

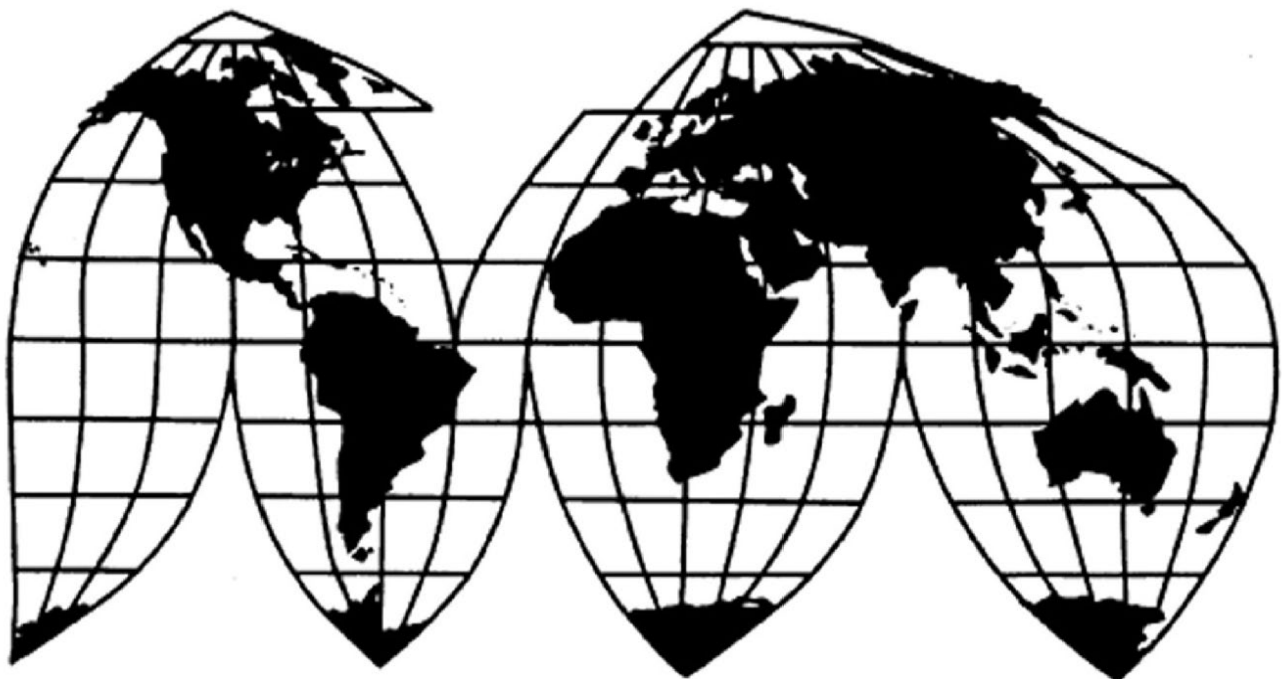
# Malleable Iron Pipe Fittings from China

Investigation No. 731-TA-1021 (Fourth Review)

Publication 5633

June 2025

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published.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

# **UNITED STATES INTERNATIONAL TRADE COMMISSION**

Investigation No. 731-TA-1021 (Fourth Review)

Malleable Iron Pipe Fittings from China

## **DETERMINATION**

On the basis of the record<sup>1</sup> developed in the subject five-year review, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty order on malleable iron pipe fittings from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

## **BACKGROUND**

The Commission instituted this review on November 1, 2024 (89 FR 87419, November 1, 2024) and determined on February 4, 2025, that it would conduct an expedited review (90 FR 11548, March 7, 2025).

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<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 this five-year review, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping duty order on malleable iron pipe fittings (“malleable fittings”) from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### I. Background

*Original Investigation.* In October 2002, petitioners filed an antidumping duty petition covering malleable fittings from China.<sup>1</sup> In December 2003, the Commission issued its final determination finding that the domestic malleable fittings industry was threatened with material injury by reason of subject imports.<sup>2</sup> Subsequently, the Department of Commerce (“Commerce”) issued an antidumping duty order on malleable fittings from China.<sup>3</sup>

*First Review.* In November 2008, the Commission instituted its first five-year review of the antidumping duty order.<sup>4</sup> After conducting an expedited review, the Commission determined that revocation of the order would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>5</sup> In April 2009, Commerce issued a continuation of the order.<sup>6</sup>

*Second Review.* In March 2014, the Commission instituted its second five-year review.<sup>7</sup> After conducting an expedited review, the Commission determined that revocation of the order would be likely to lead to continuation or recurrence of material injury to an industry in the

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<sup>1</sup> *Malleable Iron Pipe Fittings from China*, Inv. No. 731-TA-1021 (Final), USITC Pub. 3649 at 3 (Dec. 2003) (“Original Determination”). The petitioners were Anvil International, Inc. (“Anvil”) and Ward Manufacturing, Inc. (“Ward”). *Id.*

<sup>2</sup> Original Determination, USITC Pub. 3649 at 3.

<sup>3</sup> *Antidumping Duty Order: Certain Malleable Iron Pipe Fittings From the People’s Republic of China*, 68 Fed. Reg. 69376 (Dec. 12, 2003).

<sup>4</sup> *Initiation of Five-Year (“Sunset”) Review; Malleable Cast Iron Pipe Fittings From China*, 73 Fed. Reg. 65401 (Nov. 3, 2008) (first review).

<sup>5</sup> *Malleable Iron Pipe Fittings From China*, Inv. No. 731-TA-1021 (Review), USITC Pub. 4069 at 3 (Apr. 2009) (“First Review Determination”).

<sup>6</sup> *Continuation of Antidumping Duty Order on Malleable Cast Iron Pipe Fittings From the People’s Republic of China*, 74 Fed. Reg. 18349 (Apr. 22, 2009).

<sup>7</sup> *Malleable Iron Pipe Fittings From China; Institution of a Five-Year Review*, 79 Fed. Reg. 11819 (Mar. 3, 2014).

United States within a reasonably foreseeable time.<sup>8</sup> In August 2014, Commerce issued a continuation of the order.<sup>9</sup>

*Third Review.* In July 2019, the Commission instituted its third five-year review.<sup>10</sup> After conducting an expedited review, the Commission determined that revocation of the order would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>11</sup> In December 2019, Commerce issued a continuation of the order.<sup>12</sup>

*Current Review.* The Commission instituted this fourth five-year review on November 1, 2024.<sup>13</sup> It received a single response to the notice of institution filed jointly by ASC Engineered Solutions, LLC (f/k/a Anvil International, LLC) (“ASC”) and Ward Manufacturing, LLC (“Ward”), domestic producers of malleable fittings (“domestic producers”).<sup>14</sup> The Commission did not receive a response to the notice of institution from any respondent interested party.<sup>15</sup> It determined that the domestic interested party group response was adequate and that the respondent interested party group response was inadequate. Finding no other circumstances that would warrant conducting a full review, the Commission determined on February 4, 2025,

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<sup>8</sup> *Malleable Iron Pipe Fittings From China*, Inv. No. 731-TA-1021 (Second Review), USITC Pub. 4484 at 3 (Aug. 2014) (“*Second Review Determination*”).

<sup>9</sup> *Malleable Cast Iron Pipe Fittings From the People’s Republic of China: Continuation of Antidumping Duty Order*, 79 Fed. Reg. 47089 (Aug. 12, 2014).

<sup>10</sup> *Malleable Iron Pipe Fittings From China; Institution of a Five-Year Review*, 84 Fed. Reg. 31346 (July 1, 2019).

<sup>11</sup> *Malleable Iron Pipe Fittings From China*, Inv. No. 731-TA-1021 (Third Review), USITC Pub. 4993 at 1 (Nov. 2019) (“*Third Review Determination*”).

<sup>12</sup> *Malleable Cast Iron Pipe Fittings From the People’s Republic of China: Continuation of Antidumping Duty Order*, 84 Fed. Reg. 66375 (Dec. 4, 2019).

<sup>13</sup> *Malleable Iron Pipe Fittings from China; Institution of a Five-Year Review*, 89 Fed. Reg. 87419 (Nov. 1, 2024).

<sup>14</sup> Domestic Producers’ Response to the Notice of Institution, EDIS Doc. 838357 (Dec. 2, 2024) (“Domestic Producers’ NOI Response”) at 1. *See also id.* at 37 (“ASC (formerly operating as Anvil)”). In May 2019, Anvil International and Smith-Cooper International completed their merger to form Anvil International & Smith-Cooper (“ASC”). Confidential Report, Memorandum INV-XX-009, EDIS Doc. 841681 (Jan. 23, 2025) (“CR”), Public Report, *Malleable Iron Pipe Fittings from China*, Inv. No. 731-TA-1021 (Fourth Review), USITC Pub. 5633 (June 2025) (“PR”) at Table 1.3 (recent developments in the U.S. industry).

<sup>15</sup> CR/PR at 1.14, 1.17, B.4, Table B.1; *see also* Domestic Producers’ Comments on Adequacy, EDIS Doc. 840045 at 2 (Dec. 26, 2024) (“Domestic Producers’ Adequacy Comments”).

that it would conduct an expedited review.<sup>16</sup> The domestic producers filed comments on May 8, 2025, pursuant to 19 C.F.R. § 207.62(d), arguing that the Commission should reach an affirmative determination in this expedited review.<sup>17</sup>

In this review, U.S. industry data are based on the information provided in the response to the notice of institution by the domestic producers, which are estimated to have accounted for 100 percent of domestic production of malleable fittings in 2023.<sup>18</sup> U.S. import data and related information are based on Commerce’s official import statistics.<sup>19</sup> Foreign industry data and related information are based on information from the original investigation and prior reviews, as well as information submitted by the domestic producers in this current review and publicly available information gathered by the Commission.<sup>20</sup> One U.S. purchaser of malleable fittings, \*\*\*, responded to the Commission’s adequacy phase questionnaire.<sup>21</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>22</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>23</sup> The Commission’s

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<sup>16</sup> *Malleable Iron Pipe Fittings from China; Scheduling of an Expedited Five-Year Review*, 90 Fed. Reg. 11548 (Mar. 7, 2025) (“Notice of Scheduling of Expedited Review”); Explanation of Commission’s Determination on Adequacy Vote, EDIS Doc. 843236 at 1 (Feb. 11, 2025). Commissioner David S. Johanson voted to conduct a full review due to the passage of time without a full review since the order was originally imposed. Explanation of Commission’s Determination on Adequacy Vote, at 1.

<sup>17</sup> Domestic Producers’ Final Comments, EDIS Doc. 850667 (May 8, 2025) (“Final Comments”).

<sup>18</sup> CR/PR at I.11; *see also* Domestic Producers’ NOI Response at 37 & Exh. 1 (response to the notice of institution – USITC template).

<sup>19</sup> CR/PR at Table 1.5. Import data are based on HTS statistical reporting numbers 7307.19.9030, 7307.19.9060, and 7307.19.9080, and may be understated to the extent that malleable fittings were also entered under HTS statistical reporting numbers 7307.19.3060, 7307.19.3085, and 7326.90.8688. *Id.* at Table 1.5 Note. Imports under those HTS reporting numbers have not been included because the numbers also cover out-of-scope products. *Id.*

<sup>20</sup> *See* CR/PR at Tables 1.7 & 1.8.

<sup>21</sup> CR/PR at D.3.

<sup>22</sup> 19 U.S.C. § 1677(4)(A).

<sup>23</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. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l (Continued...))

practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.<sup>24</sup>

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

The merchandise covered by the Order are certain malleable iron pipe fittings, cast, other than grooved fittings, from China. The merchandise is currently classifiable under item numbers 7307.19.30.60, 7307.19.30.85, 7307.19.90.30, 7307.19.90.60, 7307.19.90.80, and 7326.90.86.88 of the Harmonized Tariff Schedule of the United States (HTSUS). Excluded from the scope of this order are metal compression couplings, which are imported under HTSUS number 7307.19.90.80. A metal compression coupling consists of a coupling body, two gaskets, and two compression nuts. These products range in diameter from 1/2 inch to 2 inches and are carried only in galvanized finish. Although HTSUS subheadings are provided for convenience and customs purposes, Commerce's written description of the scope of the *Order* is dispositive.<sup>25 26</sup>

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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>24</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).

<sup>25</sup> *Certain Malleable Cast Iron Pipe Fittings from the People's Republic of China: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 11505 (Mar. 7, 2025) ("Commerce's Fourth Review Final Results"), *citing* accompanying Issues and Decision Memorandum for the Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order on Certain Malleable Cast Iron Pipe Fittings from the People's Republic of China (Mar. 3, 2025), EDIS Doc. 847323 ("IDM") at 2. *See also* CR/PR at 1.5-1.6.

<sup>26</sup> The scope definition has not changed since the original investigation. *See Antidumping Duty Order: Certain Malleable Iron Pipe Fittings from the People's Republic of China*, 68 Fed. Reg. 69376 (Dec. 12, 2003); *Continuation of Antidumping Duty Order: Certain Malleable Cast Iron Pipe Fittings From the People's Republic of China*, 74 Fed. Reg. 18349 (Apr. 22, 2009) (first review); *Malleable Cast Iron Pipe Fittings From the People's Republic of China: Continuation of Antidumping Duty Order*, 79 Fed. Reg. 47089 (Aug. 12, 2014) (second review); *Malleable Cast Iron Pipe Fittings From the People's Republic of China: Continuation of Antidumping Duty Order*, 84 Fed. Reg. 66375 (Dec. 4, 2019) (third review).

Malleable fittings are used for connecting two or more pipes or tubes, connecting a pipe to some other apparatus, changing the direction of fluid flow, or closing a pipe.<sup>27</sup> They are principally used in gas and water systems of residential and non-residential buildings as well as in the pipe systems of oil refineries.<sup>28</sup> Malleable fittings are made from cast iron, which includes alloys generally composed of iron, carbon, and silicon.<sup>29</sup> The metal is subjected to a lengthy annealing process following casting which improves its machinability, ductility, and durability.<sup>30</sup> Malleable fittings are used when shock and vibration resistances are required and when fittings must withstand rapid temperature changes.<sup>31</sup>

In the prior proceedings, the Commission defined a single domestic like product consisting of malleable fittings, other than grooved, coextensive with Commerce's scope definition.<sup>32</sup> In the current review, the domestic producers state that they agree with the domestic like product definition adopted by the Commission in the original investigation and prior reviews.<sup>33</sup> The record contains no new information suggesting the pertinent characteristics and uses of domestically produced malleable fittings have changed since the prior proceedings so as to warrant revisiting the Commission's domestic like product definition.<sup>34</sup> Accordingly, we again define a single domestic like product of malleable fittings, other than grooved, coextensive with the scope of the order 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>35</sup> In defining the domestic industry, the Commission's general practice has been

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<sup>27</sup> CR/PR at 1.6; *see also Third Review Determination*, USITC Pub. 4993 at 5.

<sup>28</sup> CR/PR at 1.8; *see also Domestic Producers' NOI Response* at 14.

<sup>29</sup> CR/PR at 1.6.

<sup>30</sup> CR/PR at 1.7.

<sup>31</sup> CR/PR at 1.8.

<sup>32</sup> *Original Determination*, USITC Pub. 3649 at 6; *First Review Determination*, USITC Pub. 4069 at 5; *Second Review Determination*, USITC Pub. 4484 at 5; *Third Review Determination*, USITC Pub. 4993 at 6.

<sup>33</sup> Domestic Producers' NOI Response at 40.

<sup>34</sup> *See generally* CR/PR at 1.6-1.10.

<sup>35</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.

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.

The Commission must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.<sup>36</sup> Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.<sup>37</sup>

In the original investigation and prior reviews, the Commission defined the domestic industry as consisting of all producers of the domestic like product.<sup>38</sup> In the prior reviews, the Commission found that appropriate circumstances did not exist to exclude petitioner \*\*\* from the domestic industry as a related party as defined in 19 U.S.C. § 1677(4)(b).<sup>39</sup>

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<sup>36</sup> See *Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

<sup>37</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); see also *Torrington*, 790 F. Supp. at 1168.

<sup>38</sup> Original Determination, USITC Pub. 3649 at 6; *First Review Determination*, USITC Pub. 4069 at 6; *Second Review Determination*, USITC Pub. 4484 at 6; *Third Review Determination*, USITC Pub. 4993 at 7.

<sup>39</sup> *First Review Determination*, USITC Pub. 4069 at 6; *Second Review Determination*, USITC Pub. 4484 at 6; *Third Review Determination*, USITC Pub. 4993 at 7. In the first and second reviews, the Commission found that, although \*\*\* imported subject merchandise from China, it continued to account for a substantial portion of domestic production of malleable fittings, and supported continuation of the order. Furthermore, the amount of subject merchandise \*\*\* imported did not result in an apparent financial benefit to \*\*\*. *Confidential First Review Determination*, EDIS Doc. 687255 at 7; *Confidential Second Review Determination*, EDIS Doc. 687259 at 8. In the third review, the Commission found that Anvil's principal interest lied in domestic production rather than importing subject products. *Confidential Third Review Determination*, EDIS Doc. 839983 at 9-10; *Third Review* (Continued...)

In the current review, the domestic producers assert that the Commission should define the domestic industry as it did in the original investigation and in prior reviews.<sup>40</sup> They also argue that neither ASC nor Ward should be excluded from the domestic industry under the related parties provision.<sup>41</sup>

ASC is subject to possible exclusion from the domestic industry pursuant to the related parties provision because it imported subject merchandise during the period of review.<sup>42</sup> Ward qualifies as a related party because it is now wholly owned by ASC, a U.S. importer of subject merchandise.<sup>43</sup> For the reasons set forth below, we find that appropriate circumstances do not exist to exclude either ASC or Ward from the domestic industry.

ASC. ASC was the \*\*\* of the two domestic producers in 2023, accounting for \*\*\* percent of U.S. production of malleable fittings that year.<sup>44</sup> It supports continuation of the order. In 2023, ASC imported \*\*\* short tons of malleable fittings from China,<sup>45</sup> and its ratio of subject imports to its domestic production was \*\*\* percent.<sup>46</sup> ASC made substantial investments in its domestic malleable fittings operations during the review period, including several acquisitions and a product line expansion.<sup>47</sup>

Notwithstanding the ratio of ASC's subject imports to its U.S. production in 2023, its substantial investments during the period of review, including its acquisition of Ward, and

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*Determination*, USITC Pub. 4993 at 6-7. There were no related party issues in the original investigation. See Confidential Original Determination, EDIS Doc. 839976, at 7; *Original Determination*, USITC Pub. 3649 at 6.

<sup>40</sup> Domestic Producers' NOI Response at 40, citing *Malleable Iron Pipe Fittings From China: Institution of a Five-year Review*, 89 Fed. Reg. 87419, 87419 (Nov. 1, 2024) ("Notice of Institution").

<sup>41</sup> See Domestic Producers' NOI Response at 8 & nn.40 & 41, 37.

<sup>42</sup> See Domestic Producers' NOI Response at 8 & n.41, 37, Exh. 1, page 12; see also CR/PR at B.3-B.4, Table B.1.

<sup>43</sup> See Domestic Producers' NOI Response at 8 & nn.40 & 41, 37.

<sup>44</sup> Domestic Producers' NOI Response at Exh. 1, page 10; see also CR/PR at 1.14.

<sup>45</sup> Domestic Producers' NOI Response at Exh. 1, page 12; CR/PR at Table B.1 note. The domestic producers did not indicate the reasons for ASC's importation of subject merchandise from China during the POR. See, e.g., Domestic Producers' NOI Response at 8, 37, Exh. 1, page 12.

<sup>46</sup> Calculated from Domestic Producers' NOI Response at Exh. 1, pages 10 & 12; see also CR/PR at Table B.1. Note (ASC's reported imports of \*\*\* short tons of malleable fittings in 2023).

<sup>47</sup> See CR/PR at Table 1.3; Domestic Producers' NOI Response at 8 & nn.40 & 41, 37. ASC also completed acquisition of several U.S. businesses during the POR. For example, in June 2021, ASC completed its acquisition of Trenton Pipe Nipple Co. LLC of Federalsburg, MD. *Id.* In January 2022, ASC completed its acquisition of Value Engineered Products ("VEP") of Denver, CO. *Id.* Moreover, in July 2021, ASC expanded its digital design solution landscape with the addition of threaded fitting Autodesk Revit families. *Id.*

support for continuation of the order indicate that its primary interest is in domestic production. Further, the record in this review does not indicate that Ward's imports of subject merchandise benefitted its domestic production operations such that its inclusion in the domestic industry would skew industry data or mask likely injury. Given this, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude ASC from the domestic industry.

*Ward.* Ward was acquired by ASC, a domestic producer and U.S. importer of subject merchandise, after the end of the period of review in February 2024.<sup>48</sup> It was \*\*\* of the two domestic producers of malleable fittings in 2023, accounting for \*\*\* percent of U.S. production that year.<sup>49</sup> It supports the continuation of the order.<sup>50</sup> Ward imported no subject merchandise during the period of review and was a domestic producer throughout the period of review. Thus, its primary interest during the period of review was in domestic production. There is no indication that Ward's affiliation with ASC would skew the industry data or mask likely injury. Indeed, because ASC acquired Ward after the end of the period of review, any effect that Ward's affiliation with ASC may have in terms of shielding it from subject import competition or benefiting its domestic production operations would not impact Ward's data from the period of review.

For these reasons, and in the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude Ward from the domestic industry.

In sum, consistent with our definition of the domestic like product, we define the domestic industry as consisting of all domestic producers of malleable fittings, other than grooved.

### **III. Revocation of the Antidumping Duty Order Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time**

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

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that

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<sup>48</sup> Domestic Producers' NOI Response at 37.

<sup>49</sup> *Calculated from* Domestic Producers' NOI Response at Exh. 1, page 10. *See also* CR/PR at 1.14 (ASC accounted for \*\*\* percent of U.S. production in 2023).

<sup>50</sup> Domestic Producers' NOI Response at 8 & n.41.



dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”<sup>51</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>52</sup> Thus, the likelihood standard is prospective in nature.<sup>53</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>54</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>55</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>56</sup>

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<sup>51</sup> 19 U.S.C. § 1675a(a).

<sup>52</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.

<sup>53</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>54</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>55</sup> 19 U.S.C. § 1675a(a)(5).

<sup>56</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 (Continued...)”

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>57</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>58</sup> The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.<sup>59</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>60</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>61</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

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only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

<sup>57</sup> 19 U.S.C. § 1675a(a)(1).

<sup>58</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the order under review. *See Commerce’s Fourth Review Final Results*, 90 Fed. Reg. at 11506 (Appendix: list of issues addressed in IDM), IDM at 4 (“Commerce has not ... found any duty absorption over the history of the *Order*.”).

<sup>59</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>60</sup> 19 U.S.C. § 1675a(a)(2).

<sup>61</sup> 19 U.S.C. § 1675a(a)(2)(A–D).

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>62</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 more advanced version of the domestic like product.<sup>63</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 order under review and whether the industry is vulnerable to material injury upon revocation.<sup>64</sup>

As discussed above, no respondent interested party participated in this expedited review. The record, therefore, contains limited new information with respect to the malleable fittings industry in China. There also is limited information on the malleable fittings market in the United States during the period of review. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigation and the prior reviews and the limited new information on the record in this review.

## **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

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<sup>62</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.

<sup>63</sup> 19 U.S.C. § 1675a(a)(4).

<sup>64</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.

“within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>65</sup> The following conditions of competition inform our determination.

### **1. Demand Conditions**

*Prior Proceedings.* In the original investigation and prior reviews, the Commission found that demand for malleable fittings was based on demand for construction and systems incorporating malleable fittings, primarily in the residential, commercial, and industrial building markets.<sup>66</sup>

In the original investigation, apparent U.S. consumption for malleable fittings decreased irregularly, from \*\*\* short tons in 2000 to \*\*\* short tons in 2002.<sup>67</sup> In the first review, the Commission found that demand for malleable fittings weakened in 2007 and was likely to continue to weaken in the reasonably foreseeable future due to declines in construction spending.<sup>68</sup> In the second review, the Commission found that apparent U.S. consumption of malleable fittings was lower in 2013, at \*\*\* short tons, than in 2007 or 2002.<sup>69</sup> In the third review, the Commission found that apparent U.S. consumption for malleable fittings was lower in 2018, at \*\*\* short tons, than in 2002, but higher than in 2007 or 2013.<sup>70</sup>

*Current Review.* The record in the current review indicates that the drivers of demand for malleable fittings in the U.S. market have not changed since the last review. According to the domestic producers, demand for malleable fittings continues to be driven by demand for new and retrofit construction in the residential and commercial/industrial building markets.<sup>71</sup> The domestic producers assert that since 2019, when the last review of the order occurred, demand for malleable fittings has fluctuated somewhat, dropping during the COVID-19 pandemic but growing in the years after, driven by growth in residential and

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<sup>65</sup> 19 U.S.C. § 1675a(a)(4).

<sup>66</sup> *Original Determination*, USITC Pub. 3649 at 7; *First Review Determination*, USITC Pub. 4069 at 8; *Second Review Determination*, USITC Pub. 4484 at 10; *Third Review Determination*, USITC Pub. 4993 at 10-11.

<sup>67</sup> *Confidential Original Determination*, EDIS Doc. 839976 at 8-9; *Original Determination*, USITC Pub. 3649 at 7.

<sup>68</sup> *First Review Determination*, USITC Pub. 4069 at 8-9.

<sup>69</sup> *Confidential Second Review Determination*, EDIS Doc. 839981 at 14; *Second Review Determination*, USITC Pub. 4484 at 10.

<sup>70</sup> *Confidential Third Review Determination* at 15; *Third Review Determination*, USITC Pub. 4993 at 11.

<sup>71</sup> Domestic Producers' NOI Response at 14.

non-residential construction activity.<sup>72</sup> They contend that this growth in residential and non-residential construction activity is expected to continue in the reasonably foreseeable future.<sup>73</sup> Responding purchaser \*\*\* reports that \*\*\*.<sup>74</sup>

Apparent U.S. consumption was \*\*\* short tons in 2023, down from \*\*\* short tons in 2018, a decline of \*\*\* percent.<sup>75</sup>

## **2. Supply Conditions**

*Prior Proceedings.* In the original investigation and prior reviews, the Commission found that Anvil and Ward accounted for all or nearly all U.S. production of malleable fittings.<sup>76</sup> The Commission observed that Anvil reduced its production capacity in 2001 due to the consolidation of its foundries.<sup>77</sup> The domestic industry's share of apparent U.S. consumption was \*\*\* percent in 2002, \*\*\* percent in 2007, \*\*\* percent in 2013, and \*\*\* percent in 2018.<sup>78</sup> By contrast, subject imports' share of apparent U.S. consumption, which was \*\*\* percent in 2002, was higher in 2007 at \*\*\* percent and in 2013 at \*\*\* percent, and still higher in 2018 at \*\*\* percent.<sup>79</sup> Nonsubject imports' share of apparent U.S. consumption was lower in 2007, 2013 and 2018, when it was \*\*\* percent, \*\*\* percent and \*\*\* percent, respectively, than in 2002, when it was \*\*\* percent.<sup>80</sup>

*Current Review.* The domestic industry was the \*\*\* source of supply of malleable fittings in the U.S. market in 2023, accounting for \*\*\* percent of apparent U.S. consumption that year.<sup>81</sup> As discussed in section II.B above, ASC acquired Ward in February 2024 and the two domestic producers, which continue to operate separately, account for all known domestic production of malleable fittings.<sup>82</sup>

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<sup>72</sup> Domestic Producers' NOI Response at 14.

<sup>73</sup> Domestic Producers' NOI Response at 14.

<sup>74</sup> CR/PR at D.3.

<sup>75</sup> CR/PR at Table 1.6.

<sup>76</sup> *Confidential Original Determination*, EDIS Doc. 687231 at 9; *Original Determination*, USITC Pub. 3649 at 7; *Confidential First Review Determination*, EDIS Doc. 839977 at 11; *First Review Determination*, USITC Pub. 4069 at 9; *Confidential Second Review Determination*, EDIS Doc. 839981 at 15; *Second Review Determination*, USITC Pub. 4484 at 10; *Confidential Third Review Determination*, EDIS Doc. 839983 at 16; *Third Review Determination*, USITC Pub. 4993 at 11.

<sup>77</sup> *Original Determination*, USITC Pub. 3649 at 7.

<sup>78</sup> CR/PR at Table 1.6.

<sup>79</sup> CR/PR at Table 1.6.

<sup>80</sup> CR/PR at Table 1.6.

<sup>81</sup> CR/PR at Table 1.6.

<sup>82</sup> CR/PR at 1.11 & Table B.1; *see also* Domestic Producers' NOI Response at 37.

Subject imports were the \*\*\* source of supply in the U.S. market in 2023, but still accounted for \*\*\* percent of apparent U.S. consumption that year.<sup>83</sup> Nonsubject imports were the \*\*\* source of supply, accounting for \*\*\* percent of apparent U.S. consumption in 2023.<sup>84</sup> Vietnam and Thailand were the largest sources of nonsubject imports in the U.S. market that year.<sup>85</sup>

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

*Prior Proceedings.* In the original investigation, the Commission found that the domestic like product and subject imports were substitutable.<sup>86</sup> The Commission also found that price and quality were important factors in purchasing decisions.<sup>87</sup> While quality was the primary consideration reported by purchasers in purchasing decisions, most purchasers reported in the original investigation that subject imports and the domestic like product were comparable in terms of quality and consistency.<sup>88</sup> In the prior reviews, the Commission found that there was no new evidence that warranted modification of its previous findings on these issues.<sup>89</sup>

*Current Review.* The record in this review contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price in purchasing decisions have changed since the last review.<sup>90</sup> The domestic producers argue that subject imports are highly interchangeable with the domestic like product, and that price remains important in purchasing decisions.<sup>91</sup> Accordingly, we find that

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<sup>83</sup> CR/PR at Table 1.6. The subject imports' share of apparent U.S. consumption was \*\*\* percent in 2002, \*\*\* percent in 2007, \*\*\* percent in 2013, and \*\*\* percent in 2018. *Id.*

<sup>84</sup> CR/PR at Table 1.6. Nonsubject imports' share of apparent U.S. consumption was \*\*\* percent in 2002, \*\*\* percent in 2007, \*\*\* percent in 2013, and \*\*\* percent in 2018. *Id.* The domestic producers note that since 2003 the volume of nonsubject imports has fluctuated, but increased, growing to 20,414 short tons in 2023. Domestic Producers' NOI Response at 15.

<sup>85</sup> CR/PR at Table 1.5. With the exception of 2023, Thailand was the top source of nonsubject imports during the current period of review (2019 to 2022). *Id.* With the exception of 2019, Vietnam was one of the top three sources of nonsubject imports throughout the review period. *Id.*

<sup>86</sup> *Original Determination*, USITC Pub. 3649 at 7.

<sup>87</sup> *Original Determination*, USITC Pub. 3649 at 7-8.

<sup>88</sup> *Original Determination*, USITC Pub. 3649 at 7-8.

<sup>89</sup> *First Review Determination*, USITC Pub. 4069 at 9; *Second Review Determination*, USITC Pub. 4484 at 11; *Third Review Determination*, USITC Pub. 4993 at 12.

<sup>90</sup> *See* Domestic Producers' NOI Response at 16; *see also* Final Comments at 10.

<sup>91</sup> Domestic Producers' NOI Response at 16.

the domestic like product and subject imports remain substitutable and that price remains an important factor in purchasing decisions.

Effective September 24, 2018, malleable fittings from China entering under HTS subheading 7307.19.90 became subject to an additional 10 percent ad valorem duty pursuant to Section 301 of the Trade Act of 1974.<sup>92</sup> Effective May 10, 2019, the section 301 duty for imports of malleable fittings was increased to 25 percent.<sup>93</sup>

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

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

In the original investigation, the Commission found that the volume of subject imports increased by 54.2 percent between 2000 and 2002.<sup>94</sup> The market share of subject imports also increased over the period of investigation (“POI”), while apparent U.S. consumption declined.<sup>95</sup> The Commission found that the volume of subject imports was significant, both in absolute terms and relative to U.S. production and apparent U.S. consumption, and that the increase in the volume of subject imports was significant.<sup>96</sup>

In its threat of material injury analysis, the Commission found that the significant rate of increase in the volume of subject imports and the growth in subject import market share at the expense of the domestic industry during the POI strongly indicated the likelihood of substantially increasing volumes of subject imports in the future.<sup>97</sup> The Commission found that the Chinese malleable fittings industry had substantial and growing capacity, increasing unused

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<sup>92</sup> CR/PR at 1.6; *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 47974 (Sept. 21, 2018); see also *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (May 9, 2019). See also HTS heading 9903.88.03 and U.S. notes 20(e) and 20(f) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Revision 10, USITC Publication 5569, November 2024, pp. 94.22, 99.3.28 to 99.3.29, 99.3.52, 99.3.251 to 99.3.255, 99.3.318 to 99.3.326.

<sup>93</sup> CR/PR at 1.6. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty. CR/PR at 1.6 n.25; *Implementing Modification to Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 21892 (May 15, 2019).

<sup>94</sup> *Original Determination*, USITC Pub. 3649 at 10.

<sup>95</sup> *Original Determination*, USITC Pub. 3649 at 10.

<sup>96</sup> *Original Determination*, USITC Pub. 3649 at 10.

<sup>97</sup> *Original Determination*, USITC Pub. 3649 at 14.

capacity, and increasing production volume, and that it was export oriented.<sup>98</sup> It further found that the Chinese industry would have the incentive to increase the volume of subject imports to the United States due to the significance of the U.S. market to the Chinese industry and the existence of import barriers in Argentina, Brazil, the European Union (“EU”), and Turkey.<sup>99</sup> Accordingly, the Commission determined that the likely increasing volume and market share of subject imports in the imminent future would be significant.<sup>100</sup>

In the first review, the Commission found that the volume of subject imports initially declined after imposition of the antidumping duty order in 2003, but then increased again until 2007, when the volume declined once more.<sup>101</sup> However, despite the decline in volume, the market share of subject imports remained higher in 2007 than in 2002.<sup>102</sup> The Commission found that nothing on the record disturbed its finding in the original investigation regarding Chinese producers’ substantial excess capacity and the attractiveness of the U.S. market to the Chinese industry.<sup>103</sup> It further found that the Chinese industry had the incentive to shift production from non-malleable pipe fittings, which were subject to antidumping duties, to the production of subject merchandise if the order were revoked.<sup>104</sup> The Commission determined that the likely volume of subject imports, both in absolute terms and relative to U.S. production and apparent U.S. consumption, would be significant if the order were revoked.<sup>105</sup>

In the second review, the Commission found that the volume and market share of subject imports were higher in 2013 than in 2002 or 2007.<sup>106</sup> The record indicated that China had been the largest global exporter of malleable fittings since 2009 and that the United States was China’s largest export market.<sup>107</sup> Additionally, malleable fittings continued to be subject to antidumping duty orders in Argentina, the EU, and Turkey.<sup>108</sup> In light of the subject producers’ continued interest in the U.S. market and their ability to increase export volume sharply, the

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<sup>98</sup> *Original Determination*, USITC Pub. 3649 at 14-15.

<sup>99</sup> *Original Determination*, USITC Pub. 3649 at 15.

<sup>100</sup> *Original Determination*, USITC Pub. 3649 at 16.

<sup>101</sup> *First Review Determination*, USITC Pub. 4069 at 10.

<sup>102</sup> *First Review Determination*, USITC Pub. 4069 at 10.

<sup>103</sup> *First Review Determination*, USITC Pub. 4069 at 11.

<sup>104</sup> *First Review Determination*, USITC Pub. 4069 at 11.

<sup>105</sup> *First Review Determination*, USITC Pub. 4069 at 11.

<sup>106</sup> *Second Review Determination*, USITC Pub. 4484 at 12.

<sup>107</sup> *Second Review Determination*, USITC Pub. 4484 at 12.

<sup>108</sup> *Second Review Determination*, USITC Pub. 4484 at 12-13.



Commission determined that the likely volume of subject imports, both in absolute terms and relative to consumption, would be significant if the order were revoked.<sup>109</sup>

In the third review, the Commission noted that the volume of subject imports was higher in 2018, the last year of the review period, than in the original investigation and prior reviews.<sup>110</sup> Although the record did not contain data on China's production capacity or production levels, the Commission noted that China was the largest global exporter of cast iron or steel pipe or tube fittings, a category including malleable fittings, throughout the review, and its export volume of such products was highest in 2018.<sup>111</sup> It also found that China continued to have a strong interest in the U.S. market.<sup>112</sup> As the Commission explained, both the volume and market share of subject imports were higher during the period of review than during the original investigation and prior reviews,<sup>113</sup> as China remained the predominant supplier of imported malleable fittings to the United States during the period.<sup>114</sup> It also noted that the United States was, by far, China's largest export market for cast iron or steel pipe or tube fittings during the POR.<sup>115</sup> Consequently, the Commission concluded that the likely volume of subject imports, both in absolute terms and relative to consumption in the United States, would be significant if the order were revoked.<sup>116</sup>

## **2. The Current Review**

Under the discipline of the antidumping duty order, subject import volume remained substantial, although at lower levels than prior to the imposition of the order.<sup>117</sup> The volume of subject imports declined irregularly during the POR, increasing from 21,273 short tons in 2019 to 21,590 short tons in 2020 and 21,924 short tons in 2021, before decreasing to 20,620 short tons in 2022, and 13,487 short tons in 2023.<sup>118</sup> Subject imports' share of apparent

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<sup>109</sup> *Second Review Determination*, USITC Pub. 4484 at 13.

<sup>110</sup> *Third Review Determination*, USITC Pub. 4993 at 14. Subject import volume ranged from a low of 29,667 short tons in 2014 to a high of 34,384 short tons in 2018. *Id.*

<sup>111</sup> *Third Review Determination*, USITC Pub. 4993 at 14.

<sup>112</sup> *Third Review Determination*, USITC Pub. 4993 at 14.

<sup>113</sup> *Third Review Determination*, USITC Pub. 4993 at 14.

<sup>114</sup> *Third Review Determination*, USITC Pub. 4993 at 14.

<sup>115</sup> *Third Review Determination*, USITC Pub. 4993 at 14-15.

<sup>116</sup> *Third Review Determination*, USITC Pub. 4993 at 15.

<sup>117</sup> CR/PR at Tables 1.5 & 1.6.

<sup>118</sup> CR/PR at Tables 1.5 & 1.6.

consumption was \*\*\* percent in 2023, nearly equal to the level in 2002 (the last year of the POI), \*\*\* percent, but lower than that at the end points of the prior periods of review.<sup>119</sup>

The record in this expedited review contains limited information on the subject industry in China. However, the information available indicates that subject producers have the ability and incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the order were revoked.

The information available indicates that subject producers continued to have substantial production capacity during the POR.<sup>120</sup> Although no subject producer responded to the Commission's notice of institution in this review, the domestic producers identified 36 possible producers of malleable fittings in China.<sup>121</sup> Based on information from ten company websites submitted by the domestic producers, China maintains a large amount of production capacity that could be used to produce malleable fittings for export to the United States.<sup>122</sup> This

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<sup>119</sup> CR/PR at Table 1.6. Subject imports' share of apparent consumption was \*\*\* percent in 2007, \*\*\* percent in 2013, and \*\*\* percent in 2018. *Id.*

<sup>120</sup> Domestic Producers' NOI Response at 22, 24-26; Final Comments at 9.

<sup>121</sup> Domestic Producers' NOI Response at 38, Exh. 1; *see also* CR/PR at 1.17.

<sup>122</sup> Domestic Producers' NOI Response at 24-26, Exh. 4. For example, Shanghai Pudong Malleable Iron Plant has an annual melt capacity of 6.0 million metric tons (6.6 million short tons). Domestic Producers' NOI Response at 25, *citing* Exh. 4 (Shanghai Pudong Malleable Iron Plant's profile). This includes both malleable fittings and out-of-scope products. *See id.* Further, The Meide Group ("Meide") is a large Chinese producer of pipe fittings, with an overall annual production capacity for malleable fittings and other fluid conveying products of more than two million metric tons (or 2.2 million short tons). *Id.* at 25, *citing* Exh. 4 (The Meide Group profile). The cited figure includes both malleable fittings and out-of-scope products. *See id.* Hebei Jianzhi Casting Group Ltd., produces 400,000 metric tons (440,924 short tons) of cast iron pipe fittings annually, and maintains an inventory of 25,000 metric tons (27,557 short tons). *Id.* at 25, *citing* Exh. 4 (Hebei Jianzhi Casting Group Ltd.'s profile). This includes both malleable fittings and out-of-scope products. Hefei Lamat Piping Co., Ltd., produces 150,000 metric tons (165,346 short tons) of malleable cast iron and grooved fittings per year. *Id.* at 25, *citing* Exh. 4 (Hefei Lamat Piping Co., Ltd.'s profile). Hebei Dikai Pipe Manufacturing Co., Ltd., has an annual pipe fittings production capacity of 100,000 metric tons (110,231 short tons). Domestic Producers' NOI Response at 25, *citing* Exh. 4 (Hebei Jianzhi Casting Group Ltd.'s profile). This includes both malleable fittings and out-of-scope products. *See id.* Further, Eathu Casting and Forging, Ltd. has a production capacity of 70,000 metric tons (77,161 short tons) for iron pipe fitting products. *Id.* at 25, *citing* Exh. 4 (Eathu Casting and Forging, Ltd., profile). This includes both malleable fittings and out-of-scope products. *See id.* Similarly, Kanaifu Group (Shanxi) Piping Systems Co., annually produces 70,000 metric tons (77,161 short tons) of malleable fittings. *Id.* at 25, *citing* Exh. 4 (Kanaifu Group (Shanxi) Piping Systems Co.'s profile). Another example is Jingman Zhengyaun Guanghua Pipe Co., Ltd., which recently built a new pipe and pipe fittings production line; it can produce 50,000 metric tons (55,100 short tons) of ductile iron pipe and pipe fittings. *Id.* at 25, *citing* Exh. 4 (Jingman Zhengyaun Guanghua Pipe Co., Ltd.'s profile). The cited figure includes both malleable fittings and out-of-scope products. *See id.* (Continued...)

information indicates that these ten subject producers alone possess capacity of at least 9.8 million short tons, equivalent to more than \*\*\* apparent U.S. consumption in 2023.<sup>123</sup>

Although these data include capacity for both subject and out-of-scope products, the Commission found in the first review that subject producers have the ability to shift production from out-of-scope products to malleable fittings produced on the same equipment, as a means of increasing their production and exports of malleable fittings.<sup>124</sup>

The information available also indicates that subject producers in China are significant exporters. Global Trade Atlas (“GTA”) data show that Chinese exports of pipe or tube fittings of cast iron or steel (other than of nonmalleable iron) under HS subheading 7307.19, which includes both subject merchandise and out-of-scope products, were 191,782 short tons in 2023.<sup>125</sup> These data also show that China was by far the world’s largest exporter of such merchandise in every year of the POR.<sup>126</sup> Based on United Nations Comtrade data submitted by the domestic producers, the Chinese producers exported between \$508.8 million and \$669.6 million worth of malleable pipe fittings and related products during the 2019-2023 period.<sup>127</sup>

The record also indicates that the Chinese industry remains interested in supplying the U.S. market. Notwithstanding the order, subject imports maintained a significant presence in the U.S. market during the period of review, accounting for \*\*\* percent of apparent U.S. consumption in 2023, thereby retaining customers and distribution networks in the United States.<sup>128</sup> Indeed, subject imports remained the largest country source of supply in the U.S. market throughout the period.<sup>129</sup> Moreover, GTA data indicate that the United States was by

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Leyon Steel Co., Ltd., one of the largest pipe fittings manufacturers in the world, exports 80 to 90 percent of its production and is capable of exporting 30,000 metric tons (33,069 short tons) annually. *Id.* at 26, *citing* Exh. 4 (Leyon Steel Co., Ltd.’s profile). This includes both malleable fittings and out-of-scope products. *See id.* In addition, Hebei Jinmai Cast Co., Ltd., produces 20,000 metric tons (22,046 short tons) of pipe fittings annually. *Id.* at 26, *citing* Exh. 4 (Hebei Jinmai Cast Co., Ltd.’s profile). The company lists “North America” as one of its main markets. *Id.* at Exh. 4 (Hebei Jinmai profile) at 1.

<sup>123</sup> Calculated from Domestic Producers’ NOI Response at 24-26 and CR/PR at Table 1.6.

<sup>124</sup> *First Review Determination*, USITC Pub. 4069 at 11. *See also* Domestic Producers’ NOI Response at 29; Final Comments at 9; Domestic Producers’ Adequacy Comments at 7.

<sup>125</sup> CR/PR at Table 1.8.

<sup>126</sup> CR/PR at Table 1.8.

<sup>127</sup> Domestic Producers’ NOI Response at 27, Exh. 5 (UN Comtrade database for Harmonized Tariff Code No. 7307.19: global exports of malleable iron pipe fittings and related products, by country: 2019-2023).

<sup>128</sup> CR/PR at Table 1.6.

<sup>129</sup> CR/PR at Tables 1.5 & 1.6.

far the Chinese industry's largest export market for cast iron or steel pipe or tube fittings, including malleable fittings and out-of-scope products, during the review period.<sup>130</sup>

Given the foregoing, including the significant and increasing volume of subject imports in the original investigation, the level of subject imports during the period of review, the subject industry's large capacity and exports, and the attractiveness of the U.S. market to subject producers, we find that the likely volume of subject imports, both in absolute terms and relative to consumption in the United States, would be significant if the order were revoked.<sup>131</sup>

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

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

In the original investigation, the Commission found that subject imports undersold domestically produced malleable fittings in 223 of 224 (or 99.5 percent of) quarterly price comparisons.<sup>132</sup> Nonetheless, the Commission determined that the subject imports did not have significant price-depressing or price-suppressing effects during the POI due, in part, to the domestic industry's strategy of ceding sales volume to subject imports while not competing on price.<sup>133</sup>

In its threat of material injury analysis, the Commission found that the underselling that it observed during the POI would likely continue and erode the preference of certain purchasers for the domestic like product due to the importance of price in purchasing decisions and the substitutability of the products.<sup>134</sup> It also observed that underselling

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<sup>130</sup> CR/PR at Table 1.7. As previously indicated, the available export data include both subject merchandise (malleable fittings) and out-of-scope merchandise.

<sup>131</sup> Although subject imports from China are currently subject to a 25 percent ad valorem duty under section 301, the record does not indicate that this duty would prevent subject imports from entering the U.S. market at significant levels if the order were revoked. See CR/PR at 1.6. After imposition of the section 301 duties, subject imports increased from 21,273 short tons in 2019 to 21,924 short tons in 2021, before declining to 13,487 short tons in 2023 (when they accounted for \*\*\* percent of apparent consumption). CR/PR at Table 1.5. Given the Chinese industry's large capacity and exports, the continued presence of subject imports in the U.S. market, and the attractiveness of the U.S. market to subject producers, we find that the section 301 duties would not likely prevent subject imports from increasing to significant levels if the order were revoked.

The record in the current review does not contain any current information about inventories of the subject merchandise.

<sup>132</sup> *Original Determination*, USITC Pub. 3649 at 11.

<sup>133</sup> *Original Determination*, USITC Pub. 3649 at 11.

<sup>134</sup> *Original Determination*, USITC Pub. 3649 at 15.

margins increased over the POI.<sup>135</sup> The Commission determined that these trends indicated that the pricing of subject imports would likely heighten demand for them.<sup>136</sup>

There was no product-specific pricing information in the prior reviews. In each review, the Commission found that price continued to play an important role in purchasing decisions. The Commission concluded in the prior reviews that, if the order were revoked, subject imports would likely increase U.S. sales by underselling the domestic like product, which would likely lead to adverse effects on the domestic industry.<sup>137</sup>

## **2. The Current Review**

The record in this expedited review does not contain new product-specific pricing information.

Based on the available information, including the 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 order were revoked, the likely significant volume of subject imports would likely undersell the domestic like product to a significant degree as a means of gaining market share, as occurred in the original investigation.<sup>138</sup> Absent the discipline of the order, 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 order were revoked, significant volumes of subject imports would likely have significant price effects.

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<sup>135</sup> *Original Determination*, USITC Pub. 3649 at 15.

<sup>136</sup> *Original Determination*, USITC Pub. 3649 at 15-16. The Commission stated that it was not making a finding of likely price depression or suppression. *Id.* at 16.

<sup>137</sup> *First Review Determination*, USITC Pub. 4069 at 12; *Second Review Determination*, USITC Pub. 4484 at 14; *Third Review Determination*, USITC Pub. 4993 at 16.

<sup>138</sup> In 2023, the average unit value (“AUV”) of the Chinese imports of malleable fitting to the United States was \*\*\* percent lower than the AUV of the domestic industry’s U.S. shipments. *Calculated from CR/PR at Tables 1.4 & 1.5.* We recognize that AUV comparisons may be influenced by differences in product mix and changes in product mix over time.

## **E. Likely Impact<sup>139</sup>**

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

In the original investigation, the Commission found that subject imports did not have a significant adverse impact on the domestic industry's performance during the POI.<sup>140</sup> Although a number of the domestic industry's performance indicators had declined, the Commission found that the financial condition of the domestic industry was relatively healthy.<sup>141</sup> The Commission determined that the decline in several performance indicators resulted, in part, from factors other than subject imports, such as declining apparent U.S. consumption, increased unit costs, and consolidation within the domestic industry.<sup>142</sup> In its threat of material injury analysis, the Commission determined that the likely increasing volume and market share of imports in the imminent future would likely have a significant negative impact on the domestic industry's production, capacity utilization, employment, revenues, and profitability.<sup>143</sup>

In the first review, the Commission did not make a finding concerning whether the domestic industry was in a vulnerable condition.<sup>144</sup> However, it found that the domestic industry's production and shipments were lower in 2007 than in 2002, and that its financial performance appeared to have deteriorated since the original investigation.<sup>145</sup> The Commission determined that revocation of the order would likely lead to significant increases in the volume of subject imports that would likely undersell the domestic like product and significantly suppress or depress prices for the domestic like product.<sup>146</sup> It also determined that the intensified competition between subject imports and the domestic like product would likely cause the domestic industry to lose market share to subject imports, resulting in declines in

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<sup>139</sup> In its expedited fourth review of the antidumping duty order, Commerce determined that revocation of the antidumping duty order on imports from China would likely result in the continuation or recurrence of dumping with margins of up to 111.36 percent. *Commerce's Fourth Review Final Results*, 90 Fed. Reg. at 11505, and accompanying IDM at 10.

<sup>140</sup> *Original Determination*, USITC Pub. 3649 at 12.

<sup>141</sup> *Original Determination*, USITC Pub. 3649 at 12-13.

<sup>142</sup> *Original Determination*, USITC Pub. 3649 at 12-13.

<sup>143</sup> *Original Determination*, USITC Pub. 3649 at 16.

<sup>144</sup> *First Review Determination*, USITC Pub. 4069 at 13. It declined to do so in light of the limited information on the record. *Id.*

<sup>145</sup> *First Review Determination*, USITC Pub. 4069 at 13.

<sup>146</sup> *First Review Determination*, USITC Pub. 4069 at 13-14.

production, shipments, sales, and revenues for the domestic industry.<sup>147</sup> The Commission concluded that these declines would, in turn, likely have an adverse impact on the industry's profitability, employment, and its ability to raise and invest capital.<sup>148</sup>

In the second review, the Commission again declined to make a vulnerability finding.<sup>149</sup> The domestic industry's ratio of operating income to net sales was higher than in the first review and at the end of the original POI, but was lower than in the first two years of the original POI.<sup>150</sup> The Commission determined that, should the order be revoked, the likely significant volume of low-priced subject imports would likely have an adverse impact on the domestic industry's production, shipments, sales, revenues, and market share which would, in turn, likely result in declines in the industry's financial performance.<sup>151</sup> In its non-attribution analysis, considering the impact of nonsubject imports, the Commission found that their market share was lower in 2013 than in both 2002 and 2007, while the inverse was true for subject imports.<sup>152</sup> Consequently, the Commission determined that revocation of the order would likely have a significant adverse impact on the domestic industry.<sup>153</sup>

In the third review, the Commission again declined to make a vulnerability finding.<sup>154</sup> It determined that, should the order be revoked, the likely significant volume of low-priced subject imports would likely have an adverse impact on the domestic industry's production, shipments, sales, market share, and revenues, which in turn would likely cause declines in the domestic industry's employment and financial performance.<sup>155</sup>

Considering nonsubject imports for purposes of non-attribution, the Commission found that given the substitutability of the domestic like product and the subject imports, upon revocation the subject imports would cause the domestic industry to cut prices, forgo price

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<sup>147</sup> *First Review Determination*, USITC Pub. 4069 at 14.

<sup>148</sup> *First Review Determination*, USITC Pub. 4069 at 14.

<sup>149</sup> *Second Review Determination*, USITC Pub. 4484 at 15. It stated that the limited evidence in the review was insufficient to make a finding on whether the domestic industry was in a vulnerable condition. *Id.*

<sup>150</sup> *Second Review Determination*, USITC Pub. 4484 at 15.

<sup>151</sup> *Second Review Determination*, USITC Pub. 4484 at 15.

<sup>152</sup> *Second Review Determination*, USITC Pub. 4484 at 15-16.

<sup>153</sup> *Second Review Determination*, USITC Pub. 4484 at 16.

<sup>154</sup> *Third Review Determination*, USITC Pub. 4993 at 17. The Commission found that the limited evidence in the review was insufficient to make a vulnerability finding. *Id.*

<sup>155</sup> *Confidential Third Review Determination* at 25-26; *Third Review Determination*, USITC Pub. 4993 at 17.

increases, or lose market share, irrespective of the presence of nonsubject imports.<sup>156</sup> The Commission further observed that as subject imports increased their market share during the review period, the increase came at the expense of the domestic industry, as nonsubject imports also gained market share in terms of quantity.<sup>157</sup> Consequently, the Commission determined that revocation of the order would likely have a significant adverse impact on the domestic industry.<sup>158</sup>

## 2. The Current Review

The record in this five-year review contains limited information concerning the domestic industry's performance since the last review.

The information available indicates that the domestic industry's trade indicators were generally weaker in 2023 than in the last years examined in the prior proceedings, but its financial performance was stronger.<sup>159</sup> In 2023, the domestic industry's production was \*\*\* short tons, its U.S. shipments were \*\*\* short tons, and its capacity utilization rate was \*\*\* percent, which were all lower than in the prior proceedings.<sup>160</sup> In 2023, its U.S. shipments were \*\*\* short tons, and its share of apparent U.S. consumption was \*\*\* percent, lower than in the prior proceedings.<sup>161</sup> On the other hand, the domestic industry's production capacity was \*\*\*

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<sup>156</sup> *Confidential Third Review Determination* at 26; *Third Review Determination*, USITC Pub. 4993 at 17-18.

<sup>157</sup> *Confidential Third Review Determination* at 26; *Third Review Determination*, USITC Pub. 4993 at 17-18.

<sup>158</sup> *Confidential Third Review Determination* at 26; *Third Review Determination*, USITC Pub. 4993 at 18.

<sup>159</sup> CR/PR at Table 1.4.

<sup>160</sup> CR/PR at Table 1.4. The domestic industry's production quantity was \*\*\* short tons in 2002, \*\*\* short tons in 2007, \*\*\* short tons in 2013, and \*\*\* short tons in 2018. *Id.* Its U.S. shipments were \*\*\* short tons in 2002, \*\*\* short tons in 2007, \*\*\* short tons in 2013, and \*\*\* short tons in 2018. *Id.* The industry's capacity utilization continuously decreased since the original investigation; it was \*\*\* percent in 2002, \*\*\* percent in 2013, and \*\*\* percent in 2018. *Id.* Its capacity utilization rate was not available for 2007, the last year of the first period of review. *Id.*, note.

<sup>161</sup> CR/PR at Tables 1.4 & 1.6. In 2002, its U.S. shipments were \*\*\* short tons, and its share of apparent U.S. consumption was \*\*\* percent. *Id.* In 2007, its U.S. shipments were \*\*\* short tons, and its share of apparent U.S. consumption was \*\*\* percent. *Id.* In 2013, its U.S. shipments were \*\*\* short tons, and its share of apparent U.S. consumption was \*\*\* percent. *Id.* In 2018, its U.S. shipments were \*\*\* short tons, and its share of apparent U.S. consumption was \*\*\* percent. *Id.*



short tons in 2023, which was lower than in 2002, the last year examined in the original investigation, but higher than in the prior reviews.<sup>162</sup>

The domestic industry's financial indicators were uniformly stronger in 2023 than in the prior proceedings.<sup>163</sup> The domestic industry's net sales value, at \$\*\*\*, and the AUV of its U.S. shipments, at \$\*\*\* per short ton, were higher in 2023 than in the prior proceedings.<sup>164</sup> Further, the industry's COGS to net sales ratio was \*\*\* percent in 2023, a level lower than in any prior proceeding.<sup>165</sup> Notably, the domestic industry's gross profits, at \$\*\*\*, operating income, at \$\*\*\*, and operating income to net sales ratio, at \*\*\* percent, were all higher in 2023 than in any prior proceeding.<sup>166</sup> This limited information is insufficient for us to make a finding on whether the domestic industry is vulnerable to the likely continuation or recurrence of material injury in the event of revocation of the order.

Based on the information available in this review, we find that revocation of the order 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 substitutability between the domestic like product and subject imports and the importance of price to purchasers, significant volumes of low-priced subject imports would likely significantly undersell the domestic like product and 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 imports and their significant price effects would likely have a significant adverse impact on the domestic industry's production, shipments, sales, market share, and revenues,

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<sup>162</sup> CR/PR at Table 1.4. The domestic industry's capacity was \*\*\* short tons in 2002, \*\*\* short tons in 2013, and \*\*\* short tons in 2018. *Id.* The industry's capacity was not available for 2007, the last year of the first review. *Id.*, note.

<sup>163</sup> CR/PR at Table 1.4.

<sup>164</sup> CR/PR at Table 1.4. The AUVs of U.S. producers' U.S. shipments were \$\*\*\* per short ton in 2002, \$\*\*\* per short ton in 2007, \$\*\*\* per short ton in 2013, and \$\*\*\* per short ton in 2018. *Id.* Its U.S. shipments' AUV increased \*\*\* percent from 2018 to 2023, and increased \*\*\* percent from 2002 to 2023. The \*\*\* increase in the domestic industry's AUVs for U.S. shipments appears to account, at least in part, for the industry's improved financial indicators notwithstanding its generally declining trade indicators. *See id.*

<sup>165</sup> CR/PR at Table 1.4. The industry's COGS to net sales ratio was \*\*\* percent in 2002, \*\*\* percent in 2013, and \*\*\* percent in 2018. *Id.* Its COGs to net sales ratio was not available for 2007, the last year of the first review. *Id.*, note.

<sup>166</sup> CR/PR at Table 1.4. The industry's gross profits were \$\*\*\* in 2002, \$\*\*\* in 2013, and \$\*\*\* in 2018. *Id.* Its gross profits were not available for 2007, the last year of the first review. *Id.*, note. The domestic industry's operating income was \$\*\*\* in 2002, \$\*\*\* in 2013, and \$\*\*\* in 2018. *Id.* Further, its operating income to net sales ratio was \*\*\* percent in 2002, \*\*\* percent in 2007, \*\*\* percent in 2013, and \*\*\* percent in 2018. *Id.*

which in turn would have a direct adverse impact on the domestic 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. The volume of nonsubject imports increased irregularly during the period of review from 14,140 short tons in 2019 to 20,414 short tons in 2023, equivalent to \*\*\* percent of apparent U.S. consumption that year.<sup>167</sup> Although nonsubject imports have increased their presence in the U.S. market since the last review, 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 order. Given the substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, the significant increase in low-priced subject imports that is likely after revocation would likely take market share from the domestic industry, as well as from nonsubject imports, and/or force 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 impact on the domestic industry.

We recognize that apparent U.S. consumption was \*\*\* percent lower in 2023 than in 2018.<sup>168</sup> As discussed in section III.B.1 above, however, the domestic producers claim that U.S. demand for malleable fittings has increased since the COVID-19 pandemic and is likely to continue increasing in the reasonably foreseeable future, and responding purchaser \*\*\* reported that \*\*\*. To the extent that demand remains flat or declines, the significant volume of low-priced subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry.

In sum, we find that revocation of the antidumping duty order on malleable fittings from China would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

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<sup>167</sup> CR/PR at Table 1.6. Nonsubject import market share was higher in 2023 than in the prior proceedings. Their share of apparent U.S. consumption decreased from \*\*\* percent in 2002, to \*\*\* percent in 2007 and \*\*\* percent in 2013, and then increased to \*\*\* percent in 2018. *Id.*

<sup>168</sup> CR/PR at Table 1.6. Apparent U.S. consumption was \*\*\* short tons in 2018 and \*\*\* short tons in 2023. *Id.*

#### **IV. Conclusion**

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



# Information obtained in this review

## 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 a review to determine whether revocation of the antidumping duty order on malleable iron pipe fittings (“malleable fittings”) from China would be likely to lead to continuation or recurrence of material injury.<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 Malleable fittings: Information relating to the background and schedule of this proceeding**

Effective date	Action
November 1, 2024	Notice of institution by Commission (89 FR 87419, 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 review (90 FR 11505, March 7, 2025)
June 4, 2025	Commission’s determination and views

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

<sup>2</sup> 89 FR 87419, 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 review of the subject antidumping duty order. 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 investigation 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 investigation**

The original investigation resulted from a petition filed on October 30, 2002, with Commerce and the Commission by Anvil International, Inc., Portsmouth, New Hampshire, and Ward Manufacturing, Inc., Blossburg, Pennsylvania.<sup>5</sup> On October 28, 2003, Commerce determined that imports of malleable fittings from China were being sold at less than fair value (“LTFV”).<sup>6</sup> The Commission determined on December 3, 2003 that an industry in the United States is threatened with material injury by reason of imports from China of malleable fittings.<sup>7</sup> On December 12, 2003, Commerce issued its antidumping duty order with the final weighted-average dumping margins ranging from 7.35 to 111.36 percent.<sup>8</sup>

## **The first five-year review**

On February 6, 2009, the Commission determined that it would conduct an expedited review of the antidumping duty order on malleable fittings from China.<sup>9</sup> On March 10, 2009, Commerce determined that revocation of the antidumping duty order on malleable fittings from China would be likely to lead to continuation or recurrence of dumping.<sup>10</sup> On April 1, 2009, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>11</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective April 22, 2009, Commerce issued a continuation of the antidumping duty order on imports of malleable fittings from China.<sup>12</sup>

## **The second five-year review**

On June 6, 2014, the Commission determined that it would conduct an expedited review of the antidumping duty order on malleable fittings from China.<sup>13</sup> On July 21, 2014, Commerce determined that revocation of the antidumping duty order on malleable fittings from China

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<sup>5</sup> Malleable Iron Pipe Fittings from China, Inv. No. 731-TA-1021 (Final), USITC Publication 3649, December 2003 (“Original publication”), p. 1.1.

<sup>6</sup> 68 FR 61395, October 28, 2003.

<sup>7</sup> 68 FR 67472, December 2, 2003.

<sup>8</sup> 68 FR 69376, December 12, 2003.

<sup>9</sup> 74 FR 7703, February 19, 2009.

<sup>10</sup> 74 FR 10239, March 10, 2009.

<sup>11</sup> 74 FR 16233, April 9, 2009.

<sup>12</sup> 74 FR 18349, April 22, 2009.

<sup>13</sup> 79 FR 34550, June 17, 2014.

would be likely to lead to continuation or recurrence of dumping.<sup>14</sup> On August 4, 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, effective August 12, 2014, Commerce issued a continuation of the antidumping duty order on imports of malleable fittings from China.<sup>16</sup>

## **The third five-year review**

On October 4, 2019, the Commission determined that it would conduct an expedited review of the antidumping duty order on malleable fittings from China.<sup>17</sup> On November 1, 2019, Commerce determined that revocation of the antidumping duty order on malleable fittings from China would be likely to lead to continuation or recurrence of dumping and subsidization.<sup>18</sup> On November 19, 2019, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>19</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective December 4, 2019, Commerce issued a continuation of the antidumping duty order on imports of malleable fittings from China.<sup>20</sup>

## **Previous and related investigations**

The Commission has conducted a number of previous import relief investigations on malleable fittings or similar merchandise, as presented in table 1.2.

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<sup>14</sup> 79 FR 42291, July 21, 2014.

<sup>15</sup> 79 FR 45460, August 5, 2014.

<sup>16</sup> 79 FR 47089, August 12, 2014.

<sup>17</sup> 84 FR 55172, October 15, 2019.

<sup>18</sup> 84 FR 58686, November 1, 2019.

<sup>19</sup> 84 FR 64921, November 25, 2019.

<sup>20</sup> 84 FR 66375, December 4, 2019.

**Table 1.2 Malleable fittings: Previous and related Commission proceedings and current status**

Date	Number	Country	ITC original determination	Current status
1977	TA-201-26	Global safeguard	Negative	NA
1980	701-TA-9	Japan	Terminated (withdrawn by petitioner)	NA
1985	701-TA-221	Brazil	Negative	NA
1984	701-TA-222	India	Terminated (withdrawn by petitioner)	NA
1986	731-TA-278	Brazil	Affirmative	Order revoked after first review, 2000
1986	731-TA-279	South Korea	Affirmative	Order revoked after termination of second review, 2005
1986	731-TA-280	Taiwan	Affirmative	Order revoked after first review, 2000
1987	731-TA-347	Japan	Affirmative	Order revoked after termination of second review, 2005
1987	731-TA-348	Thailand	Affirmative	Order revoked after first review, 2000

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: "Date" refers to the year in which the investigation was completed by the Commission.

Note: All investigations listed above cover malleable fittings. In addition, Investigation No. 731-TA-281 and Investigation No. 731-TA-990 cover out-of-scope non-malleable cast iron pipe fittings and are excluded from the table.



## Commerce's five-year review

Commerce announced that it would conduct an expedited review with respect to the order on imports of malleable fittings from China with the intent of issuing the final results of this review based on the facts available not later than March 4, 2025.<sup>21</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 antircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty order on imports of malleable fittings from China are noted in the sections titled "The original investigation" and "U.S. imports," if applicable.

## The product

### Commerce's scope

Commerce has defined the scope as follows:

*The products covered by the Order are certain malleable iron pipe fittings, cast, other than grooved fittings, from the People's Republic of China. The merchandise is currently classifiable under item numbers 7307.19.30.60, 7307.19.30.85, 7307.19.90.30, 7307.19.90.60, 7307.19.90.80, and 7326.90.86.88 of the Harmonized Tariff Schedule of the United States (HTSUS). Excluded from the scope of this order are metal compression couplings, which are imported under HTSUS number 7307.19.90.80. A metal compression coupling consists of a coupling body, two gaskets, and two compression nuts. These products range in diameter from 1/2 inch to 2 inches and are carried only in galvanized finish. Although HTSUS subheadings are provided for convenience and customs purposes,*

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<sup>21</sup> Letter from Howard Smith, Acting Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, December 26, 2024.

*Commerce's written description of the scope of this proceeding is dispositive.*<sup>22</sup>

## **U.S. tariff treatment**

Malleable fittings are currently imported under Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”) statistical reporting numbers 7307.19.9030 (unions), 7307.19.9060 (other, threaded), and 7307.19.9080 (all other, not elsewhere specified or identified).<sup>23</sup> The column 1-general duty rate is 6.2 percent ad valorem for HTS subheading 7307.19.90.<sup>24</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 24, 2018, malleable fittings originating in China were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974, as amended. Effective May 10, 2019, the section 301 duty for imports under this subheading was increased to 25 percent ad valorem.<sup>25</sup>

## **Description and uses<sup>26</sup>**

Malleable fittings are generally used for connecting the bores of two or more pipes, connecting a pipe to an apparatus, or changing the direction of fluid flow (figure 1.1). They are also used for closing off the end of a pipe. The material from which the subject fittings are made, cast iron, is a general term for ferrous alloys primarily composed of iron, carbon (more than 2 percent), and silicon. Made to the American Society for Testing and Materials (“ASTM”) International and the American Society of Mechanical Engineers (“ASME”) specifications, iron castings exhibit mechanical properties which are determined by the cooling rate during and after solidification, chemical

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<sup>22</sup> 84 FR 66375, December 4, 2019.

<sup>23</sup> The merchandise subject to this review may also be imported under HTS statistical reporting numbers 7307.19.3060, 7307.19.3085, and 7326.90.8688 that include many iron and steel articles outside of Commerce’s scope.

<sup>24</sup> HTSUS (2024) Revision 10, USITC Publication 5569, November 2024, p. 73.21.

<sup>25</sup> 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS heading 9903.88.03 and U.S. notes 20(e) and 20(f) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Revision 10, USITC Publication 5569, November 2024, pp. 94.22, 99.3.28 to 99.3.29, 99.3.52, 99.3.251 to 99.3.255, 99.3.318 to 99.3.326. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

<sup>26</sup> Unless otherwise noted, this information is based on Malleable Iron Pipe Fittings from China, Inv. No. 731-TA-1021 (Third Review), USITC Publication 4993, November 2019 (“Third review publication”), pp. 1.8 to 1.11.

composition, heat treatment, design, and molding technique. During the cooling and solidification processes, carbon is segregated within the crystalline structure of the iron in the form of iron carbide or graphite, resulting in different types of cast irons with different physical properties.

**Figure 1.1: Different types of cast iron pipe fittings**



Source: Indiamart.com, <https://www.indiamart.com/proddetail/pipes-fittings-22066525212.html>, retrieved December 19, 2024.

There are three basic metallurgical types of cast iron pipe fittings: malleable, non-malleable (or gray iron), and ductile fittings. The scope of this review includes malleable fittings and certain ductile fittings but excludes non-malleable fittings. All three types of fittings and the cast iron from which they are made are discussed below. A description of grooved fittings, which are specifically excluded from the scope of the order, is also provided below.

### **Malleable fittings**

Malleable iron is initially cast as white iron and subsequently is subject to a lengthy annealing process that strengthens the cast iron. The annealing process consists of rapidly heating the casting to approximately 1,750°F, followed by a slow controlled cooling period.

This annealing process distinguishes the product from nonmalleable cast iron pipe fittings in terms of both its microstructure and physical characteristics. Specifically, annealing improves the machinability, ductility, and durability of the metal by reducing its brittleness. The overall production and heat treatment process performed on malleable iron fittings distinguishes the product from non-malleable cast iron pipe fittings in chemical composition, microstructure, material strength, size, and weight. Malleable iron can be specified either by its

tensile properties or hardness. The principal uses of malleable fittings are in gas lines, piping systems of petroleum refineries, and building gas and water systems.

In some applications, malleable fittings may be substituted for non-malleable fittings, but due to the higher cost of malleable fittings, such substitution is not economical. Malleable fittings are available in many configurations, the most common being elbows, tees, couplings, crosses, and unions (see figure 1.1). They are produced in both black (non-galvanized) and galvanized form. Malleable fittings, being lighter, thinner, stronger, and less brittle than non-malleable cast iron fittings, are also used where shock and vibration resistance is required and where fittings are subject to quick temperature changes.

### **Non-malleable fittings**

Non-malleable or gray cast iron is defined by ASTM International standards as cast iron that has fine graphite flakes, which are formed during cooling. Gray iron has excellent machinability, wear resistance, and high hardness value. Yield strength, however, is not a significant property of gray iron. Gray irons do not exhibit elastic behavior and are comparatively weak, with a tensile strength ranging from 20,000 to 58,000 pounds per square inch (“psi”). The graphite flakes dominate the properties of this material, by weakening the metallic matrix and causing fractures under stress. Fittings produced from non-malleable iron are used primarily in fire protection/sprinkler systems but are also sometimes used in the steam conveyance systems installed in buildings.

### **Ductile fittings**

Ductile iron is sometimes referred to as “nodular iron” or “spheroid iron” because, as defined by ASTM International standards, it is a cast iron that has a very small but definite amount of magnesium added in the liquid state to induce the formation of graphite in the form of spheroids or nodules, which remain in the as-cast iron. The characteristics of the particular ductile fittings are derived from the metallurgical differences imparted during the production process. Ductile iron has the ductility of malleable iron and the corrosion resistance of alloy cast iron. It compares in strength and elastic properties with cast steel and can be stronger than malleable iron, with a tensile strength ranging from 60,000 to 100,000 psi. Ductile iron fittings are superior to gray cast iron fittings in elastic properties, impact resistance, yield strength/weight, and wear resistance; they are comparable to such fittings in castability, surface hardenability, and corrosion resistance, but are inferior in ease of machining, vibration damping, and cost of manufacture.

## **Grooved fittings**

Grooved fittings are specifically excluded from the scope of this proceeding. Grooved fittings are produced from ductile or malleable cast iron and are a different type of fitting from threaded or flanged fittings in that a split coupling attaches to a circumferential groove near the end of each piece to be joined. A gasket inside the coupling serves as a seal for the pipe and the coupling. Grooved fittings are used for the same purpose for which threaded or flanged fittings are used.

## **Manufacturing process<sup>27</sup>**

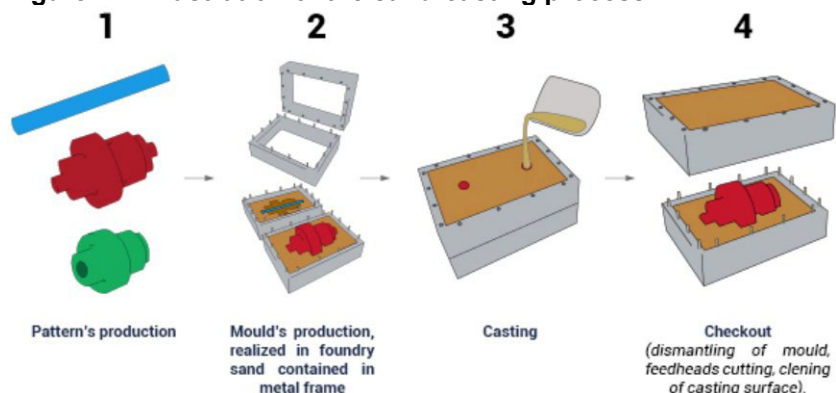
Cast iron pipe fittings are manufactured using a technologically mature process. It begins with the making of molten iron in a foundry with fuel provided by foundry coke or an electric furnace. The raw materials are ferrous scrap and other materials such as silicon carbide and carbon. The molten iron for cast iron fittings contains approximately 3.5 percent carbon, 2.5 percent silicon, and 0.5 percent manganese by weight, but may vary among specific compositions.

The casting process begins with the making of a pattern, which has the same external form and shape as the designed fitting. Sand casting is the predominant method for making malleable fittings (figure 1.2). Molding sand, after being mixed with a binder, is spread around the pattern in a mold, and then rammed by a machine to compact the sand. The pattern is then withdrawn, leaving a mold cavity in the sand. Solid molded sand cores are inserted to form the internal shape of the fitting. Two mold halves are put together with the core in the center. A system of gates, risers, and vents is provided in the casting cavity to ensure a smooth flow of the molten iron into the mold cavity under gravity. To form the shape of the fittings, molten iron is poured directly into the mold cavity. After the iron solidifies, the red-hot fittings are shaken out of the sand onto a shaker table or belt and allowed to cool for four to five hours.

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<sup>27</sup> Unless otherwise noted, this information is based on the third review publication, pp. 1.11 to 1.12.

**Figure 1.2: Illustration of the sand-casting process**



Source: FV Cast, Sand Casting, <https://fv-cast.com/en/production/>, retrieved December 19, 2024.

The specific chemical compositions and manufacturing processes of malleable, non-malleable, and ductile iron fittings differ somewhat, although all are comprised mainly of iron. Cast iron pipe fittings are available in similar configurations and all are produced using sand casting; however, the specific molds for the individual castings are reportedly not interchangeable. After casting, the production of non-malleable and ductile cast iron pipe fittings is essentially complete, except for cooling, cleaning, and, if necessary, machining, threading, or finishing. In contrast, malleable fittings are subjected to an additional process of annealing and controlled cooling after casting. This additional process makes malleable fittings more expensive to produce per pound than ductile or non-malleable ones. The basic manufacturing processes and technologies for iron castings are well established and are similar throughout the world. Differences lie mainly in the extent of the application of automatic equipment and ancillary operations, such as environmental control facilities.

## The industry in the United States

### U.S. producers

During the final phase of the original investigation, the Commission received U.S. producer questionnaires from three firms, which accounted for virtually all U.S. production of malleable fittings in the United States during 2002.<sup>28</sup>

During the first five-year review, domestic interested parties provided a list of three known and currently operating U.S. producers of malleable fittings. Two responding firms

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<sup>28</sup> Original publication, pp. 1.1 and 1.2.

accounted for approximately 90.0 to 95.0 percent of production of malleable fittings in the United States during 2007.<sup>29</sup>

During the second five-year review, domestic interested parties provided a list of two known and currently operating U.S. producers of malleable fittings. Two responding firms accounted for nearly 100 percent of production of malleable fittings in the United States during 2013.<sup>30</sup>

During the third five-year review, domestic interested parties provided a list of two known and currently operating U.S. producers of malleable fittings. Two responding firms accounted for all known production of malleable fittings in the United States during 2018.<sup>31</sup>

In response to the Commission's notice of institution in this current review, domestic interested parties provided a list of two known and currently operating U.S. producers of malleable fittings. Two responding firms accounted for all known production of malleable fittings in the United States during 2023.<sup>32</sup>

## **Recent developments**

Table 1.3 presents events in the U.S. industry since the Commission's last five-year review.<sup>33</sup>

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<sup>29</sup> Malleable Iron Pipe Fittings from China, Inv. No. 731-TA-1021 (Review), USITC Publication 4069, April 2009 ("First review publication"), pp. 1.18 and 1.21.

<sup>30</sup> Malleable Iron Pipe Fittings from China, Inv. No. 731-TA-1021 (Second Review), USITC Publication 4484, August 2014 ("Second review publication"), pp. 1.11 and 1.13.

<sup>31</sup> Third review publication, p. 1.13 and table 1.1.

<sup>32</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, p. 37 and exh. 1.

<sup>33</sup> For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

**Table 1.3 Malleable fittings: Developments in the U.S. industry**

Item	Firm	Event
Merger	ASC	May 2019: Anvil International and Smith-Cooper International complete their merger to form Anvil International & Smith-Cooper ("ASC").
Acquisition	ASC	June 2021: ASC completed its acquisition of Trenton Pipe Nipple Co. LLC of Federalsburg, Maryland.
Expansion	ASC	July 2021: ASC expanded its digital design solution landscape with the addition of threaded fitting Autodesk Revit families. New and free digital content will now feature both Anvil and SCI branded cast, ductile, and malleable iron products in both standard and heavyweight offerings.
Acquisition	ASC	January 2022: ASC completed its acquisition of Value Engineered Products ("VEP") of Denver, Colorado.
Acquisition	ASC and Ward	February 2024: ASC completed its acquisition of Ward, a subsidiary of Proterial Ltd.

Source: ASC Engineered Solutions, "Anvil International and Smith-Cooper International Complete Merger," May 29, 2019, <https://www.asc-es.com/news/2019/anvil-international-and-smith-cooper-international-complete-merger>;

ASC Engineered Solutions, "ASC Engineered Solutions Acquires Trenton Pipe Nipple Company, LLC," news release, June 14, 2021, <https://www.asc-es.com/news/2021/asc-engineered-solutions-acquires-trenton-pipe-nipple-company-llc>;

ASC Engineered Solutions, "New Threaded Revit® Families and Additional CAD File Options Now Available From ASC-Engineered Solutions™," news release, July 19, 2021, <https://www.asc-es.com/news/2021/new-threaded-revit-families-and-additional-cad-file-options-now-available-from-asc-engineered-solutions>;

ASC Engineered Solutions, "ASC Engineered Solutions Acquires Value Engineered Products," news release, December 20, 2021, <https://www.asc-es.com/news/2022/as-c-engineered-solutions-acquires-value-engineered-products>;

ASC Engineered Solutions, "ASC Engineered Solutions Acquires Ward Manufacturing," news release, February 2, 2024, <https://www.asc-es.com/news/2024/asc-acquires-ward-manufacturing>;

Ward Manufacturing, "ASC Engineered Solutions Acquires Ward Manufacturing," press release, February 2, 2024, <https://www.wardmfg.com/press-release-asc-engineered-solutions-acquires-ward-manufacturing>.

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



**Table 1.4 Malleable fittings: Trade and financial data submitted by U.S. producers, by period**

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

Item	Measure	2002	2007	2013	2018	2023
Capacity	Quantity	***	NA	***	***	***
Production	Quantity	***	***	***	***	***
Capacity utilization	Ratio	***	NA	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Net sales	Value	***	NA	***	***	***
COGS	Value	***	NA	***	***	***
COGS to net sales	Ratio	***	NA	***	***	***
Gross profit or (loss)	Value	***	NA	***	***	***
SG&A expenses	Value	***	NA	***	***	***
Operating income or (loss)	Value	***	NA	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***	***

Source: For the years 2002, 2007, 2013, and 2018, data are compiled using data submitted in the Commission's original investigation and prior five-year reviews. For the year 2023, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

Note: NA = not available

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>34</sup>

<sup>34</sup> Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

In its original determination and its expedited first, second, and third five-year review determinations, the Commission defined a single domestic like product as malleable fittings, other than grooved fittings, coextensive with Commerce’s scope. In its original determination and its expedited first, second, and third five-year review determinations, the Commission defined the domestic industry as all producers of malleable fittings.<sup>35</sup> In 2023, U.S. producer ASC accounted for \*\*\* percent of total subject imports from China and its subject imports were equivalent to \*\*\* percent of the quantity of its U.S. production of malleable fittings. One of two domestic producers of malleable fittings, ASC accounted for \*\*\* percent of U.S. production in 2023.

## **U.S. importers**

During the final phase of the original investigation, the Commission received U.S. importer questionnaires from 24 firms.<sup>36</sup> Import data presented in the original investigation are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its first, second, or third five-year reviews, the domestic interested parties provided a list of seven firms in each proceeding that may have imported malleable fittings from China.<sup>37</sup> Import data presented in the prior five-year reviews are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in this current review, in its response to the Commission’s notice of institution, the domestic interested parties provided a list of 30 potential U.S. importers of malleable fittings.<sup>38</sup>

## **U.S. imports**

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

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<sup>35</sup> 89 FR 87419, November 1, 2024.

<sup>36</sup> Original publication, p. 4.1.

<sup>37</sup> First review publication, p. 1.22; second review publication, p. 1.14; and third review publication, pp. 1.16 to 1.17.

<sup>38</sup> Domestic interested parties’ response to the notice of institution, December 2, 2024, exh. 1.

**Table 1.5 Malleable fittings: U.S. imports, by source and period**

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

<b>U.S. imports from</b>	<b>Measure</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
China	Quantity	21,273	21,590	21,924	20,620	13,487
Vietnam	Quantity	206	4,151	5,850	7,999	7,723
Thailand	Quantity	6,361	7,930	8,429	9,838	5,187
Indonesia	Quantity	3,358	3,348	4,219	4,013	3,891
All other sources	Quantity	4,215	3,418	3,670	4,896	3,612
Nonsubject sources	Quantity	14,140	18,848	22,169	26,746	20,414
All import sources	Quantity	35,413	40,437	44,092	47,366	33,901
China	Value	102,120	95,985	105,947	118,757	70,938
Vietnam	Value	865	16,999	26,217	43,921	38,808
Thailand	Value	23,456	29,302	33,308	46,016	25,612
Indonesia	Value	10,277	9,778	12,761	15,343	14,429
All other sources	Value	29,986	26,020	33,605	46,959	34,872
Nonsubject sources	Value	64,584	82,099	105,891	152,240	113,720
All import sources	Value	166,704	178,084	211,838	270,997	184,658
China	Unit value	4,801	4,446	4,832	5,759	5,260
Vietnam	Unit value	4,204	4,095	4,481	5,491	5,025
Thailand	Unit value	3,688	3,695	3,951	4,677	4,938
Indonesia	Unit value	3,060	2,920	3,025	3,823	3,708
All other sources	Unit value	7,114	7,613	9,157	9,591	9,653
Nonsubject sources	Unit value	4,567	4,356	4,777	5,692	5,571
All import sources	Unit value	4,707	4,404	4,804	5,721	5,447

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7307.19.9030, 7307.19.9060, and 7307.19.9080, accessed December 4, 2024. Import data do not include HTS statistical reporting numbers 7307.19.3060, 7307.19.3085, and 7326.90.8688, which contain products outside the scope of the order. Subject imports may be understated as product may also enter under HTS statistical reporting numbers 7307.19.3060, 7307.19.3085, and 7326.90.8688.

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

## Apparent U.S. consumption and market shares

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

**Table 1.6 Malleable fittings: Apparent U.S. consumption and market shares, by source and period**

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

Source	Measure	2002	2007	2013	2018	2023
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	20,809	25,065	27,900	34,384	13,487
Nonsubject sources	Quantity	11,946	9,838	6,464	9,865	20,414
All import sources	Quantity	32,755	34,903	34,364	44,248	33,901
Apparent U.S. consumption	Quantity	***	***	***	***	***
U.S. producers	Value	***	***	***	***	***
China	Value	30,276	46,577	93,093	137,371	70,938
Nonsubject sources	Value	40,837	46,568	39,888	47,921	113,720
All import sources	Value	71,113	93,145	132,981	185,292	184,658
Apparent U.S. consumption	Value	***	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	***	***	***	***	***
U.S. producers	Share of value	***	***	***	***	***
China	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***

Source: For the years 2002, 2007, 2013, and 2018, data are compiled using data submitted in the Commission's original investigations and prior five-year reviews. 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 7307.19.9030, 7307.19.9060, and 7307.19.9080, accessed December 4, 2024. Import data do not include HTS statistical reporting numbers 7307.19.3060, 7307.19.3085, and 7326.90.8688, which contain products outside the scope of the order.

Note: Import data in the Commission's original investigation and prior five-year reviews are based on official Commerce statistics under HTS statistical reporting numbers 7307.19.9030, 7307.19.9060, and 7307.19.9080.

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

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

## **The industry in China**

### **Producers in China**

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from six firms (four producers and two non-producing exporters), which accounted for approximately \*\*\* percent of production of malleable fittings in China during 2002, and approximately \*\*\* percent of subject U.S. imports from China during 2002.<sup>39</sup>

Although the Commission did not receive responses from any respondent interested parties, the domestic interested parties provided a list of five possible producers in China in the first five-year review, and a list of 48 possible producers in China in the second and third five-year reviews.<sup>40</sup> In the current fourth five-year review, the domestic interested parties provided a list of 36 possible producers of malleable fittings in China.<sup>41</sup>

### **Recent developments**

There were no major developments in the industry in China since the last five-year review identified by the domestic interested parties, and no relevant information from outside sources was found.

### **Exports**

Table 1.7 presents export data for pipe or tube fittings of cast iron or steel (other than of non-malleable iron), a category that includes malleable fittings and out-of-scope products, from China (by export destination in descending order of quantity for 2023).

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<sup>39</sup> Investigation No. 731-TA-1021 (Final): Malleable Iron Pipe Fittings from China--Staff Report, INV-AA-171, November 7, 2002, p.7.1 and n.3.

<sup>40</sup> First review publication, p. 1.28; second review publication, p. 1.19; and third review publication, p. 1.22.

<sup>41</sup> Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

**Table 1.7 Pipe or tube fittings of cast iron or steel (other than of nonmalleable iron): Quantity of exports from China, by destination and period**

Quantity in short tons

Destination market	2019	2020	2021	2022	2023
United States	59,881	57,031	55,577	46,303	28,684
Korea, South	18,985	19,869	17,897	13,104	13,080
Taiwan	10,497	10,896	11,827	8,409	7,244
Mexico	6,332	6,091	9,124	5,955	7,080
Saudi Arabia	5,861	7,918	7,355	6,363	6,555
United Arab Emirates	5,378	8,583	5,206	5,426	6,472
Netherlands	10,670	11,951	8,527	6,859	6,470
Singapore	3,927	2,795	3,310	4,295	6,306
Canada	8,137	7,193	10,946	8,602	6,235
Malaysia	8,179	7,289	7,493	6,523	6,075
All other markets	115,441	118,164	107,837	94,074	97,581
All markets	253,288	257,780	245,099	205,913	191,782

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7307.19, accessed December 17, 2024. These data may be overstated as HS subheadings 7307.19 may contain products outside the scope of this review.

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

## Third-country trade actions

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

## The global market

Table 1.8 presents global export data for pipe or tube fittings of cast iron or steel (other than of nonmalleable iron), a category that includes malleable fittings and out-of-scope products (by source in descending order of quantity for 2023).

**Table 1.8 Pipe or tube fittings of cast iron or steel (other than of nonmalleable iron): Quantity of global exports by country and period**

Quantity in short tons

<b>Exporting country</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
China	253,288	257,780	245,099	205,913	191,782
Poland	39,154	40,914	44,598	44,494	34,072
United States	30,266	25,575	29,268	30,148	26,197
Malaysia	23,768	25,378	28,886	28,910	22,545
India	14,875	15,427	26,999	29,814	19,896
Thailand	21,914	20,351	22,548	21,031	18,686
Spain	15,417	14,407	18,183	16,722	16,490
Indonesia	8,240	8,879	11,247	9,749	15,001
Belgium	11,909	9,282	11,996	13,221	13,685
Austria	15,399	14,536	15,171	14,109	13,468
All other exporters	148,661	141,371	134,692	138,978	64,495
All exporters	582,891	573,900	588,687	553,089	478,606

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7307.19, accessed December 17, 2024. These data may be overstated as HS subheading 7307.19 may contain products outside the scope of this review.

Note: Because of rounding, figures may not add to total 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 87419 November 1, 2024	Malleable Iron Pipe Fittings From China; Institution of a Five-Year Review	<a href="https://www.govinfo.gov/content/pkg/FR-2024-11-01/pdf/2024-25104.pdf">https://www.govinfo.gov/content/pkg/FR-2024-11-01/pdf/2024-25104.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 review. It was filed on behalf of ASC Engineered Solutions, LLC (formerly known as Anvil International, LLC) (“ASC”) and Ward Manufacturing, LLC (“Ward”), domestic producers of malleable fittings (collectively referred to herein as “domestic interested parties”). ASC is also a U.S. importer of malleable fittings from China.<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.

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<sup>1</sup> ASC supports the continuation of the order covering imports of malleable fittings from China.

**Table B.1 Malleable fittings: Summary of responses to the Commission's notice of institution**

Interested party type	Number	Coverage
U.S. producer	2	100%
U.S. importer	1	***%

Note: The U.S. producer coverage figure presented is the domestic interested parties' estimate of their share of total U.S. production of malleable fittings during 2023. Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

Note: The U.S. importer coverage figure is the estimated share of the quantity of total U.S. imports of malleable fittings from China in 2023 accounted for by U.S. producer and importer ASC. The estimate was calculated as the quantity of reported imports (\*\* short tons) divided by the quantity of total U.S. imports from China reported for 2023 in Commerce's official import statistics (13,487 short tons). Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

## 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 an expedited review of the antidumping duty order on malleable fittings.<sup>2</sup>

## Company-specific information

**Table B.2 Malleable fittings: Response checklist for U.S. producers**

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

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

<sup>2</sup> Domestic interested parties' comments on adequacy, December 26, 2024, p. 2.



**Table B.3 Malleable fittings: Response checklist for U.S. importer from China**

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

<b>Item</b>	<b>ASC Engineered Solutions, LLC</b>
<b>Nature of operation</b>	Yes
<b>Statement of intent to participate</b>	Yes
<b>Statement of likely effects of revoking the order</b>	Yes
<b>U.S. producer list</b>	Yes
<b>U.S. importer/foreign producer list</b>	Yes
<b>List of 3-5 leading purchasers</b>	Yes
<b>List of sources for national/regional prices</b>	Not known
<b>Trade data</b>	Yes
<b>Changes in supply/demand</b>	Yes
<b>Complete response</b>	Yes



## **APPENDIX C**

### **SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS**



Table C-1

Malleable iron pipe fittings: Summary data concerning the U.S. market, 2000-2002, January-June 2002, and January-June 2003

(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			
	2000	2001	2002	January-June 2002	January-June 2003	2000-2002	2000-2001	2001-2002	Jan.-June 2002-2003
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. imports from:									
China:									
Quantity	13,492	13,443	20,809	8,954	9,505	54.2	-0.4	54.8	6.2
Value	21,029	20,395	30,276	13,385	13,155	44.0	-3.0	48.4	-1.7
Unit value	\$1,558.66	\$1,517.20	\$1,454.95	\$1,494.93	\$1,384.03	-6.7	-2.7	-4.1	-7.4
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity	9,988	9,446	11,946	4,968	8,290	19.6	-5.4	26.5	66.9
Value	24,636	22,253	40,837	17,259	25,655	65.8	-9.7	83.5	48.6
Unit value	\$2,466.47	\$2,355.89	\$3,418.46	\$3,474.02	\$3,094.69	38.6	-4.5	45.1	-10.9
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	23,480	22,889	32,755	13,922	17,795	39.5	-2.5	43.1	27.8
Value	45,665	42,649	71,113	30,644	38,810	55.7	-6.6	66.7	26.6
Unit value	\$1,944.84	\$1,863.32	\$2,171.06	\$2,201.17	\$2,180.96	11.6	-4.2	16.5	-0.9
Ending inventory quantity	***	***	***	***	***	***	***	***	***
U.S. producers:									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***
Capacity utilization (1)	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Inventories/total shipments (1)	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000s)	***	***	***	***	***	***	***	***	***
Hourly wages	***	***	***	***	***	***	***	***	***
Productivity (tons/1,000 hours)	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (1)	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (1)	***	***	***	***	***	***	***	***	***

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

Note.—Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. 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.



**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 pipe fittings: \*\*\*. Purchaser questionnaires were sent to these four 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 pipe fittings that have occurred in the United States or in the market for pipe fittings in China, India, Taiwan and/or Thailand 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 pipe fittings in the United States or in the market for pipe fittings in China, India, Taiwan and/or Thailand within a reasonably foreseeable time?

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

