

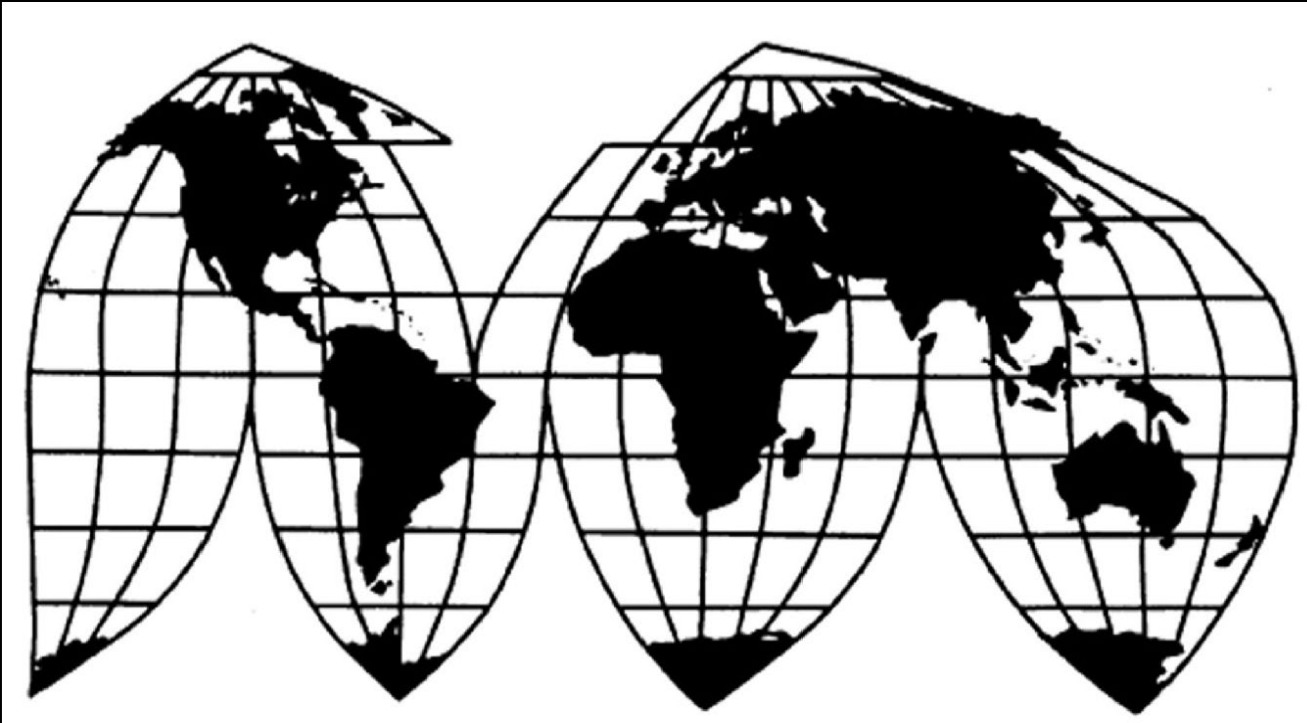
Refined Brown Aluminum Oxide from China

Investigation No. 731-TA-1022 (Fourth Review)

Publication 5645

July 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Note.—Information that would reveal confidential operations of individual firms may not be published.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-1022 (Fourth Review)

Refined Brown Aluminum Oxide from China

DETERMINATION

On the basis of the record¹ 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 refined brown aluminum oxide 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 February 3, 2025 (90 FR 8812, February 3, 2025) and determined on May 9, 2025, that it would conduct an expedited review (90 FR 22113, May 23, 2025).

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

Views of the Commission

Based on the record in 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 refined brown aluminum oxide (“RBAO”) 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: On November 20, 2002, Washington Mills Group Inc. (“Washington Mills”) filed an antidumping duty petition covering RBAO from China.¹ On November 10, 2003, the Commission found that an industry in the United States was materially injured by reason of less than fair value imports of RBAO from China.² On November 19, 2003, the U.S. Department of Commerce (“Commerce”) issued an antidumping duty order on imports of RBAO from China.³

First Review: On October 1, 2008, the Commission instituted the first five-year review of the order.⁴ After conducting an expedited review, the Commission reached an affirmative determination on February 19, 2009.⁵ Following the Commission’s affirmative determination, Commerce issued a continuation of the order on March 13, 2009.⁶

Second Review: On February 3, 2014, the Commission instituted the second five-year review of the order.⁷ After conducting an expedited review, the Commission reached an

¹ On November 27, 2002, the petition was amended to include two additional petitioners, C-E Minerals, Inc. (“C-E Minerals”) and Treibacher Schleifmittel Corporation. Confidential Report, INV-XX-052, EDIS Doc. 849831 (Apr. 28, 2025) (“CR”); *Refined Brown Aluminum Oxide from China*, Inv. No. 731-TA-1022 (Fourth Review), USITC Pub. ____ (July 2025) (“PR”) at 1.2.

² *Refined Brown Aluminum Oxide from China*, Inv. No. 731-TA-1022 (Final), USITC Pub. 3643 (Nov. 2003) (“*Original Determination*”).

³ *Antidumping Duty Order: Refined Brown Aluminum Oxide (Otherwise Known as Refined Brown Artificial Corundum or Brown Fused Alumina) From the People's Republic of China*, 68 Fed. Reg. 65249 (Dep’t of Commerce Nov. 19, 2003).

⁴ *Refined Brown Aluminum Oxide from China*, 73 Fed. Reg. 57149 (ITC Oct. 1, 2008).

⁵ *Refined Brown Aluminum Oxide from China*, Inv. No. 731-TA-1022 (Review), USITC Pub. 4063 (Mar. 2009) (“*First Review Determination*”).

⁶ *Refined Brown Aluminum Oxide from the People's Republic of China: Notice of Continuation of Antidumping Duty Order*, 74 Fed. Reg. 10884 (Dep’t of Commerce Mar. 13, 2009).

⁷ *Refined Brown Aluminum Oxide from China; Institution of A Five-Year Review*, 79 Fed. Reg. 6225 (ITC Feb. 3, 2014).

affirmative determination on September 18, 2014.⁸ Following the Commission's affirmative determination, Commerce issued a continuation of the order on October 14, 2014.⁹

Third Review: On September 3, 2019, the Commission instituted the third five-year review of the order.¹⁰ After conducting an expedited review, the Commission reached an affirmative determination on February 20, 2020.¹¹ Following the Commission's affirmative determination, Commerce issued a continuation of the order on March 6, 2020.¹²

Current Review: The Commission instituted this fourth five-year review on February 3, 2025.¹³ On March 5, 2025, four domestic producers of the domestic like product filed the sole response to the notice of institution.¹⁴ No respondent interested party filed a response to the notice of institution. On May 9, 2025, the Commission determined that the domestic interested party group response to the notice of institution was adequate and that the respondent interested party group response was inadequate.¹⁵ Finding that no other circumstances warranted conducting a full review, the Commission determined to conduct an expedited review.¹⁶ On June 11, 2025, the Domestic Producers filed comments regarding the

⁸ *Refined Brown Aluminum Oxide from China*, Inv. No. 731-TA-1022 (Second Review), USITC Pub. 4492 (Oct. 2014) ("*Second Review Determination*").

⁹ *Refined Brown Aluminum Oxide from the People's Republic of China: Continuation of Antidumping Duty Order*, 79 Fed. Reg. 61606 (Dep't of Commerce Oct. 14, 2014).

¹⁰ *Refined Brown Aluminum Oxide from China; Institution of a Five-Year Review*, 84 Fed. Reg. 46047 (ITC Sept. 3, 2019). In the adequacy phase, Commissioner David S. Johanson determined to conduct a full review. *Refined Brown Aluminum Oxide from China: Scheduling of an Expedited Five-Year Review*, 85 Fed. Reg. 3416 at 3416 n.2. (USITC Jan. 21, 2020).

¹¹ *Refined Brown Aluminum Oxide from China*, Inv. No. 731-TA-1022 (Third Review), USITC Pub. 5020 (Feb. 2020) ("*Third Review Determination*").

¹² *Refined Brown Aluminum Oxide from the People's Republic of China: Continuation of the Antidumping Order*, 85 Fed. Reg. 13138 (Dep't of Commerce Mar. 6, 2020).

¹³ *Refined Brown Aluminum Oxide from China; Institution of a Five-Year Review*, 90 Fed. Reg. 8812 (Feb. 3, 2025).

¹⁴ Petitioners' Response to Notice of Institution ("Response"), EDIS Doc. 845053 (March 5, 2025). The four responding domestic producers are Great Lakes Minerals, LLC ("Great Lakes"), Imerys Fused Minerals Niagara Falls, Inc. ("Imerys Niagara Falls"), U.S. Electrofused Minerals, Inc. ("Electrofused Minerals"), and Washington Mills (collectively, "Domestic Producers"). *Id.* at 1. The Domestic Producers filed a supplemental response on March 18, 2025, EDIS Doc. 846119, and a second supplemental response on April 25, 2025, EDIS Doc. 849673.

¹⁵ Explanation of Commission Determination on Adequacy, EDIS Doc. 851079 (May 13, 2025) ("*Adequacy Statement*"). Commissioner Johanson determined to conduct a full review. *Id.*

¹⁶ Adequacy Statement at 1; *Refined Brown Aluminum Oxide from China; Scheduling of an Expedited Five-Year Review*, 90 Fed. Reg. 22113 (May 23, 2025).

determination that the Commission should reach in this expedited review pursuant to 19 C.F.R. § 207.62(d), arguing for an affirmative determination.¹⁷

U.S. industry data are based on information submitted by the Domestic Producers in response to the notice of institution. The Domestic Producers estimate that they accounted for approximately *** percent of domestic production in 2024.¹⁸ U.S. import data and related information are based on Commerce’s official import statistics.¹⁹ Foreign industry data and related information are based on information from the original investigations, as well as information submitted by the Domestic Producers in these expedited reviews, and publicly available information, such as Global Trade Atlas (“GTA”) data, gathered by Commission staff.²⁰ Two U.S. purchasers of RBAO, ***, responded to the Commission’s adequacy phase questionnaire.²¹

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.”²² 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.”²³ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²⁴

¹⁷ Domestic Producers’ Final Comments, EDIS Doc. 853448 (June 11, 2025) (“Comments”).

¹⁸ CR/PR at 1.9.

¹⁹ CR/PR at Tables 1.3 and 1.4. These data are compiled from official Commerce statistics for Harmonized Tariff Schedule (“HTS”) statistical reporting number 2818.10.2090. *Id.*

²⁰ The Commission used GTA data for Harmonized System (“HS”) subheading 2818.10 for Tables 1.6 and 1.7, which may contain products outside the scope of these reviews.

²¹ CR/PR at D.3.

²² 19 U.S.C. § 1677(4)(A).

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

²⁴ *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377

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

{G}round, pulverized or refined brown artificial corundum, also known as brown aluminum oxide or brown fused alumina, in grit size of 3/8 inch or less. Excluded from the scope of the order is crude artificial corundum in which particles with a diameter greater than 3/8 inch constitute at least 50 percent of the total weight of the entire batch. The scope includes brown artificial corundum in which particles with a diameter greater than 3/8 inch constitute less than 50 percent of the total weight of the batch. The merchandise under investigation is currently classifiable under subheadings 2818.10.20.00 and 2818.10.20.90 of the Harmonized Tariff Schedule of the United States (HTSUS).²⁵

RBAO is a solid inorganic chemical derived from the aluminum oxide in mined bauxites and is produced by crushing, grinding, and sieving brown aluminum oxide in ingot or crude form.²⁶ The product is sold in a range of sizes to end users and distributors. Generally, the more uniform the particle size, the more expensive and difficult the RBAO is to manufacture.²⁷ RBAO is primarily used in abrasive or refractory applications.²⁸

Original Investigation. The Commission defined the domestic like product more broadly than Commerce's scope. The Commission found that the size and weight parameters for RBAO contained in Commerce's scope did not reflect precisely the understanding within the industry of the distinction between RBAO and crude brown aluminum oxide.²⁹ The Commission found that both the larger and smaller particle brown aluminum oxide were used for refractories,

(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).

²⁵ *Refined Brown Aluminum Oxide from the People's Republic of China: Final Results of the Expedited Fourth Five-Year Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 23675 (Dep't of Commerce June 4, 2025) and accompanying Issues and Decision Memorandum for the Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order on Refined Brown Aluminum Oxide from the People's Republic of China, ("IDM"), A-570-882, (Sunset Review) EDIS Doc. 852729 (May 29, 2025) at 2.

²⁶ CR/PR at I.6-1.7.

²⁷ CR/PR at I.7.

²⁸ CR/PR at I.7.

²⁹ *Original Determination*, USITC Pub. 3643 at 5-7.

shared the same channels of distribution, and were perceived by customers to be an RBAO product.³⁰ The record also did not contain any information indicating that larger and smaller particle brown aluminum oxide were produced in distinct facilities or had a significant price difference.³¹ The Commission found that, although larger and smaller particle size brown aluminum oxide were not directly interchangeable, this lack of interchangeability pertained to particle sizes within the scope's size parameters, and that most brown aluminum oxide was produced to specific customer size specifications.³² Thus, the Commission defined the domestic like product to include both the merchandise described by Commerce's scope and certain brown aluminum oxide in which particles with a diameter greater than 3/8 inch constitute at least 50 percent of the total weight of the entire batch, as long as the product had been crushed, screened, and sorted into consistent sizes.³³

Prior Reviews. The domestic interested parties indicated that they agreed with the Commission's definition of the domestic like product in the original investigation.³⁴ In each prior review, the Commission found that there was no new information in the record that would warrant revisiting the domestic like product definition from the original investigation.³⁵ Accordingly, the Commission defined the domestic like product in each of the prior reviews as it did in the original investigation.³⁶

Current Review. The Domestic Producers agree with the Commission's domestic like product definition in the prior proceedings.³⁷ The record contains no new information suggesting that the characteristics and uses of the domestic like product have changed since the prior proceedings.³⁸ Accordingly, we again define the domestic like product as RBAO consisting of all merchandise corresponding to Commerce's scope, as well as brown aluminum oxide in which particles with a diameter greater than 3/8 inch constitute at least 50 percent of

³⁰ *Original Determination*, USITC Pub. 3643 at 6-7.

³¹ *Original Determination*, USITC Pub. 3643 at 7.

³² *Original Determination*, USITC Pub. 3643 at 6-7.

³³ *Original Determination*, USITC Pub. 3643 at 7.

³⁴ *First Review Determination*, USITC Pub. 4063 at 4; *Second Review Determination*, USITC Pub. 4492 at 5; *Third Review Determination*, USITC Pub. 5020 at 6-7.

³⁵ *First Review Determination*, USITC Pub. 4063 at 4; *Second Review Determination*, USITC Pub. 4492 at 5; *Third Review Determination*, USITC Pub. 5020 at 6-7.

³⁶ *First Review Determination*, USITC Pub. 4063 at 4; *Second Review Determination*, USITC Pub. 4492 at 5; *Third Review Determination*, USITC Pub. 5020 at 7.

³⁷ Response at 20; Comments at 3.

³⁸ See generally CR/PR at 1.5-1.7.

the total weight of the entire batch, as long as this product has been crushed, screened, and sorted into consistent sizes.

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.”³⁹ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all the domestic like product, whether toll-produced, captively consumed, or sold in the domestic merchant market. Additionally, in defining the domestic industry, the Commission must determine whether any producer of the domestic like product should be excluded from a domestic industry pursuant to section 771(4)(B) of the Tariff Act.⁴⁰ This provision allows the Commission, if appropriate circumstances exist, to exclude from a domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁴¹ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.⁴²

Prior Proceedings. In the original investigation, five domestic producers were found to be potentially eligible for exclusion under the related parties provision because they imported

³⁹ 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.

⁴⁰ *See* 19 U.S.C. § 1677(4)(B).

⁴¹ *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).

⁴² 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), *aff’d*, 879 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

subject merchandise during the period of investigation (“POI”).⁴³ The Commission excluded Great Lakes from the domestic industry under the related party provision because Great Lakes *** and had a strong interest in maintaining access to those imports. Further, Great Lakes’ financial performance towards the end of the POI reflected ***.⁴⁴ The Commission did not exclude any of the remaining domestic producers from the domestic industry, in part, because they either ceased importing subject merchandise or imported a relatively small proportion of subject merchandise compared to their domestic production during the POI.⁴⁵ The Commission therefore defined the domestic industry as consisting of all U.S. producers of the domestic like product, with the exception of Great Lakes.⁴⁶

In each of the prior reviews, there were no related party issues, and the Commission defined the domestic industry to include all domestic producers of the domestic like product.⁴⁷

Current Review. In the current review, there are no related party issues, as none of the Domestic Producers participating in this review reported importing or purchasing subject merchandise during the period of review, and none of the Domestic Producers are related to a foreign producer or U.S. importer of subject merchandise.⁴⁸ The Domestic Producers agree with the Commission’s domestic industry definition as set out in the notice of institution and in prior reviews.⁴⁹ Accordingly, we define the domestic industry as consisting of all domestic producers of the domestic like product.

⁴³ *Original Determination*, USITC Pub. 3643 at 10.

⁴⁴ Confidential Views of the Commission, Refined Brown Aluminum Oxide from China, Inv. No. 731-TA-1022 (Final) (Nov. 2003) (“*Confidential Original Determination*”), EDIS Doc. 846569 at 15.

⁴⁵ *Original Determination*, USITC Pub. 3643 at 10–11. The Commission also weighed whether Great Lakes engaged in sufficient production-related activity to be considered as part of the domestic industry. *Id.* at 8-9. The Commission ultimately concluded that Great Lakes did engage in sufficient production-related activity, although it found the “issue to be a close one”; Great Lakes’ activities, the Commission stated, were “substantially similar in nature to those of some other U.S. producers.” *Id.* at 9. All domestic RBAO producers imported all their raw material, crude BAO, because there was no domestic production of crude BAO. *Id.* at 9.

⁴⁶ *Original Determination*, USITC Pub. 3643 at 9–11.

⁴⁷ *First Review Determination*, USITC Pub. 4063 at 5; *Second Review Determination*, USITC Pub. 4492 at 6; *Third Review Determination*, USITC Pub. 5020 at 8.

⁴⁸ Response at 21; Comments at 3. Although Imerys Niagara Falls is affiliated with a Chinese producer, Imerys Fused Minerals, China, Imerys Niagara Falls did not import RBAO from China during the POR. *Id.*

⁴⁹ Response at 21.

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 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.”⁵⁰ 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.”⁵¹ Thus, the likelihood standard is prospective in nature.⁵² 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.⁵³

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

⁵⁰ 19 U.S.C. § 1675a(a).

⁵¹ 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.

⁵² 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.

⁵³ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

time.”⁵⁴ 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.”⁵⁵

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.”⁵⁶ 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).⁵⁷ 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.⁵⁸

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.⁵⁹ 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

⁵⁴ 19 U.S.C. § 1675a(a)(5).

⁵⁵ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

⁵⁶ 19 U.S.C. § 1675a(a)(1).

⁵⁷ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to this order. *Refined Brown Aluminum Oxide from the People’s Republic of China*, 90 Fed. Reg. at 23675 and accompanying IDM at 3.

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

⁵⁹ 19 U.S.C. § 1675a(a)(2).

country, which can be used to produce the subject merchandise, are currently being used to produce other products.⁶⁰

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.⁶¹

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.⁶² All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.⁶³

No respondent interested party participated in this expedited review. The record, therefore, contains limited new information with respect to the RBAO industry in China. There also is limited information about the market for RBAO in the United States during the POR. Accordingly, for our determination, we rely as appropriate on the facts available from the

⁶⁰ 19 U.S.C. § 1675a(a)(2)(A-D).

⁶¹ 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.

⁶² 19 U.S.C. § 1675a(a)(4).

⁶³ 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.

original investigation and the prior reviews, and the limited new information on the record in this fourth five-year review, including publicly available information that has been placed on the record of 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 “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁶⁴ The following conditions of competition inform our determination.

1. Demand Conditions

Original Investigation. The Commission found that RBAO was used in refractory applications for lining crucibles and furnaces, in bonded/coated applications for abrasives, and in general, industrial applications for surface preparation.⁶⁵ The Commission observed that demand for RBAO declined over the POI. This decline was reportedly caused by factors such as an overall deterioration in the economy, weak conditions in the refractory and steel industries, and increasing imports of downstream products.⁶⁶ Apparent U.S. consumption declined by *** percent between 2000 and 2001 and by *** percent between 2001 and 2002. Apparent U.S. consumption was *** percent lower in interim 2003 than in interim 2002.⁶⁷

Prior Reviews. Apparent U.S. consumption increased between the original investigation and the first review,⁶⁸ but it decreased in subsequent reviews, from 167,086 short tons in 2007 to 134,645 short tons in 2013, and 127,992 short tons in 2018.⁶⁹

⁶⁴ 19 U.S.C. § 1675a(a)(4).

⁶⁵ *Original Determination*, USITC Pub. 3643 at 3.

⁶⁶ *Original Determination*, USITC Pub. 3643 at 12.

⁶⁷ *Confidential Original Determination*, EDIS Doc. 846569 at 17. Apparent U.S. consumption was *** short tons in 2002. CR/PR at Table 1.4. The Commission acknowledged that the decline in apparent U.S. consumption may have been overstated due to the misclassification of refined and crude brown aluminum oxide and the inclusion of white and pink aluminum oxide in the relevant HTSUS subheadings. *Id.* at n.68. Since 2005, white and pink aluminum oxide have been imported under a statistical reporting number different from the one used for RBAO. *Id.* at 1.5 n.27.

⁶⁸ Apparent U.S. consumption was *** short tons in 2002. CR/PR at Table 1.4.

⁶⁹ CR/PR at Table 1.4. In the first review, the Commission observed that industry publications treat industrial and abrasives end uses for RBAO as a single abrasives market. *First Review Determination*, USITC Pub. 4063 at 8 n.36. In the second review, the Commission noted that, due to improvements in technology, growth in portions of the U.S. manufacturing sector may not translate into

In the current review, U.S. demand continues to be derived from demand for products used in the abrasives and refractories market.⁷⁰ The Domestic Producers indicate that there have been no significant changes in demand since 2018, and responding purchasers *** indicate that there have been no significant changes in demand conditions since 2020.⁷¹

Apparent U.S. consumption was *** short tons in 2024, down from 127,922 short tons in 2018.⁷²

2. Supply Conditions

Original Investigation. The Commission found that all domestic producers of RBAO, other than Washington Mills, purchased all of their crude brown aluminum oxide from foreign sources.⁷³ The Commission noted several changes in the domestic industry during the POI, including Washington Mills' acquisition of the RBAO operations of domestic producer Exolon-ESK Co., domestic producer 3M's cessation of RBAO production in 2002, and the beginning of domestic RBAO production by C-E Minerals in 2002.⁷⁴ Finally, the Commission observed that the volume of nonsubject imports declined over the POI.⁷⁵

Prior Reviews. The domestic industry underwent several structural changes following imposition of the antidumping duty order. During the first review period Washington Mills sold one of its two U.S. production facilities,⁷⁶ and Great Lakes ceased importing subject merchandise and increased its domestic production of RBAO. Although Chinese producers of

increased demand for RBAO. *Second Review Determination*, USITC Pub. 4492 at 10. In the third review, the Domestic Producers predicted that domestic demand for RBAO would continue to be flat. *Third Review Determination*, USITC Pub. 5020 at 12.

⁷⁰ Response at 20.

⁷¹ Response at 12 and 20; CR/PR at D.3; Comments at 4.

⁷² CR/PR at Table 1.4. Apparent U.S. consumption in the current review and all prior reviews is understated relative to that in the original investigation because responding domestic producers accounted for all domestic production in the original investigation, compared to 80.0 percent of domestic production in 2007, *** percent in 2013, *** percent in 2018, and *** percent during 2024. *Id.* at 1.8-1.9.

⁷³ *Original Determination*, USITC Pub. 3643 at 13. Washington Mills purchased crude brown aluminum oxide at low prices from the Defense Logistics Agency in 2001 and 2002. *Id.* There was no domestic production of crude brown aluminum oxide during the period of investigation. *Id.*

⁷⁴ *Original Determination*, USITC Pub. 3643 at 12-13.

⁷⁵ *Original Determination*, USITC Pub. 3643 at 13. The Commission acknowledged that the data regarding the decline in nonsubject imports may have been the result of the misclassification of refined and crude brown aluminum oxide and the inclusion of white and pink aluminum oxide in the relevant HTSUS subheadings. *Id.* at 13-14.

⁷⁶ *First Review Determination*, USITC Pub. 4063 at 8-9.

RBAO were constrained by production difficulties during the POR, the Chinese RBAO industry remained the largest in the world.⁷⁷ The Commission noted no major changes during the second review period.⁷⁸ During the third review period, FX Minerals purchased Imerys Fused Minerals' RBAO-producing facilities in Newell, West Virginia, in 2015.⁷⁹

The volume of subject imports declined during the first review period.⁸⁰ In the second review period, the domestic industry was the largest supplier of RBAO to the U.S. market in 2013, followed by nonsubject imports, which were principally from Canada, Austria, and Brazil. Subject imports had a very small presence in the market in 2013.⁸¹ The domestic industry was the largest supplier of RBAO to the U.S. market in 2018, followed by nonsubject imports which were principally from Austria.⁸²

Current Review. The information available indicates that there were no major structural changes in the domestic industry, with Domestic Producers reporting six U.S. producers of RBAO.⁸³ The domestic industry again accounted for the largest share of apparent U.S. consumption of RBAO in 2024, at *** percent.⁸⁴ In addition, the Domestic Producers and responding purchaser *** reported that there have been no changes in the supply conditions for RBAO during the period of review.⁸⁵

Subject imports accounted for *** percent of apparent U.S. consumption in 2024.⁸⁶ Nonsubject imports accounted for *** percent of apparent U.S. consumption in 2024.⁸⁷ Of the

⁷⁷ *First Review Determination*, USITC Pub. 4063 at 9.

⁷⁸ *Second Review Determination*, USITC Pub. 4492 at 12-13.

⁷⁹ *Third Review Determination*, USITC Pub. 5020 at 13. The purchased assets were previously operated under C-E Minerals, one of the petitioners in the original investigation and a participant in the prior reviews. *Id.* at 13 n.78.

⁸⁰ *First Review Determination*, USITC Pub. 4063 at 10.

⁸¹ *Second Review Determination*, USITC Pub. 4492 at 11.

⁸² *Third Review Determination*, USITC Pub. 5020 at 13.

⁸³ CR/PR at 1.9 and B.3. The producers are petitioners Great Lakes, Imerys Niagara Falls, Electrofused Minerals, and Washington Mills, as well as C-E Minerals, and Detroit Abrasives Company. Response at Ex. 8.

⁸⁴ CR/PR at Table 1.4. The domestic industry's share of apparent U.S. consumption in this review, and in all prior reviews, may be understated relative to that in the original investigation due to the lower data coverage of the domestic industry in each review period compared to the original investigation, as discussed in section III.B.1, above. CR/PR at 1.8-1.9.

⁸⁵ CR/PR at 1.9 and D.3; Response at 20.

⁸⁶ CR/PR at Table I.4.

⁸⁷ CR/PR at Table I.4.

nonsubject sources of RBAO, Austria was the largest source of supply in 2024, followed by Brazil and Japan.⁸⁸

3. Substitutability and Other Conditions

Prior Proceedings. In the original investigation, the Commission observed that all responding purchasers characterized price as a very important factor in their purchasing decisions.⁸⁹ Although quality was reported as the primary consideration for most purchasers, they also stated that the quality of the U.S. and Chinese products were comparable.⁹⁰ The record reflected that, overall, U.S. producers, importers, and purchasers reported that RBAO produced in the United States and China was generally interchangeable.⁹¹ Accordingly, the Commission found that there was a moderate-to-high degree of substitutability between RBAO from China and the domestic like product, and that price was an important factor for purchasing decisions.⁹² In each of the prior reviews, the Commission found that there was no new record evidence that warranted modification of its previous findings regarding substitutability or the importance of price in purchasing decisions.⁹³

Current Review. In the current review, there is no new information that warrants modification of our prior findings of a moderate-to-high degree of substitutability between subject imports and the domestic like product, or of the importance of price in purchasing decisions.⁹⁴ Accordingly, we again find that there is a moderate-to-high degree of substitutability between RBAO from China and the domestic like product, and that price continues to be an important factor in purchasing decisions.

Effective September 1, 2019, RBAO originating in China became subject to an additional 15 percent *ad valorem* duty pursuant to Section 301 of the Trade Act of 1974 (“section 301 tariffs”). Effective February 14, 2020, the section 301 duty for RBAO from China was reduced to 7.5 percent *ad valorem*.⁹⁵

⁸⁸ CR/PR at Table I.3.

⁸⁹ *Original Determination*, USITC Pub. 3643 at 13.

⁹⁰ *Original Determination*, USITC Pub. 3643 at 13.

⁹¹ *Original Determination*, USITC Pub. 3643, at 13.

⁹² *Original Determination*, USITC Pub. 3643 at 13.

⁹³ *First Review Determination*, USITC Pub. 4063 at 9; *Second Review Determination*, USITC Pub. 4492 at 11; *Third Review Determination*, USITC Pub. 5020 at 14.

⁹⁴ Response at 11-12 and 20; Comments at 4.

⁹⁵ 19 U.S.C. § 2411; CR/PR at 1.6 (citing HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter 3 of chapter 99, USITC, HTS (2025) Rev. 6, USITC Pub. 5607, Apr. 2025 at 99.3.96 to 99.3.109).

Effective February 4, 2025, RBAO originating in China was subject to an additional ten percent *ad valorem* duty under the International Emergency Economic Powers Act (“IEEPA”). Effective March 3, 2025, the duty was increased to 20 percent.⁹⁶

Responding purchaser ***, indicated that ***⁹⁷ ***.⁹⁸

C. Likely Volume of Subject Imports

1. The Prior Proceedings

In the original investigation, the volume of subject imports was 68,994 short tons in 2000, 80,547 short tons in 2001, and 57,172 short tons in 2002. In interim 2002 and interim 2003, the volumes of subject imports were 24,295 short tons and 22,073 short tons, respectively.⁹⁹ The market share of subject imports was *** percent in 2000, *** percent in 2001, and *** percent in 2002; subject imports’ market share was lower in interim 2003 than in interim 2002.¹⁰⁰ The ratio of subject import volume to domestic production was 55.7 percent in 2000, 71.0 percent in 2001, 51.9 percent in 2002, 52.2 percent in interim 2002, and 34.3 percent in interim 2003.¹⁰¹ The Commission found that the volume of subject imports, both in absolute terms and relative to production and apparent U.S. consumption, was significant.¹⁰²

In each of the prior reviews, the Commission has found that the volume of imports of RBAO from China would likely be significant in the reasonably foreseeable future if the order were revoked.¹⁰³ In the first review, the Commission found that the volume of subject imports declined sharply after the imposition of the order in November 2003, although there was a slight increase in subject import volume in 2007.¹⁰⁴ As a share of U.S. consumption, subject imports also sharply decreased, and represented 1.7 percent of apparent U.S. consumption in

⁹⁶ 50 U.S.C. § 1701, *et seq.*; CR/PR at 1.6 and n.30 (citing Exec. Order 14257, 90 Fed. Reg. 14257 (Apr. 2, 2025); Exec. Order 14228, 90 Fed. Reg. 11463 (Mar. 3, 2025)). RBAO from China is not subject to the reciprocal IEEPA tariffs that went into effect on April 5, 2025, and April 9, 2025. *Id.* at 1.6.

⁹⁷ In its response, ***. CR/PR at D.3; Response at Ex. 8.

⁹⁸ CR/PR at D.3.

⁹⁹ *Original Determination*, USITC Pub. 3643 at 14.

¹⁰⁰ *Confidential Original Determination*, EDIS Doc. 846569 at 20.

¹⁰¹ *Original Determination*, USITC Pub. 3643 at 14.

¹⁰² *Original Determination*, USITC Pub. 3643 at 14.

¹⁰³ *First Review Determination*, USITC Pub. 4063 at 11; *Second Review Determination*, USITC Pub. 4492 at 13; *Third Review Determination*, USITC Pub. 5020 at 16.

¹⁰⁴ *First Review Determination*, USITC Pub. 4063 at 10. Subject import volume decreased from 57,172 short tons in 2002, to 1,011 short tons in 2005, before increasing to 2,922 short tons in 2007. *Id.*

2007.¹⁰⁵ The Commission noted that the available data indicated that China's RBAO industry was the largest in the world at the time of the original investigation, and that China's production capacity had since grown significantly, surpassing U.S. consumption during the period of review.¹⁰⁶ The Commission found that China's RBAO industry was export oriented and that it was by far the world's largest exporter of fused aluminum oxide (a broader category that includes RBAO).¹⁰⁷ Also, the Commission observed that, since the imposition of the antidumping duty order, exports of RBAO from China to the United States fell sharply and exports of fused aluminum oxide to other destinations increased. The Commission found that, if the order on RBAO were revoked, Chinese producers would have an incentive to shift exports to the higher-value refined product, RBAO.¹⁰⁸

In the second review, the Commission found that the volume of subject imports had decreased since the prior review and was 1,373 short tons in 2013, and that subject imports accounted for 1.0 percent of apparent consumption.¹⁰⁹ In the third review, the Commission found that subject imports had increased to 3,710 short tons in 2018, despite apparent U.S. consumption being lower in 2018 than in 2013, representing 2.9 percent of apparent domestic consumption.¹¹⁰ In both the second and third reviews, GTA data for the most pertinent product category that included RBAO for which data was available demonstrated that China remained the world's largest exporter of products in the most narrowly defined categories that included RBAO.¹¹¹

¹⁰⁵ *First Review Determination*, USITC Pub. 4063 at 10.

¹⁰⁶ *First Review Determination*, USITC Pub. 4063 at 10-11.

¹⁰⁷ *First Review Determination*, USITC Pub. 4063 at 11. Although fused aluminum oxide included RBAO and out-of-scope products, it was the most narrowly defined product category that included RBAO for which data was available. *Id.* at 10. The Chinese industry's production capacity for fused aluminum oxide was 661,380 short tons in 2003 and 1,322,744 short tons in 2007, comprising 54.1 percent and 70.6 percent of global production capacity, respectively. *Id.* (citing Rachel Backus, *Uphill Struggle*, INDUSTRIAL MINERALS, Dec. 2017 at 33 and Asia Metal Ltd, *2007 Annual Report on Chinese Artificial Corundum Market*).

¹⁰⁸ *First Review Determination*, USITC Pub. 4063 at 11.

¹⁰⁹ *Second Review Determination*, USITC Pub. 4492 at 12-13.

¹¹⁰ *Third Review Determination*, USITC Pub. 5020 at 16.

¹¹¹ *Second Review Determination*, USITC Pub. 4492 at 13; *Third Review Determination*, USITC Pub. 5020 at 16. In the second review, the most narrowly defined product category that included RBAO for which data was available was fused aluminum oxide. *Second Review Determination*, USITC Pub. 4492 at 13 and n.80. In the *Second Review Determination*, the Commission found that the United States was a substantial export market for fused aluminum oxide and that at least some Chinese producers of fused aluminum oxide also produced RBAO. *Id.* at 13. In the *Third Review Determination*, the most narrowly defined HTS category that included RBAO was artificial corundum. *Third Review Determination*, USITC Pub. 5020 at 16.

2. The Current Review

The information available indicates that the volume of subject imports has decreased since 2018, but has increased as a share of U.S. apparent consumption, which decreased since 2018. The volume of subject imports increased irregularly during the period of review, falling from 1,150 short tons in 2019 to 548 short tons in 2020, then increasing to 1,302 short tons in 2021 and 2,549 short tons in 2022, then falling to 420 short tons in 2023, and sharply increasing to 3,075 short tons in 2024.¹¹² Subject imports accounted for *** percent of apparent U.S. consumption by quantity in 2024.¹¹³

The record in this review contains limited information on the subject industry in China. Nonetheless, the information available indicates that subject producers continue to have the ability and incentive to export subject merchandise to the U.S. market at significant volumes in the event of the revocation of the order. Although no subject producer responded to the Commission's questionnaire in this review, the Domestic Producers identified 20 possible producers of RBAO in China.¹¹⁴

¹¹² CR/PR at Table 1.3. The Domestic Producers have also submitted GTA data regarding artificial corundum, whether or not chemically defined, classified under HS subheading 2818.10, a category that includes both covered RBAO and out-of-scope products, which indicate that Chinese exports to the United States have increased irregularly over the period of review, rising from 77,306 metric tons in 2020 to 130,110 metric tons in 2021 to 172,262 metric tons in 2022, before falling to 112,215 metric tons in 2023, and rising to 132,881 metric tons in 2024. Response at 15 & Ex. 5.

¹¹³ CR/PR at Table 1.4.

¹¹⁴ CR/PR at 1.14; Response at Ex. 10.

In addition, available information indicates that subject producers have substantial capacity, with additional new capacity to become available in 2025.¹¹⁵ Specifically, more than 13 million tons of capacity are due to come online in 2025 for production of alumina in China.¹¹⁶

The information available also indicates that the subject foreign industry remains a large exporter.¹¹⁷ GTA data indicate that in 2024, China was responsible for 74.5 percent of global exports of artificial corundum, whether or not chemically defined, the most narrowly defined category that covers subject merchandise.¹¹⁸ Further, China was the largest exporter of such products by a significant margin in every year of the POR.¹¹⁹

The information available also indicates that the U.S. market remains attractive to subject producers. Despite the imposition of the section 301 tariffs in 2019, subject imports increased by 167.4 percent over the POR, indicating that subject producers have retained customers and distribution networks in the United States.¹²⁰ In addition, GTA data indicate that

¹¹⁵ The Domestic Producers state that they have identified eight additional subject producers in addition to those that the Commission identified in the *First Review Determination*. Response at 13-14 (citing *First Review Determination*, USITC Pub. 4063 at Table I-16). The available information indicates that many of these producers possess substantial capacity: Zibo JinYu Abrasive Co., Ltd., the sole participating mandatory respondent in Commerce's original investigation continues to produce RBAO and exports to over 20 countries; Zouping has an annual production capacity of 120,000 tons and exports to several countries, including the United States; Luoyang WeiXang Abrasives Co., Ltd. has an annual production capacity of more than 13,000 tons and exports to more than 10 countries; Yafeite has an annual production output value of more than 600 million Renminbi and exports to more than 50 countries; Pinglu Jinlang Refractory Materials Co., Ltd. is a primary brown fused alumina producer with an annual production capacity of 83,000 tons; and Jinyuan Jieda Abrasive Materials Co., Ltd. is a major brown fused alumina producer in Henan and has an annual production capacity of 27,000 tons. Response at 13-14 & Ex. 3.

¹¹⁶ CR/PR at Table 1.5; Response at 15 & Ex. 6; Comments at 7. In addition, available information indicates that some firms that had shut down production in late 2023 and early 2024 because of concerns about industrial pollution, resumed production in early 2024. CR/PR at 1.15; Response at 15 & Ex. 4. For example, Pinglu Kinlang Refractory Materials Co., Ltd. resumed production of brown fused alumina in January 2024, expecting an output of nearly 2,000 tons in January, and Jiyuan Jieda Abrasive Materials Co., resumed production of brown fused alumina in January 2024, expecting to produce about 600 tons in January and 3,500 tons in 2024. *Id.*

¹¹⁷ CR/PR at 1.17 & Tables 1.6 & 1.7.

¹¹⁸ CR/PR at 1.17 & Table 1.7.

¹¹⁹ CR/PR at Table 1.7. The quantity of global exports increased irregularly by 0.9 percent over the period of review. *Id.* at 1.17.

¹²⁰ *Derived from* CR/PR at Table 1.3; *id.* at 1.6.

the United States was the largest destination market for exports of artificial corundum from China from 2022 to 2024, and was the second-largest destination market from 2019 to 2021.¹²¹

In light of these considerations, including the significant volume and market share of subject imports during the original investigations, the continued and increasing presence of subject imports in the U.S. market during the period of review, the subject industry's large size and exports, and the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, if the order were revoked.^{122 123}

D. Likely Price Effects

1. The Prior Proceedings

In the original investigation, the Commission found that subject imports undersold the domestic like product in 46 of 56 quarterly price comparisons and by substantial margins, and on that basis found the underselling to be significant. The Commission observed that prices for the domestic like product and subject imports generally declined over the POI and found that a decline in raw material costs and weak demand for RBAO did not fully explain the decline in

¹²¹ CR/PR at Table 1.6; *see also* Response at 14 (stating "Chinese exports of RBAO had steadily increased since the last review period, notwithstanding the duties imposed pursuant to Section 301 of the Trade Act of 1974"). Exports of such merchandise increased irregularly over the POR, falling from 211,747 short tons in 2019 to 170,430 short tons in 2020, before rising to 286,840 short tons in 2021 to 379,768 short tons in 2022, before falling to 247,388 short tons in 2023, and then rising to 292,949 short tons in 2024. CR/PR at Table 1.6.

¹²² As discussed above, although subject imports were subject to an additional 15 percent duty *ad valorem* under section 301 from September 1, 2019, until February 14, 2020, and since then have been subject to an additional 7.5 percent duty *ad valorem*, such tariffs did not prevent an overall increase in the volume of subject imports over the period of review. CR/PR at Table 1.3 Table 1.6; Response at 14. Given the Chinese industry's large capacity and exports, the continued presence of subject imports from China in the U.S. market despite the imposition of section 301 duties, the uncertainty of the duration of the IEEPA tariffs, and the attractiveness of the U.S. market, we find that the section 301 and IEEPA duties would not likely prevent subject imports from China from increasing to significant levels if the order were revoked.

¹²³ The record of this expedited review contains no information on inventories of subject merchandise or the ability of subject producers to product shift. The information available also indicates that in November 2024, the European Union initiated an antidumping proceeding concerning imports of fused alumina, which includes RBAO, originating in China. CR/PR at 1.16.

domestic prices.¹²⁴ The Commission further found that there were substantial lost sales, and that subject imports depressed prices for the domestic like product.¹²⁵

In the first review, the record did not contain new confidential product-specific pricing data, though it did contain published data from a trade journal, *Industrial Minerals*.¹²⁶ The Commission attributed price increases for a small portion of subject imports to the imposition of the order, and was not persuaded by the argument that such price increases demonstrated that subject imports would not undersell the domestic like product if the order were revoked.¹²⁷

In the second and third reviews, the record did not contain new confidential product-specific pricing data.¹²⁸ In addition, in the second and third reviews, the Commission found that if the order were revoked, subject imports would again undersell the domestic like product at high margins as they did in the original investigation, which would in turn require the domestic industry either to lower prices or restrain price increases to prevent loss of sales.¹²⁹ Accordingly, the Commission concluded that, upon revocation, subject imports would likely significantly undersell the domestic like product and enter the United States at prices that would have significant price depressing or suppressing effects.¹³⁰

2. The Current Review

As discussed above in section III.B.3, we continue to find a moderate-to-high degree of substitutability between subject imports and domestically produced RBAO, and that price remains an important factor in purchasing decisions.

The record in this expedited review does not contain new product-specific pricing information. Based on the available information, including the moderate-to-high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the degree of underselling in the original investigation, we find that if the order were revoked, subject imports would likely undersell the domestic like product

¹²⁴ *Original Determination*, USITC Pub. 3643 at 16.

¹²⁵ *Original Determination*, USITC Pub. 3643 at 17.

¹²⁶ *First Review Determination*, USITC Pub. 4063 at 11-12 & I-9 n.25.

¹²⁷ *First Review Determination*, USITC Pub. 4063 at 12.

¹²⁸ *Second Review Determination*, USITC Pub. 4492, at 14; *Third Review Determination*, USITC Pub. 5020 at 18.

¹²⁹ *Second Review Determination*, USITC Pub. 4492, at 14; *Third Review Determination*, USITC Pub. 5020 at 18.

¹³⁰ *First Review Determination*, USITC Pub. 4063 at 12; *Second Review Determination*, USITC Pub. 4492 at 14; *Third Review Determination*, USITC Pub. 5020 at 18.

to a significant degree. 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 lower prices, as occurred in the original investigation, or restrain price increases, 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.

E. Likely Impact¹³¹

1. The Prior Proceedings

In the original investigation, the Commission found that most of the domestic industry's performance indicators were weak throughout the POI, with many worsening over the period of investigation. It found subject imports were present in the U.S. market in significant volumes, and at prices underselling the domestic like product by significant margins.¹³² The Commission recognized that declining demand for RBAO played a role in the domestic industry's worsening performance, but it found that demand could not fully explain the domestic industry's prices, limited market share, and performance. Accordingly, the Commission concluded that subject imports had a significant adverse impact on the domestic industry.¹³³

In the first review, the record contained limited information about the domestic industry. The Commission found that the domestic industry experienced some positive effects as a result of the order, including increased capacity, production, capacity utilization, shipments, and net sales, as well as a slight improvement in financial performance. The Commission concluded that the limited information on the record did not permit a finding of vulnerability, but that intensified competition with subject imports that would likely occur after revocation of the order would likely have a significant adverse impact on the domestic industry, especially in an anticipated period of declining demand.¹³⁴

In both the second and third reviews, the Commission also concluded that the limited record available on the domestic industry's performance was insufficient for it to make a

¹³¹ In its expedited review of the antidumping duty order, Commerce determined that revocation of the antidumping order would likely result in the continuation or recurrence of dumping with margins of up to 135.18 percent. *Refined Brown Aluminum Oxide from the People's Republic of China*, 90 Fed. Reg. at 23676, June 4, 2025.

¹³² *Original Determination*, USITC Pub. 3643 at 17.

¹³³ *Original Determination*, USITC Pub. 3643 at 19.

¹³⁴ *First Review Determination*, USITC Pub. 4063 at 13.

vulnerability finding.¹³⁵ Based on the information available, however, in both reviews the Commission concluded that, if the order were revoked, subject imports would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which would, in turn, cause declines in its financial performance.¹³⁶ In addition, in both reviews, the Commission found that, although nonsubject imports had increased their market share relative to the last year of the original investigations, the domestic industry had also improved its financial performance since that time.¹³⁷ Thus, in the second and third reviews, the Commission found that subject imports would likely cause adverse effects on the domestic industry that were distinct from any effects attributable to nonsubject imports in the event of revocation.¹³⁸

2. The Current Review

The record in this review contains limited information concerning the domestic industry's performance since the original investigation. The information available indicates that, although some of the domestic industry's output indicators declined in 2024 relative to its performance in 2018, the last year examined in the third review, its financial performance was otherwise generally stronger.¹³⁹ In 2024, the domestic industry's capacity was *** short tons, its production was *** short tons, its U.S. shipments were *** short tons, and its capacity

¹³⁵ *Second Review Determination*, USITC Pub. 4492 at 15; *Third Review Determination*, USITC Pub. 5020 at 19-20.

¹³⁶ *Second Review Determination*, USITC Pub. 4492 at 16; *Third Review Determination*, USITC Pub. 5020 at 20. In the *Second Review Determination*, the Domestic Producers asserted that these adverse effects would be exacerbated by declining or stagnant demand for RBAO since the original investigation. *Id.*

¹³⁷ *Second Review Determination*, USITC Pub. 4492 at 16; *Third Review Determination*, USITC Pub. 5020 at 20. In the *Second Review Determination* the Commission noted that the average unit volume ("AUV") of nonsubject imports were higher than those of the domestic industry, and in the *Third Review Determination*, the Commission found that the AUVs of Austria, the largest source of nonsubject imports for most years of the POR, were higher than subject imports for each year of the period of review. *Id.*

¹³⁸ *Second Review Determination*, USITC Pub. 4492 at 16; *Third Review Determination*, USITC Pub. 5020 at 20. In the *Third Review Determination*, the Commission noted that subject imports' market share was lower in 2018 than in prior proceedings, but it concluded that stagnant or depressed demand would likely exacerbate the adverse effects of subject imports.

¹³⁹ CR/PR at Table 1.2. As discussed in section III.B.1 above, the domestic industry data coverage in this review is identical to the coverage in the third review. *Id.* at 1.8-1.9.

utilization was *** percent, which were all lower than in 2018.¹⁴⁰ In contrast, the AUV of the industry's U.S. shipments was \$*** per short ton in 2024, higher than in prior proceedings.¹⁴¹ In 2024, the domestic industry's share of apparent U.S. consumption of *** percent by quantity was also higher than in 2018.¹⁴² The industry's financial performance was stronger in 2024 than in 2018 by every measure. Specifically, the industry's net sales value of \$***, its ratio of cost-of-goods sold to net-sales value of *** percent, its operating income of \$***, and its operating income margin of *** percent, were all improved compared to 2018.¹⁴³ This limited information is insufficient for us to make a finding as to whether the domestic industry is vulnerable to 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 moderate-to-high degree of 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

¹⁴⁰ CR/PR at Table 1.2. The domestic industry's capacity was *** short tons in 2002, it was 250,000 short tons in 2007, 220,000 short tons in 2013, and 198,000 short tons in 2018. *Id.* The industry's production was *** short tons in 2002, 159,337 short tons in 2007, 114,675 short tons in 2013, and 103,778 short tons in 2018. *Id.* The industry's U.S. shipments were *** short tons in 2002, 154,103 short tons in 2007, 111,611 short tons in 2013, and 106,384 short tons in 2018. *Id.* The industry's capacity utilization was *** percent in 2002, 63.7 percent in 2007, 52.1 percent in 2013, and 52.4 percent in 2018. *Id.*

¹⁴¹ CR/PR at Table 1.2. The AUV of the domestic industry's domestic shipments was \$*** per short ton in 2002, \$564 per short ton in 2007, \$896 per short ton in 2013, and \$846 per short ton in 2018. *Id.*

¹⁴² CR/PR at Table 1.4. In 2002, the domestic industry's share of apparent U.S. consumption was *** percent by quantity, it was 92.2 percent in 2007, 82.9 percent in 2013, and 83.2 percent in 2018. *Id.*

¹⁴³ CR/PR at Table 1.2. In 2002, the domestic industry's net sales value was \$***, it was \$91.4 million in 2007, \$115.3 million in 2013, and \$101.1 million in 2018. *Id.* In 2002, the industry's COGS-to-net-sales ratio was *** percent, and it reported an operating income of \$***, which resulted in an operating income margin of *** percent. *Id.* In 2007, the industry's COGS-to-net-sales ratio was unavailable, but it reported an operating income of negative \$125,000, which resulted in an operating income margin of negative 0.1 percent. *Id.* In 2013, the industry's COGS-to-net-sales ratio was 90.6 percent, and it reported an operating income of \$5.7 million, which resulted in an operating income margin of 5.0 percent. *Id.* In 2018, the industry's COGS-to-net-sales ratio was 83.8 percent, and it reported an operating income of \$9.6 million, which resulted in an operating income margin of 9.5 percent. *Id.*

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, 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. Nonsubject imports decreased by 42.3 percent over the period of review, and they accounted for a smaller share of apparent U.S. consumption in 2024 than in 2018.¹⁴⁴ Thus, we find that 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.¹⁴⁵

In addition, we have also considered the likely effects of demand trends on the domestic industry. As discussed in section III.B.1. above, apparent U.S. consumption by quantity was lower in 2024 than in prior proceedings.¹⁴⁶ If demand were to remain stagnant or decline, the significant volume of low-priced subject imports that is likely if the order is revoked would exacerbate any negative effects caused by adverse demand trends by further reducing the industry's sales, increasing domestic producers' per-unit costs, and placing additional downward pressure price pressure on domestic producers.

Accordingly, we conclude that, if the order were revoked, subject imports would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

IV. Conclusion

For the foregoing reasons, we determine that revocation of the antidumping duty order on RBAO 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.

¹⁴⁴ CR/PR at Tables 1.3 & 1.4.

¹⁴⁵ CR/PR at Table 1.4.

¹⁴⁶ CR/PR at Table 1.4.

Information obtained in this review

Background

On February 3, 2025, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted a review to determine whether revocation of the antidumping duty order on refined brown aluminum oxide (“RBAO”) from China would be likely to lead to continuation or recurrence of material injury.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.³ ⁴ Table 1.1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
February 3, 2025	Notice of initiation by Commerce (90 FR 8789, February 3, 2025)
February 3, 2025	Notice of institution by Commission (90 FR 8812, February 3, 2025)
May 9, 2025	Commission’s vote on adequacy
June 4, 2025	Commerce’s results of its expedited review (90 FR, 23675)
July 3, 2025	Commission’s determination and views

¹ 19 U.S.C. 1675(c).

² 90 FR 8812, February 3, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of a five-year review of the subject antidumping duty order. 90 FR 8789, February 3, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

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

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

The original investigation

The original investigation resulted from a petition filed on November 20, 2002, with Commerce and the Commission by Washington Mills Company, Inc. (“Washington Mills”), North Grafton, Massachusetts.⁵ On November 27, 2002, the petition was amended to include two additional petitioners, C-E Minerals, King of Prussia, Pennsylvania, and Treibacher Schleifmittel Corporation (“Treibacher”), Niagara Falls, New York.⁶ On September 26, 2003, Commerce determined that imports of RBAO from China were being sold at less than fair value (“LTFV”).⁷ The Commission determined on November 10, 2003, that the domestic industry was materially injured by reason of LTFV imports of RBAO from China.⁸ On November 19, 2003, Commerce issued an antidumping duty order with a final weighted-average dumping margin of 135.18 percent.⁹

The first five-year review

On January 5, 2009, the Commission determined that it would conduct an expedited review of the antidumping duty order on RBAO from China.¹⁰ On January 23, 2009, Commerce determined that revocation of the antidumping duty order on RBAO from China would be likely to lead to continuation or recurrence of dumping.¹¹ On March 2, 2009, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹² Following affirmative determinations in the five-year review by Commerce and the Commission, effective March 13, 2009, Commerce issued a continuation of the antidumping duty order on imports of RBAO from China.¹³

⁵ Refined Brown Aluminum Oxide from China, Inv. No. 731-TA-1022 (Final), USITC Publication 3643, November 2003 (“Original publication”), p. 1.1.

⁶ 67 FR 71195, November 29, 2002; Original publication, p. 1.1.

⁷ 68 FR 55589, September 26, 2003.

⁸ 68 FR 64369, November 13, 2003. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on China.

⁹ 68 FR 65249, November 19, 2003.

¹⁰ 74 FR 1706, January 13, 2009.

¹¹ 74 FR 4138, January 23, 2009.

¹² 74 FR 9830, March 6, 2009.

¹³ 74 FR 10884, March 13, 2009.

The second five-year review

On May 9, 2014, the Commission determined that it would conduct an expedited review of the antidumping duty order on RBAO from China.¹⁴ On May 7, 2014, Commerce determined that revocation of the antidumping duty order on RBAO from China would be likely to lead to continuation or recurrence of dumping and subsidization.¹⁵ On October 1, 2014, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹⁶ Following affirmative determinations in the five-year review by Commerce and the Commission, effective October 14, 2014, Commerce issued a continuation of the antidumping duty order on imports of RBAO from China.¹⁷

The third five-year review

On December 9, 2019, the Commission determined that it would conduct an expedited review of the antidumping duty order on RBAO from China.¹⁸ On December 31, 2019, Commerce determined that revocation of the antidumping duty order on RBAO from China would be likely to lead to continuation or recurrence of dumping.¹⁹ On February 20, 2020, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.²⁰ Following affirmative determinations in the five-year review by Commerce and the Commission, effective March 6, 2020, Commerce issued a continuation of the antidumping duty order on imports of RBAO from China.²¹

¹⁴ 79 FR 48248, August 15, 2014.

¹⁵ 79 FR 26207, May 7, 2014.

¹⁶ 79 FR 60183, October 6, 2014.

¹⁷ 79 FR 61606, October 14, 2014.

¹⁸ 85 FR 3416, January 21, 2020.

¹⁹ 84 FR 72293, December 31, 2019.

²⁰ 85 FR 10723, February 25, 2020.

²¹ 85 FR 13138, March 6, 2020.

Previous and related investigations

RBAO has not been the subject of any prior related antidumping or countervailing duty investigations in the United States. However, on November 25, 2024, the Commission instituted preliminary phase antidumping and countervailing duty investigations regarding imports of sol gel alumina-based ceramic abrasive grains from China, a related product.²² On January 29, 2025, the Commission issued its determination that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of ceramic abrasive grains from China, and it gave notice of the commencement of the final phase of its investigations.²³

Commerce's five-year review

Commerce announced that it would conduct an expedited review with respect to the order on imports of RBAO from China with the intent of issuing the final results of this review based on the facts available not later than June 3, 2025.²⁴ 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 RBAO from China are noted in the sections titled "The original investigation" and "U.S. imports," if applicable.

²² 89 FR 95235, December 2, 2024.

²³ 90 FR 8810, February 3, 2025.

²⁴ Letter from Eric Greynolds, Office Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, March 21, 2025.

The product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise covered by this order is ground, pulverized or refined brown artificial corundum, also known as brown aluminum oxide or brown fused alumina, in grit size of 3/8 inch or less. Excluded from the scope of the order is crude artificial corundum in which particles with a diameter greater than 3/8 inch constitute at least 50 percent of the total weight of the entire batch. The scope includes brown artificial corundum in which particles with a diameter greater than 3/8 inch constitute less than 50 percent of the total weight of the batch. ²⁵

U.S. tariff treatment

Refined brown aluminum oxide (RBAO) is classifiable in the Harmonized Tariff Schedule of the United States ("HTS") under subheading 2818.10.20 and imported under statistical reporting number 2818.10.2090.^{26 27} RBAO imported from China enters the U.S. market at a column 1-general duty rate of 1.3 percent ad valorem.²⁸ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

²⁵ 85 FR 13138, March 6, 2020.

²⁶ USITC, HTS (2025) Revision 6, USITC Publication 5607, April 2025, p. 28.10.

²⁷ During the original investigation, the subject merchandise was imported under HTS statistical reporting number 2818.10.2000. Imports that entered the United States under this provision included not only refined brown aluminum oxide, but also items outside the scope of the investigation (e.g., white and pink refined aluminum oxide). Beginning in 2005, the white, pink, and ruby product is imported under HTS statistical reporting number 2818.10.2010 ("white, pink or ruby, containing more than 97.5 percent by weight of aluminum oxide"), and the subject merchandise is imported under HTS statistical reporting number 2818.10.2090.

²⁸ There is an active investigation before the Commission for Sol Gel Alumina-Based Ceramic Abrasive Grains from China, which also has subject merchandise imported under statistical reporting number 2818.10.2090 (as well as 2812.10.2010). Sol Gel Alumina-Based Ceramic Abrasive Grains from China, Inv. Nos. 701-TA-750 & 731-TA-1728 (Preliminary), USITC Publication 5581 (Feb. 2025) ("Sol Gel Alumina-Based Ceramic Abrasive Grains Preliminary Publication"), p. 1.6.

Effective September 1, 2019, RBAO produced in China is subject to an additional 15 percent ad valorem duty under Section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for RBAO was reduced to 7.5 percent ad valorem duty.²⁹

Effective February 4, 2025, RBAO originating in China was subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”). Effective March 3, 2025, the duty was increased to 20 percent.³⁰

RBAO originating in China is not subject to reciprocal tariffs that went into effect on April 5, 2025, and April 9, 2025.³¹

Description and uses³²

RBAO (also known as brown fused alumina grain or grits) is a solid inorganic chemical of the formula Al_2O_3 . It is a processed form of aluminum oxide (also referred to as alumina) found in mined bauxites. RBAO is processed from fused alumina, which is a granular material with a high density, low porosity, low permeability, and high refractoriness. Fused alumina (or fused aluminum oxide) is produced in various forms. During the original investigation, the most common form of alumina was reportedly brown fused alumina, which accounted for about two-thirds of the global market for fused alumina.^{33 34}

²⁹ See HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter 3 of chapter 99. USITC, HTS (2025) Revision 6, USITC Publication 5607, April 2025, p. 99.3.96 to 99.3.109.

³⁰ 90 FR 9121, February 7, 2025; 90 FR 11463, March 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 6, USITC Publication 5607, April 2025, pp. 99.3.3 and 99.3.4.

³¹ Effective April 5, 2025, most imports from China were subject to an additional 10 percent ad valorem reciprocal tariff under IEEPA, but rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. However, RBAO is not subject to the additional reciprocal tariffs. 90 FR 15041, April 7, 2025. See also HTS heading 9903.01.25, 9903.01.32, 9903.01.63, and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.4, 99.3.298, 99.3.299, and 99.3.304.

³² Unless otherwise noted, this information is based on Refined Brown Aluminum Oxide from China (Third Review), USITC Publication 5020, February 2020 (“Third review publication”), p. 1.6.

³³ During the first review, global annual production estimates for brown and white fused alumina were approximately 1 million short tons and 500,000 short tons, respectively.

³⁴ The U.S. Geological Survey (USGS) estimated U.S. production of crude fused aluminum oxide in 2024 at 25,000 metric tons (mt; 27,558 short tons) and U.S. imports of fused aluminum oxide at 120,000 mt (132,277 short tons). USGS, “Mineral Commodity Summaries: Abrasives (Manufactured),” January 2025, <https://pubs.usgs.gov/periodicals/mcs2025/mcs2025-abrasives.pdf>.

There are two main end-use applications for RBAO: abrasives and refractories.³⁵ RBAO is used in the manufacture of a variety of abrasive products, such as bonded abrasives (e.g., grinding wheels for high tensile materials), coated abrasives (e.g., paper, discs and belts for wood and metalworking), and surface preparation products (e.g., blast media, ceramic deburring tools, and cutting tools to roughen, shape, buff, polish, or finish a work piece). Refractory applications include use in the linings of furnaces and ovens. Abrasives account for about 60 percent of the worldwide demand for RBAO, with refractory uses accounting for the bulk of the remaining 40 percent. Other specialty uses for RBAO include pigments, chemical reagents, optical powders, and non-slip flooring and floor tiles.³⁶

Manufacturing process³⁷

Production of RBAO uses bauxite ores that have been oven dried at high heat (calcined) to drive off both free moisture and chemically combined water. The calcined bauxite is then heated (or fused) to its melting point (about 2,100 degrees Fahrenheit). The impurities, such as iron oxide, silica, and titania, are removed in the electric arc furnace (EAF) by melting the calcined bauxite in the presence of carbon and iron. The carbon reacts with the oxygen in the impurities to form carbon monoxide (CO) gas, and the impurities are reduced to their corresponding metals; the iron forms iron salts (e.g., ferrosilicates). Both the precipitate metals and iron salts are denser than aluminum oxide and settle to the bottom of the melt. The brown aluminum oxide ingot is cooled and removed from the vessel. Impurities are subsequently removed from the bottom of the ingot, and the resultant brown aluminum oxide is then refined (crushed, ground, and screened) into specific particle sizes. In general, the more uniform the end product is in size, the more difficult and expensive it is to manufacture RBAO. The sized material is packaged for shipping to end users and distributors. RBAO is produced in separate

³⁵ In the original investigation, the Commission reported that there were three main end-use markets: refractories, abrasives, and industrial. It also reported that the refractory market was the largest end-use market, consisting of comparatively fewer customers requiring large quantities of relatively coarser RBAO.

³⁶ RBAO end-use applications do overlap some with those of white-fused aluminum oxide grains and sol-gel alumina ceramic abrasive grains. However, it is generally recognized that there is a performance distinction between the differing types of alumina. Sol Gel Alumina-Based Ceramic Abrasive Grains Preliminary Publication, pp. 1.8 to 1.9.

³⁷ Unless otherwise noted, this information is based on Third review publication, p. 1.7. The manufacturing process, sometimes referred to as “traditional methods,” is what differentiates in-scope RBAO from in-scope alumina grains in the current USITC investigations of sol gel alumina-based ceramic abrasive grains from China. Sol Gel Alumina-Based Ceramic Abrasive Grains Preliminary Publication, pp. 1.11 to 1.15.

facilities from white and pink aluminum oxide to avoid contaminating those products with RBAO.³⁸

Traditionally, spent RBAO was transported to landfills for final disposal. However, up to 30 percent of fused aluminum oxide is reportedly recycled back into the manufacturing process in North America. During the first five-year review, domestic RBAO producer Washington Mills developed a process to collect spent aluminum oxide grains and recycle the spent product back into its aluminum oxide furnaces located in Canada. The process takes spent aluminum oxide, blends it with new bauxite, and the mixture is then fed into specially designed furnaces that melt and purify the resulting liquid product. This recycling process reportedly enabled Washington Mills to reduce costs.

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 five firms, which accounted for 100 percent of production of RBAO in the United States during 2002.³⁹ During the first five-year review, domestic interested parties provided a list of six known and currently operating U.S. producers of RBAO. Four responding firms accounted for approximately 80 percent of production of RBAO in the United States during 2007.⁴⁰ During the second five-year review, domestic interested parties provided a list of six known and currently operating U.S. producers of RBAO. Five responding firms accounted for approximately *** percent of production of RBAO in the United States during 2013.⁴¹ During the third five-year review, domestic interested parties provided a list of six known and currently operating U.S. producers of RBAO. Four responding firms accounted for *** percent of production of RBAO in the United States during 2018.⁴²

³⁸ Domestic producers Washington Mills and Treibacher reported in the original investigation that they produced the brown and white products in separate facilities.

³⁹ Original publication, p. 1.1.

⁴⁰ Refined Brown Aluminum Oxide from China (Review), USITC Publication 4063, March 2009 (“First review publication”), p. 1.3 n.4.

⁴¹ Refined Brown Aluminum Oxide from China (Second Review), Confidential Report, INV-MM-086, August 29, 2014, as revised in INV-MM-089, September 16, 2014, pp. 1.3 n.4 and 1.21.

⁴² Refined Brown Aluminum Oxide from China (Third Review), Confidential Report, INV-RR-127, November 25, 2019, p. 1.8.

In response to the Commission's notice of institution in this current review, domestic interested parties provided a list of six known and currently operating U.S. producers of RBAO. Four firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of RBAO in the United States during 2024.⁴³

Recent developments

Since the continuation of the orders, there were no major developments in the RBAO industry identified by interested parties in this proceeding, and no relevant information from outside sources was found.⁴⁴

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 1.2 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.

⁴³ Domestic interested parties' response to the notice of institution, March 5, 2025, p. 19; Domestic interested parties' revised response to the notice of institution, April 25, 2025, exh. 1.

⁴⁴ Domestic interested party's response to the notice of institution, March 5, 2025, p. 20.

Table 1.2 RBAO: 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; NA = not available

Item	Measure	2002	2007	2013	2018	2024
Capacity	Quantity	***	250,000	220,000	198,000	***
Production	Quantity	***	159,337	114,675	103,778	***
Capacity utilization	Ratio	***	63.7	52.1	52.4	***
U.S. shipments	Quantity	***	154,103	111,611	106,384	***
U.S. shipments	Value	***	86,969	99,971	90,040	***
U.S. shipments	Unit value	***	564	896	846	***
Net sales	Value	***	91,447	115,282	101,113	***
COGS	Value	***	NA	104,446	84,763	***
COGS to net sales	Ratio	***	NA	90.6	83.8	***
Gross profit or (loss)	Value	***	NA	10,836	15,860	***
SG&A expenses	Value	***	NA	5,120	6,268	***
Operating income or (loss)	Value	***	(125)	5,716	9,592	***
Operating income or (loss) to net sales	Ratio	***	(0.1)	5.0	9.5	***

Source: For the years 2002-18, data are compiled using data submitted in the Commission's original investigation and first, second, and third five-year reviews. For the year 2024, data are compiled using data submitted by domestic interested parties. Domestic interested parties' revised response to the notice of institution, April 25, 2025, exh. 1.

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

Note: In the original investigation, the Commission excluded Great Lakes Minerals from the domestic industry. Thus, 2002 U.S. industry data do not include Great Lakes Minerals.

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.⁴⁵

⁴⁵ 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 the domestic like product as all merchandise corresponding to Commerce's scope, as well as any brown aluminum oxide where particles with a diameter greater than 3/8 inch constitute at least 50 percent of the total weight of the entire batch, as long as the product has been crushed, screened, and sorted into consistent sizes. In its original determination, the Commission defined the domestic industry as all U.S. producers of RBAO, with the exception of Great Lakes Minerals, which was excluded from the domestic industry as a related party. In its expedited first, second, and third five-year review determinations, the Commission defined the domestic industry as consisting of all domestic producers of RBAO.⁴⁶

U.S. importers

During the final phase of the original investigation, the Commission received U.S. importer questionnaires from 14 firms believed to have accounted for virtually all imports of RBAO from China during 2002.⁴⁷ Import data presented in the original investigation are based on questionnaire responses for China and official Commerce statistics for other sources. Although the Commission did not receive responses from any respondent interested parties in its first five-year review, the domestic interested parties provided a list of seven firms that may have imported RBAO from China.⁴⁸ Import data presented in the first review are based on official Commerce statistics. In both the second and third five-year reviews, the Commission did not receive responses from any respondent interested parties. However, in both the second and third five-year reviews, the domestic interested parties noted that, although they do not know of all the importers of RBAO from China, the companies identified as importers in the first review might continue to import RBAO into the United States.⁴⁹ Import data presented in the second and third 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 seven potential U.S. importers of RBAO.⁵⁰

⁴⁶ 90 FR 8812, February 3, 2025.

⁴⁷ Original publication, p. 4.1.

⁴⁸ First review publication, p. 1.24.

⁴⁹ Refined Brown Aluminum Oxide from China (Second Review), USITC Publication 4492, October 2014 ("Second review publication"), p. 1.23; Third review publication, p. 1.11.

⁵⁰ Domestic interested parties' revised response to the notice of institution, March 13, 2025, exh. 1.

U.S. imports

Table 1.3 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 2024 imports by quantity).

Table 1.3 RBAO: U.S. imports, by source and period

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

U.S. imports from	Measure	2019	2020	2021	2022	2023	2024
China	Quantity	1,150	548	1,302	2,549	420	3,075
Austria	Quantity	3,400	3,528	4,593	4,179	2,422	3,018
Brazil	Quantity	3,160	2,410	778	350	1,224	1,074
Japan	Quantity	1,509	1,397	1,406	1,707	1,188	805
All other sources	Quantity	4,673	2,336	2,631	2,916	1,982	2,462
Nonsubject sources	Quantity	12,742	9,672	9,408	9,152	6,817	7,358
All import sources	Quantity	13,892	10,219	10,709	11,701	7,236	10,433
China	Value	3,201	2,007	2,701	5,718	1,759	4,934
Austria	Value	9,350	9,536	12,655	14,981	8,378	10,403
Brazil	Value	2,472	1,916	621	271	1,256	1,281
Japan	Value	1,852	1,574	1,908	3,190	2,119	1,427
All other sources	Value	7,067	4,001	7,041	6,221	3,982	5,477
Nonsubject sources	Value	20,741	17,027	22,226	24,663	15,734	18,587
All import sources	Value	23,942	19,033	24,927	30,381	17,493	23,521
China	Unit value	2,783	3,665	2,075	2,243	4,189	1,604
Austria	Unit value	2,750	2,703	2,755	3,585	3,458	3,447
Brazil	Unit value	782	795	798	773	1,026	1,193
Japan	Unit value	1,227	1,127	1,358	1,869	1,783	1,772
All other sources	Unit value	1,512	1,713	2,676	2,133	2,009	2,225
Nonsubject sources	Unit value	1,628	1,760	2,363	2,695	2,308	2,526
All import sources	Unit value	1,723	1,863	2,328	2,596	2,417	2,254

Source: Compiled from official Commerce statistics for HTS statistical reporting number 2818.10.2090, accessed March 10, 2025.

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

Apparent U.S. consumption and market shares

Table 1.4 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.4 RBAO: 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	2024
U.S. producers	Quantity	***	154,103	111,611	106,384	***
China	Quantity	68,864	2,922	1,373	3,710	3,075
Nonsubject sources	Quantity	9,673	10,061	21,661	17,828	7,358
All import sources	Quantity	78,536	12,983	23,034	21,538	10,433
Apparent U.S. consumption	Quantity	***	167,086	134,645	127,922	***
U.S. producers	Value	***	86,969	99,971	90,040	***
China	Value	22,057	1,387	1,781	5,766	4,934
Nonsubject sources	Value	5,763	17,031	28,905	28,297	18,587
All import sources	Value	27,820	18,418	30,686	34,064	23,521
Apparent U.S. consumption	Value	***	105,387	130,657	124,104	***
U.S. producers	Share of quantity	***	92.2	82.9	83.2	***
China	Share of quantity	***	1.7	1.0	2.9	***
Nonsubject sources	Share of quantity	***	6.0	16.1	13.9	***
All import sources	Share of quantity	***	7.8	17.1	16.8	***
U.S. producers	Share of value	***	82.5	76.5	72.5	***
China	Share of value	***	1.3	1.4	4.7	***
Nonsubject sources	Share of value	***	16.2	22.1	22.8	***
All import sources	Share of value	***	17.5	23.5	27.5	***

Source: For the years 2002-18, U.S. producers' U.S. shipments data are compiled using data submitted in the Commission's original investigation and first, second, and third five-year reviews. For the year 2024, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution. Domestic interested parties' revised response to the notice of institution, April 25, 2025, exh. 1. For the year 2002, U.S. import data for China are compiled from data submitted in the Commission's original investigation and import data for all other sources are compiled using official Commerce statistics. For years 2007-2018, U.S. import data are compiled using official Commerce statistics. For the year 2024, U.S. import data are compiled using official Commerce statistics under HTS statistical reporting number 2818.10.2090, accessed March 10, 2025.

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 2002, apparent U.S. consumption is derived from U.S. shipments of imports from China, rather than U.S. imports.

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

The industry in China

Producers in China

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from 13 firms.⁵¹ The Commission did not receive responses from any respondent interested parties in its first, second, or third five-year reviews. During the first five-year review, the domestic interested parties provided a list of 11 known producers of RBAO in China.⁵² During the second five-year review, the domestic interested parties provided a list of more than 150 Chinese producers of brown fused alumina, indicating that these firms either themselves produce RBAO or would supply feedstock to RBAO producers.⁵³ During the third review, the domestic interested parties noted that Chinese producers of brown fused alumina – which either themselves produce RBAO and/or would supply feedstock to RBAO producers – are listed in Table 1.6 in the Commission’s first review publication.⁵⁴

Although the Commission did not receive responses from any respondent interested parties in this five-year review, the domestic interested parties provided a list of 20 possible producers of RBAO in China.⁵⁵

Recent developments

Table 1.5 presents events in the Chinese industry since the Commission’s third five-year review.

⁵¹ Original publication, p. 7.1.

⁵² First review publication, p. 1.50

⁵³ Second review publication, p. 1.35.

⁵⁴ Third review publication, p. 1.14.

⁵⁵ Domestic interested parties’ response to the notice of institution, March 5, 2025, exh. 1.

Table 1.5 RBAO: Developments in the Chinese industry

Item	Firm	Event
Production Resumption	Jiyuan Jieda Abrasive Materials Co., Ltd.	January 2024: Jiyuan Jieda Abrasive Materials resumed production of brown fused alumina in January 2024, expecting to produce about 600 tons for the month. Jiyuan Jieda expected to produce approximately 3,500 tons in 2024.
Production Resumption	Pinglu Jinlang Refractory Materials Co., Ltd.	January 2024: Pinglu Jinlang Refractory Materials resumed production of brown fused alumina, expecting to produce about 2,000 tons in January.
Expansion	Industry-wide	November 2024: Shanghai Metals Market reports that more than 13 million tons of new alumina capacity in China is due to come online in 2025.

Source: Reuters, “New Alumina Supplies in 2025 Poised to Rupture Record Price Rally,” November 14, 2024, <https://www.reuters.com/markets/commodities/new-alumina-supplies-2025-poised-rupture-record-price-rally-2024-11-15/>; Domestic interested party’s response to the notice of institution, March 4, 2025, exh. 4, p. 15.

Exports

Table 1.6 presents export data for artificial corundum, whether or not chemically defined, a category that includes RBAO and out-of-scope products, from China (by export destination in descending order of quantity for 2024).

Table 1.6 Artificial corundum, whether or not chemically defined: Quantity of exports from China, by destination and period

Quantity in short tons (1,000 pounds)

Destination market	2019	2020	2021	2022	2023	2024
United States	211,747	170,430	286,840	379,768	247,388	292,949
Japan	282,069	211,898	329,708	271,590	241,722	261,410
India	138,718	126,737	179,352	181,231	223,275	208,501
South Korea	130,001	123,021	152,898	140,141	155,994	192,121
Netherlands	44,323	45,094	208,281	168,398	100,866	171,983
Turkey	49,489	58,211	66,456	77,804	91,637	93,715
Taiwan	75,073	84,951	98,810	72,538	69,025	86,529
Thailand	59,128	53,899	65,516	60,766	56,571	66,373
Italy	56,499	41,088	45,940	47,130	39,539	59,380
Germany	47,072	44,886	41,195	49,100	56,856	58,886
All other exporters	475,815	412,405	488,133	474,307	573,379	535,934
All exporters	1,569,934	1,372,619	1,963,129	1,922,772	1,856,253	2,027,782

Source: Official exports statistics and official global imports statistics from Russia and Ukraine (constructed exports) under HS subheading 2818.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed March 6, 2025. These data may be overstated as HS subheading 2818.10 contains products outside the scope of this review.

Note: As of March 6, 2025, several countries have not reported data for full year 2024, so some values may be understated. Because of rounding, figures may not add to totals shown.

Third-country trade actions

Based on available information, RBAO from China has not been subject to other antidumping or countervailing duty investigations outside the United States. However, on November 21, 2024, the European Union initiated an antidumping proceeding concerning imports of fused alumina, which includes RBAO originating in the People’s Republic of China.⁵⁶

⁵⁶ European Commission, “Case AD720 - Fused alumina,” Trade Defence Investigations, accessed March 12, 2025, <https://tron.trade.ec.europa.eu/investigations/case-view?caseId=2757>. Note that this scope also contains alumina-based ceramic abrasive grains produced via the sol-gel method; a product that currently is part of a separate Commission investigation. Sol Gel Alumina-Based Ceramic Abrasive Grains Preliminary Publication, p. 7.11.

The global market

Table 1.7 presents global export data for artificial corundum, whether or not chemically defined, a category that includes RBAO and out-of-scope products (by source in descending order of quantity for 2024). From 2019 to 2024, the quantity of global exports increased irregularly by 0.9 percent from 2019 to 2024, as there were notable fluctuations during the period. China was the largest exporter. In 2024, three quarters (74.5 percent) of global exports of artificial corundum were from China. Since the previous review, Russia has fallen out of the top ten position (previously the seventh largest global exporter in this category); however, Ukraine has continued to maintain its position as the eighth largest source of global exports in this category during the period.⁵⁷ During the period of this review, two countries—the Netherlands and France—became the second and third largest exporters of artificial corundum, representing 4 and 3 percent, respectively, of global exports in 2024 (neither were top ten exporters during the previous review). As shown in table 1.7, France was not an exporter of artificial corundum prior to 2021; however, by 2024 it was the third largest global exporter. Imerys S.A., a French company headquartered in Paris, is the complainant in the current EU antidumping the proceeding initiated in late 2024 that is cited in the third-country trade actions section above.⁵⁸

⁵⁷ Third review publication, p. 1.16.

⁵⁸ Imerys S.A. is the world's largest supplier of electrically fused aluminum oxide products. This multinational company has 28 industrial and offices in France. Imerys, "2023, Universal Registration Document," March 26, 2024, p. 35; Imerys, "Imerys France," accessed March 25, 2025, <https://www.imerys.com/france#:~:text=an%20alternative%20orange.-,28,in%20Lyon%20and%20Toulouse>

Table 1.7 Artificial corundum, whether or not chemically defined: Quantity of global exports by country and period

Quantity in short tons (1,000 pounds)

Exporting country	2019	2020	2021	2022	2023	2024
China	1,569,934	1,372,619	1,963,129	1,922,772	1,856,253	2,027,782
Netherlands	35,919	36,264	101,131	159,876	67,140	100,023
France	—	—	109,532	89,689	72,707	72,391
Germany	101,595	87,692	110,007	117,266	86,787	69,275
Hungary	82,361	63,038	78,832	65,754	40,154	54,722
Slovenia	60,766	70,712	93,416	82,508	40,785	51,735
Brazil	299,408	55,359	59,270	72,134	52,229	51,199
Ukraine	66,882	60,476	78,823	40,391	31,940	44,710
Italy	69,806	74,753	74,293	65,103	48,492	43,811
Canada	42,475	40,534	50,490	41,346	44,130	42,751
All other exporters	366,730	325,275	398,713	343,591	227,506	162,133
All exporters	2,695,877	2,186,721	3,117,636	3,000,430	2,568,125	2,720,532

Source: Official exports statistics and official global imports statistics from Russia and Ukraine (constructed exports) under HS subheading 2818.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed March 6, 2025. These data may be overstated as HS subheading 2818.10 contains products outside the scope of this review.

Note: As of March 6, 2025, several countries have not reported data for full year 2024, so some values may be understated. Because of rounding, figures may not add to totals shown.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
90 FR 8812 February 3, 2025	Refined Brown Aluminum Oxide From China; Institution of a Five-Year Review	https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02002.pdf
90 FR 8789 February 3, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02119.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject review. They were filed on behalf of the following entities: (1) Great Lakes Minerals, LLC (“Great Lakes Minerals”); (2) Imerys Niagara Falls, Inc. (“Imerys”);¹ (3) U.S. Electrofused Minerals, Inc. (“U.S. Electrofused Minerals”); and (4) Washington Mills, domestic producers of RBAO (collectively referred to herein as “domestic interested parties”).

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

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

Interested party type	Number	Coverage
U.S. producer	4	***%

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of RBAO during 2024. Domestic interested parties’ revised response to the notice of institution, April 25, 2025, 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 RBAO.²

¹ Imerys participated in the original investigation and first five-year review as Treibacher, a wholly owned subsidiary of the Imerys family of companies, headquartered in Paris, France. Before the second five-year review, Treibacher was renamed to Imerys Fused Minerals, and participated in the second and third five-year reviews as Imerys Fused Minerals Niagara Falls, Inc. Original publication, pp. 12 to 13; Second review publication, p. 1.17; Third review publication p. 1.1 to 1.2.

² Domestic interested parties’ comments on adequacy, April 15, 2025, p. 2.

Company-specific information

Table B.2 RBAO: 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	Great Lakes Minerals	Imerys	U.S. Electrofused Minerals	Washington Mills
Nature of operation	Yes	Yes	Yes	Yes
Statement of intent to participate	Yes	Yes	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes	Yes	Yes
U.S. producer list	Yes	Yes	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes	Yes	Yes
List of sources for national/regional prices	Not known	Not known	Not known	Not known
Trade/financial data	Yes	Yes	Yes	Yes
Changes in supply/demand	Yes	Yes	Yes	Yes
Complete response	Yes	Yes	Yes	Yes

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-2

RBAO: Summary data concerning the U.S. market (excluding all "domestic" data reported by Great Lakes),¹ 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 ton*; and period changes=*percent*, except where noted)

Item	Calendar year			January-June		Period changes			
	2000	2001	2002	2002	2003	2000-2002	2000-2001	2001-2002	Jan.-June 2002-Jan.-June 2003
U.S. consumption quantity: Amount	***	***	***	***	***	***	***	***	***
Producers' share ¹	***	***	***	***	***	***	***	***	***
Importers' share: ¹									
China (Great Lakes)	***	***	***	***	***	***	***	***	***
China (all other)	***	***	***	***	***	***	***	***	***
China (total)	***	***	***	***	***	***	***	***	***
Other sources	***	***	***	***	***	***	***	***	***
Total	***	***	***	***	***	***	***	***	***
U.S. consumption value: Amount	***	***	***	***	***	***	***	***	***
Producers' share ¹	***	***	***	***	***	***	***	***	***
Importers' share: ¹									
China (Great Lakes)	***	***	***	***	***	***	***	***	***
China (all other)	***	***	***	***	***	***	***	***	***
China (total)	***	***	***	***	***	***	***	***	***
Other sources	***	***	***	***	***	***	***	***	***
Total	***	***	***	***	***	***	***	***	***
U.S. shipments of imports from--									
China (Great Lakes) Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***
China (all other) Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***
China (total) Quantity	66,046	71,461	68,864	40,391	28,262	4.3	8.2	-3.6	-30.0
Value	21,796	22,456	22,057	12,772	9,939	1.2	3.0	-1.8	-22.2
Unit value	\$330.02	\$314.24	\$320.29	\$316.22	\$351.67	-2.9	-4.8	1.9	11.2
Ending inventory	29,858	38,487	29,983	24,151	17,605	0.4	28.9	-22.1	-27.1
Other sources: ² Quantity	52,247	28,632	9,673	5,489	3,948	-81.5	-45.2	-66.2	-28.1
Value	20,465	11,399	5,763	3,227	2,654	-71.8	-44.3	-49.4	-17.8
Unit value	\$391.70	\$398.14	\$595.83	\$587.81	\$672.16	52.1	1.6	49.7	14.3
Ending inventory	0	0	0	0	0	(3)	(3)	(3)	(3)
All sources: Quantity	118,293	100,093	78,536	45,880	32,210	-33.6	-15.4	-21.5	-29.8
Value	42,262	33,855	27,820	15,999	12,592	-34.2	-19.9	-17.8	-21.3
Unit value	\$357.26	\$338.24	\$354.23	\$348.71	\$390.95	-0.8	-5.3	4.7	12.1
Ending inventory	29,858	38,487	29,983	24,151	17,605	0.4	28.9	-22.1	-27.1

Table continued on next page.

(Quantity=Short tons; value=1,000 dollars; unit values, unit labor costs, and unit expenses are per ton; and period changes=percent, except where noted)

Item	Calendar year			January-June		Period changes			
	2000	2001	2002	2002	2003	2000-2002	2000-2001	2001-2002	Jan.-June 2002-Jan.-June 2003
U.S. producers'--									
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 (1,000 hours)	***	***	***	***	***	***	***	***	***
Wages paid (1,000 dollars)	***	***	***	***	***	***	***	***	***
Hourly wages	***	***	***	***	***	***	***	***	***
Productivity (tons per 1,000 hours)	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
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.

² U.S. imports from other sources.

³ Not applicable.

⁴ Undefined.

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

Source: Compiled from data submitted in response to Commission producer and importer (China) questionnaires and official Commerce statistics.

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 refined brown aluminum oxide: ***. Purchaser questionnaires were sent to these five firms and two firms (***) submitted a response to the Commission's request for information.

1. Have there been any significant changes in the supply and demand conditions for refined brown aluminum oxide that have occurred in the United States or in the market for refined brown aluminum oxide in China since January 1, 2020?

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

2. Do you anticipate any significant changes in the supply and demand conditions for refined brown aluminum oxide in the United States or in the market for refined brown aluminum oxide in China within a reasonably foreseeable time?

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

