
Value.....	---	---	42	42	---	fn2	fn2	fn2	(100.0)
Unit value.....	---	---	\$974	\$974	---	fn2	fn2	fn2	(100.0)
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
India:									
Quantity.....	12	26	120	---	149	923.4	122.3	360.3	fn2
Value.....	19	26	95	---	120	414.0	39.2	269.3	fn2
Unit value.....	\$1,578	\$988	\$793	---	\$802	(49.8)	(37.4)	(19.8)	fn2
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Korea:									
Quantity.....	8,803	20,463	20,993	9,198	13,518	138.5	132.5	2.6	47.0
Value.....	6,883	16,244	15,846	6,397	12,538	130.2	136.0	(2.4)	96.0
Unit value.....	\$782	\$794	\$755	\$695	\$927	(3.5)	1.5	(4.9)	33.4
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Turkey:									
Quantity.....	1,216	3,257	16,770	5,752	4,111	1,279.7	168.0	414.8	(28.5)
Value.....	1,425	3,031	15,447	5,565	3,674	984.1	112.7	409.6	(34.0)
Unit value.....	\$1,172	\$931	\$921	\$968	\$894	(21.4)	(20.6)	(1.0)	(7.6)
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Subject sources:									
Quantity.....	42,305	42,832	71,403	32,061	27,166	68.8	1.2	66.7	(15.3)
Value.....	32,495	32,068	58,172	24,805	27,047	79.0	(1.3)	81.4	9.0
Unit value.....	\$768	\$749	\$815	\$774	\$996	6.1	(2.5)	8.8	28.7
Ending inventory quantity.....	8,484	3,428	1,120	1,120	320	(86.8)	(59.6)	(67.3)	(71.4)
Subject sources less Greece and India:									
Quantity.....	42,293	42,806	71,239	32,018	27,017	68.4	1.2	66.4	(15.6)
Value.....	32,476	32,042	58,035	24,763	26,928	78.7	(1.3)	81.1	8.7
Unit value.....	\$768	\$749	\$815	\$773	\$997	6.1	(2.5)	8.8	28.9
Ending inventory quantity.....	8,484	3,428	1,120	1,120	320	(86.8)	(59.6)	(67.3)	(71.4)
Nonsubject sources:									
Quantity.....	18,130	27,054	26,433	9,471	12,134	45.8	49.2	(2.3)	28.1
Value.....	20,190	24,348	23,041	7,353	15,650	14.1	20.6	(5.4)	112.8
Unit value.....	\$1,114	\$900	\$872	\$776	\$1,290	(21.7)	(19.2)	(3.1)	66.1
Ending inventory quantity.....	18	7	7	7	7	(61.1)	(61.1)	---	---

Table continued on next page.

Table ALT C-5--Continued

LDW carbon and other alloy steel structural pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2015	Calendar year 2016	2017	January to June 2017	January to June 2018	2015-17	Comparison years 2015-16	2016-17	Jan-Jun 2017-18
Nonsubject sources plus Greece and India:									
Quantity.....	18,142	27,080	26,597	9,514	12,283	46.6	49.3	(1.8)	29.1
Value.....	20,209	24,374	23,179	7,395	15,770	14.7	20.6	(4.9)	113.2
Unit value.....	\$1,114	\$900	\$871	\$777	\$1,284	(21.8)	(19.2)	(3.2)	65.2
Ending inventory quantity.....	18	7	7	7	7	(61.1)	(61.1)	---	---
All import sources:									
Quantity.....	60,435	69,886	97,836	41,532	39,299	61.9	15.6	40.0	(5.4)
Value.....	52,685	56,416	81,213	32,158	42,697	54.1	7.1	44.0	32.8
Unit value.....	\$872	\$807	\$830	\$774	\$1,086	(4.8)	(7.4)	2.8	40.3
Ending inventory quantity.....	8,502	3,435	1,127	1,127	327	(86.7)	(59.6)	(67.2)	(71.0)
Included U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Channels of distribution (fn1):									
to Distributors.....	***	***	***	***	***	***	***	***	***
to Oil and gas end users.....	***	***	***	***	***	***	***	***	***
to Other end users.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

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

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

APPENDIX D

LDW LINE PIPE--COMMENTS ON EFFECTS OF ORDERS AND LIKELY EFFECTS OF REVOCATION

Table D.1

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Table continued

Table D.1 (Continued)

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

Table continued

Table D.1 (Continued)

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. importers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Table continued

Table D.1 (Continued)

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. importers

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Table continued

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. purchasers

Table continued

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. purchasers

Table continued

Table D.1 (Continued)

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, foreign producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Table continued

Table D.1 (Continued)

LDW line pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, foreign producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

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

APPENDIX E

BID DATA FOR LDW LINE PIPE

As noted in Line Part 5, six purchasers indicated that they had LDW line pipe projects which had bids from both domestic firms and subject countries: ***.¹ In total, they noted at least 60 events had taken place since January 1, 2021.² These purchasers were asked for details about their five largest bidding events in which domestic and subject sources bid. Five purchasers provided these details. Their responses are provided in tables E.1 to E.18 below.

¹ Three events submitted by *** were not for LDW line pipe of greater than 16 inches.

² Purchaser *** reported having *** multi-country bidding events, *** reported *** events, *** offered ***, and *** offered ***. Purchaser *** submitted data on *** multi-country bidding events but answered “unknown” with respect to how many LDW line pipe project bidding events it has offered since January 1, 2021. Purchaser *** reported that it had these multi-country bidding events, but did not describe how many, nor submit any details regarding those bidding events, despite staff’s repeated attempts to obtain these details. Purchaser *** did not submit any details regarding its bidding events – only the sources of the bids. Purchaser *** did not total its bidding events since January 1, 2021, but reported that its total number of projects bid utilizing LDW line pipe for calendar year 2023 was ***. It reported South Korea participating in *** of these project bidding events, the United States in ***, other countries (Germany, Greece, Italy, and the United Kingdom) in ***, and Canada in ***.

Table E.1 LDW line pipe: * bid data event 1 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.2 LDW line pipe: * bid data event 1 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.3 LDW line pipe: * bid data event 2 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.4 LDW line pipe: * bid data event 3 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.5 LDW line pipe: * bid data event 4 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.6 LDW line pipe: * bid data event 5 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.7 LDW line pipe: * bid data event 1 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.8 LDW line pipe: * bid data event 2 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.9 LDW line pipe: * bid data event 1 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Note: The countries listed in “Other may include Germany, Greece, Italy, and/or the UK.

Table E.10 LDW line pipe: * bid data event 2 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.11 LDW line pipe: * bid data event 3 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.12 LDW line pipe: * bid data event 4 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.13 LDW line pipe: * bid data event 5 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.14 LDW line pipe: * bid data event 1 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.15 LDW line pipe: * bid data event 2 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.16 LDW line pipe: * bid data event 3 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.17 LDW line pipe: * bid data event 4 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Table E.18 LDW line pipe: * bid data event 5 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***

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

APPENDIX F

LDW STRUCTURAL PIPE--COMMENTS ON EFFECTS OF ORDERS AND LIKELY EFFECTS OF REVOCATION

Table F.1 LDW structural pipe: Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Table continued

Table F.1 LDW structural pipe (Continued): Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

Table continued

Table F.1 LDW structural pipe (Continued): Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. importers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of orders	Importers	***

Table continued

Table F.1 LDW structural pipe (Continued): Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. importers

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Table continued

Table F.1 LDW structural pipe (Continued): Firms' narratives on the impact of the orders and the likely impact of revocation, U.S. purchasers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***

Table continued

Table F.1 LDW structural pipe (Continued): Firms' narratives on the impact of the orders and the likely impact of revocation, foreign producers

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Likely impact of revocation	Foreign producers	***

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

APPENDIX G

BID DATA FOR LDW STRUCTURAL PIPE

As noted in Structural Part 5, one purchaser indicated that it had LDW structural pipe projects which had bids from both domestic firms and subject countries. *** provided details regarding its five largest bidding events for LDW structural pipe since January 1, 2021. Its responses are provided in tables G.1 to G.5.

Table G.1 LDW structural pipe: * bid data event 1 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table G.2 LDW structural pipe: * bid data event 2 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table G.3 LDW structural pipe: * bid data event 3 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table G.4 LDW structural pipe: * bid data event 4 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

Table G.5 LDW structural pipe: * bid data event 5 details**

Bid event details	
Bid element	Element detail
Bid end date	***
Date of bid award	***
Quantity(ies)	***
Outer diameter size(s)	***
Grade/standard(s)	***
Manufacture type(s)	***
Delivery location(s)	***

Submitted bids details					
Bidding firm name	Country produced	Initial total delivered cost quote (\$1,000s)	Final total delivered cost quote (\$1,000s)	Winning bid (yes/no/split)	Reason bid accepted or rejected
***	***	***	***	***	***
***	***	***	***	***	***

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

