

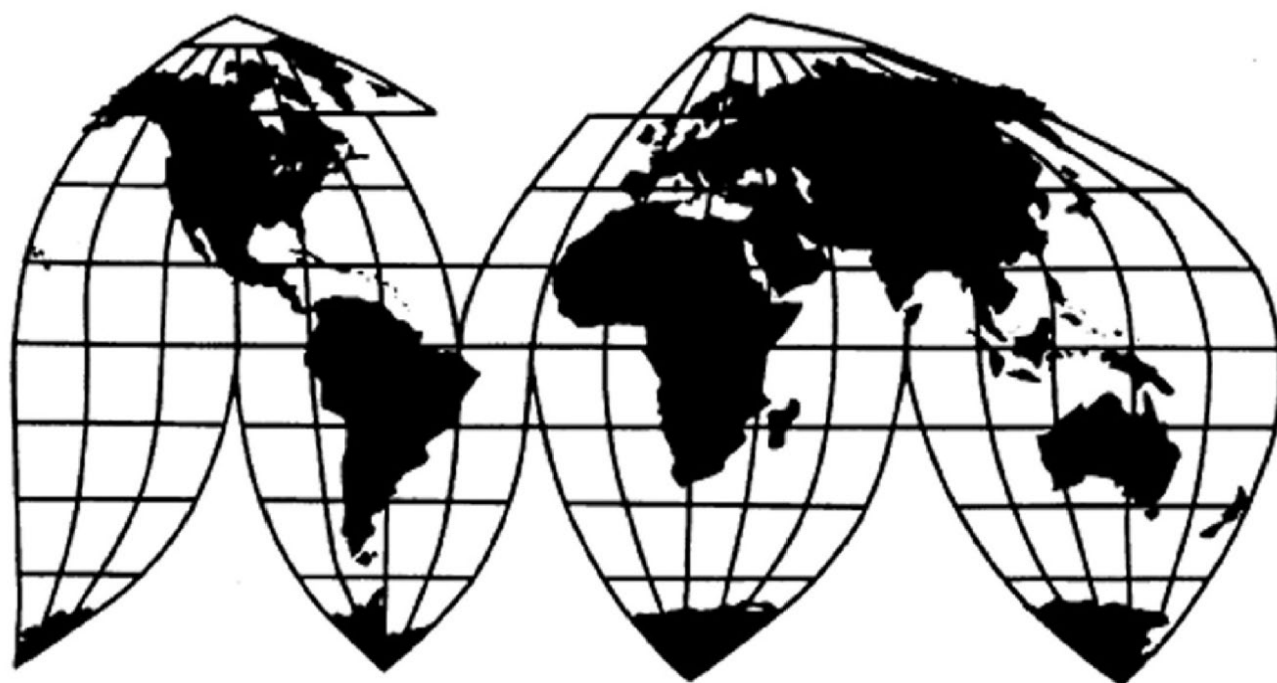
# **Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam**

Investigation Nos. 701-TA-454 and 731-TA-1144 (Third Review) and  
731-TA-1210–1212 (Second Review)

**Publication 5624**

**May 2025**

**U.S. International Trade Commission**



# U.S. International Trade Commission

## COMMISSIONERS

**Amy A. Karpel, Chair**  
**David S. Johanson**  
**Jason E. Kearns**

---

Catherine DeFilippo  
*Director of Operations*

---

### *Staff assigned*

Alexis Yim, Investigator  
David Guberman, Industry Analyst  
James Horne, Economist  
Cayla Ebert DeJaco, Attorney  
Charles Cummings, Supervisory Investigator

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

# **U.S. International Trade Commission**

Washington, DC 20436  
*www.usitc.gov*

## **Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam**

Investigation Nos. 701-TA-454 and 731-TA-1144 (Third Review) and  
731-TA-1210–1212 (Second Review)





## CONTENTS

	Page
<b>Determinations .....</b>	<b>1</b>
<b>Views of the Commission .....</b>	<b>3</b>
<b>Information obtained in these reviews .....</b>	<b>1.1</b>
Background .....	1.1
The original investigations .....	1.2
China .....	1.2
Malaysia, Thailand, Vietnam.....	1.2
China first five-year reviews .....	1.3
China second five-year reviews and Malaysia, Thailand, and Vietnam first five-year reviews .....	1.3
Previous and related investigations.....	1.4
Commerce’s five-year reviews.....	1.5
The product.....	1.6
Commerce’s scope .....	1.6
U.S. tariff treatment.....	1.7
Description and uses.....	1.8
Manufacturing process .....	1.9
The industry in the United States .....	1.10
U.S. producers.....	1.10
Recent developments .....	1.11
U.S. producers’ trade and financial data .....	1.13
Definitions of the domestic like product and domestic industry .....	1.14
U.S. importers .....	1.14
U.S. imports.....	1.15
Cumulation considerations .....	1.17
Apparent U.S. consumption and market shares.....	1.17
The industry in China .....	1.19
Producers in China .....	1.19
Recent developments .....	1.20
Exports .....	1.20
The industry in Malaysia .....	1.21
Producers in Malaysia.....	1.21
Exports .....	1.22

The industry in Thailand.....	1.23
Producers in Thailand .....	1.23
Recent developments .....	1.23
Exports .....	1.23
The industry in Vietnam.....	1.24
Producers in Vietnam .....	1.24
Exports .....	1.26
Third-country trade actions .....	1.27
The global market .....	1.29

## Appendixes

A. <i>Federal Register</i> notices .....	A.1
B. Responses to the notice of institution .....	B.1
C. Summary data compiled in prior proceedings .....	C.1
D. Purchaser questionnaire responses .....	D.1

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-454 and 731-TA-1144 (Third Review)

and 731-TA-1210-1212 (Second Review)

Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam

### **DETERMINATIONS**

On the basis of the record<sup>1</sup> developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing duty order on welded stainless steel pressure pipe from China and the antidumping duty orders on welded stainless steel pressure pipe from China, Malaysia, Thailand, and Vietnam would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### **BACKGROUND**

The Commission instituted these reviews on November 1, 2024 (89 FR 87416) and determined on February 4, 2025, that it would conduct expedited reviews (90 FR 11182, March 4, 2025).

---

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





## Views of the Commission

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

### I. Background

*Original China Investigations:* On January 30, 2008, Bristol Metals, LLC (“Bristol”), Felker Brothers Corporation (“Felker”), Marcegaglia USA Inc. (“Marcegaglia”), Outokumpu Stainless Pipe, Inc. (“Outokumpu”), and the United Steel Workers filed antidumping and countervailing duty petitions on WSS pressure pipe from China.<sup>1</sup> Only one Chinese producer participated in the preliminary phase of the original investigations and no Chinese producers participated in the final phase of the investigations.<sup>2</sup> The Commission made final affirmative determinations with respect to subject imports from China in March 2009.<sup>3</sup> The Department of Commerce (“Commerce”) issued antidumping and countervailing duty orders covering WSS pressure pipe from China on March 17 and 19, 2009, respectively.<sup>4</sup>

*First Five-Year China Reviews:* The Commission instituted its first reviews of the orders on imports from China on May 9, 2014. After conducting expedited reviews, the Commission reached affirmative determinations in July 2014.<sup>5</sup> Effective July 23 and August 12, 2014, respectively, Commerce issued continuations of the antidumping and countervailing duty orders on imports of WSS pressure pipe from China.<sup>6</sup>

---

<sup>1</sup> *Welded Stainless Steel Pressure Pipe from China*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Final), USITC Pub. 4064 (Mar. 2009) (“*Original Determination – China*”).

<sup>2</sup> *Original Determination – China*, USITC Pub. 4064 at 3.

<sup>3</sup> *Original Determination – China*, USITC Pub. 4064; *Welded Stainless Steel Pressure Pipe from China: Determination*, 74 Fed. Reg. 11378 (Int’l Trade Comm’n Mar. 17, 2009).

<sup>4</sup> *Antidumping Duty Order: Circular Welded Austenitic Stainless Pressure Pipe from the People’s Republic of China*, 74 Fed. Reg. 11351 (Dep’t Commerce Mar. 17, 2009) and *Circular Welded Austenitic Stainless Pressure Pipe from People’s Republic of China: Countervailing Duty Order*, 74 Fed. Reg. 11712 (Dep’t Commerce Mar. 19, 2009).

<sup>5</sup> *Welded Stainless Steel Pressure Pipe From China*, 79 Fed. Reg. 40779 (Int’l Trade Comm’n July 14, 2014).

<sup>6</sup> *Circular Welded Austenitic Stainless Pressure Pipe From the People’s Republic of China: Continuation of Antidumping Duty Order*, 79 Fed. Reg. 42760 (July 23, 2014); *Continuation of Countervailing Duty Order: Circular Welded Austenitic Stainless Pressure Pipe From the People’s Republic*

*Original Malaysia, Thailand, and Vietnam Investigations:* On May 16, 2013, Bristol, Felker, and Outokumpu filed antidumping duty petitions on WSS pressure pipe from Malaysia, Thailand, and Vietnam.<sup>7</sup> The Commission made final affirmative determinations with respect to subject imports from the three countries in July 2014.<sup>8</sup> On July 21, 2014, Commerce issued antidumping duty orders covering WSS pressure pipe from Malaysia, Thailand, and Vietnam.<sup>9</sup>

*Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Reviews ("2019 Reviews"):* The Commission instituted second five-year reviews for China and first five-year reviews for Malaysia, Thailand, and Vietnam on June 3, 2019.<sup>10</sup> The orders with respect to imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam, and those for imports from China cover the same products. The antidumping duty orders on WSS pressure pipe from all four countries were imposed or continued in July 2014, and the countervailing duty order on WSS pressure pipe from China was continued in August 2014. Therefore, Commerce combined the first reviews of the orders on imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam with the second reviews of the orders on imports from China. After conducting expedited reviews, the Commission reached affirmative determinations for all four countries in November 2019.<sup>11</sup> Effective December 3 and December 6, 2019, respectively, Commerce issued continuations of the antidumping duty orders on WSS pressure pipe from Malaysia, Thailand, and Vietnam and the antidumping and countervailing duty orders on imports of WSS pressure pipe from China.<sup>12</sup>

---

*of China*, 79 Fed. Reg. 47089 (Dep't Commerce Aug. 12, 2014).

<sup>7</sup> *Welded Stainless Steel Pressure Pipe from Malaysia, Thailand, and Vietnam*, Inv. Nos. 731-TA-1210-1212 (Final), USITC Pub. 4477 (July 2014) ("*Original Determination – Malaysia, Thailand, and Vietnam*").

<sup>8</sup> *Welded Stainless Pressure Pipe From Malaysia, Thailand, and the Socialist Republic of Vietnam*, 79 Fed. Reg. 43511 (Int'l Trade Comm'n July 25, 2014).

<sup>9</sup> *Welded Stainless Pressure Pipe From Malaysia, Thailand, and the Socialist Republic of Vietnam: Antidumping Duty Orders*, 79 Fed. Reg. 42289 (Dep't Commerce July 21, 2014).

<sup>10</sup> *Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam; Institution of Five-Year Reviews*, 84 Fed. Reg. 25567 (Int'l Trade Comm'n June 3, 2019).

<sup>11</sup> *Welded Stainless Steel Pressure Pipe From China, Malaysia, Thailand, and Vietnam*, Inv. Nos. 731-TA-1210-1212 (First Review) and 701-TA-454 and 731-TA-1144 (Second Review), USITC Pub. 4994 (Nov. 2019) ("*Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*").

<sup>12</sup> *Welded Stainless Steel Pressure Pipe From Malaysia, Thailand, and the Socialist Republic of Vietnam: Continuation of Antidumping Duty Orders*, 84 Fed. Reg. 66154 (Dep't Commerce Dec. 3, 2019); *Circular Welded Austenitic Stainless Pressure Pipe From the People's Republic of China: Continuation of Antidumping Duty Order and Countervailing Duty Order*, 84 Fed. Reg. 66883 (Dep't Commerce Dec. 6, 2019).

*Current Reviews:* The Commission instituted these reviews on November 1, 2024.<sup>13</sup> The Commission received one joint response to its notice of institution on behalf of three domestic producers – Bristol, Felker Brothers, and Primus Pipe and Tube Inc. (“Primus”) (collectively, “the Domestic Producers”).<sup>14</sup> On February 4, 2025, the Commission determined that the domestic interested party group response to the notice of institution was adequate and the respondent interested party group response to the notice of institution was inadequate. Finding that no other circumstances warranted conducting full reviews, the Commission determined to conduct expedited reviews.<sup>15</sup>

In these reviews, U.S. industry data are based on information the Domestic Producers submitted in their responses to the notice of institution. The Domestic Producers estimate that they accounted for \*\*\* percent of total U.S. production of WSS pressure pipe in 2024.<sup>16</sup> U.S. import data and related information are based on Commerce’s official import statistics.<sup>17</sup> Foreign industry data and related information are based on information the domestic producers submitted, questionnaire responses from the prior proceedings, and publicly available information gathered by staff.<sup>18</sup>

## **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.”<sup>19</sup> The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”<sup>20</sup> The Commission’s

---

<sup>13</sup> *Welded Stainless Steel Pressure Pipe From China, Malaysia, Thailand, and Vietnam; Institution of Five-Year Reviews*, 89 Fed. Reg. 87416 (Int’l Trade Comm’n Nov. 2, 2024).

<sup>14</sup> *Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam*, Inv. Nos. 731-TA-1210-1212 (Second Review) and 701-TA-454 and 731-TA-1144 (Third Review): Domestic Interested Parties’ Response to Notice of Institution, EDIS Doc. 838390 (Dec. 2, 2024) (“Domestic Producers Response”).

<sup>15</sup> *Explanation of Commission Determinations on Adequacy*, Inv. Nos. 731-TA-1210-1212 (Second Review) and 701-TA-454 and 731-TA-1144 (Third Review), EDIS Doc. 843799 (Feb. 18, 2025).

<sup>16</sup> CR/PR at 1.11 and B.3.

<sup>17</sup> CR/PR at Table 1.5

<sup>18</sup> The publicly available information includes Global Trade Atlas (“GTA”) data. *See generally* CR/PR at 1.19–1.26.

<sup>19</sup> 19 U.S.C. § 1677(4)(A).

<sup>20</sup> 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.*

practice in five-year reviews is to examine the domestic like product definition from the original investigation(s) and consider whether the record indicates any reason to revisit the prior findings.<sup>21</sup>

Commerce has defined the scope of the antidumping and countervailing duty orders in these five-year reviews as follows:

The products covered by these orders are circular welded austenitic stainless pressure pipe not greater than 14 inches in outside diameter. For purposes of these orders, references to size are in nominal inches and include all products within tolerances allowed by pipe specifications. This merchandise includes, but is not limited to, the American Society for Testing and Materials (ASTM) A-312 or ASTM A-778 specifications, or comparable domestic or foreign specifications. ASTM A-358 products are only included when they are produced to meet ASTM A-312 or ASTM A-778 specifications, or comparable domestic or foreign specifications.

Excluded from the scope are: (1) Welded stainless mechanical tubing, meeting ASTM A554 or comparable domestic or foreign specifications; (2) boiler, heat exchanger, superheater, refining furnace, feedwater heater, and condenser tubing, meeting ASTM A-249, ASTM A-688 or comparable domestic or foreign specifications; and (3) specialized tubing, meeting ASTM A269, ASTM A-270 or comparable domestic or foreign specifications.

The subject imports are normally classified in subheadings 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085 of the Harmonized Tariff Schedule of the United States (HTSUS). They may also enter under HTSUS subheadings 7306.40.1010, 7306.40.1015, 7306.40.5042, 7306.40.5044, 7306.40.5080, and 7306.40.5090. The HTSUS subheadings are provided for convenience and

---

*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, 96<sup>th</sup> Cong., 1<sup>st</sup> Sess. 90-91 (1979).

<sup>21</sup> *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).

customs purposes only; the written description of the scope of these investigations is dispositive.<sup>22</sup>

In the prior proceedings, the Commission defined the domestic like product to be coextensive with Commerce's scope.<sup>23</sup> The record contains no new information suggesting that the characteristics and uses of domestically produced WSS pressure pipe have changed since the prior proceedings so as to warrant the Commission's reconsideration of that definition. Consequently, we again define a single domestic like product consisting of WSS pressure pipe, coextensive with Commerce's definition of the scope of the orders under review.

## **B. Domestic Industry**

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."<sup>24</sup> In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the prior proceedings, the Commission identified no related party issues and defined the domestic industry to include all domestic producers of WSS pressure pipe.<sup>25</sup>

---

<sup>22</sup> *Welded Stainless Steel Pressure Pipe From Malaysia, Thailand, and the Socialist Republic of Vietnam: Final Results of Expedited Second Sunset Reviews of Antidumping Duty Orders*, 90 Fed. Reg. 11718 (Dep't Commerce Mar. 11, 2025); *Circular Welded Austenitic Stainless Pressure Pipe From the People's Republic of China: Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 11507 (Dep't Commerce Mar. 7, 2025); *Circular Welded Austenitic Stainless Pressure Pipe From the People's Republic of China: Final Results of the Expedited Third Sunset Review of the Countervailing Duty Order*, 90 Fed. Reg. 11506 (Dep't Commerce Mar. 7, 2025). The scope of the orders is the same across all reviews. There has been one scope ruling since the imposition of the orders, which resulted in the exclusion of pipe spools from China that were made entirely from components produced in third countries and exported by SinoStruct. *Notice of Scope Rulings*, 84 Fed. Reg. 33915 (Dep't Commerce July 16, 2019).

<sup>23</sup> *Original Determination – China*, USITC Pub. 4064 at 10; *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 6; *Welded Stainless Steel Pressure Pipe from China*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Review), USITC Pub. 4478 (July 2014) ("*First Review Determination – China*"), at 5–6; *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 7.

<sup>24</sup> 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.

<sup>25</sup> *Original Determination – China*, USITC Pub. 4064 at 11; *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 7; *First Review Determination – China*, USITC Pub. 4478 at 5;

In the current reviews, there are no related party or domestic industry issues.<sup>26</sup> Consequently, we again define the domestic industry to include all domestic producers of WSS pressure 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 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.<sup>27</sup>

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.<sup>28</sup> 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.

---

*Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 7.

<sup>26</sup> Domestic Producers' Response at 23, Exh. 1.

<sup>27</sup> 19 U.S.C. § 1675a(a)(7).

<sup>28</sup> 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).

## B. Prior Proceedings and Arguments of the Parties

*Original Malaysia, Thailand, and Vietnam Investigations:* In the original investigations, the Commission found that the statutory requirements for cumulation were satisfied with regard to imports from Malaysia, Thailand, and Vietnam.<sup>29</sup> It also found that there was a reasonable overlap of competition both among the subject imports from Malaysia, Thailand, and Vietnam and between imports from each subject country and the domestic like product. Accordingly, it determined to cumulate subject imports from all three countries for purpose of its material injury analysis.<sup>30</sup>

*2019 Reviews:* The Commission exercised its discretion to cumulate subject imports from China, Malaysia, Thailand, and Vietnam.<sup>31</sup> After analyzing each subject country individually, it did not find that subject imports from any of the four subject countries were likely to have no discernible adverse impact on the domestic industry in the event of revocation of the corresponding orders. The Commission also found that subject imports from each subject country and the domestic like product were fungible with each other, sold in similar channels of distribution and geographic markets, and simultaneously present in the U.S. market.<sup>32</sup> Accordingly, the Commission found a reasonable overlap of competition between and among the domestic like product and imports from the four subject countries.<sup>33</sup> The Commission also found that no significant differences in the conditions of competition were likely to prevail after revocation with respect to subject imports from each source.<sup>34</sup>

*Current Reviews:* The Domestic Producers argue that the Commission should again cumulate subject imports from China, Malaysia, Thailand, and Vietnam in these reviews because the same conditions that led the Commission to cumulate subject imports in the 2019 reviews continue to prevail.<sup>35</sup> They argue that there is no basis for the Commission to conclude that subject imports from any of the subject countries would be likely to have no discernible adverse impact on the domestic industry, and that the imports from each subject source are

---

<sup>29</sup> The original investigation and first reviews with respect to imports from China were single country investigations or reviews and, therefore, cumulation was not an issue.

<sup>30</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 9.

<sup>31</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 18.

<sup>32</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 16–17.

<sup>33</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 17.

<sup>34</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 17.

<sup>35</sup> Domestic Producers Response at 12–13.

likely to compete with each other and the domestic like product if the orders are revoked.<sup>36</sup>

### **C. Analysis**

In these reviews, the statutory threshold for cumulation is satisfied as all reviews were instituted on the same day: November 1, 2024.<sup>37</sup> In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.

#### **1. Likelihood of No Discernible Adverse Impact**

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.<sup>38</sup> 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.<sup>39</sup> With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record in these reviews, we do not find that imports from any of the subject countries are likely to have no discernible adverse impact on the domestic industry in the event of revocation of the corresponding orders.

*China.* In the original investigations, the volume of subject imports from China more than doubled during the 2005-2007 period of investigation (“POI”).<sup>40</sup> In terms of apparent U.S.

---

<sup>36</sup> Domestic Producers Response at 12–13.

<sup>37</sup> *Welded Stainless Steel Pressure Pipe From China, Malaysia, Thailand, and Vietnam; Institution of Five-Year Reviews*, 89 Fed Reg. 87416 (Int’l Trade Comm. Nov. 2, 2024).

<sup>38</sup> 19 U.S.C. § 1675a(a)(7).

<sup>39</sup> SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

<sup>40</sup> *Original Determination – China*, USITC Pub. 4064 at 20. Subject imports from China were 14,394 short tons in 2005, 23,712 short tons in 2006, and 30,371 short tons in 2007. *Id.*



consumption, subject imports from China increased their market share by quantity by \*\*\* percentage points over the POI.<sup>41</sup>

In the 2019 reviews, the proceeding in which cumulation for Chinese subject imports became an issue, subject imports from China ranged from 961 to 2,097 short tons for the 2014-2018 period,<sup>42</sup> and accounted for 1.8 percent of apparent U.S. consumption in 2018.<sup>43</sup> The Commission found that Chinese global exports of pipes, tubes, and hollow profiles not elsewhere specified or included, welded, of circular cross section, of stainless steel (“stainless steel tubular goods”), a broader category that includes WSS pressure pipe, increased irregularly from 142,994 short tons in 2014 to 248,327 short tons in 2018, whereas US consumption of WSS pressure pipe was 83,094 short tons in 2018.<sup>44</sup> The Commission also found that China was the third largest global exporter of stainless steel tubular goods from 2014 to 2016 and the second largest global exporter from 2017 to 2018.<sup>45</sup> The Commission determined that subject imports from China were not likely to have no discernible adverse impact on the domestic industry if the orders on those imports were revoked.<sup>46</sup>

No producer from China participated in the current expedited reviews, so there is limited information regarding the WSS pressure pipe industry in China. The information available on the record indicates that three Chinese producers, Winner Stainless Steel (“Winner”), Zhejiang Juili Hi-Tech Metals Co., Ltd. (“Juili”), and Froch Enterprise Co., Ltd. (“Froch”), remain actively engaged in production, with a combined annual production capacity of 550,000 metric tons.<sup>47</sup> The volume of subject imports from China fluctuated over the POR, decreasing from 915 short tons in 2019 to 513 short tons in 2020, then increasing to 1,194 short tons in 2021 and to 1,527 short tons in 2022, and finally decreasing to 1,118

---

<sup>41</sup> *Original Determination – China*, USITC Pub. 4064 at 20-21; *Welded Stainless Steel Pressure Pipe from China*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Final) (Confidential), EDIS Doc. 321447 (Mar. 20, 2009) (“*Confidential Version – China Original Investigation*”) at 28. Subject imports from China accounted for \*\*\* percent of apparent U.S. consumption in 2005, \*\*\* percent in 2006, and \*\*\* percent in 2007. *Id.*

<sup>42</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 10.

<sup>43</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 10.

<sup>44</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 10, Table I-9.

<sup>45</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 10, Table I-14.

<sup>46</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 11.

<sup>47</sup> Domestic Producers Response at 16–17.

short tons in 2023.<sup>48</sup> In 2023, subject imports from China accounted for \*\*\* percent of apparent U.S. consumption.<sup>49</sup>

The information available also indicates that the subject industry is large and a leading exporter, with exports to more than 60 countries.<sup>50</sup> GTA data indicate that Chinese global exports of stainless steel tubular goods decreased irregularly during the period of review (“POR”) from 259,266 short tons in 2019 and 217,857 short tons in 2023.<sup>51</sup> Although we recognize that this category contains out-of-scope merchandise, the volume of exports of stainless steel tubular goods from China far exceeded apparent U.S. consumption of WSS pressure pipe in 2023, which was \*\*\* short tons.<sup>52</sup> GTA data also indicate that China was the second largest global exporter of stainless steel tubular goods from 2019 to 2023,<sup>53</sup> with its largest export markets in 2023 consisting of Vietnam, Thailand, Philippines, Brazil, and Russia.<sup>54</sup> Brazil, India, the Eurasian Economic Union, Saudia Arabia, Thailand, and Turkey have imposed antidumping and countervailing duties on broad categories of circular stainless steel products that include WSS pressure pipe from China. Seamless stainless tube and pipe and large welded tubes, another broader category that includes WSS pressure pipe, are subject to global safeguard measures imposed by the European Union and the United Kingdom.<sup>55</sup>

During the original investigations, subject imports from China undersold the domestic like product in 73 percent of quarterly comparisons, often at large margins.<sup>56</sup> No pricing comparisons were available in the prior or the current reviews.<sup>57</sup>

In light of these considerations, including the Chinese industry’s significant production capacity and volume of exports of stainless steel tubular goods as well as subject imports’ continued presence in the U.S. market, we do not find that subject imports from China would

---

<sup>48</sup> CR/PR at Table 1.5. Import data is based on official Commerce statistics for HTS statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085. These data may overstate the volume of subject merchandise as these HTS statistical reporting numbers may contain products outside the scope of these reviews. *Id.* at 1.16, Source.

<sup>49</sup> CR/PR at Table 1.6.

<sup>50</sup> Domestic Producers Response at 16–17.

<sup>51</sup> CR/PR at Table 1.7. Chinese global exports of stainless steel tubular goods were 259,266 short tons in 2019, 215,106 short tons in 2020, 175,303 short tons in 2021, 199,432 short tons in 2022, and 217,857 short tons in 2023. *Id.*

<sup>52</sup> CR/PR at Table 1.6

<sup>53</sup> CR/PR at Table 1.14.

<sup>54</sup> CR/PR at Table 1.7.

<sup>55</sup> CR/PR at Table 1.13.

<sup>56</sup> *Original Determination – China*, USITC Pub. 4064 at 23.

<sup>57</sup> *First Review Determination – China*, USITC Pub. 4478 at 12; *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 10.

likely have no discernible adverse impact on the domestic industry if the countervailing and antidumping duty orders covering these imports were revoked.<sup>58</sup>

*Malaysia.* In the original investigations, the volume of subject imports from Malaysia rose irregularly from 2011 to 2013.<sup>59</sup> In terms of apparent U.S. consumption, subject imports from Malaysia increased their market share by quantity by \*\*\* percentage points from 2011 to 2013.<sup>60</sup> In the final phase of the original investigations, the Commission received usable data from Pantech Stainless & Allow Industries Sdn. Bhd (“Pantech”), a Malaysian producer and exporter of subject merchandise.<sup>61</sup>

In the 2019 reviews, subject imports from Malaysia declined from 2014 to 2015, were absent from the U.S. market in 2016 and 2017, and were present in limited quantities in 2018.<sup>62</sup> Subject imports from Malaysia accounted for less than 0.05 percent of apparent U.S. consumption in 2018.<sup>63</sup> No producer from Malaysia participated in the 2019 reviews.<sup>64</sup> The Commission found that Malaysia’s global exports of stainless steel tubular goods nearly doubled from 2014 to 2018.<sup>65</sup> It determined that subject imports from Malaysia were not likely

---

<sup>58</sup> Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise or the capacity of the subject producers for product shifting during the current POR.

<sup>59</sup> *Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam*, Inv. Nos. 731-1210-1212 (First Review), 701-TA-454 and 731-TA-1144 (Second Review) (Confidential), EDIS Doc. 695140 (Nov. 20, 2019) (“*Confidential Version – Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*”) at 14. Subject imports from Malaysia totaled \*\*\* short tons in 2011, \*\*\* short tons in 2012, and \*\*\* short tons in 2013. *Id.*

<sup>60</sup> *Confidential Version – Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations* at 14. Subject imports from Malaysia held \*\*\* percent of apparent U.S. consumption in 2011, \*\*\* percent in 2012, and \*\*\* percent in 2013. *Id.*

<sup>61</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 3. In the preliminary phase of the original investigations, the Commission issued foreign producers’ or exporters’ questionnaires to eight firms believed to produce and/or export WSS pressure pipe from Malaysia. Usable responses to the Commission’s questionnaire were received from three firms. Of these, Pantech was the only firm to respond in the final phase of the investigations. *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at II-3, n.3.

<sup>62</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 11, n.52, Table I-6. Subject imports from Malaysia were 136 short tons in 2014, 92 short tons in 2015, zero short tons in 2016 and 2017, and 32 short tons in 2018. *Id.*

<sup>63</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 11.

<sup>64</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 11.

<sup>65</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 12. Global exports of stainless steel tubular goods from Malaysia increased overall from 11,481 short tons in 2014 to 22,309 in 2018. *Id.* at n.57.

to have no discernible adverse impact on the domestic industry if the order on those imports were revoked.<sup>66</sup>

No producer from Malaysia participated in these expedited reviews, so the record contains limited information concerning the WSS pressure pipe industry in Malaysia. According to Domestic Producers, two Malaysian producers, Kanzen Tetsu and Pantech, remain actively engaged in the production of subject merchandise, and have combined annual production capacity of 20,000 metric tons.<sup>67</sup> Information available also indicates that Pantech has announced plans to build new factories and warehouses in Malaysia by 2027, which would further increase production capacity.<sup>68</sup> The volume of subject imports from Malaysia remained very low throughout the POR, ranging from 0 to 11 short tons during the POR.<sup>69</sup> In 2023, subject imports from Malaysia accounted for \*\*\* percent of apparent U.S. consumption.<sup>70</sup>

GTA data indicate that Malaysian global exports of stainless steel tubular goods decreased irregularly during the POR from 16,163 short tons in 2019 and 6,736 short tons in 2023.<sup>71</sup> Domestic Producers identified more than 60 countries to which Malaysia exports subject merchandise,<sup>72</sup> and GTA data identify Malaysia's largest export markets for stainless steel tubular goods in 2023 as Thailand, Indonesia, and the Netherlands.<sup>73</sup> Brazil imposed antidumping and countervailing duties on a broad category of circular stainless steel products, including WSS pressure pipe, from Malaysia. Seamless stainless tube and pipe and large welded tubes, another broader category that includes WSS pressure pipe, from Malaysia are subject to global safeguard measures imposed by the European Union and the United Kingdom.<sup>74</sup>

During the original investigations, subject imports from Malaysia undersold the domestic like product in 69 out of 72 instances.<sup>75</sup> No pricing comparisons were available in the prior reviews or these current reviews.<sup>76</sup>

---

<sup>66</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 12.

<sup>67</sup> Domestic Producers Response at 17.

<sup>68</sup> Domestic Producers Response at 17.

<sup>69</sup> CR/PR at Table 1.5.

<sup>70</sup> CR/PR at Table 1.6.

<sup>71</sup> CR/PR at Table 1.9. Malaysian global exports of stainless steel tubular goods were 16,163 short tons in 2019, 16,755 short tons in 2020, 12,889 short tons in 2021, 9,560 short tons in 2022, and 6,736 short tons in 2023. *Id.*

<sup>72</sup> Domestic Producers Response at 17.

<sup>73</sup> CR/PR at Table 1.9.

<sup>74</sup> CR/PR at Table 1.13.

<sup>75</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at Table V-10.

<sup>76</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review*

In light of these considerations, including the Malaysian industry's exportation of related products, significant instances of underselling in the original investigations, and subject imports' continued presence in the U.S. market, we do not find that subject imports from Malaysia would likely have no discernible adverse impact on the domestic industry if the antidumping duty order concerning such imports were revoked.<sup>77</sup>

*Thailand.* In the original investigations, subject imports from Thailand decreased slightly overall during the POI,<sup>78</sup> and accounted for \*\*\* percent of apparent U.S. consumption in 2013.<sup>79</sup> The Commission received usable data from one Thai producer of subject merchandise.<sup>80</sup>

In the 2019 reviews, subject imports from Thailand increased irregularly from 2014 to 2018,<sup>81</sup> and accounted for 0.4 percent of apparent U.S. consumption in 2018.<sup>82</sup> No producer from Thailand participated in the 2019 reviews.<sup>83</sup> The Commission found that Thailand's global exports of stainless steel tubular goods decreased overall from 2014 to 2018,<sup>84</sup> with its largest export markets in 2018 consisting of Taiwan, Japan, and India.<sup>85</sup> The Commission found that subject imports from Thailand were not likely to have no discernible adverse impact on the

---

*Determinations*, USITC Pub. 4994 at 12.

<sup>77</sup> Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise or the capacity of the subject producers for product shifting during the current period of review.

<sup>78</sup> Confidential Staff Report in *Welded Stainless Steel Pressure Pipe from Malaysia, Thailand, and Vietnam*, Inv. Nos. 731-TA-1210-1212 (Final), EDIS Doc. 535639 (June 12, 2014) at Table IV-2 revised in Corrections to Staff Report, Inv. Nos. 731-TA-1210-1212 (Final), EDIS Doc. 536236 (June 18, 2014) at Table IV-2. Subject imports from Thailand totaled \*\*\* short tons in 2011, \*\*\* short tons in 2012, and \*\*\* short tons in 2013. *Id.*

<sup>79</sup> Confidential Staff Report in *Welded Stainless Steel Pressure Pipe from Malaysia, Thailand, and Vietnam*, Inv. Nos. 731-TA-1210-1212 (Final), EDIS Doc. 535639 (June 12, 2014) at Table IV-10 revised in Corrections to Staff Report, Inv. Nos. 731-TA-1210-1212 (Final), EDIS Doc. 536236 (June 18, 2014) at Table IV-2.

<sup>80</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at VII-5.

<sup>81</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 12. Subject imports from Thailand were 232 short tons in 2014, 145 short tons in 2015, 167 short tons in 2016, 424 short tons in 2017, and 317 short tons in 2018. *Id.* at n.64, Table I-6.

<sup>82</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 12.

<sup>83</sup> CR at I-3; PR at I-1.

<sup>84</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 13, Table I-12. Global exports of stainless steel tubular goods from Thailand were 17,456 short tons in 2014, 20,069 short tons in 2015, 17,533 short tons in 2016, 16,636 short tons in 2017, and 16,564 short tons in 2018. *Id.* at n. 69, Table I-12.

<sup>85</sup> CR/PR at Table I-12.

domestic industry if the order on those imports were revoked.<sup>86</sup>

No producer from Thailand participated in these current reviews, so the record contains limited information concerning the WSS pressure pipe industry in Thailand. The information available on the record indicates that one Thai producer, Thai-German Products Public Company Limited (“TGP”), remains actively engaged in production and export of WSS pressure pipe.<sup>87</sup> The volume of subject imports from Thailand during the POR, was 543 short tons in 2019, 469 short tons in 2020, 804 short tons in 2021, 2,007 short tons in 2022, and 1,165 short tons in 2023.<sup>88</sup> In 2023, subject imports from Thailand accounted for \*\*\* of apparent U.S. consumption.<sup>89</sup>

The information available indicates that TGP exports to more than 30 countries.<sup>90</sup> GTA data show that Thailand’s global exports of stainless steel tubular goods increased overall from 2019 to 2023,<sup>91</sup> with its largest export markets in 2023 consisting of India, Taiwan, and Japan.<sup>92</sup> Brazil and India have imposed antidumping and/or countervailing duties on variously defined broader categories of circular stainless steel products that include WSS pressure pipe. Seamless stainless tube and pipe and large welded tubes, another broader category that includes WSS pressure pipe, are subject to global safeguard measures imposed by the European Union and the United Kingdom.<sup>93</sup>

During the original investigations, subject imports from Thailand undersold the domestic like product in 69 out of 72 instances.<sup>94</sup> No pricing comparisons were available in the prior or the current reviews.<sup>95</sup>

In light of these considerations, including the Thai industry’s increasing quantities of

---

<sup>86</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 13.

<sup>87</sup> Domestic Producers’ Response at 17.

<sup>88</sup> CR/PR at Table 1.5. Import data is based on official Commerce statistics for HTS statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085, thus these data may be overstated as these HTS statistical reporting numbers may contain products outside the scope of these reviews. *Id.* at 1.16, Source.

<sup>89</sup> CR/PR at Table 1.6.

<sup>90</sup> Domestic Producers Response at 17.

<sup>91</sup> CR/PR at Table 1.10. Global exports of stainless steel tubular goods from Thailand were 16,869 short tons in 2019, 57,122 short tons in 2020, 24,928 short tons in 2021, 20,622 short tons in 2022, and 26,240 short tons in 2023. *Id.*

<sup>92</sup> CR/PR at 1.23.

<sup>93</sup> CR/PR at Table 1.13.

<sup>94</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at Table V-10.

<sup>95</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 13.

exports of related products, subject imports' continued presence in the U.S. market, and the significant instances of underselling during the original investigations, we do not find that subject imports from Thailand would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.<sup>96</sup>

*Vietnam.* In the original investigations, subject imports from Vietnam decreased from 2011 to 2013,<sup>97</sup> accounting for between \*\*\* percent and \*\*\* percent of apparent U.S. consumption during the POI.<sup>98</sup> The Commission received usable data from Son Ha International Corporation ("Son Ha"), a Vietnamese producer of subject merchandise.<sup>99</sup>

In the 2019 reviews, subject imports from Vietnam increased from 612 short tons in 2014 to 1,690 short tons in 2018,<sup>100</sup> accounting for 2.0 percent of apparent U.S. consumption in 2018.<sup>101</sup> The Commission found that Vietnam's global exports of stainless steel tubular goods increased overall from 2014 to 2017 (the last year for which data are available).<sup>102</sup> The Commission determined that subject imports from Vietnam were not likely to have no discernible adverse impact on the domestic industry if the order on those imports were

---

<sup>96</sup> Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise or the capacity of the subject producers for product shifting during the current period of review.

<sup>97</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at Table C-2, App. C. Subject imports from Vietnam totaled \*\*\* short tons in 2011, \*\*\* short tons in 2012, and \*\*\* short tons in 2013. *Id.*

<sup>98</sup> *Confidential Version – Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations* at Table C-2, App. C.

<sup>99</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at VII-6. In the original investigations, the Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export WSS pressure pipe from Vietnam. Usable responses to the Commission's questionnaire were received from two firms (Mejonson Industrial Vietnam Co., Ltd. ("Mejonson") and Son Ha) in the preliminary phase of the original investigations. Of these, only Son Ha responded in the final phase of the original investigations. It did not estimate its share of total Vietnamese production or Vietnamese exports to the United States. As a result, there is limited information available regarding the WSS pressure pipe industry in Vietnam. *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at II-5, n.6.

<sup>100</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 13–14.

<sup>101</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 14.

<sup>102</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 14. Global exports of stainless steel tubular goods from Vietnam were 10,628 short tons in 2014, 9,179 short tons in 2015, 12,827 short tons in 2016, and 15,719 short tons in 2017. *Id.* at n. 81. Vietnam did not report trade statistics for 2018. *Id.* at n.81, Table I-13.

revoked.<sup>103</sup>

No Vietnamese producer participated in these expedited reviews, so the record contains limited information concerning the WSS pressure pipe industry in Vietnam.<sup>104</sup> The volume of subject imports from Vietnam during the POR was 1,712 short tons in 2019, 1,558 short tons in 2020, 2,210 short tons in 2021, 2,661 short tons in 2022, and 4,828 short tons in 2023.<sup>105</sup> Subject imports from Vietnam accounted for \*\*\* percent of U.S. apparent consumption in 2023.<sup>106</sup>

According to the information available, two Vietnamese producers, Mejonson Industrial Vietnam Co., Ltd. (“Mejonson”) and Son Ha, remain actively engaged in the production and export of WSS pressure pipe,<sup>107</sup> and a new entrant, Hoa Phat, began producing and selling WSS pressure pipe during the POR.<sup>108</sup> The record also indicates that as of May 30, 2024, Son Ha’s shareholders approved a business plan including applying technological advances to its production process, researching and developing new products, and expanding its export markets.<sup>109</sup> GTA data show that Vietnam’s global exports of stainless steel tubular goods fluctuated from 2019 to 2023,<sup>110</sup> with its largest export markets in 2023 consisting of India, United States, and Poland.<sup>111</sup> Brazil, India, Thailand, and Turkey have imposed antidumping and/or countervailing duties on variously defined broader categories of circular stainless steel products that include WSS pressure pipe from Vietnam. Seamless stainless tube and pipe and

---

<sup>103</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 15.

<sup>104</sup> Joint Domestic Producer Response at 14, Ex. 3. The Joint Domestic Producers noted the export orientation of two Vietnamese producers named as producers of WSS pressure pipe in the original investigations regarding subject imports from Malaysia, Thailand, and Vietnam. They indicated that Vietnamese producer Mejonson has global exports and owns its own distribution and stocking facility in New Jersey, and that Vietnamese producer Son Ha advertises that 94 percent of its revenue comes from exports outside of Southeast Asia, with a third of its total revenue generated by sales in North America. According to the Joint Domestic Producers, Son Ha lists its “Main Target Region” as the United States. *Id.*

<sup>105</sup> CR/PR at Table 1.5. Import data is based on official Commerce statistics for HTS statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085, thus these data may be overstated as these HTS statistical reporting numbers may contain products outside the scope of these reviews. *Id.* at 1.16, Source.

<sup>106</sup> CR/PR at Table 1.6.

<sup>107</sup> Domestic Producers’ Response at 17–18.

<sup>108</sup> CR/PR at Table 1.11.

<sup>109</sup> CR/PR at Table 1.11; Domestic Producers’ Response at 18.

<sup>110</sup> CR/PR at Table 1.12. Global exports of stainless steel tubular goods from Vietnam were 37,111 short tons in 2019, 28,393 short tons in 2020, 41,319 short tons in 2021, 37,771 short tons in 2022, and 33,074 short tons in 2023. *Id.*

<sup>111</sup> CR/PR at 1.26.



large welded tubes are subject to global safeguard measures imposed by the European Union and the United Kingdom.<sup>112</sup>

During the original investigations, subject imports from Vietnam undersold the domestic like product in 63 out of 66 instances.<sup>113</sup> No pricing comparisons were available in the prior or the current reviews.<sup>114</sup>

In light of these considerations, including the Vietnamese industry's significant volume of exports of related products, subject imports' continued and increasing presence in the U.S. market, and the significant instances of underselling in the original investigations, we do not find that subject imports from Vietnam would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports was revoked.<sup>115</sup>

## **2. Likelihood of a Reasonable Overlap of Competition**

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.<sup>116</sup> Only a "reasonable overlap" of competition is required.<sup>117</sup> In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists

---

<sup>112</sup> CR/PR at Table 1.13.

<sup>113</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at Table V-10.

<sup>114</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 15.

<sup>115</sup> Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise or the capacity of the subject producers for product shifting during the current period of review.

<sup>116</sup> 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).

<sup>117</sup> *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-812–813 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff'd sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int'l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761–762 (Final), USITC Pub. 3098 at 13–15 (Apr. 1998).

because the subject imports are absent from the U.S. market.<sup>118</sup>

*Fungibility.* In the original investigations regarding imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam, the Commission found that WSS pressure pipe from domestic and subject sources is generally fungible, observing that it is manufactured to meet ASTM standards and used in the same general applications.<sup>119</sup> All responding U.S. producers and most responding importers and purchasers reported that imports from Malaysia, Thailand, and Vietnam were always or frequently interchangeable with the domestic like product and with each other.<sup>120</sup>

In the 2019 reviews, the Commission found that WSS pressure pipe from China, Malaysia, Thailand, and Vietnam would likely be fungible with each other and with the domestic like product in the event of revocation of the orders.<sup>121</sup>

In these current reviews, Domestic Producers claim that the same conditions persist today. They argue that WSS pressure pipe remains fungible and interchangeable as it is made to the same ASTM specifications regardless of source.<sup>122</sup> Given the standardized nature of the products, the general substitutability reported for all products in the prior proceedings, and the fact that there is no new information on the record of these reviews to indicate that the fungibility between and among subject imports from China, Malaysia, Thailand, and Vietnam and the domestic like product has changed since the prior proceedings, we find that the WSS pressure pipe from all four subject countries would likely be fungible with each other and with the domestic like product in the event of revocation of the orders.

*Channels of Distribution.* In the original investigations regarding WSS pressure pipe from Malaysia, Thailand, and Vietnam, the Commission found that WSS pressure pipe, whether domestically produced or imported from Malaysia, Thailand, or Vietnam, was sold through distributors.<sup>123</sup> In the prior investigations regarding WSS pressure pipe from China, the Commission found that subject imports from China and the domestic like product were sold through distributors.<sup>124</sup> In the 2019 reviews, the Commission found no information to indicate

---

<sup>118</sup> See generally, *Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

<sup>119</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 9.

<sup>120</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 9.

<sup>121</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 16.

<sup>122</sup> Domestic Producers' Response at 13.

<sup>123</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 9.

<sup>124</sup> *Original Determination – China*, USITC Pub. 4064 at 8; *First Review Determination – China*, USITC Pub. 4478 at 10.

that the channels of distribution had changed since the original investigations.<sup>125</sup> Similarly, in these current reviews, there is no new information on the record indicating that the channels of distribution have changed since the prior proceedings or are likely to do so upon revocation.

*Geographic Overlap.* In the original investigations regarding WSS pressure pipe from Malaysia, Thailand, and Vietnam, the U.S. producers and importers of subject merchandise reported selling WSS pressure pipe to all regions in the contiguous United States.<sup>126</sup> In the 2019 reviews the Commission found that the domestic like product and subject imports from China, Malaysia, Thailand, and Vietnam were present in the same geographic markets.<sup>127</sup> The Commission also found that subject merchandise from each of the four subject sources entered the U.S. market in customs districts located in the East, South, North, and West regions of the United States during 2014-2018.<sup>128</sup>

In these current reviews, the domestic like product and subject imports from all four countries were present in the same geographic markets, and subject merchandise from each of the four subject sources entered the U.S. market in customs districts located in the East, South, North, and West regions of the United States during the POR.<sup>129</sup>

*Simultaneous Presence in Market.* In the original investigations regarding Malaysia, Thailand, and Vietnam, the Commission found that WSS pressure pipe produced in the United States and each of the three subject countries was sold in the United States during each quarter between January 2011 and December 2013.<sup>130</sup> In the 2019 reviews, the Commission found subject imports from China, Thailand, and Vietnam entered the U.S. market each year from 2014-2018; subject imports from Malaysia were present in each year except 2017.<sup>131</sup>

In these current reviews, subject imports from all four subject sources were present in the U.S. market during the POR, although subject imports from certain sources were not present in all 60 months of the period. Subject imports from China and Vietnam were reported in all of the 60 months between 2019 and 2023; subject imports from Malaysia were reported in 24 of the 60 months; and subject imports from Thailand were reported in 49 of the 60

---

<sup>125</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 16.

<sup>126</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 9.

<sup>127</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 16.

<sup>128</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 16.

<sup>129</sup> CR/PR at 1.17.

<sup>130</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 9.

<sup>131</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 17.

months.<sup>132</sup> In light of the continued presence of subject imports from all four sources in the U.S. market during the POR and the absence of any contrary information, the record indicates that subject imports from each source would likely be simultaneously present in the U.S. market with each other and the domestic like product if the orders were revoked.

*Conclusion.* The record in these expedited reviews contains limited information concerning subject imports in the U.S. market during the POR. The record, however, contains no information suggesting a change in the considerations that led the Commission to conclude that there would be a likely reasonable overlap of competition between and among subject imports from China, Malaysia, Thailand, and Vietnam and the domestic like product upon revocation. Accordingly, and in the absence of any contrary argument, we find that there would likely be a reasonable overlap of competition among subject imports from China, Malaysia, Thailand, and Vietnam and between the domestic like product and subject imports from each source if the orders were revoked.

### **3. Likely Conditions of Competition**

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from the subject countries are likely to compete under similar or different conditions in the U.S. market after revocation of the orders.

In the 2019 reviews, the Commission found that subject imports from China, Malaysia, Thailand, and Vietnam would likely compete in the U.S. market under similar conditions of competition if the orders were revoked.<sup>133</sup> The Commission also found that imports of WSS pressure pipe from each of the subject countries were present in the U.S. market throughout that POR, each of the subject countries globally exported substantial volumes of stainless steel tubular goods, and imports from each of the subject countries undersold the U.S. product in a majority of comparisons during the original investigations.<sup>134</sup>

The record in these five-year reviews contains limited current information about the industries in China, Malaysia, Thailand, and Vietnam. However, the available information shows that imports of WSS pressure pipe from each of the subject countries were present in the U.S. market throughout much of the POR, that the subject producers in each country export substantial volumes of stainless steel tubular goods, and that imports from each of the subject

---

<sup>132</sup> CR/PR at 1.17.

<sup>133</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 17.

<sup>134</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 17.

countries undersold the U.S. product in a majority of comparisons during the original investigations. Based on the information available, and in the absence of any argument to the contrary, we do not find any likely significant difference in conditions of competition that would warrant not cumulating subject imports from all four countries.

#### **D. Conclusion**

In sum, we determine that subject imports of WSS pressure pipe from China, Malaysia, Thailand, and Vietnam, considered individually, would not likely have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition among subject imports from the four countries and between the subject imports from each subject country and the domestic like product. Finally, we find that subject imports from each of the four subject countries are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from China, Malaysia, Thailand, and Vietnam.

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

#### **A. Legal Standards**

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping duty order unless:

(1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”<sup>135</sup> 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.”<sup>136</sup>

---

<sup>135</sup> 19 U.S.C. § 1675a(a).

<sup>136</sup> 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.

Thus, the likelihood standard is prospective in nature.<sup>137</sup> 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.<sup>138</sup>

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.”<sup>139</sup> 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.”<sup>140</sup>

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.”<sup>141</sup> 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).<sup>142</sup> The statute further provides

---

<sup>137</sup> 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.

<sup>138</sup> See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

<sup>139</sup> 19 U.S.C. § 1675a(a)(5).

<sup>140</sup> 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.*

<sup>141</sup> 19 U.S.C. § 1675a(a)(1).

<sup>142</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings with respect to strontium chromate from Austria and France. *Final Results*, 90 Fed. Reg. 8182 and accompanying

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.<sup>143</sup>

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.<sup>144</sup> In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.<sup>145</sup>

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.<sup>146</sup>

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

---

*Issues and Decision Memorandum*, A-433-813, A-427-830 (Sunset Reviews), EDIS Doc. 845140 (Jan. 21, 2025) at 3-4.

<sup>143</sup> 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

<sup>144</sup> 19 U.S.C. § 1675a(a)(2).

<sup>145</sup> 19 U.S.C. § 1675a(a)(2)(A-D).

<sup>146</sup> See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

more advanced version of the domestic like product.<sup>147</sup> 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.<sup>148</sup>

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the WSS pressure pipe industries in China, Malaysia, Thailand, and Vietnam. There is also limited information on the domestic WSS pressure pipe market in the United States during the POR covered by these investigations. Accordingly, for our determination, we rely as appropriate on the facts available from the prior proceedings, and the limited new information on the record in these five-year reviews.

## **B. Conditions of Competition and the Business Cycle**

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>149</sup> The following conditions of competition inform our determinations.

### **1. Demand Conditions**

*Prior Proceedings.* The Commission found that demand for WSS pressure pipe was driven by demand in the downstream industries that use WSS pressure pipe, such as the chemical, petrochemical, food and beverage, pharmaceutical, water purification, ethanol, and oil and gas industries.<sup>150</sup>

In the original investigations concerning subject imports from China, the Commission observed that apparent U.S. consumption increased overall between 2005 and 2007 before

---

<sup>147</sup> 19 U.S.C. § 1675a(a)(4).

<sup>148</sup> 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.

<sup>149</sup> 19 U.S.C. § 1675a(a)(4).

<sup>150</sup> *Original Determination – China*, USITC Pub. 4064 at 15, I-3; *First Review Determination – China*, USITC Pub. 4478 at 9; *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 13-14; *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 21.



falling in late 2007.<sup>151</sup> In the first five-year reviews of those orders, apparent U.S. consumption in 2013, at \*\*\* short tons, was lower than during the 2005-2007 period.<sup>152</sup>

In the original investigations concerning subject imports from Malaysia, Thailand, and Vietnam, apparent U.S. consumption showed minor fluctuations and declined overall by 3.3 percent during the POI, ending the POI at 63,294 short tons in 2013.<sup>153</sup>

In the 2019 Reviews, the Commission found that apparent U.S. consumption had increased since 2013 and was 83,904 short tons in 2018.<sup>154</sup>

*Current Reviews.* The information available in the current reviews indicates that demand for WSS pressure pipe continues to be driven by demand in the downstream industries that use WSS pressure pipe, such as the chemical, petrochemical, food and beverage, pharmaceutical, water purification, ethanol, and oil and gas industries.<sup>155</sup> Apparent U.S. consumption was \*\*\* short tons in 2023, down from 83,904 short tons in 2018.<sup>156</sup>

## 2. Supply Conditions

*Prior Proceedings.* In the original investigations concerning subject imports from China, the Commission found that some U.S. production capacity closed or consolidated prior to and during the POI.

Domestic producers' share of the U.S. market declined over the period from \*\*\* percent in 2005 to \*\*\* percent in 2006 and \*\*\* percent in 2007. At the same time, subject imports' share of the market increased from \*\*\* percent in 2005 to \*\*\* percent in 2007.<sup>157</sup> Nonsubject imports' share of the U.S. market rose slightly overall from 2005 to 2007.<sup>158</sup>

---

<sup>151</sup> *Original Determination – China*, USITC Pub. 4064 at 15-16. Apparent U.S. consumption was \*\*\* short tons in 2005, \*\*\* short tons in 2006, and \*\*\* short tons in 2007. Confidential Staff Report in *Welded Stainless Steel Pressure Pipe from China*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Final), Memorandum INV-GG-009, EDIS Doc. 535346 at Table IV-4.

<sup>152</sup> *First Review Determination – China*, USITC Pub. 4478 at 9; *Welded Stainless Steel Pressure Pipe from China*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Review) (Confidential), EDIS Doc. 684611 (Aug. 7, 2019) ("*Confidential Version – China Review*") at 12.

<sup>153</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 14. Apparent U.S. consumption was 65,478 short tons in 2011, 66,835 short tons in 2012, and 63,294 short tons in 2013. *Id.*

<sup>154</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 21.

<sup>155</sup> CR/PR at 1.11; Domestic Producers' Response at 24; CR/PR at 1.9.

<sup>156</sup> CR/PR at Table 1.6.

<sup>157</sup> *Original Determination – China*, USITC Pub. 4064 at 21; *Confidential Version – China Original Investigation* at 28.

<sup>158</sup> *Original Determination – China*, USITC Pub. 4064 at 21; *Confidential Version – China Original Investigation* at 28. Nonsubject imports accounted for \*\*\* percent of apparent U.S.

In the first expedited reviews with respect to China, the Commission found that the domestic industry accounted for \*\*\* percent of apparent U.S. consumption in 2013, subject imports accounted for \*\*\* percent, and nonsubject imports accounted for \*\*\* percent.<sup>159</sup>

In the original investigations concerning subject imports from Malaysia, Thailand, and Vietnam, the Commission observed that the domestic industry supplied the largest share of the U.S. market over the 2011-2013 POI. Its market share increased from 39.5 percent in 2011 to 40.1 percent in 2012 and 45.1 percent in 2013.<sup>160</sup> The market share of cumulated subject imports increased from 27.2 percent in 2011 to 27.6 percent in 2012, and then declined to 24.7 percent in 2013, while the market share of non-subject imports decreased from 33.3 percent in 2011 to 32.3 percent in 2012, and decreased again to 30.2 percent in 2013.<sup>161</sup>

In the 2019 Reviews, the Commission observed that the domestic industry underwent several changes, including Outokumpu's sale of a Florida pipe plant to a foreign producer and Bristol's acquisition of operations in Pennsylvania.<sup>162</sup> The Commission found that the domestic producers supplied 32.2 percent of apparent U.S. consumption in 2018,<sup>163</sup> subject imports supplied a small share (4.3 percent),<sup>164</sup> and nonsubject imports supplied the largest share (63.5 percent).<sup>165</sup>

*Current Reviews.* The domestic industry supplied \*\*\* percent of apparent U.S. consumption in 2023.<sup>166</sup> There were several changes to the domestic industry during the POR, including an acquisition, rebranding, and closure. Notably, effective August 31, 2023, Ascent

---

consumption in 2005, \*\*\* percent in 2006, and \*\*\* percent in 2007. *Id.*

<sup>159</sup> *First Review Determination - China*, USITC Pub. 4478 at 9; *Confidential Version – China Review* at 12–13.

<sup>160</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 14.

<sup>161</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 14.

<sup>162</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 22. In August 2017, Outokumpu sold its Wildwood, Florida pipe plant to the Taiwanese company Ta Chen Stainless Pipe Ltd. In May 2018, Synalloy subsidiary Bristol Metals, LLC, acquired the galvanized tube operation of Marcegaglia USA in Munhall Pennsylvania. It primarily acquired the galvanized tube manufacturing equipment and inventory assets of the business. *Id.* n.128.

<sup>163</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 22.

<sup>164</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 22. In 2018 China supplied 1.8 percent of apparent U.S. consumption, Malaysia supplied less than 0.05 percent, Thailand supplied 0.4 percent, and Vietnam supplied 2.0 percent. *Id.* n.129.

<sup>165</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 22, n. 130. India, Korea, and Taiwan were the largest nonsubject sources of WSS pressure pipe in the current review period. *Id.*

<sup>166</sup> CR/PR at Table 1.6.

Industries Co. permanently ceased operations at its welded pipe and tube facility in Pennsylvania, resulting in the loss of 114 jobs.<sup>167</sup>

During the POR, cumulated subject imports remained in the U.S. market, and accounted for \*\*\* percent of U.S. apparent consumption in 2023.<sup>168</sup> Nonsubject imports were the largest source of supply of WSS pressure pipe in the U.S. market in 2023, accounting for \*\*\* percent of apparent U.S. consumption.<sup>169</sup> Nonsubject imports from India, Korea, and Taiwan are currently subject to antidumping duty orders in the United States, and such imports from India are also subject to a countervailing duty order.<sup>170</sup>

### **3. Substitutability and Other Conditions**

*Prior Proceedings.* In the original investigations and first expedited reviews for China, the Commission found that WSS pressure pipe was a commodity product and that subject imports were highly substitutable with the domestic like product. The Commission found that both subject imports and the domestic like product were made to identical ASTM specifications, were sold in the same channels of distribution, and were purchased based on specification and price.<sup>171</sup> Likewise, in the original Malaysia, Thailand, and Vietnam investigations, the Commission found that WSS pressure pipe was highly substitutable and that price was an important factor in purchasing decisions.<sup>172</sup>

In the 2019 reviews, the Commission again found that domestic like product and subject imports were highly substitutable and that price continued to be an important factor in purchasing decisions.<sup>173</sup> Specifically, the Commission found that WSS pressure pipe was a fungible and interchangeable product that is made to the same ASTM specifications regardless of source.<sup>174</sup>

---

<sup>167</sup> CR/PR at Table 1.3.

<sup>168</sup> CR/PR at Table 1.6. In 2023 China supplied \*\*\* percent of apparent U.S. consumption, Malaysia supplied less than \*\*\* percent, Thailand supplied \*\*\* percent, and Vietnam supplied \*\*\* percent. *Id.*

<sup>169</sup> CR/PR at Table 1.6.

<sup>170</sup> CR/PR at Table 1.2.

<sup>171</sup> *Original Determination – China*, USITC Pub. 4064 at 19–20; *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 15; *First Review Determination – China*, USITC Pub. 4478 at 9–10.

<sup>172</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 15.

<sup>173</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 23.

<sup>174</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 23.

*Current Reviews.* There is no new information on the record to suggest that the substitutability of subject imports and the domestic like product or the importance of price in purchasing decisions have changed significantly since the prior proceedings. Domestic Producers assert that there continues to be a high degree of substitutability between domestically produced and Chinese imported pipe and that price remains an important factor in purchasing decisions.<sup>175</sup> Accordingly, we again find that there is a high degree of substitutability between subject imports and the domestic like product and that price is an important factor in purchasing decisions.

Effective March 2018, WSS pressure pipe originating in China, Malaysia, Thailand, and Vietnam is subject to an additional 25 percent *ad valorem* duty under section 232 of the Trade Expansion Act of 1962, as amended.<sup>176</sup> Additionally, effective September 1, 2019, WSS pressure pipe originating in China became subject to an additional 15 percent *ad valorem* duty under section 301 of the Trade Act of 1974.<sup>177</sup> The section 301 duty for WSS pressure pipe from China was reduced to 7.5 percent, effective February 14, 2020,<sup>178</sup> and later increased to 25 percent *ad valorem*, effective September 27, 2024.<sup>179</sup>

## **C. Likely Volume of Subject Imports**

### **1. The Prior Proceedings**

*China:* In the original investigations, the Commission found that the absolute volume of subject imports increased from 2005 to 2007 at a rate that greatly outpaced demand growth,<sup>180</sup> increasing their share of the U.S. market by \*\*\* percentage points.<sup>181</sup> In 2007, the volume of

---

<sup>175</sup> Domestic Producers Response at 21.

<sup>176</sup> 19 U.S.C. § 1862.

<sup>177</sup> *Notice of Modification of Section 301 Acton: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 45821, (Aug. 30, 2019); CR/PR at 1.7.

<sup>178</sup> 84 FR 45821, August 30, 2019; *Notice of Modification of Section 301 Acton: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 Fed. Reg. 3741 (Jan. 22, 2020). See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 99.3.88 to 99.3.102, and 99.3.313.

<sup>179</sup> *Notice of Modification of Section 301 Acton: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 89 Fed. Reg. 76581 (Sept. 18, 2024); CR/PR at 1.7.

<sup>180</sup> *Original Determination – China*, USITC Pub. 4064 at 20. The volume of subject imports more than doubled, increasing from 14,394 short tons in 2005 to 30,371 short tons in 2007. *Id.*

<sup>181</sup> *Original Determination – China*, USITC Pub. 4064 at 20; *Confidential Version – China Original Investigation* at 28. Subject imports were \*\*\* percent of the U.S. market in 2005, \*\*\* percent in 2006,

subject imports was greater than both domestic production and the volume of nonsubject imports.<sup>182</sup> The Commission found that because nonsubject imports held a relatively stable share of the U.S. market throughout the 2011-2013 period, subject imports gained market share almost entirely at the expense of the domestic industry.<sup>183</sup> The Commission found that the volume of subject imports and the increase in that volume were significant, both on an absolute basis and relative to consumption and production in the United States.<sup>184</sup>

In the expedited first five-year reviews, the Commission found that the orders had a disciplining effect on the volume of subject imports, which had declined significantly since the original investigations.<sup>185</sup> In 2013, total subject imports were 1,544 short tons, compared with 30,371 short tons in 2007.<sup>186</sup> The Commission found that there was no information on the record that indicated that subject producers' capacity and production had declined appreciably since the original investigations or that their interest in the U.S. market would not return to prior levels upon revocation.<sup>187</sup> The Commission found that subject merchandise from China faced barriers in countries other than the United States, as Brazil and Turkey imposed antidumping duty orders on imports of welded stainless steel tubes and pipes from China after the original investigations.<sup>188</sup> The Commission thus found that the WSS pressure pipe industry in China had the ability and incentive to increase exports of subject merchandise to the United States upon revocation.<sup>189</sup> The Commission also found that China remained a substantial exporter of stainless steel tubular goods, a broader category that includes WSS pressure pipe.<sup>190</sup> Accordingly, the Commission found that the subject producers in China were likely, absent the restraining effects of the orders, to direct significant volumes of WSS pressure pipe to the U.S. market, as they did during the original investigations. It also found that the likely volume of subject imports, both in absolute terms and relative to consumption in the United States, would be significant if the orders were revoked.<sup>191</sup>

*Malaysia, Thailand, and Vietnam:* In the original investigations, the Commission found that the volume of cumulated subject imports was significant both in absolute terms and

---

and \*\*\* percent in 2007. *Id.*

<sup>182</sup> *Original Determination – China*, USITC Pub. 4064 at 20–21.

<sup>183</sup> *Original Determination – China*, USITC Pub. 4064 at 21.

<sup>184</sup> *Original Determination – China*, USITC Pub. 4064 at 21–22.

<sup>185</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

<sup>186</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

<sup>187</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

<sup>188</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

<sup>189</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

<sup>190</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

<sup>191</sup> *First Review Determination – China*, USITC Pub. 4478 at 11.

relative to consumption in the United States.<sup>192</sup> The share of apparent U.S. consumption held by cumulated subject imports, by quantity, decreased overall by 2.5 percentage points from 2011 to 2013.<sup>193</sup> The Commission found that the decline in the volume of cumulated subject imports between 2012 and 2013 was due at least in part to the filing of the petitions, and therefore gave reduced weight to that decline in its analysis.<sup>194</sup>

*2019 Reviews:* The Commission found that the subject foreign industries had significant production capacity for the manufacture of stainless steel tubular goods, and that the cumulated subject industries in these countries were significant global exporters of those products.<sup>195</sup> While the orders had a disciplining effect on the subject imports orders during the POR, the Commission found that their continued presence in the U.S. market during the POR indicated that subject producers remained interested in supplying U.S. customers, and that barriers to other export markets (*i.e.*, antidumping duty orders on imports from all four countries in Brazil and antidumping duty orders on imports from China, Malaysia, and Vietnam in Turkey) made the U.S. market attractive for subject producers upon revocation of the orders.<sup>196</sup> The Commission also found that cumulated subject industries exported substantial volumes of stainless steel tubular goods throughout the world during the POR.<sup>197</sup> It therefore concluded that the likely volume of cumulated subject imports, both in absolute terms and relative to consumption in the United States, would likely be significant if the orders were revoked.<sup>198</sup>

## **2. The Current Reviews**

The information available indicates that although the orders have continued to have a

---

<sup>192</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 16. The volume of cumulated subject imports was 18,007 short tons in 2011, 18,357 short tons in 2012, and 12,125 short tons in 2013. *Id.*

<sup>193</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 16. The share of apparent U.S. consumption held by cumulated subject imports was 27.2 percent in 2011, 27.6 percent in 2012, and 24.7 percent in 2013. *Id.*

<sup>194</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 16.

<sup>195</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 25–26.

<sup>196</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 25–26.

<sup>197</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 26.

<sup>198</sup> Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise or the capacity of the subject producers for product shifting during the current period of review.

restraining effect on the volume of subject imports, subject imports continued to be present in the U.S. market throughout the POR. Subject imports fluctuated during the POR, decreasing from 3,171 short tons in 2019 to 2,540 short tons in 2020, and then increasing to 4,209 short tons in 2021, 6,198 short tons in 2022, and 7,121 short tons in 2023.<sup>199</sup> Subject imports accounted for \*\*\* percent of apparent U.S. consumption in 2023.<sup>200</sup>

The record in these expedited reviews indicates that subject producers continue to have the ability and incentive to export significant volumes of subject merchandise to the U.S. market in the event of revocation of the orders.

The information available indicates that the subject foreign industries remain large. Domestic Producers identified numerous possible subject producers, including ones that are actively engaged in the production and exportation of WSS pressure pipe: three Chinese subject producers with an aggregate annual production capacity of more than 550,000 metric tons; two Malaysian subject producers, with one having an annual production capacity of 12,000 metric tons; one Thai subject producer with an annual production capacity of more than 50,000 metric tons; and two Vietnamese subject producers, with one having an annual production capacity of 80,000 metric tons.<sup>201</sup> Additionally, the information available indicates that one of the Malaysian producers announced plans to build two new factories in Malaysia by 2027, thereby increasing production.<sup>202</sup> The record also contains no information suggesting that any of the subject industries reduced their levels of capacity or excess capacity below the levels existing during the period covered by the 2019 review, which the Commission found to be significant.<sup>203</sup>

The information available also indicates that the subject foreign industries remain large exporters of WSS pressure pipe. GTA reports that total exports from all four subject countries under HTS subheading 7306.40, which includes WSS pressure pipe and some out-of-scope products, increased from 267,385 short tons in 2022 to 283,907 short tons in 2023.<sup>204</sup> GTA data also indicate that China was the world's second largest export of WSS pressure pipe during the POR, while Vietnam and Thailand were among the top ten exporters from 2019 to

---

<sup>199</sup> CR/PR at Table 1.5.

<sup>200</sup> CR/PR at Table 1.6.

<sup>201</sup> Domestic Producers' Response at 17. Domestic Producers identified five possible Malaysian producers of WSS pressure pipe. CR/PR 1.21.

<sup>202</sup> Domestic Producers' Response at 17.

<sup>203</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 25. Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise or the capacity of the subject producers for product shifting during the current period of review.

<sup>204</sup> *Derived from* CR/PR at Tables 1.9–1.12.

2023.<sup>205</sup>

The continued and substantial presence of subject imports in the U.S. market throughout the POR, notwithstanding the disciplining effect of the orders, shows that subject producers have maintained customers and distribution networks in the U.S. market.<sup>206</sup> Furthermore, as discussed above in Section III.C.1, many third countries have trade measures that cover WSS pressure pipe, which makes the U.S. market more attractive to subject producers in the event of revocation.<sup>207</sup>

In light of these considerations, including the significant and increasing volume of subject imports in the original investigations, the continued presence of subject imports in the U.S. market during the POR, the subject industries' large production capacity and export volumes, and the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, if the orders were revoked.<sup>208</sup>

#### **D. Likely Price Effects**

##### **1. The Prior Proceedings**

*China:* In the original investigations, the Commission found that the subject imports consistently undersold the domestic like product throughout the POI, with underselling occurring in 73.0 percent of quarterly comparisons, often at large margins.<sup>209</sup> The Commission found that instances of overselling were limited, which generally occurred after the petitions were filed, and involved smaller quantities of WSS pressure pipe.<sup>210</sup> In addition, the prices of subject imports in the instances of overselling did not reflect the same declines in raw material costs that were reflected in domestic prices because, unlike domestic prices, subject import prices were determined when ordered rather than when sold.<sup>211</sup> The Commission also found that

---

<sup>205</sup> CR/PR at 1.29.

<sup>206</sup> CR/PR at Tables 1.5, 1.6.

<sup>207</sup> CR/PR at 1.13.

<sup>208</sup> As discussed in section IV.B.3 above, WSS pressure pipe from certain subject countries is subject to additional duties under Section 232 and Section 301. CR/PR at 1.7. There is no evidence on the record that these additional duties would prevent subject imports from subject industries from increasing to significant levels if the orders were revoked, particularly considering the subject industries' large size and exports, and the attractiveness of the U.S. market. The record in these five-year reviews does not contain information concerning inventories of subject merchandise.

<sup>209</sup> *Original Determination – China*, USITC Pub. 4064 at 23.

<sup>210</sup> *Original Determination – China*, USITC Pub. 4064 at 23.

<sup>211</sup> *Original Determination – China*, USITC Pub. 4064 at 23–24.



the significant underselling of the domestic like product by subject imports from China took substantial market share from the domestic industry as noted above.<sup>212</sup>

In the first five-year reviews for China, there was no new product-specific pricing information on the record. The Commission found that price continued to be an important factor in purchasing decisions. In light of the underselling that occurred during the original investigations, the Commission found that, absent the orders, subject imports from China would likely undersell the domestic like product at high margins, as they did during the original investigations. The Commission found that this underselling would, in turn, likely cause the domestic producers to cut prices, restrain needed price increases, or lose sales.<sup>213</sup> Thus, the Commission found that the subject imports would likely enter the United States at prices that would significantly depress or suppress U.S. prices if the orders were revoked.<sup>214</sup>

*Malaysia, Thailand, and Vietnam:* In the original investigations, the Commission found that the pricing data showed consistent and pervasive underselling by cumulated subject imports for all six pricing products on which the Commission collected data.<sup>215</sup> The Commission found that underselling by subject imports was significant,<sup>216</sup> and that subject imports depressed the domestic industry's prices.<sup>217</sup>

The Commission found that while the domestic industry's COGS declined, the industry's ratio of COGS to net sales increased. The domestic industry's net sales value per short ton declined on absolute and percentage bases more sharply than its raw materials cost per ton. The negative effect of decreased prices was greater than the positive effect of decreased costs and expenses between 2011 and 2013.<sup>218</sup> Moreover, the Commission found that the timing of the decline in U.S. producers' prices in 2012 corresponded with increases in cumulated subject import volumes and market share, as well as pervasive underselling by cumulated subject imports.<sup>219</sup> Thus, the Commission found that, notwithstanding the decline in raw material costs, the cumulated subject imports depressed U.S. producers' prices to a significant

---

<sup>212</sup> *Original Determination – China*, USITC Pub. 4064 at 24.

<sup>213</sup> *First Review Determination – China*, USITC Pub. 4478 at 12.

<sup>214</sup> *First Review Determination – China*, USITC Pub. 4478 at 12.

<sup>215</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 17.

<sup>216</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 18.

<sup>217</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 19. Although the Commission acknowledged that domestic WSS pressure pipe prices were affected in part by raw material cost changes, the Commission found that these could not fully explain the domestic industry's price declines. *Id.* at 18.

<sup>218</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 18.

<sup>219</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 20.

degree.<sup>220</sup>

*2019 Reviews:* The Commission found there was a high degree of substitutability between the domestic like product and subject imports and price continued to be an important factor in purchasing decisions.<sup>221</sup> Although the record did not contain new pricing data, the Commission found that the likely significant cumulated volume of subject imports from China, Malaysia, Thailand, and Vietnam entering at low prices would likely require domestic producers to cut prices, forego price increases, or lose market share. The Commission therefore concluded that subject imports would likely have significant price effects on domestic producers' WSS pressure pipe prices upon revocation of the orders.<sup>222</sup>

## **2. The Current Reviews**

The record in these expedited reviews does not contain new product-specific pricing information. Based on the available information, including the high degree of substitutability between the domestic like product and subject imports, the importance of price in purchasing decisions, and the attractiveness of the U.S. market to subject producers, we find that if the orders were revoked, the likely significant volumes of subject imports would likely undersell the domestic like product to a significant degree, as they did in the original investigations. Absent the discipline of the orders, the significant volumes of low-priced subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or restrain price increases necessary to cover any increasing costs, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, significant volumes of subject imports would likely have significant price effects.

### **E. Likely Impact**

#### **1. The Prior Proceedings**

*China:* In the original investigations, the Commission found that performance indicia for the domestic industry generally declined.<sup>223</sup> Domestic production of WSS pressure pipe increased in 2006, but then declined in 2007 to levels lower than in 2005.<sup>224</sup> Inventories

---

<sup>220</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 20.

<sup>221</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 29.

<sup>222</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 29.

<sup>223</sup> *Original Determination – China*, USITC Pub. 4064 at 26.

<sup>224</sup> *Original Determination – China*, USITC Pub. 4064 at 26.

increased from 2005 to 2007.<sup>225</sup> The domestic industry was generally able to increase its production and capacity between 2005 and 2006, but still lost market share to subject imports, and lost additional market share between 2006 and 2007 despite an increase in apparent U.S. consumption.<sup>226</sup> The domestic industry's average number of production and related workers, hours worked, total wages, and productivity increased marginally between 2005 and 2006 before declining between 2006 and 2007.<sup>227</sup> Net sales by quantity followed a similar trend, increasing between 2005 and 2006, and then decreasing in 2007.<sup>228</sup> Net sales by value, however, increased, which the Commission found reflected higher prices for domestically produced WSS pressure pipe.<sup>229</sup> The Commission observed that the domestic industry's financial performance improved during the 2005 to 2007 period of investigation.<sup>230</sup> Capital expenditures also increased overall from 2005 to 2007.<sup>231</sup>

The Commission found that, given the decrease in shipments and capacity utilization levels, and the industry's lost sales, which occurred when volumes of low-priced subject imports were increasing, the improvement in the domestic industry's operating income did not merit as much weight as the other factors that it considered in its analysis.<sup>232</sup> The Commission thus concluded that subject imports from China had a significant adverse impact on the domestic industry.<sup>233</sup>

In the first five-year reviews for China, the Commission concluded that the limited record was insufficient for it to make a finding as to whether the domestic industry was vulnerable to the likely continuation or recurrence of material injury in the event of revocation of the orders.<sup>234</sup> However, based on the information on the record, the Commission found that should the orders be revoked, the likely significant volume and price effects of the subject

---

<sup>225</sup> *Original Determination – China*, USITC Pub. 4064 at 26.

<sup>226</sup> *Original Determination – China*, USITC Pub. 4064 at 27.

<sup>227</sup> *Original Determination – China*, USITC Pub. 4064 at 27.

<sup>228</sup> *Original Determination – China*, USITC Pub. 4064 at 27.

<sup>229</sup> *Original Determination – China*, USITC Pub. 4064 at 28.

<sup>230</sup> *Original Determination – China*, USITC Pub. 4064 at 29. The domestic industry's financial performance shifted from a \$3.6 million operating loss in 2005 to \$7.0 million in operating profits in 2006, and then to \$14.2 million in operating profits in 2007. *Id.*

<sup>231</sup> *Original Determination – China*, USITC Pub. 4064 at 29. Capital expenditures were \$2.7 million in 2005, \$1.5 million in 2006, and \$3.8 million in 2007. *Id.*

<sup>232</sup> *Original Determination – China*, USITC Pub. 4064 at 29.

<sup>233</sup> *Original Determination – China*, USITC Pub. 4064 at 29. The Commission examined the price and volume trends of nonsubject imports and concluded that such imports did not break the causal link between the material injury and subject imports from China. *Original Determination – China*, USITC Pub. 4064 at 30–31.

<sup>234</sup> *First Review Determination – China*, USITC Pub. 4478 at 13.

imports would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry. Those declines would then likely have a direct adverse impact on the domestic industry's profitability and employment, as well as its ability to raise capital, and to make and maintain capital investments.<sup>235</sup>

In its non-attribution analysis, the Commission observed that nonsubject imports from Malaysia, Thailand, and Vietnam increased since the imposition of the orders on subject imports from China.<sup>236</sup> Nonetheless, the Commission found that given the likely significant volume and underselling of subject imports from China, the effects of nonsubject imports would be distinct from those of subject imports from China upon revocation of the orders.<sup>237</sup>

*Malaysia, Thailand, and Vietnam:* In the original investigations, the Commission found that although the domestic industry showed some improvement in production, shipments, and market share during the 2011-2013 period, it displayed poor and worsening financial performance and incurred operating losses in each year of the period.<sup>238</sup>

The domestic industry's capacity, production, and capacity utilization all increased modestly from 2011 to 2013. The industry's employment-related indicators likewise showed increases, except for productivity, which declined.<sup>239</sup> Net sales, U.S. shipments, and the domestic industry's share of apparent U.S. consumption increased from 2011 to 2013.<sup>240</sup> Despite the increase in net sales quantities, the industry's net sales value declined by 23.5 percent from 2011 to 2013.<sup>241</sup> Both operating income and the industry's operating margin declined from 2011 to 2013.<sup>242</sup>

---

<sup>235</sup> *First Review Determination - China*, USITC Pub. 4478 at 13.

<sup>236</sup> At the time the record closed in the first five-year reviews regarding subject imports from China, the Commission was conducting its final phase of the antidumping duty investigations concerning imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam that are under review in this proceeding. *First Review Determination - China*, USITC Pub. 4478 at 13.

<sup>237</sup> *First Review Determination - China*, USITC Pub. 4478 at 13.

<sup>238</sup> *Original Determination - Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 21.

<sup>239</sup> *Original Determination - Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 21.

<sup>240</sup> *Original Determination - Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 22. Net sales were 26,776 short tons in 2011, 27,518 short tons in 2012, and 28,818 short tons in 2013. U.S. shipments were 25,857 short tons in 2011, 26,794 short tons in 2012, and 28,530 short tons in 2013. The domestic industry's share of apparent U.S. consumption was 39.5 percent in 2011, 40.1 percent in 2012, and 45.1 percent in 2013. *Id.*

<sup>241</sup> *Original Determination - Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 22. The domestic industry's net sales were \$139.0 million in 2011, \$127.3 million in 2012, and \$106.4 million in 2013. *Id.*

<sup>242</sup> *Original Determination - Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 22. Operating income declined from a loss of \$4.1 million in 2011 to a loss of \$5.4 million in 2012, and then to a loss of \$10.7 million in 2013. The industry's operating margin was negative 3.0 percent in 2011, negative 4.3

The Commission concluded that the domestic industry's poor financial performance was not simply a result of reduced raw material costs resulting in lower prices for WSS pressure pipe. It found instead that pervasive underselling by significant volumes of subject imports created additional competitive pressure and led the domestic industry to cut its prices by a greater magnitude than the decline in its raw material costs. This mismatch was so severe that the domestic industry's sales revenue declined by 23.5 percent between 2011 and 2013, despite an increase in shipments.<sup>243</sup> The Commission found that these declining sales revenues, in turn, led to declines in the domestic industry's financial performance. The Commission found that the significant volume of subject imports led to operating losses for the domestic producers and had a significant impact on the domestic industry.<sup>244</sup>

In its non-attribution analysis, the Commission found that, because nonsubject imports declined on both absolute and relative bases during the 2011-2013 period and were largely constrained by other trade remedies, they were not responsible for the adverse price effects that the Commission found attributable to the subject imports.<sup>245</sup> The Commission accordingly found that the cumulated subject imports had a significant impact on the domestic industry.<sup>246</sup>

*2019 Reviews:* The Commission concluded that the information available was insufficient for the Commission to make a finding on whether the domestic industry was vulnerable to the continuation or recurrence of material injury should the orders be revoked.<sup>247</sup> The Commission found, based on the information available, that if the orders were revoked, the likely significant volume and price effects of the subject imports would likely have a significant impact on the domestic industry.<sup>248</sup> Additionally, in its non-attribution analysis, the Commission found that notwithstanding the increased volume of nonsubject imports in the U.S. market since the prior proceedings, the increased volume of low-priced subject imports that was likely after revocation would likely take at least some sales and market share from the domestic industry.<sup>249</sup>

---

percent in 2012, and negative 10.1 percent in 2013. *Id.*

<sup>243</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 22–23.

<sup>244</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 23.

<sup>245</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 24.

<sup>246</sup> *Original Determination – Malaysia, Thailand, and Vietnam*, USITC Pub. 4477 at 25.

<sup>247</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 32.

<sup>248</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 32.

<sup>249</sup> *Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 32.

## 2. The Current Reviews

The record in these expedited reviews contains limited information concerning the domestic industry's performance since the original investigations. The available information shows that the domestic industry's trade and financial indicators were weaker in 2023 than in the 2019 reviews.<sup>250</sup> In 2023, the domestic industry's capacity, at \*\*\* short tons, its production, at \*\*\* short tons, and capacity utilization, at \*\*\* percent, were lower than in the prior proceedings.<sup>251</sup> The domestic industry's U.S. shipments totaled \*\*\* short tons in 2023, equivalent \*\*\* percent of apparent U.S. consumption that year – both figures lower than in the prior proceedings.<sup>252</sup> The industry's net sales revenue totaled \$\*\*\* in 2023, and its operating income and operating income to net sales ratio were \$\*\*\* and \*\*\* percent, respectively, approaching the industry's performance in 2013, in contrast to the profitability reported in 2007 and 2018.<sup>253</sup> Accordingly, we find that the industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.<sup>254</sup>

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

---

<sup>250</sup> CR/PR at Table 1.4. Responding domestic producers accounted for \*\*\* percent of domestic production of WSS pressure pipe in 2023. CR/PR at 1.11. Responding domestic producers accounted for \*\*\* percent of domestic production in the original China investigations, \*\*\* percent in the first reviews for China, and the vast majority of domestic production in the original Malaysia, Thailand, and Vietnam investigations and the 2019 reviews. CR/PR at 1.10.

<sup>251</sup> CR/PR at Table 1.4. The domestic industry's capacity and production were \*\*\* and \*\*\* short tons respectively, in 2007. *Id.* The domestic industry's capacity and production were 57,817 and 28,456 short tons, respectively, in 2013 and 65,967 and 30,009 short tons, respectively, in 2018. *Id.* The industry's capacity utilization was \*\*\* percent in 2007, 49.2 percent in 2013, and 46.9 percent in 2018. *Id.*

<sup>252</sup> CR/PR at Tables 1.4 and 1.6.

<sup>253</sup> CR/PR at Table 1.4. Domestic industry net sales were \$194.8 million in 2007, \$106.4 million in 2013, and \$115.5 million in 2018. *Id.* Domestic industry operating income was \$14.2 million in 2007 and \$9.8 million in 2018, with an operating loss of \$10.7 million in 2013. *Id.* The domestic industry's operating income to net sales ratio was 7.3 percent in 2007, 8.5 percent in 2018, and negative 10.1 percent in 2013. *Id.*

<sup>254</sup> Commissioner Johanson does not join this finding. Based on similar data respecting the industry's financial performance in 2013, the Commission in the first review of the orders on China concluded that the expedited record was insufficient for it to make a finding on whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event of revocation. *See First Review Determination – China*, USITC Pub. 4478 at 13-14; CR/PR at Table 1.4; *cf. Combined Second Five-Year China and First Five-Year Malaysia, Thailand, and Vietnam Review Determinations*, USITC Pub. 4994 at 32 (same conclusion). Commissioner Johanson also finds the limited information on this expedited record insufficient to make a finding on vulnerability.

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

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute likely injury from other factors to the subject imports. Nonsubject imports have decreased (albeit only slightly) their share of apparent U.S. consumption since the last reviews, from 63.5 percent in 2018 to \*\*\* percent in 2023.<sup>255</sup> The record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities or adversely affecting domestic prices after revocation of the orders. Given the substitutability of WSS pressure pipe, regardless of source, and the importance of price in purchasing decisions, the presence of nonsubject imports in the U.S. market would likely not prevent the significant increase in low-priced subject imports that is likely after revocation from taking market share from the domestic industry, as well as from nonsubject imports, or from forcing domestic producers to lower their prices or forgo price increases in order to retain market share. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant adverse impact on the domestic industry.

We recognize that apparent U.S. consumption was \*\*\* percent lower in 2023 than in 2018.<sup>256</sup> Notwithstanding this decline, Domestic Producers reported that there had not been any significant changes in demand since the 2019 reviews.<sup>257</sup> To the extent that demand is weak or declines, the significant volume of low-priced cumulated subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry.

In sum, we conclude that if the antidumping and countervailing duty orders on WSS

---

<sup>255</sup> CR/PR at Table 1.6. The volume of nonsubject imports was 42,148 short tons in 2023, as compared to 53,279 short tons in 2018. *Id.*

<sup>256</sup> CR/PR at Table 1.6. U.S. apparent consumption was 83,904 short tons in 2018, and \*\*\* short tons in 2023. *Id.*

<sup>257</sup> Domestic Producers Response at 24.

pressure pipe from China, Malaysia, Thailand, and Vietnam were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

## **V. Conclusion**

For the reasons stated above, we determine that revocation of the countervailing duty order on WSS pressure pipe from China and revocation of the antidumping duty orders on WSS pressure pipe from China, Malaysia, Thailand, and Vietnam would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.



# Information obtained in these reviews

## Background

On November 1, 2024, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),<sup>1</sup> that it had instituted reviews to determine whether revocation of the antidumping duty orders on welded stainless steel pressure pipe (“WSS pressure pipe”) from China, Malaysia, Thailand, and Vietnam and the countervailing duty order on WSS pressure pipe from China would be likely to lead to the continuation or recurrence of material injury to a domestic industry.<sup>2</sup> All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.<sup>3</sup> <sup>4</sup> Table 1.1 presents information relating to the background and schedule of this proceeding:

**Table 1.1 WSS pressure pipe: Information relating to the background and schedule of this proceeding**

Effective date	Action
November 1, 2024	Notice of institution by Commission (89 FR 87416, November 1, 2024)
November 4, 2024	Notice of initiation by Commerce (89 FR 87543, November 4, 2024)
February 4, 2025	Commission’s vote on adequacy
March 7, 2025	Commerce’s results of its expedited CVD review for China (90 FR 11506, March 7, 2025)
March 7, 2025	Commerce’s results of its expedited AD review for China (90 FR 11507, March 7, 2025)
March 11, 2025	Commerce’s results of its expedited AD review for Malaysia, Thailand, and Vietnam (90 FR 11718, March 11, 2025)
May 16, 2025	Commission’s determinations and views

---

<sup>1</sup> 19 U.S.C. 1675(c).

<sup>2</sup> 89 FR 87416, November 1, 2024. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 89 FR 87543, November 4, 2024. Pertinent Federal Register notices are referenced in app. A and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

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

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

## **The original investigations**

### **China**

The original investigations with respect to China resulted from petitions filed on January 30, 2008 with Commerce and the Commission by Bristol Metals (Bristol, Tennessee); Felker Brothers Corp. (Marshfield, Wisconsin); Marcegaglia USA Inc. (Munhall, Pennsylvania); Outokumpu Stainless Pipe, Inc. (Schaumburg, Illinois); and The United Steel Workers (Pittsburgh, Pennsylvania).<sup>5</sup> On January 28, 2009, Commerce determined that imports of WSS pressure pipe from China were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.<sup>6</sup> The Commission determined on March 11, 2009 that the domestic industry was materially injured by reason of LTFV and subsidized imports of WSS pressure pipe from China.<sup>7</sup> On March 17, 2009, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins ranging from 10.53 to 55.21 percent and net subsidy rates ranging from 1.10 to 299.16 percent.<sup>8</sup>

### **Malaysia, Thailand, Vietnam**

The original investigations with respect to Malaysia, Thailand, and Vietnam resulted from petitions filed on May 16, 2013 with Commerce and the Commission by Bristol Metals (Bristol, Tennessee); Felker Brothers Corp. (Marshfield, Wisconsin); Marcegaglia USA Inc. (Munhall, Pennsylvania); and Outokumpu Stainless Pipe, Inc. (Schaumburg, Illinois).<sup>9</sup> On May 30, 2014, Commerce determined that imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam were being sold at LTFV.<sup>10</sup> The Commission determined on July 14, 2014 that the domestic industry was materially injured by reason of LTFV imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam.<sup>11</sup> On July 21, 2014, Commerce issued its antidumping duty

---

<sup>5</sup> Welded Stainless Steel Pressure Pipe from China, Inv. Nos. 701-TA-454 and 731-TA-1144 (Final), USITC Publication 4064, March 2009 (“Original publication for China”), p. 1.1.

<sup>6</sup> 74 FR 4913 and 74 FR 4936, January 28, 2009.

<sup>7</sup> 74 FR 11378, March 17, 2009.

<sup>8</sup> 74 FR 11351, March 17, 2009 and 74 FR 11712, March 19, 2009.

<sup>9</sup> Welded Stainless Steel Pressure Pipe from Malaysia, Thailand, and Vietnam, Inv. Nos. 731-TA-1210-1212 (Final), USITC Publication 4477, July 2014 (“Original publication for Malaysia, Thailand, and Vietnam”), p. 1.1.

<sup>10</sup> 79 FR 31090, 79 FR 31093, and 79 FR 31092, May 30, 2014.

<sup>11</sup> 79 FR 43511, July 25, 2014.

orders with final weighted-average dumping margins ranging from 22.70 to 167.11 percent (Malaysia), 23.89 to 24.01 percent (Thailand), and 16.25 percent (Vietnam).<sup>12</sup>

## **China first five-year reviews**

On May 9, 2014, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on WSS pressure pipe from China.<sup>13</sup> On June 9, 2014, Commerce determined that revocation of the antidumping and countervailing duty orders on WSS pressure pipe from China would be likely to lead to continuation or recurrence of dumping and subsidization.<sup>14</sup> On July 7, 2014, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>15</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of WSS pressure pipe from China, effective July 23, 2014 and August 12, 2014, respectively.<sup>16</sup>

## **China second five-year reviews and Malaysia, Thailand, and Vietnam first five-year reviews<sup>17</sup>**

On September 6, 2019, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on WSS pressure pipe from China Malaysia, Thailand, and Vietnam.<sup>18</sup> On October 2, 2019, Commerce determined that revocation of the antidumping order on WSS pressure pipe from China and the countervailing duty orders on WSS pressure pipe from China, Malaysia, Thailand, and Vietnam would be likely to lead to

---

<sup>12</sup> 79 FR 42289, July 21, 2014

<sup>13</sup> 79 FR 30877, May 29, 2014.

<sup>14</sup> 79 FR 32913 and 79 FR 32911, June 9, 2014.

<sup>15</sup> 79 FR 40779, July 14, 2014.

<sup>16</sup> 79 FR 42760, July 23, 2014 and 79 FR 47089, August 12, 2014.

<sup>17</sup> The orders with respect to the imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam, and those for imports from China cover the same products. The antidumping duty orders on WSS pressure pipe from all four countries were imposed or continued in July 2014, and the countervailing duty order on WSS pressure pipe from China was continued in August 2014. Therefore, Commerce combined the first reviews of the orders on imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam with the second reviews of the orders on imports from China. Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam, Inv. Nos. 731-TA-1210-1212 (First Review) and 701-TA-454 and 731-TA-1144 (Second Review), USITC Publication 4994, November 2019 (“Second review publication”), p. 4.

<sup>18</sup> 84 FR 55171, October 15, 2019.

continuation or recurrence of dumping and subsidization.<sup>19</sup> On November 19, 2019, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>20</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, Commerce issued a continuation of the antidumping duty orders on imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam, effective December 3, 2019,<sup>21</sup> a continuation of the antidumping and countervailing duty orders on imports of WSS pressure pipe from China, effective December 6, 2019.<sup>22</sup>

## Previous and related investigations

The Commission has conducted several previous import relief investigations WSS pressure pipe and similar merchandise, as presented in table 1.2.

**Table 1.2 WSS pressure pipe: Previous and related Commission proceedings and current status**

Date	Number	Country	ITC original determination	Current status
1978	AA1921-180	Japan	Negative	–
1986	701-TA-281	Sweden	Negative	–
1986	731-TA-354	Sweden	Negative	–
1991	731-TA-540	South Korea	Affirmative	Order continued after fifth review, effective December 29, 2022
1991	731-TA-541	Taiwan	Affirmative	Order continued after fifth review, effective December 29, 2022
2015	701-TA-548	India	Affirmative	Order continued after first review, effective May 12, 2022
2015	731-TA-1298	India	Affirmative	Order continued after first review, effective May 12, 2022

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.

<sup>19</sup> 84 FR 52460, 84 FR 52462, and 84 FR 52458, October 2, 2024.

<sup>20</sup> 84 FR 64922, November 25, 2019.

<sup>21</sup> 84 FR 66154, December 3, 2019.

<sup>22</sup> 84 FR 66883, December 6, 2019.

## Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of WSS pressure pipe from China, Malaysia, Thailand, and Vietnam with the intent of issuing the final results of these reviews based on the facts available not later than March 4, 2025.<sup>23</sup> Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of WSS pressure pipe from China, Malaysia, Thailand, and Vietnam are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

---

<sup>23</sup> Letter from Howard Smith, Acting Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, December 26, 2024.

## The product

### Commerce's scope

Commerce has defined the scope as follows:

*The merchandise covered by these orders are circular welded austenitic stainless pressure pipe not greater than 14 inches in outside diameter. For purposes of these orders, references to size are in nominal inches and include all products within tolerances allowed by pipe specifications. This merchandise includes, but is not limited to, the American Society for Testing and Materials (ASTM) A-312 or ASTM A-778 specifications, or comparable domestic or foreign specifications. ASTM A-358 products are only included when they are produced to meet ASTM A-312 or ASTM A-778 specifications, or comparable domestic or foreign specifications.*

*Excluded from the scope are: (1) Welded stainless mechanical tubing, meeting ASTM A-554 or comparable domestic or foreign specifications; (2) boiler, heat exchanger, superheater, refining furnace, feedwater heater, and condenser tubing, meeting ASTM A-249, ASTM A-688 or comparable domestic or foreign specifications; and (3) specialized tubing, meeting ASTM A-269, ASTM A-270 or comparable domestic or foreign specifications.<sup>24</sup>*

---

<sup>24</sup> 84 FR 66154, December 3, 2019 and 84 FR 66883, December 6, 2019.

## U.S. tariff treatment

WSS pressure pipe is currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085. The general rate of duty is “free” for HTS subheading 7306.40.50.<sup>25</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 1, 2019, WSS pressure 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 WSS pressure pipe was reduced to 7.5 percent.<sup>26</sup> Effective September 27, 2024, the section 301 duty for WSS pressure pipe originating in China was increased from an additional 7.5 percent to an additional 25 percent ad valorem duty.<sup>27</sup>

Effective March 23, 2018, WSS pressure pipe originating in China, Malaysia, Thailand, and Vietnam is subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.<sup>28</sup>

---

<sup>25</sup> The merchandise subject to these reviews may also be imported under the following HTS statistical reporting numbers: 7306.40.1010, 7306.40.1015, 7306.40.5042, 7306.40.5044, 7306.40.5080, and 7306.40.5090. USITC, HTS (2024) Revision 10, USITC Publication 5569, November 2024, p. 73.19.

<sup>26</sup> 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 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 99.3.88 to 99.3.102, and 99.3.313.

<sup>27</sup> 89 FR 76581, September 18, 2024; See also HTS heading 9903.91.01 and U.S. 31(a) and 31(b) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 10, USITC Publication 5569, November 2024, pp. 99.3.269 to 99.3.273, and 99.3.331.

<sup>28</sup> Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas. EU member countries (effective January 1, 2022), Japan (effective April 1, 2022), and the United Kingdom (effective June 1, 2022) are currently subject to tariff-rate quotas (“TRQs”) for steel articles, and imports that exceed the TRQ limits are subject to the section 232 tariffs. Section 232 import duties on steel articles originating in Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, but restored to 25 percent effective May 21, 2019. In addition, section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2025. 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 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; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022; 88 FR 36437, June 5, 2023; 89 FR 227, January 3, 2024; 89 FR 48233, June 5, 2024; 89 FR 57347, July 15, 2024.

## Description and uses<sup>29</sup>

WSS pressure pipe refers to welded pipe of austenitic stainless steel not greater than 14 inches in outside diameter ("O.D."). The subject pipe is of circular cross-section, produced in relatively few standard sizes, designated by nominal diameter and wall thickness, and is designed for use with standard pipe fittings. Pressure pipe is used to convey fluids at high temperatures, high pressures, or both. The subject pipe is produced to exact O.D. and wall thickness, and to ASTM specifications A-312 and A-778 or to similar specifications, either foreign or domestic.

Stainless steel is a general class of steels that contains at least 10.5 percent of chromium by weight. Chromium gives stainless steel its resistance to corrosion as well as strength at high temperatures and pressure. For these reasons, it is used in corrosive environments, under high temperature and pressure conditions, or where cleanliness and ease of maintenance are strictly required. Although there are various types of stainless steels, the product subject to these investigations is made from the austenitic class of stainless steels, which has excellent corrosion resistance, very good formability, and strength as a result of cold working (changes to the shape or structure of steel, for example by rolling or drawing, without the application of heat). The subject pipe is generally made from austenitic grades 304 and 316 stainless steels. Grade 304, containing 18-20 percent chromium and 8-10.5 percent nickel, is the most widely used austenitic grade and is resistant to food-processing environments (except possibly for high-temperature conditions involving high acid or chloride contents), organic chemicals, and a wide variety of inorganic chemicals. Grade 316 contains 16-18 percent chromium, 10-14 percent nickel, and 2-3 percent molybdenum. The higher nickel and molybdenum content provides better corrosion resistance to grade 316 compared to grade 304 stainless steels.

As mentioned earlier, WSS pressure pipe is generally made to ASTM specifications A-312 or A-778. The A-312 specification covers seamless and straight-seam welded and heavily cold-worked welded austenitic stainless steel pipe intended for high-temperature and general corrosive service. Welded A-312 pipe must be annealed (heat treated) after welding. ASTM A-778 is a standard specification for welded, unannealed austenitic stainless steel tubular products. ASTM A-778 pipe is similar to A-312 pipe but differs in the welding process and in that A-778 post-weld annealing of the pipe is not required for A-312 pipe. The A-778 specification is designed for low and moderate temperatures and corrosive service where heat treatment is not necessary for corrosion resistance.

---

<sup>29</sup> Unless otherwise noted, this information is based on Second review publication, pp. 1.9 to 1.10.

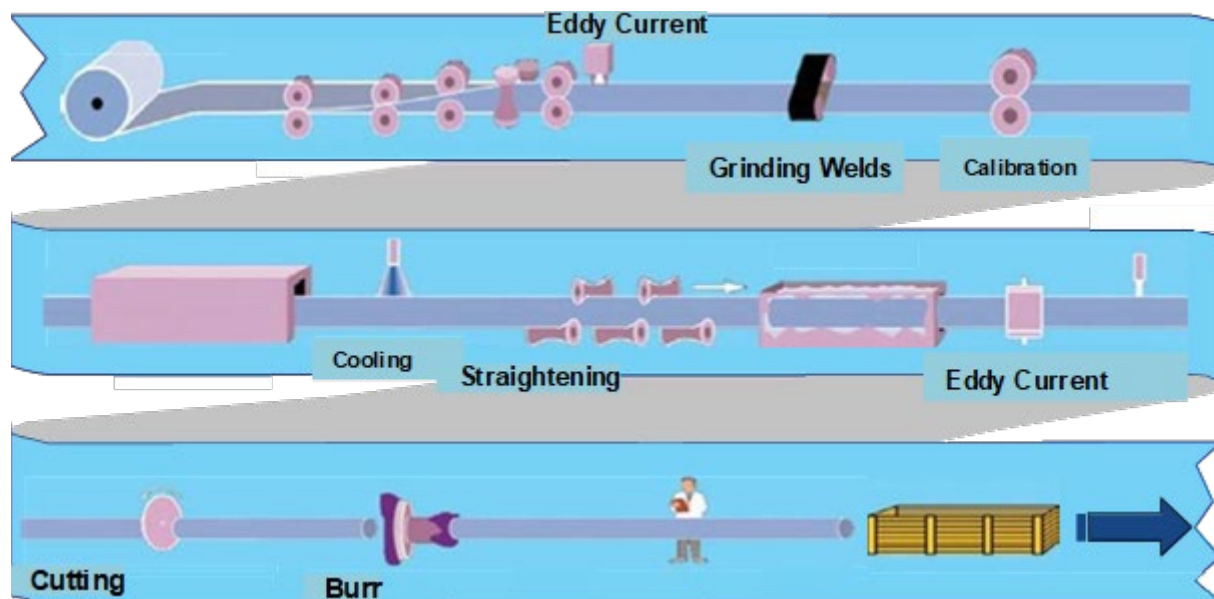


WSS pressure pipe is used by a variety of end-use industries including petrochemicals, oil and gas, manufacturing, chemical fluid handling, and water treatment.

### Manufacturing process<sup>30</sup>

Production of WSS pressure pipe is a two-stage process of forming the tubular shape from a flat steel substrate, followed by welding the product. The continuous-mill process, which is the principal method of producing WSS pressure pipe (figure 1.1), begins with coils of stainless-steel sheet, strip, or plate. Coiled steel, of a width essentially corresponding to the circumference of the pipe to be produced, is mounted in an uncoiler and fed into a series of paired forming rolls. As the stainless steel progresses through the rolls, its cross-sectional profile is formed into a tubular shape with the butted edges along its length ready for (longitudinal) welding. During the original investigations, domestic producers' facilities included several continuous-weld mill lines, with each dedicated to a limited range of pipe diameters.

**Figure 1.1 WSS pressure pipe: Manufacturing process**



Note. Although this figure presents the manufacturing process as generally used, not all WSS pressure pipe manufacturers perform every step displayed in the figure or might not perform them in the exact order shown.

<sup>30</sup> Unless otherwise noted, this information is based on the Second review publication, pp. 1.10 to 1.11.

In the welding stage, the butt edges are welded together by an automatic welding machine using either the tungsten-inert-gas (“TIG”) welding process, the plasma welding process, or the laser welding process. These methods do not require filler material, provide complete fusion of the butted edges, and shield the weld area with inert gas to prevent oxidation. In the TIG welding process, welding heat is provided by an electric arc between a tungsten electrode and the pipe edges. The plasma welding process is similar to the TIG process in that the (gaseous) plasma is heated as it passes through an arc torch, which is created by an electrode within a nozzle. In the laser welding process, a laser beam is directed to the butt-weld joint forming a deep-penetration fusion weld. The laser process is capable of a higher speed of operation than either the TIG process or plasma process.

## **The industry in the United States**

### **U.S. producers**

During the final phase of the original investigations on WSS pressure pipe imports from China, the Commission received complete U.S. producer questionnaires from five firms, which accounted for approximately \*\*\* percent of production of WSS pressure pipe in the United States during 2007.<sup>31</sup> Three other firms provided partial information, including their production quantities of WSS pressure pipe.<sup>32</sup> During the final phase of the original investigations on WSS pressure pipe imports from Malaysia, Thailand, and Vietnam, the Commission received U.S. producer questionnaires from five firms, which accounted for the vast majority of production of WSS pressure pipe in the United States in 2013.<sup>33</sup>

During the first five-year reviews on WSS pressure pipe imports from China, the three responding firms accounted for approximately \*\*\* percent of production of WSS pressure pipe in the United States during 2013. The domestic interested parties provided a list of four additional known and currently operating U.S. producers of WSS pressure pipe.<sup>34</sup>

During the first five-year reviews on WSS pressure pipe imports from Malaysia, Thailand, and Vietnam and the second five-year reviews on WSS pressure pipe from China, the four responding firms accounted for the vast majority production of WSS pressure pipe in the United

---

<sup>31</sup> Welded Stainless Steel Pressure Pipe from China (Final), Confidential Report, INV-GG-009, February 5, 2009, as revised in INV-GG-011, February 19, 2009 (“Original confidential report for China”), p. 1.4.

<sup>32</sup> Original publication for China, p. 1.3.

<sup>33</sup> Original publication for Malaysia, Thailand, and Vietnam, p. 3.1.

<sup>34</sup> Welded Stainless Steel Pressure Pipe from China (Review), Confidential Report, INV-14-056, June 9, 2014 (“First review confidential report for China”), p. 1.1 and 1.13.

States during 2018. The domestic interested parties provided a list of four additional known and currently operating U.S. producers of WSS pressure pipe.<sup>35</sup>

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of seven known and currently operating U.S. producers of WSS pressure pipe. Three firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately \*\*\* percent of production of WSS pressure pipe in the United States during 2023.<sup>36</sup>

## **Recent developments**

According to the domestic interested parties, there have been no significant changes in technology, production methods, development efforts or shifts in production in the U.S. market since 2018.<sup>37</sup> Likewise, they contend that there have been no significant changes in end uses or demand for WSS pressure pipe since 2018.<sup>38</sup>

Table 1.3 presents events in the U.S. industry since the Commission's original last five-year reviews.<sup>39</sup>

---

<sup>35</sup> Second review publication, p. 1.2.

<sup>36</sup> Domestic interested parties' response to notice of institution, December 2, 2024, exh. 1 and domestic interested parties' supplemental response to the notice of institution, December 17, 2024, p. 3.

<sup>37</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, p. 24.

<sup>38</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, p. 24.

<sup>39</sup> For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

**Table 1.3 WSS pressure pipe: Developments in the U.S. industry**

Item	Firm	Event
Acquisition	Synalloy	January 2019– Synalloy Corporation announced that its wholly-owned subsidiary, ASTI Acquisition, LLC completed the \$28 million acquisition of substantially all of the assets of American Stainless Tubing Inc. (“ASTI”), based in Troutman, NC. A corporate official stated that the acquisition would add the “high-end ornamental welded stainless steel tube products capabilities of ASTI” to Synalloys existing pipe and tube production capabilities.
Rebranding	Synalloy/ Ascent Industries	August 2022– Synalloy Corporation (“Synalloy”) announced a corporate rebranding and changed its name to Ascent Industries Co., effective August 10, 2022. Ascent Industries (formerly Synalloy) is comprised of a portfolio of manufacturing businesses including Manufacturers Chemicals, DanChem, CRI Tolling, Bristol Metals, and American Stainless Tubing Inc. The latter two are engaged in making tubular products.
Closure	Ascent Industries	August 2023– Ascent Industries Co. made the decision to permanently cease operations at its welded pipe and tube facility located in Munhall, PA, effective August 31, 2023. The closure was part of a plan “to allow the Company to focus on core competencies that drive growth and long-term value creation for our shareholders.” It was reported that the plant closure resulted in the loss of 114 jobs in 2023.

Sources: Ascent Industries Co., “A Subsidiary of Synalloy Corporation Enters into a Definitive Agreement to Acquire the Assets of American Stainless Tubing, Inc.,” December 4, 2018, [https://ir.ascentco.com/news-events/press-releases/detail/76/a-subsi-dary-of-synalloy-corporation-enters-into-a; Ascent Industries Co. \(ACNT\)](https://ir.ascentco.com/news-events/press-releases/detail/76/a-subsi-dary-of-synalloy-corporation-enters-into-a; Ascent Industries Co. (ACNT);); Ascent Industries Co., “Synalloy Announces ASTI Closing; Projections for 2018 and 2019,” January 3, 2019; <https://ir.ascentco.com/news-events/press-releases/detail/75/synalloy-announces-asti-closing-projections-for-2018-and; Ascent Industries Co.,> “Synalloy Corporation Announces Rebrand to Ascent Industries Co.,” August 4, 2022, [https://ir.ascentco.com/news-events/press-releases/detail/219/synalloy-corporation-announces-rebrand-to-ascent-industries; Ascent Industries, Co. website, “About,” https://ascentco.com/about/; retrieved December 27, 2024; Ascent Industries Co.’s 2023 Form 10-K, p. 14 \(as filed\); Commonwealth of Pennsylvania, Department of Labor and Industry, WARN Notices, January 2023; https://www.pa.gov/agencies/dli/programs-services/workforce-development-home/warn-requirements/warn-notices.html#accordion-e66b725811-item-be1d53da6e.](https://ir.ascentco.com/news-events/press-releases/detail/219/synalloy-corporation-announces-rebrand-to-ascent-industries; Ascent Industries, Co. website, “About,” https://ascentco.com/about/; retrieved December 27, 2024; Ascent Industries Co.’s 2023 Form 10-K, p. 14 (as filed); Commonwealth of Pennsylvania, Department of Labor and Industry, WARN Notices, January 2023; https://www.pa.gov/agencies/dli/programs-services/workforce-development-home/warn-requirements/warn-notices.html#accordion-e66b725811-item-be1d53da6e.)

## U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

**Table 1.4 WSS pressure pipe: Trade and financial data submitted by U.S. producers, by period**

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

Item	Measure	2007	2013	2018	2023
Capacity	Quantity	***	57,817	65,967	***
Production	Quantity	***	28,456	30,909	***
Capacity utilization	Ratio	***	49.2	46.9	***
U.S. shipments	Quantity	***	28,530	27,044	***
U.S. shipments	Value	***	104,692	116,097	***
U.S. shipments	Unit value	***	3,670	4,293	***
Net sales	Value	194,820	106,358	115,543	***
COGS	Value	171,200	108,392	98,609	***
COGS to net sales	Ratio	87.9	101.9	85.3	***
Gross profit or (loss)	Value	23,620	(2,034)	16,935	***
SG&A expenses	Value	9,416	8,685	7,125	***
Operating income or (loss)	Value	14,204	(10,719)	9,807	***
Operating income or (loss) to net sales	Ratio	7.3	(10.1)	8.5	***

Source: For the year 2007, data are compiled using data submitted in the Commission's original investigations on WSS pressure pipe imports from China. For the year 2013, data are compiled using data submitted in the Commission's original investigations on WSS pressure pipe imports from Malaysia, Thailand, and Vietnam. For the year 2018, data are compiled using data submitted in the Commission's second review investigations on WSS pressure pipe imports from China and first review investigations on WSS pressure pipe imports from Malaysia, Thailand, and Vietnam. For the year 2023, data are compiled using data submitted by domestic interested parties. Domestic interested parties' supplemental response to the notice of institution, December 17, 2024, exh. 1.

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

## Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.<sup>40</sup>

In its original determinations and its previous expedited five-year review determinations concerning China, Malaysia, Thailand, and Vietnam, the Commission defined a single domestic like product consisting of welded stainless steel pressure pipe, coextensive with Commerce’s scope. In its original determinations and its previous expedited five-year review determinations concerning China, Malaysia, Thailand, and Vietnam, the Commission defined the domestic industry as all U.S. producers of welded stainless steel pressure pipe.<sup>41</sup>

## U.S. importers

During the final phase of the original investigations on WSS pressure pipe from China, the Commission received U.S. importer questionnaires from 14 firms, which accounted for more than \*\*\* percent of total U.S. imports of WSS pressure pipe from China during 2007.<sup>42</sup> Import data presented in the original investigations on WSS pressure pipe from China are based on official Commerce statistics and questionnaire responses. During the final phase of the original investigations on WSS pressure pipe from Malaysia, Thailand, and Vietnam, the Commission received U.S. importer questionnaires from 13 firms, which accounted for the majority of total U.S. imports of WSS pressure pipe from Malaysia, Thailand, and Vietnam between 2011 and 2013.<sup>43</sup> Import data presented in the original investigations on WSS pressure pipe from Malaysia, Thailand, and Vietnam are based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews with respect to China, the domestic interested parties referred to the responses from 13 firms during the original investigations, stating that these

---

<sup>40</sup> Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

<sup>41</sup> 89 FR 87416, November 1, 2024.

<sup>42</sup> Original confidential report for China, p. 4.1.

<sup>43</sup> Original publication for Malaysia, Thailand, and Vietnam, p. 4.1.

firms may have continued to import WSS pressure pipe from China.<sup>44</sup> Import data presented in the first reviews are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its second five-year reviews for China and first five-year reviews for Malaysia Thailand, and Vietnam, the domestic interested parties provided a list of 21 firms that may have imported WSS pressure pipe from China, Malaysia, Thailand, and Vietnam.<sup>45</sup> Import data presented in the first reviews are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 158 potential U.S. importers of WSS pressure pipe.<sup>46 47</sup>

## **U.S. imports**

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

---

<sup>44</sup> Domestic interested parties' response to the notice of institution in the first review for China, March 5, 2014, p. 10.

<sup>45</sup> Second review publication, p. 1.15.

<sup>46</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

<sup>47</sup> The list of possible U.S. importers submitted by domestic interested parties likely overstates the actual number of U.S. importers of WSS pressure pipe because it includes numerous freight forwarding and logistics firms as well as a number of duplicate entities. Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

**Table 1.5 WSS pressure pipe: U.S. imports, by source and period**

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

U.S. imports from	Measure	2019	2020	2021	2022	2023
China	Quantity	915	513	1,194	1,527	1,118
Malaysia	Quantity	—	—	1	4	11
Thailand	Quantity	543	469	804	2,007	1,165
Vietnam	Quantity	1,712	1,558	2,210	2,661	4,828
Subject sources	Quantity	3,171	2,540	4,209	6,198	7,121
India	Quantity	9,601	6,175	17,373	29,368	15,067
Taiwan	Quantity	15,429	13,297	21,293	20,971	14,551
South Korea	Quantity	8,622	9,316	9,966	9,115	9,082
All other sources	Quantity	3,420	2,832	3,417	4,381	3,447
Nonsubject sources	Quantity	37,073	31,620	52,049	63,835	42,148
All import sources	Quantity	40,244	34,161	56,258	70,034	49,269
China	Value	4,635	2,868	9,165	12,469	10,566
Malaysia	Value	—	—	5	41	101
Thailand	Value	2,451	2,111	4,554	13,624	6,010
Vietnam	Value	5,286	4,523	7,276	13,323	18,790
Subject sources	Value	12,373	9,502	21,001	39,456	35,467
India	Value	34,259	19,232	69,514	159,384	77,396
Taiwan	Value	62,948	50,335	128,991	162,064	79,525
South Korea	Value	25,468	25,593	30,224	46,052	41,217
All other sources	Value	20,033	17,665	20,028	29,735	26,269
Nonsubject sources	Value	142,709	112,825	248,757	397,235	224,408
All import sources	Value	155,082	122,327	269,758	436,691	259,875
China	Unit value	5,063	5,587	7,674	8,164	9,455
Malaysia	Unit value	—	—	6,834	11,554	9,302
Thailand	Unit value	4,510	4,500	5,663	6,788	5,160
Vietnam	Unit value	3,088	2,903	3,293	5,007	3,892
Subject sources	Unit value	3,902	3,741	4,990	6,366	4,980
India	Unit value	3,568	3,115	4,001	5,427	5,137
Taiwan	Unit value	4,080	3,785	6,058	7,728	5,465
South Korea	Unit value	2,954	2,747	3,033	5,052	4,538
All other sources	Unit value	5,857	6,237	5,861	6,787	7,620
Nonsubject sources	Unit value	3,849	3,568	4,779	6,223	5,324
All import sources	Unit value	3,854	3,581	4,795	6,235	5,275

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085, accessed December 10, 2024. These data may be overstated as these HTS statistical reporting numbers may contain products outside the scope of these reviews.

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



## Cumulation considerations<sup>48</sup>

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.<sup>49</sup>

Imports from China were reported in all of the 60 months between 2019 and 2023. There were no reported U.S. imports of WSS pressure pipe from Malaysia in 2019 or 2020. Imports from Malaysia were reported in 16 of the 36 months between 2021 and 2023. There were imports reported from Malaysia in seven months of 2023. Imports from Thailand were reported in 49 of the 60 months between 2019 and 2023 with imports from Thailand reported in all months of 2023. Imports from Vietnam were reported in all of the 60 months between 2019 and 2023.

Imports from China entered through northern, southern, eastern, and western borders of entry in all years from 2019 through 2023. All imports from Malaysia entered through eastern borders of entry from 2021 through 2022 and entered through northern and eastern borders of entry in 2023. Imports from Thailand entered through eastern and western borders of entry in all years from 2019 through 2023. From 2020 through 2023, imports from Thailand also entered through northern borders of entry. In 2023, imports from Thailand also entered through southern borders of entry. Imports from Vietnam entered through northern, eastern, and western borders of entry in all years from 2019 through 2023. From 2021 through 2023, imports from Vietnam also entered through southern borders of entry.

## Apparent U.S. consumption and market shares

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

---

<sup>48</sup> Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085.

<sup>49</sup> In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

**Table 1.6 WSS pressure pipe: Apparent U.S. consumption and market shares, by source and period**

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

Source	Measure	2007	2013	2018	2023
U.S. producers	Quantity	***	28,530	27,044	***
China	Quantity	30,371	NA	1,541	1,118
Malaysia	Quantity	NA	***	32	11
Thailand	Quantity	NA	***	317	1,165
Vietnam	Quantity	NA	***	1,690	4,828
Subject sources	Quantity	30,371	15,657	3,581	7,121
Nonsubject sources	Quantity	29,078	19,107	53,279	42,148
All import sources	Quantity	59,448	34,764	56,860	49,269
Apparent U.S. consumption	Quantity	***	63,294	83,904	***
U.S. producers	Value	***	104,692	116,097	***
China	Value	154,833	NA	7,278	10,566
Malaysia	Value	NA	***	117	101
Thailand	Value	NA	***	1,394	6,010
Vietnam	Value	NA	***	4,996	18,790
Subject sources	Value	154,833	49,893	13,785	35,467
Nonsubject sources	Value	158,535	70,856	213,248	224,408
All import sources	Value	313,368	120,749	227,033	259,875
Apparent U.S. consumption	Value	***	225,441	343,130	***
U.S. producers	Share of quantity	***	45.1	32.2	***
China	Share of quantity	***	NA	1.8	***
Malaysia	Share of quantity	NA	***	0.0	***
Thailand	Share of quantity	NA	***	0.4	***
Vietnam	Share of quantity	NA	***	2.0	***
Subject sources	Share of quantity	***	24.7	4.3	***
Nonsubject sources	Share of quantity	***	30.2	63.5	***
All import sources	Share of quantity	***	54.9	67.8	***
U.S. producers	Share of value	***	46.4	33.8	***
China	Share of value	***	NA	2.1	***
Malaysia	Share of value	NA	***	0.0	***
Thailand	Share of value	NA	***	0.4	***
Vietnam	Share of value	NA	***	1.5	***
Subject sources	Share of value	***	22.1	4.0	***
Nonsubject sources	Share of value	***	31.4	62.1	***
All import sources	Share of value	***	53.6	66.2	***

Source: For the year 2007, data are compiled using data submitted in the Commission's original investigations on WSS pressure pipe imports from China. For the year 2013, data are compiled using data submitted in the Commission's original investigations on WSS pressure pipe imports from Malaysia, Thailand, and Vietnam. For the year 2018, data are compiled using data submitted in the Commission's second review investigations on WSS pressure pipe imports from China and first review investigations on WSS pressure pipe imports from Malaysia, Thailand, and Vietnam. For the year 2023, U.S. producers'

U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085, accessed December 10, 2024.

Note: For 2007, data for Malaysia, Thailand, and Vietnam are included in "Nonsubject sources." For 2013, data for China are included in "Nonsubject sources." As such, data for those respective sources in those respective years are denoted as "NA" as the data is included under the nonsubject sources lines.

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

## **The industry in China**

### **Producers in China**

During the final phase of the original investigations with respect to China, the Commission received no completed foreign producer questionnaires.<sup>50</sup>

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews with respect to China, the domestic interested parties identified Zhejiang Jiuli Hi-Tech Metals, Co., Ltd as a possible producer of WSS pressure pipe in China in that proceeding.<sup>51</sup>

Although the Commission did not receive responses from any respondent interested parties in its second five-year reviews, the domestic interested parties provided a list of 14 possible producers of WSS pressure pipe in China in that proceeding.<sup>52</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 427 possible producers of WSS pressure pipe in China.<sup>53</sup>

---

<sup>50</sup> Original confidential report for China, p. 7.4.

<sup>51</sup> Welded Stainless Steel Pressure Pipe from China, Inv. Nos. 701-TA-454 and 731-TA-1144 (Review), USITC Publication 4478, July 2014 "First review publication for China," p. 1.14.

<sup>52</sup> Second review publication, p. 1.20.

<sup>53</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, exhs. 1 and 12.

## Recent developments

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

## Exports

Table 1.7 presents export data for pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel, a category that includes WSS pressure pipe and out of scope products, from China (by export destination in descending order of quantity for 2023). Vietnam, Thailand, and the Philippines were the leading export destinations in 2023, accounting for 8.0 percent, 5.0 percent, and 5.0 percent, respectively, of total exports from China in 2023. Exports fluctuated from 2019 to 2023. Overall, total exports from China under this category decreased irregularly by 16.0 percent from 2019 to 2023.

**Table 1.7 Pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel: Quantity of exports from China, by destination and period**

Quantity in short tons

Destination market	2019	2020	2021	2022	2023
Vietnam	24,586	20,266	12,910	15,527	17,364
Thailand	9,678	7,983	8,895	11,166	10,867
Philippines	18,383	11,902	10,493	10,980	10,833
Brazil	5,280	8,338	8,344	7,658	10,669
Russia	7,357	9,824	4,805	6,165	10,176
United Arab Emirates	1,943	7,453	4,244	7,476	9,309
Malaysia	18,303	16,801	7,783	8,892	8,244
South Korea	5,679	6,627	5,866	6,457	7,572
India	46,239	9,222	8,129	5,929	6,616
Indonesia	4,717	4,584	6,307	9,146	5,914
All other markets	117,101	112,106	97,527	110,036	120,293
All markets	259,266	215,106	175,303	199,432	217,857

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.40, accessed December 11, 2024. These data may be overstated as HS subheading 7306.40 may contain products outside the scope of these reviews.

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

## The industry in Malaysia

### Producers in Malaysia

During the final phase of the original investigations with respect to Malaysia, Thailand, and Vietnam, the Commission received foreign producer/exporter questionnaires from one firm that produced WSS pressure pipe in Malaysia in that proceeding.<sup>54</sup>

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of three possible producers of WSS pressure pipe in Malaysia.<sup>55</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of five possible producers of WSS pressure pipe in Malaysia.<sup>56</sup>

Table 1.8 presents events in the Malaysian industry since the Commission's last five-year reviews.

**Table 1.8 WSS pressure pipe: Developments in the Malaysian industry**

Item	Firm	Event
Expansion	Pantech	September 2024—Pantech Group Holdings Bhd, the parent company of WSS welded pipe producer Pantech Stainless & Alloy Industries Sdn Bhd, announced plans to build two new factories and warehouses in Malaysia by 2027. Pantech primarily sells pipe and tube to customers in the United States, Malaysia, Taiwan, Indonesia, Canada, and Europe, which collectively accounted for 93.80 percent of its total revenue in 2024. Its two major products are butt weld pipe fittings and stainless steel welded pipes. One of the new factories is expected to cover an area of 10 to 12 acres and include a new corporate headquarters, production area, warehouse, and housing for workers.

Source: New Straits Times, "Pantech Global plans to build two new factories, set up warehouse in Johor through IPO," September 16, 2024, [https://www.nst.com.my/business/corporate/2024/09/1106619/pantech-global-plans-build-two-new-factories-set-warehouse-johor#:~:text=It%20plans%20to%20set%20up,house%20its%20new%20corporate%20office.&text=%22T o%20cater%20for%20our%20expansion,Klang%20Factory%20\)%20by%202027.](https://www.nst.com.my/business/corporate/2024/09/1106619/pantech-global-plans-build-two-new-factories-set-warehouse-johor#:~:text=It%20plans%20to%20set%20up,house%20its%20new%20corporate%20office.&text=%22T o%20cater%20for%20our%20expansion,Klang%20Factory%20)%20by%202027.)

<sup>54</sup> Original publication for Malaysia, Thailand, and Vietnam, p. 7.3

<sup>55</sup> Second review publication, p. 1.22.

<sup>56</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 12.

## Exports

Table 1.9 presents export data for pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel, a category that includes WSS pressure pipe and out of scope products, from Malaysia (by export destination in descending order of quantity for 2023). Thailand, Indonesia, and the Netherlands were the leading export destinations in 2023, accounting for 24.1 percent, 21.2 percent, and 19.2 percent, respectively, of total exports from Malaysia in 2023. Overall, total exports from Malaysia under this category decreased by 58.3 percent from 2019 to 2023.

**Table 1.9 Pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel: Quantity of exports from Malaysia, by destination and period**

Quantity in short tons

Destination market	2019	2020	2021	2022	2023
Thailand	6,257	3,695	2,718	1,654	1,621
Indonesia	4,681	1,742	2,388	3,250	1,431
Netherlands	—	—	173	169	1,291
Canada	1,217	963	1,829	1,567	616
Singapore	119	264	265	448	474
Germany	213	144	237	361	276
India	1,319	8,447	3,556	1,126	231
United Kingdom	774	210	160	145	130
Italy	54	31	117	125	93
Mexico	59	—	50	—	89
All other markets	1,470	1,259	1,396	715	484
All markets	16,163	16,755	12,889	9,560	6,736

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.40, accessed December 11, 2024. These data may be overstated as HS subheading 7306.40 may contain products outside the scope of these reviews.

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

## The industry in Thailand

### Producers in Thailand

During the final phase of the original investigations with respect to Malaysia, Thailand, and Vietnam, the Commission received foreign producer/exporter questionnaires from one firm that produced WSS pressure pipe in Thailand in that proceeding.<sup>57</sup>

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of three possible producers of WSS pressure pipe in Thailand.<sup>58</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of seven possible producers of WSS pressure pipe in Thailand.<sup>59</sup>

### Recent developments

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

### Exports

Table 1.10 presents export data for pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel, a category that includes WSS pressure pipe and out of scope products, from Thailand (by export destination in descending order of quantity for 2023). India, Taiwan, and Japan were the leading export destinations in 2023, accounting for 52.7 percent, 23.6 percent, and 12.8 percent, respectively, of total exports from Thailand in 2023. Overall, total exports from Thailand under this category increased by 55.6 percent from 2019 to 2023.

---

<sup>57</sup> Original publication for Malaysia, Thailand, and Vietnam, p. 7.5.

<sup>58</sup> Second review publication, p. 1.24.

<sup>59</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 12.

**Table 1.10 Pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel: Quantity of exports from Thailand, by destination and period**

Quantity in short tons

Destination market	2019	2020	2021	2022	2023
India	1,872	43,427	9,276	6,478	13,826
Taiwan	8,142	7,613	7,994	6,386	6,191
Japan	3,387	2,963	3,414	3,603	3,351
United States	473	657	1,266	1,741	1,119
Myanmar	275	307	861	325	331
South Korea	2	19	17	20	221
Australia	25	79	153	106	183
Indonesia	1,283	998	807	559	178
Germany	37	70	29	163	165
Turkey	—	—	194	380	112
All other markets	1,373	989	917	861	563
All markets	16,869	57,122	24,928	20,622	26,240

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.40, accessed December 11, 2024. These data may be overstated as HS subheading 7306.40 may contain products outside the scope of these reviews.

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

## The industry in Vietnam

### Producers in Vietnam

During the final phase of the original investigations with respect to Malaysia, Thailand, and Vietnam, the Commission received foreign producer/exporter questionnaires from one firm that produced WSS pressure pipe in Vietnam in that proceeding.<sup>60</sup>

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of four possible producers of WSS pressure pipe in Vietnam.<sup>61</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 14 possible producers of WSS pressure pipe in Vietnam.<sup>62</sup>

Table 1.11 presents events in the Vietnamese industry since the Commission's last five-year reviews.

<sup>60</sup> Original publication for Malaysia, Thailand, and Vietnam, p. 7.7.

<sup>61</sup> Second review publication, p. 1.26.

<sup>62</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 12.



**Table 1.11 WSS pressure pipe: Developments in the Vietnamese industry**

Item	Firm	Event
New sales orders	Hoa Phat	March 2024–Hoa Phat announced that it had received steel pipe orders from customers in the United States, Australia, and Canada and had completed its first pipe shipments to Japan. The company stated that the pipes were used in a wide range of applications and met quality standards including corrosion resistance and weatherability.
New business plan	Son Ha	On May 30, 2024–Son Ha’s annual general shareholders meeting approved the results of production and business activities in 2023 and its plan for 2024. At the meeting Son Ha identified tasks for reaching its 2024 revenue goal that included applying technological advances to its production process, researching and developing new products, and expanding its export markets.

Source: Steel Orbis, “Vietnam's Hoa Phat enters Japanese pipe market,” March 4, 2024; <https://www.steelorbis.com/steel-news/latest-news/vietnams-hoa-phat-enters-japanese-pipe-market-1330323.htm>; ASEM Connect, “Son Ha Group (SHI) targets VND10,000 billion revenue in 2024,” June 10, 2024; <https://asemconnectvietnam.gov.vn/default.aspx?ID1=2&ZID1=6&ID8=137148>.

## Exports

Table 1.12 presents export data for pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel, a category that includes WSS pressure pipe and out of scope products, from Vietnam (by export destination in descending order of quantity for 2023). India, United States, and Poland were the leading export destinations in 2023, accounting for 49.6 percent, 16.8 percent, and 7.8 percent, respectively, of total exports from Vietnam in 2023. Overall, total exports from Vietnam under this category decreased by 10.9 percent from 2019 to 2023.

**Table 1.12 Pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel: Quantity of exports from Vietnam, by destination and period**

Quantity in short tons

Destination market	2019	2020	2021	2022	2023
India	20,799	10,806	23,359	19,813	16,408
United States	2,474	2,533	3,366	3,885	5,545
Poland	1,296	2,022	2,319	2,913	2,573
Mexico	39	41	52	539	1,957
Philippines	608	797	478	812	973
Colombia	437	461	670	800	649
Argentina	296	335	406	282	544
Canada	488	458	784	1,596	527
Japan	63	139	230	201	499
Netherlands	789	885	471	349	335
All other markets	9,822	9,916	9,184	6,581	3,064
All markets	37,111	28,393	41,319	37,771	33,074

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.40, accessed December 11, 2024. These data may be overstated as HS subheading 7306.40 may contain products outside the scope of these reviews.

Note: Vietnam did not report official export data for all years, exports in this table are represented by global imports (mirror data).

## Third-country trade actions

Table 1.13 presents third-country trade actions. The following countries have imposed antidumping or countervailing duties and/or safeguard actions on imports of WSS pressure pipe from subject countries.

**Table 1.13 WSS pressure pipe: Third-country trade actions in subject countries**

Export Market	Product	Date Imposed	Measure	Subject Countries
Brazil	Seamed tubes of austenitic stainless steel. HS subheadings 7306.40 and 7306.90.	China: July 29, 2013; extended July 25, 2019 Malaysia, Thailand, Vietnam: June 14, 2018	Antidumping	China, Malaysia, Thailand, and Vietnam
Eurasian Economic Union (Armenia, Kazakhstan, Kyrgyz Republic, and Russia)	Welded tubes of stainless steel. HS subheadings 7306.40, 7306.61, and 7306.69.	March 14, 2021	Antidumping	China
European Union	Steel products including welded tubes of stainless steel.	March 28, 2018; extended until June 30, 2026	Safeguard	China, Malaysia, Thailand, and Vietnam
India	Welded stainless-steel pipes and tubes. Several HS subheadings, including 7306.40.	November 5, 2023	Antidumping	Thailand and Vietnam
India	Stainless steel welded pipes. Several HS subheadings, including 7306.11, 7306.21, 7306.40, and 7306.61.	September 17, 2019	Countervailing	China and Vietnam
Saudi Arabia	Longitudinally welded circular cross-section pipes of stainless steel. HS subheadings 7306.11, 7306.21, 7306.40, and 7306.50.	Ongoing investigation, initiated May 2, 2024	Antidumping	China

**Table 1.13 Continued WSS pressure pipe: Third-country trade actions in subject countries**

Export Market	Product	Date Imposed	Measure	Subject Countries
Thailand	Stainless steel pipe and tube. HS subheadings 7305.31, 7306.11, 7306.21, 7306.40, and 7306.61.	September 16, 2016; extended September 16, 2022	Antidumping	China and Vietnam
Turkey	Welded stainless steel tubes, pipes & profiles. HS subheadings 7306, 7306.40, and 7306.61.	March 15, 2013; extended December 31, 2018	Antidumping	China and Vietnam
United Kingdom	Steel products including welded tubes of stainless steel.	January 1, 2020; extended until June 30, 2026	Safeguard	China, Malaysia, Thailand, and Vietnam

Sources: World Trade Organization, Trade remedies data portal, accessed December 31, 2024, at <https://trade-remedies.wto.org/en>. Links to subject country data are located at: Brazil: <https://trade-remedies.wto.org/en/antidumping/investigations/measures/bra-1201160-1>, <https://trade-remedies.wto.org/en/antidumping/investigations/measures/bra-1701455-1>, <https://trade-remedies.wto.org/en/antidumping/investigations/measures/bra-1701776-1>, <https://trade-remedies.wto.org/en/antidumping/investigations/measures/bra-1701858-1>; Eurasian Economic Union: <https://trade-remedies.wto.org/en/antidumping/investigations/measures/arm-ad-30-cn-1>; European Union: “EU prolongs steel safeguard measure until June 2026,” [https://policy.trade.ec.europa.eu/news/eu-prolongs-steel-safeguard-measure-until-june-2026-2024-06-25\\_en](https://policy.trade.ec.europa.eu/news/eu-prolongs-steel-safeguard-measure-until-june-2026-2024-06-25_en); India: Steel Orbis, “India imposed AD duty on welded stainless pipes and tubes from Vietnam, Thailand,” <https://www.steelorbis.com/steel-news/latest-news/india-imposes-ad-duty-on-welded-stainless-pipes-and-tubes-from-vietnam-thailand-1364759.htm>, <https://trade-remedies.wto.org/en/countervailing/investigations/measures/ind-6222018-dgad-12>, <https://trade-remedies.wto.org/en/countervailing/investigations/measures/ind-6222018-dgad-22>; Saudi Arabia: <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/sau-ad-24-1chn>; Thailand: <https://trade-remedies.wto.org/en/antidumping/investigations/measures/tha-ad2015-4-1>, <https://trade-remedies.wto.org/en/antidumping/investigations/measures/tha-ad2015-5-1>; Turkey: <https://trade-remedies.wto.org/en/antidumping/investigations/measures/tur-221vnm-2>, <https://trade-remedies.wto.org/en/antidumping/investigations/measures/tur-221chc-1>; United Kingdom: UK Parliament, “UK steel safeguards,” <https://commonslibrary.parliament.uk/research-briefings/cbp-9596/>.

## The global market

Table 1.14 presents global export data for pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel, a category that includes WSS pressure pipe and out of scope products (by source in descending order of quantity for 2023). Italy, China, Taiwan, Germany, South Korea, and Vietnam were the leading exporters in 2023, accounting for 28.0 percent, 21.3 percent, 11.2 percent, 6.3 percent, 3.6, and 3.2 percent, respectively, of total global exports. The top six exporters accounted for a combined 73.6 percent of global exports in 2023. Subject countries Malaysia and Thailand were not among the top six global exporters in 2023, but Thailand was among the top ten. Overall global exports in 2023 were 1.1 percent higher than the level in 2022 and slightly lower than in 2019.

**Table 1.14 Pipes, tubes and hollow profiles nesoi, welded, of circular cross section, of stainless steel: Quantity of global exports by country and period**

Quantity in short tons

Exporting country	2019	2020	2021	2022	2023
Italy	334,345	301,597	329,894	292,740	286,195
China	259,266	215,106	175,303	199,432	217,857
Taiwan	147,044	131,922	145,810	117,460	114,937
Germany	79,123	62,521	65,969	66,877	64,153
South Korea	41,172	37,652	42,406	33,486	36,827
Vietnam	37,111	28,393	41,319	37,771	33,074
India	19,524	21,242	34,621	36,061	29,233
United States	22,404	20,182	26,647	26,579	29,144
Thailand	16,869	57,122	24,928	20,622	26,240
Czech Republic	27,628	21,343	20,756	19,201	21,131
All other exporters	205,648	177,725	174,998	161,608	163,693
All exporters	1,190,134	1,074,805	1,082,651	1,011,837	1,022,484

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.40, accessed December 11, 2024. These data may be overstated as HS subheading 7306.40 may contain products outside the scope of these reviews.

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



**APPENDIX A**

**FEDERAL REGISTER NOTICES**





The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://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 87416, November 1, 2024	Welded Stainless Steel Pressure Pipe From China, Malaysia, Thailand, and Vietnam; Institution of Five- Year Reviews	<a href="https://www.govinfo.gov/content/pkg/FR-2024-11-01/pdf/2024-25124.pdf">https://www.govinfo.gov/content/pkg/FR-2024-11-01/pdf/2024-25124.pdf</a>
89 FR 87543, November 4, 2024	Initiation of Five-Year (Sunset) Reviews	<a href="https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25610.pdf">https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25610.pdf</a>



**APPENDIX B**

**RESPONSES TO THE NOTICE OF INSTITUTION**



# Responses to the Commission’s notice of institution

## Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of the following entities:

- 1. Bristol Metals, LLC (“Bristol”), Felker Brothers Corporation (“Felker”), and Primus Pipe and Tube Inc. (“Primus”), domestic producers of WSS pressure pipe (collectively referred to herein as “domestic interested parties”)<sup>1</sup>

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table B.1.

**Table B.1**  
**WSS pressure pipe: Summary of responses to the Commission’s notice of institution**

Interested party type	Number	Coverage
U.S. producers	3	***0%

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of WSS pressure pipe during 2023. Domestic interested parties’ supplemental response to the notice of institution, December 17, 2024, p. 3.

## Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on WSS pressure pipe.<sup>2</sup>

<sup>1</sup> Domestic interested parties’ response to the notice of institution, December 2, 2024, p. 1.  
<sup>2</sup> Domestic interested parties’ comments on adequacy, January 2, 2024, p. 2.

## Company-specific information

**Table B.2**

**WSS pressure pipe: Response checklist for U.S. producers**

Yes = provided response; Not known = information was not known

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

**APPENDIX C**

**SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS**





Table C-1

WSS pressure pipe (&lt;= 14"): Summary data concerning the U.S. market, 2005-07, January-September 2007, and January-September 2008

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)									
Item	Reported data					Period changes			
	2005	2006	2007	January-September 2007	2008	2005-07	2005-06	2006-07	Jan.-Sept. 2007-08
U.S. consumption quantity:									
Amount .....	*****	*****	*****	69,301	48,568	*****	*****	*****	-29.9
Producers' share (1) .....	*****	*****	*****	29.2	43.2	*****	*****	*****	14.0
Importers' share (1):									
China .....	*****	*****	*****	36.3	13.8	*****	*****	*****	-22.5
All other sources .....	*****	*****	*****	34.5	43.0	*****	*****	*****	8.6
Total imports .....	*****	*****	*****	70.8	56.8	*****	*****	*****	-14.0
U.S. consumption value:									
Amount .....	*****	*****	*****	412,012	286,473	*****	*****	*****	-30.5
Producers' share (1) .....	*****	*****	*****	36.7	49.2	*****	*****	*****	12.5
Importers' share (1):									
China .....	*****	*****	*****	30.3	11.7	*****	*****	*****	-18.6
All other sources .....	*****	*****	*****	33.0	39.1	*****	*****	*****	6.1
Total imports .....	*****	*****	*****	63.3	50.8	*****	*****	*****	-12.5
U.S. imports from:									
China:									
Quantity .....	14,394	23,712	30,371	25,169	6,700	111.0	64.7	28.1	-73.4
Value .....	47,607	79,360	154,833	124,975	33,592	225.2	66.7	95.1	-73.1
Unit value .....	\$3,307	\$3,347	\$5,098	\$4,965	\$5,014	54.1	1.2	52.3	1.0
Ending inventory quantity .....	*****	*****	*****	*****	*****	*****	*****	*****	*****
All other sources:									
Quantity .....	21,810	24,099	29,078	23,879	20,888	33.3	10.5	20.7	-12.5
Value .....	76,573	99,681	158,535	135,942	111,893	107.0	30.2	59.0	-17.7
Unit value .....	\$3,511	\$4,136	\$5,452	\$5,693	\$5,357	55.3	17.8	31.8	-5.9
Ending inventory quantity .....	*****	*****	*****	*****	*****	*****	*****	*****	*****
All sources:									
Quantity .....	36,204	47,811	59,448	49,048	27,588	64.2	32.1	24.3	-43.8
Value .....	124,180	179,041	313,368	260,917	145,485	152.3	44.2	75.0	-44.2
Unit value .....	\$3,430	\$3,745	\$5,271	\$5,320	\$5,274	53.7	9.2	40.8	-0.9
Ending inventory quantity .....	*****	*****	*****	*****	*****	*****	*****	*****	*****
U.S. producers':									
Average capacity quantity .....	*****	*****	*****	49,041	47,961	*****	*****	*****	-2.2
Production quantity .....	*****	*****	*****	22,421	22,010	*****	*****	*****	-1.8
Capacity utilization (1) .....	*****	*****	*****	45.7	45.9	*****	*****	*****	0.2
U.S. shipments:									
Quantity .....	*****	*****	*****	20,253	20,980	*****	*****	*****	3.6
Value .....	*****	*****	*****	151,095	140,988	*****	*****	*****	-6.7
Unit value .....	*****	*****	*****	\$7,460	\$6,720	*****	*****	*****	-9.9
Export shipments:									
Quantity .....	*****	*****	*****	223	605	*****	*****	*****	171.3
Value .....	*****	*****	*****	2,049	4,971	*****	*****	*****	142.6
Unit value .....	*****	*****	*****	\$9,188	\$8,217	*****	*****	*****	-10.6
Ending inventory quantity .....	*****	*****	*****	10,485	8,680	*****	*****	*****	-17.2
Inventories/total shipments (1) .....	*****	*****	*****	38.4	30.2	*****	*****	*****	-8.2
Production workers .....	*****	*****	*****	308	348	*****	*****	*****	13.0
Hours worked (1,000s) .....	*****	*****	*****	540	568	*****	*****	*****	5.3
Wages paid (\$1,000s) .....	*****	*****	*****	8,699	9,392	*****	*****	*****	8.0
Hourly wages .....	*****	*****	*****	\$16.11	\$16.53	*****	*****	*****	2.6
Productivity (tons/1,000 hours) .....	*****	*****	*****	41.5	38.7	*****	*****	*****	-6.7
Unit labor costs .....	*****	*****	*****	\$387.98	\$426.72	*****	*****	*****	10.0
Net sales:									
Quantity .....	29,688	32,410	26,259	20,394	21,465	-11.6	9.2	-19.0	5.3
Value .....	134,353	167,817	194,820	152,722	145,260	45.0	24.9	16.1	-4.9
Unit value .....	\$4,525	\$5,178	\$7,419	\$7,489	\$6,767	63.9	14.4	43.3	-9.6
Cost of goods sold (COGS) .....	128,183	150,065	171,200	127,593	137,392	33.6	17.1	14.1	7.7
Gross profit or (loss) .....	6,170	17,752	23,620	25,129	7,868	282.8	187.7	33.1	-68.7
SG&A expenses .....	9,731	10,752	9,416	7,320	8,450	-3.2	10.5	-12.4	15.4
Operating income or (loss) .....	(3,561)	7,000	14,204	17,809	(582)	(2)	(2)	102.9	(2)
Capital expenditures .....	2,681	1,474	3,808	2,786	4,410	42.0	-45.0	158.4	58.3
Unit COGS .....	\$4,318	\$4,630	\$6,520	\$6,256	\$6,401	51.0	7.2	40.8	2.3
Unit SG&A expenses .....	\$328	\$332	\$359	\$359	\$394	9.4	1.2	8.1	9.7
Unit operating income or (loss) .....	(\$120)	\$216	\$541	\$873	(\$27)	(2)	(2)	150.4	(2)
COGS/sales (1) .....	95.4	89.4	87.9	83.5	94.6	-7.5	-6.0	-1.5	11.0
Operating income or (loss)/ sales (1) .....	(2.7)	4.2	7.3	11.7	(0.4)	9.9	6.8	3.1	-12.1

(1) "Reported data" are in percent and "period changes" are in percentage points.

(2) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

Table C-2

**Welded stainless steel pressure pipe: Summary data concerning the U.S. market, 2011-13**

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

	Report data			Period changes		
	Calendar year			Comparison period		
	2011	2012	2013	2011-13	2011-12	2012-13
U.S. consumption quantity:						
Amount.....	65,478	66,835	63,294	(3.3)	2.1	(5.3)
Producers' share (fn1).....	39.5	40.1	45.1	5.6	0.6	5.0
Importers' share (fn1):						
Malaysia.....	***	***	***	***	***	***
Thailand.....	***	***	***	***	***	***
Vietnam.....	***	***	***	***	***	***
Subtotal, subject sources.....	27.2	27.6	24.7	(2.5)	0.4	(2.9)
All others sources, nonsubject.....	33.3	32.3	30.2	(3.1)	(1.0)	(2.1)
Total imports.....	60.5	59.9	54.9	(5.6)	(0.6)	(5.0)
U.S. consumption value:						
Amount.....	308,407	281,092	225,441	(26.9)	(8.9)	(19.8)
Producers' share (fn1).....	43.1	43.9	46.4	3.3	0.8	2.5
Importers' share (fn1):						
Malaysia.....	***	***	***	***	***	***
Thailand.....	***	***	***	***	***	***
Vietnam.....	***	***	***	***	***	***
Subtotal, subject sources.....	23.4	24.0	22.1	(1.3)	0.6	(1.9)
All others sources, nonsubject.....	33.5	32.1	31.4	(2.1)	(1.5)	(0.6)
Total imports.....	56.9	56.1	53.6	(3.3)	(0.8)	(2.5)
U.S. importers' U.S. shipments of Imports from:						
Malaysia:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
Thailand:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
Vietnam:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	17,840	18,444	15,657	(12.2)	3.4	(15.1)
Value.....	72,130	67,537	49,893	(30.8)	(6.4)	(26.1)
Unit value.....	\$4,043.16	\$3,661.73	\$3,186.60	(21.2)	(9.4)	(13.0)
Ending inventory quantity.....	4,371	6,233	3,862	(11.6)	42.6	(38.0)
All other sources:						
Quantity.....	21,781	21,597	19,107	(12.3)	(0.8)	(11.5)
Value.....	103,331	90,100	70,856	(31.4)	(12.8)	(21.4)
Unit value.....	\$4,744.09	\$4,171.88	\$3,708.38	(21.8)	(12.1)	(11.1)
Ending inventory quantity.....	5,498	6,291	5,128	(6.7)	14.4	(18.5)
Total imports:						
Quantity.....	39,621	40,041	34,764	(12.3)	1.1	(13.2)
Value.....	175,461	157,637	120,749	(31.2)	(10.2)	(23.4)
Unit value.....	\$4,428.48	\$3,936.89	\$3,473.38	(21.6)	(11.1)	(11.8)
Ending inventory quantity.....	9,869	12,524	8,990	(8.9)	26.9	(28.2)

**APPENDIX D**

**PURCHASER QUESTIONNAIRE RESPONSES**



As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following five firms as top purchasers of WSS pressure pipe: \*\*\*. Purchaser questionnaires were sent to these five firms, and one firm (\*\*\*) submitted a response to the Commission's request for information.

1. Have there been any significant changes in the supply and demand conditions for WSS pressure pipe that have occurred in the United States or in the market for WSS pressure pipe in China, Malaysia, Thailand and/or Vietnam since January 1, 2019?

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

2. Do you anticipate any significant changes in the supply and demand conditions for WSS pressure pipe in the United States or in the market for WSS pressure pipe in China, Malaysia, Thailand and/or Vietnam within a reasonably foreseeable time?

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

