

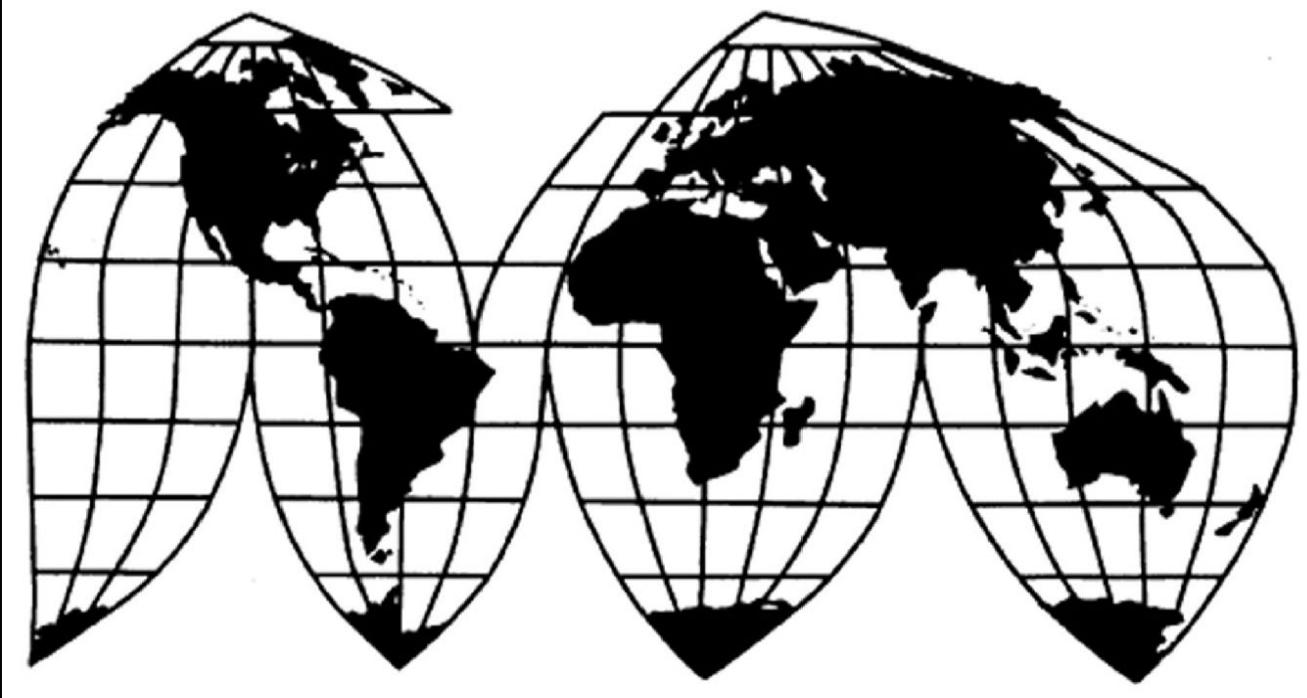
Certain Welded Large Diameter Line Pipe from Japan

Investigation No. 731-TA-919 (Fourth Review)

Publication 5689

December 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Note.—Information that would reveal confidential operations of individual firms may not be published.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-919 (Fourth Review)

Certain Welded Large Diameter Line Pipe from Japan

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 Certain Welded Large Diameter Line Pipe from Japan 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 September 3, 2024 (89 FR 71417) and determined on December 9, 2024, that it would conduct a full review (90 FR 6010, January 17, 2025). Notice of the scheduling of the Commission’s review and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on March 13 (90 FR 11995).² The Commission conducted its hearing on September 11, 2025. All persons who requested the opportunity were permitted to participate.

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

² Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in a subsequent notice published in the *Federal Register* on November 21, 2025 (90 FR 52696).

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 certain welded large diameter line pipe (“CWLDLP”) from Japan 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. The petition in the original investigations concerned CWLDLP from Japan and Mexico. On October 26, 2001, the Commission unanimously determined that an industry in the United States was materially injured by reason of less than fair value (“LTFV”) imports of CWLDLP from Japan,¹ and Commerce issued an antidumping duty order on subject imports from Japan on December 6, 2001.² On February 19, 2002, the Commission unanimously determined that an industry in the United States was materially injured by reason of LTFV imports of CWLDLP from Mexico, and Commerce issued an antidumping duty order on subject imports from Mexico on February 27, 2002.³

First Five-Year Review. The Commission instituted its first five-year reviews of the antidumping orders on November 1, 2006.⁴ In October 2007, after conducting full reviews, the Commission determined that revocation of the order on CWLDLP from Japan would be likely to lead to continuation or recurrence of material injury to the domestic industry.⁵ The Commission further determined that revocation of the order on CWLDLP from Mexico would

¹ *Certain Welded Large Diameter Line Pipe from Japan*, Inv. No. 731-TA-919 (Final), USITC Pub. 3464 (Nov. 2001) (“*Original Investigations*”). Since Commerce had not yet reached its final determination with respect to imports from Mexico, the Commission made its final determination only with respect to imports from Japan but cumulated the subject imports from Japan and Mexico for its material injury determination. *Id.* at 11-13.

² See *Certain Welded Large Diameter Line Pipe from Japan*, 66 Fed. Reg. 55204 (Nov. 1, 2001); *Antidumping Duty Order: Welded Large Diameter Line Pipe from Japan*, 66 Fed. Reg. 63368 (Dec. 6, 2001).

³ See *Certain Welded Large Diameter Line Pipe from Mexico*, Inv. No. 731-TA-920 (Final), USITC Pub. 3487 (Feb. 2002); *Antidumping Duty Order: Welded Large Diameter Line Pipe from Mexico*, 67 Fed. Reg. 8937 (Feb. 27, 2002).

⁴ *Welded Large Diameter Line Pipe from Japan and Mexico*, 71 Fed. Reg. 64294 (Nov. 1, 2006).

⁵ *Certain Welded Large Diameter Line Pipe from Japan and Mexico*, Inv. Nos. 731-TA-919 and 920 (Review), USITC Pub. 3953 (Oct. 2007) (“*First Reviews*”) at 3.

not be likely to lead to continuation or recurrence of material injury to the domestic industry.⁶ On November 5, 2007, Commerce published a continuation of the order on CWLDLP from Japan and a revocation of the order on CWLDLP from Mexico.^{7 8}

Second Five-Year Review. The Commission instituted its second review of the order covering CWLDLP from Japan in October 2012.⁹ In September 2013, after conducting a full review, the Commission determined that revocation of the order would be likely to lead to continuation or recurrence of material injury to the domestic industry.¹⁰ Commerce continued the order on October 29, 2013.¹¹

Third Five-Year Review. The Commission instituted its third review of the order covering CWLDLP from Japan in September 2018.¹² In September 2019, after conducting a full review, the Commission determined that revocation of the order would be likely to lead to continuation

⁶ *First Reviews*, USITC Pub. 3953 at 3.

⁷ *Continuation of Antidumping Duty Order on Certain Welded Large Diameter Line Pipe from Japan*, 72 Fed. Reg. 62435 (Nov. 5, 2007); *Revocation Pursuant to Five-year (“Sunset”) Review of Antidumping Duty Order: Certain Large Diameter Line Pipe from Mexico*, 72 Fed. Reg. 62436 (Nov. 5, 2007).

⁸ On November 1, 2007, domestic producer U.S. Steel Corporation requested that a binational panel review the Commission’s negative five-year review determination with respect to the order on CWLDLP from Mexico under Article 1904 of the North American Free Trade Agreement (“NAFTA”). On January 18, 2011, the NAFTA Panel issued a decision in the matter, affirming in part and remanding the determination so that the Commission could consider new information filed by Mexican producer Procarsa. On remand, the Commission determined that revocation of the order would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. *See Certain Welded Large Diameter Line Pipe from Japan*, Inv. No. 731-TA-920 (Review) (Remand), USITC Pub. 4227 (May 2011) at 1; and CR/PR at I-4, PR at I-3. On August 29, 2011, the NAFTA Panel affirmed the Commission’s determination on remand. *In the Matter of Certain Welded Large Diameter Line Pipe from Mexico: Decision of the Panel Reviewing the Determination of the International Trade Commission on Remand*, Secretariat File No. USA-USA-MEX-2007-1904-03, NAFTA Binational Panel Review, Aug. 29, 2011.

⁹ *Certain Welded Large Diameter Line Pipe from Japan; Institution of a Five-Year Review Concerning the Antidumping Duty Order on Certain Welded Large Diameter Line Pipe from Japan*, 77 Fed. Reg. 59973 (Oct. 1, 2012).

¹⁰ *Certain Welded Large Diameter Line Pipe from Japan*, Inv. No. 731-TA-919 (Second Review), USITC Pub. 4427 (Sep. 2013) (“*Second Review*”) at 3.

¹¹ *Welded Large Diameter Line Pipe from Japan: Continuation of Antidumping Duty Order*, 78 Fed. Reg. 64477 (Oct. 29, 2013).

¹² *Certain Welded Large Diameter Line Pipe from Japan; Institution of a Five-Year Review*, 83 Fed. Reg. 44900 (Sep. 4, 2018).

or recurrence of material injury to the domestic industry.¹³ Commerce continued the order on October 11, 2019.¹⁴

Current Review. On September 3, 2024, the Commission instituted this fourth five-year review.¹⁵ The Commission received a joint response to the notice of institution filed on behalf of the American Line Pipe Producer Association (“ALPPA”).¹⁶ The majority of ALPPA’s members manufacture, produce, or wholesale CWLDLP produced in the United States.¹⁷ ALPPA’s members reported that they accounted for all domestic production of CWLDLP in 2023.¹⁸ JFE, a subject producer/exporter of CWLDLP from Japan, also filed a response.¹⁹ JFE estimated at the time that it accounted for *** percent of production of CWLDLP in Japan in 2023.²⁰ On December 9, 2024, the Commission found that the domestic and respondent interested party

¹³ *Certain Welded Large Diameter Line Pipe from Japan*, Inv. No. 731-TA-919 (Third Review), USITC Pub. 4973 (Sept. 2019) (“Third Review”) at 32; *Welded Large Diameter Line Pipe from Japan: Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order*, 84 Fed. Reg. 1059 (Feb. 1, 2019); *Welded Large Diameter Line Pipe From Japan: Continuation of Antidumping Duty Order*, 84 Fed. Reg. 52896 (Oct. 3, 2019).

¹⁴ *Welded Large Diameter Line Pipe from Japan: Continuation of Antidumping Duty Order*, 84 Fed. Reg. 54837 (Oct. 11, 2019).

¹⁵ *Certain Welded Large Diameter Line Pipe from Japan; Institution of a Five-Year Review*, 89 Fed. Reg. 71417 (Sept. 3, 2024).

¹⁶ American Line Pipe Producer Association’s Response to the Notice of Institution, EDIS Doc. 834051 (Oct. 3, 2024) (“ALPPA NOI Response”); American Line Pipe Producer Association’s Supplemental Response to Notice of Institution, EDIS Doc. 835925 (Oct. 29, 2024). The ALPPA’s individual members are American Cast Iron Pipe Company; Berg Pipe Panama City Corp./Berg Pipe Mobile Corp.; Dura-Bond Industries; Stupp Corporation; and Welspun Global Trade LLC. See ALPPA NOI Response, EDIS Doc. 834051 at 2.

¹⁷ ALPPA NOI Response, EDIS Doc. 834051 at 2.

¹⁸ American Line Pipe Producer Association’s Supplemental Response to Notice of Institution, EDIS Doc. 835925 (Oct. 29, 2024) at 1-4 & Exh. 1.

¹⁹ JFE Response to the Notice of Institution, EDIS Doc. 834047 (Oct. 3, 2024) (“JFE NOI Response”); JFE Steel Corporation’s Supplemental Response to Notice of Institution, EDIS Doc. 835921 (Oct. 29, 2024).

²⁰ JFE NOI Response, EDIS Doc. 834052 (Oct. 3, 2024) at 9 & Attach. 1. JFE initially reported that it was the sole CWLDLP producer in Japan; however, Nippon Steel later submitted a questionnaire response indicating that it had produced CWLDLP in Japan during the POR. The domestic industry asserts that Nippon Steel has at least three plants with ERW capacity to produce subject pipe. Similarly, JFE also has indicated at the Commission’s public hearing that Nippon Steel still owns ERW mills and is capable of producing smaller diameter pipes. CR/PR at 4.12 n.15.

group responses were adequate and therefore determined to conduct a full review.²¹

Representatives of both ALPPA and JFE appeared at the hearing represented by counsel.

U.S. industry data are based on the questionnaire responses from nine current and former domestic producers that are believed to have accounted for all known domestic production of CWLDLP in 2024.²² U.S. import data are based on Commerce’s official import statistics adjusted to remove excluded merchandise and the questionnaire responses of 24 U.S. importers of CWLDLP, which accounted for virtually all (***) percent) of imports from Japan by quantity, and a large majority of imports from all other sources (***) percent) and a large majority of total U.S. imports (***) percent) by quantity during 2024.²³ Foreign industry data and related information are based on the questionnaire responses of two producers, JFE and Nippon Steel, and three current and former exporters of CWLDLP in Japan that are believed to have accounted for all known production of CWLDLP in Japan during 2024.²⁴

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”²⁵ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”²⁶ The Commission’s practice in five-year review is to examine the domestic like product definition from the original

²¹ *Certain Welded Large Diameter Line Pipe from Japan; Notice of Commission Determination to Conduct a Full Five-Year Review*, 90 Fed. Reg. 6010 (Jan. 17, 2025).

²² CR/PR at 1.14.

²³ CR/PR at 1.14. This coverage calculation consists of imports of in-scope CWLDLP as well as excluded large diameter line pipe. CR/PR at 4.1.

²⁴ CR/PR at 1.14.

²⁵ 19 U.S.C. § 1677(4)(A).

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

investigation and consider whether the record indicates any reason to revisit the prior findings.²⁷

Commerce has defined the scope of the antidumping duty order in this five-year review as follows:

. . . a certain welded carbon and alloy line pipe. Of circular cross section and with an outside diameter greater than 16 inches, but less than 64 inches, in diameter whether or not stenciled. This product is normally produced according to American Petroleum Institute (API) specifications, including Grades A25, A, B, and X grades ranging from X42 to X80, but can also be produced to other specifications. The product currently is classified under U.S. Harmonized Tariff Schedule (HTSUS) item numbers 7305.11.10.30, 7305.11.10.60, 7305.11.50.00, 7305.12.10.30, 7305.12.10.60, 7305.12.50.00, 7305.19.10.30, 7305.19.10.60, and 7305.19.50.00. Although the HTSUS item numbers are provided for convenience and customs purposes, the written description of the scope is dispositive. Specifically, not included within the scope of this investigation is the American Water Works Association (AWWA) specification water and sewage pipe and the following size/grade combinations, of line pipe:

- Having an outside diameter greater than or equal to 18 inches and less than or equal to 22 inches, with a wall thickness measuring 0.750 inch or greater, regardless of grade.
- Having an outside diameter greater than or equal to 24 inches and less than 30 inches, with wall thickness measuring greater than 0.875 inches in grades A, B, and X42, with wall thickness measuring greater than 0.750 inches in grades X52 through X56,

²⁷ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

and with wall thickness measuring greater than 0.688 inches in grades X60 or greater.

- Having an outside diameter greater than or equal to 30 inches and less than 36 inches, with wall thickness measuring greater than 1.250 inches in grades A, B, and X42, with

wall thickness measuring greater than 1.000 inches in grades X52 through X56, and with wall thickness measuring greater than 0.875 inches in grades X60 or greater.

- Having an outside diameter greater than or equal to 36 inches and less than 42 inches, with wall thickness measuring greater than 1.375 inches in grades A, B, and X42, with wall thickness measuring greater than 1.250 inches in grades X52 through X56, and with wall thickness measuring greater than 1.125 inches in grades X60 or greater.

- Having an outside diameter greater than or equal to 42 inches and less than 64 inches, with a wall thickness measuring greater than 1.500 inches in grades A, B, and X42, with wall thickness measuring greater than 1.375 inches in grades X52 through X56, and with wall thickness measuring greater than 1.250 inches in grades X60 or greater.

- Having an outside diameter equal to 48 inches, with a wall thickness measuring 1.0 inch or greater, in grades X-80 or greater.

- In API grades X80 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.90 inch or more.

- In API grades X100 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.54 inch or more.

- An API grade X-80 having an outside diameter of 21 inches and wall thickness of 0.625 inch or more.^{28 29}

Line pipe is used for conveyance of gas, oil, or water, generally in a pipeline or utility distribution system.³⁰ It is produced to API certification.³¹ CWLDLP within the scope is line pipe with an outside diameter greater than 16 inches but less than 64 inches, excluding water and sewage pipe as specified by the AWWA and certain size/grade combinations of line pipe, including very thick walled line pipe that can be used in Arctic or offshore deep water environments, or to convey highly corrosive (“sour”) gases.³²

CWLDLP is produced by two major manufacturing methods.³³ One method, submerged arc welding, encompasses both helical (or spiral) welding (“HSAW”) and longitudinal welding (“LSAW”) means of production.³⁴ A second production method is electric resistance welding (“ERW”). HSAW and ERW pipe are both made from steel coils whereas LSAW pipe is made

²⁸ *Welded Large Diameter Line Pipe from Japan: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 303 (Jan. 3, 2025) and accompanying Issues and Decision Memorandum for the Expedited Fourth Sunset Review of the Antidumping Duty Order on Welded Large Diameter Line Pipe from Japan (Dec. 27, 2024) at 2-3; CR/PR at 1.17-1.18.

²⁹ Commerce has completed two changed circumstances reviews and issued a final scope ruling since the issuance of the antidumping duty order. In 2002, in the first changed circumstances review, Commerce made an affirmative determination that the antidumping duty order on imports from Japan be revoked with respect to imports meeting the following specifications: American Petroleum Institute (“API”) grades X-80 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.90 inch or more; and, in API grades X-100 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.54 inch or more. *Certain Welded Large Diameter Line Pipe from Japan: Final Results of Changed Circumstances Review*, 67 Fed. Reg. 64870 (Oct. 22, 2002).

In 2006, in the second changed circumstances review, Commerce made an affirmative determination that imports from Japan be excluded from the order with respect to large diameter line pipe with an API grade X-80 having an outside diameter of 21 inches and wall thickness of 0.625 inch or more. *Final Results of Changed Circumstances Review: Certain Welded Large Diameter Line Pipe from Japan*, 71 Fed. Reg. 62584 (Oct. 26, 2006).

In 2014, Commerce conducted a scope ruling in which it determined that CSA 550 pipe having an outside diameter of 48 inches up to and including 52 inches and a wall thickness of 0.90 inches or more is comparable to API X80 (as described above) and thus is excluded from the scope of the order. *Notice of Scope Rulings*, 79 Fed. Reg. 30821 (May 29, 2014).

³⁰ CR/PR at 1.21.

³¹ CR/PR at 1.21.

³² CR/PR at 1.21, 1.24.

³³ CR/PR at 1.22.

³⁴ CR/PR at 1.22.

from steel plates.³⁵ Because of the helical wrap of the steel, HSAW pipe size is not limited by the coil width and generally is used for larger diameter pipe projects.³⁶ ERW pipe is limited by the coil width and accordingly is suitable for thinner walled and smaller diameter pipe.³⁷ HSAW and ERW production are continuous forming processes versus the piece-by-piece production of LSAW.³⁸ HSAW and ERW pipe generally are used in less demanding applications, whereas LSAW pipe is preferred for use in more demanding applications.³⁹ Technological advances allowing for wider and thicker coil production have made the HSAW production method more common.⁴⁰

Typically, LSAW is the most expensive production method, and ERW is the least expensive.⁴¹ The API 5L specification allows for a number of line pipe production processes and permits ERW and SAW in all grades and classes of large diameter line pipe.⁴² During the original investigations, domestic producers produced either LSAW or ERW pipe. Several domestic producers now employ multiple production methods, and the domestic industry as a whole utilizes all three methods of production.⁴³

In the original investigations and prior reviews, the Commission defined a single domestic like product consisting of all CWLDLP, coextensive with Commerce's scope.⁴⁴

In the current review, the record does not contain any information suggesting that the pertinent characteristics and uses of CWLDLP have changed since the prior reviews to warrant revisiting the Commission's domestic like product definition.⁴⁵ The Domestic Interested Parties submit that the Commission should continue to define a single domestic like product coextensive with Commerce's scope, as it did in the original investigations and prior reviews.⁴⁶

³⁵ CR/PR at 1.22.

³⁶ CR/PR at 1.22.

³⁷ CR/PR at 1.22.

³⁸ CR/PR at 1.22.

³⁹ CR/PR at 1.22.

⁴⁰ CR/PR at 1.22.

⁴¹ CR/PR at 1.23, Table 1.8.

⁴² CR/PR at 1.25.

⁴³ CR/PR at 1.25 and Table 3.11.

⁴⁴ *Original Investigations*, USITC Pub. 3464 at 9-10; *First Reviews*, USITC Pub. 3953 at 6-8; *Second Review*, USITC Pub. 4427 at 7; *Third Review*, USITC Pub. 4973 at 8.

⁴⁵ See CR/PR at 1.31.

⁴⁶ American Line Pipe Producer Association's Prehearing Br., EDIS Doc. 861080 (Sept. 3, 2025) at 5 ("ALPPA Prehearing Br.").

No respondent interested party addressed the issue of the domestic like product definition.⁴⁷ Consequently, we again define a single domestic like product consisting of all CWLDLP, coextensive with Commerce's scope.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."⁴⁸ In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the original investigations and the prior reviews, the Commission defined the domestic industry to include all U.S. producers of CWLDLP.⁴⁹ There were no related party issues in any of the prior proceedings.⁵⁰

In the current review, there is no new information on the record indicating that circumstances have changed since the prior reviews to warrant the Commission's reconsideration of the domestic industry definition. The Domestic Interested Parties submit that the Commission should continue to define the domestic industry as a single domestic industry consisting of all U.S. producers of the domestic like product, as it did in the original investigations and prior reviews.⁵¹ No respondent interested party addressed the issue of the domestic industry definition.⁵² The record indicates that there are no related parties issues in this review.⁵³ Consequently, consistent with our definition of the domestic like product, we again define the domestic industry as all domestic producers of CWLDLP.

⁴⁷ See generally JFE Steel Corporation's Prehearing Br., EDIS Doc 861058 (Sept. 3, 2025) ("JFE Prehearing Br."); JFE Steel Corporation's Posthearing Br., EDIS Doc 862473 (Sept. 19, 2025) ("JFE Posthearing Br.").

⁴⁸ 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.

⁴⁹ *Original Investigations*, USITC Pub. 3464 at 10; *First Reviews*, USITC Pub. 3953 at 8; *Second Review*, USITC Pub. 4427 at 7; *Third Review*, USITC Pub. 4973 at 9.

⁵⁰ *Original Investigations*, USITC Pub. 3464 at 10; *First Reviews*, USITC Pub. 3953 at 8; *Second Review*, USITC Pub. 4427 at 7; *Third Review*, USITC Pub. 4973 at 8-9.

⁵¹ ALPPA Prehearing Br. at 5; ALPPA NOI Response at 24.

⁵² See JFE Prehearing Br.; JFE Posthearing Br.

⁵³ See CR/PR at 3.15 n.8.

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.”⁵⁴ The Statement of Administrative Action (“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.”⁵⁵ Thus, the likelihood standard is prospective in nature.⁵⁶ 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 review.⁵⁷

⁵⁴ 19 U.S.C. § 1675a(a).

⁵⁵ 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.

⁵⁶ 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.

⁵⁷ 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’”).

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”⁵⁸ 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 investigation.”⁵⁹

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.”⁶⁰ 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).⁶¹ 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.⁶²

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.⁶³ 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;

⁵⁸ 19 U.S.C. § 1675a(a)(5).

⁵⁹ 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.*

⁶⁰ 19 U.S.C. § 1675a(a)(1).

⁶¹ 19 U.S.C. § 1675a(a)(1). Commerce has not completed any administrative reviews or issued any duty absorption findings with respect to CWLDLP from Japan since the original investigations. CR/PR at 1.15.

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

⁶³ 19 U.S.C. § 1675a(a)(2).

(2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.⁶⁴

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.⁶⁵

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.⁶⁶ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.⁶⁷

⁶⁴ 19 U.S.C. § 1675a(a)(2)(A-D).

⁶⁵ 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.

⁶⁶ 19 U.S.C. § 1675a(a)(4).

⁶⁷ 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.

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.”⁶⁸ The following conditions of competition inform our determination.

1. Demand Conditions

Original Investigations and Prior Reviews. In the original investigations and prior reviews, the Commission found that CWLDLP was purchased by end users for use in pipeline projects, and by distributors, which resold the pipe to customers for use in the repair and maintenance of existing pipelines and for structural applications.⁶⁹ The Commission also found that demand for CWLDLP depended upon oil and gas prices and activity in the energy sector, as CWLDLP was primarily used in the transmission of oil and gas.⁷⁰

The Commission found that, during the original period of investigation (“POI”), U.S. CWLDLP demand fell sharply between 1998 and 2000, from *** to *** short tons, due to the completion of the major Alliance pipeline project in early 1999 and the consolidation of CWLDLP end users. It also observed that similar declines in CWLDLP demand occurred globally.⁷¹

⁶⁸ 19 U.S.C. § 1675a(a)(4).

⁶⁹ *Original Investigations*, USITC Pub. 3464 at 14; *First Reviews*, USITC Pub. 3958 at 17; *Second Review*, USITC Pub. 4427 at 10; *Third Review*, USITC Pub. 4973 at 14.

⁷⁰ *Original Investigations*, USITC Pub. 3464 at 14; *First Reviews*, USITC Pub. 3958 at 17; *Second Review*, USITC Pub. 4427 at 10; *Third Review*, USITC Pub. 4973 at 13. In the original investigations, the Commission found that sales were made differently in each channel of distribution. With respect to pipeline projects, oil and gas transmission companies formulated a technical plan, invited bids from qualified manufacturers, and selected suppliers based on compliance with technical specifications, price, and ability to meet project deadlines, with CWLDLP deliveries occurring six to twelve months later. By contrast, CWLDLP sales to distributors typically involved spot sales. *Original Investigations*, USITC Pub. 3464 at 14. The Commission found a divergence between CWLDLP demand and oil and gas production during the second review period; oil and gas production increased by 28 and 25 percent, respectively, while apparent U.S. consumption of CWLDLP fell by 38 percent. *Second Review*, USITC Pub. 4427 at 21.

⁷¹ Confidential Original Determination (Nov. 6, 2001), EDIS Doc. 661456 (“*Confidential Original Determination*”) at 21-22; *Original Investigations*, USITC Pub. 3464 at 15. The domestic industry’s export shipments fell from 315,797 short tons in 1998 to 10,085 short tons in 2000, Japanese producers’ exports to non-U.S. markets declined from 775,443 short tons in 1998 to 293,335 short tons in 2000, and Mexican producers’ exports to non-U.S. markets declined from *** short tons in 1998 to *** short tons in 2000. *Id.* at 22.

In the first review, the Commission found that, while demand in the repair and maintenance market fluctuated over the period, the project market collapsed between 2001 and 2003, resulting in a *** percent decline in apparent U.S. consumption of CWLDLP, from *** short tons in 2001 to *** short tons in 2003. Apparent U.S. consumption remained depressed through 2005, but it recovered in 2006 to *** short tons and continued to strengthen in the first half of 2007.⁷²

In the second review, the Commission found that the volume of CWLDLP sold in the repair and maintenance market decreased by about 50 percent, and that a shift within the project market, from large-scale oil and gas projects towards smaller, more localized shale deposit extraction projects, resulted in apparent U.S. consumption of CWLDLP becoming concentrated in smaller diameter product over the period reviewed. Apparent U.S. consumption decreased by 38.3 percent during this period, from 2.6 million short tons in 2007 to 1.6 million short tons in 2012.⁷³

In the third review, the Commission found that demand for CWLDLP continued to be driven by pipeline construction projects and repair and maintenance of existing pipelines, and key indicators of demand fluctuated over the POR.⁷⁴ Apparent U.S. consumption fluctuated during this period of review, ultimately decreasing from 2.9 million short tons in 2015 to 2.3 million short tons in 2018, with a plurality of the market participants indicating that they expected future demand to continue to fluctuate.⁷⁵ Accordingly, the Commission again found that demand was particularly difficult to predict in this industry and, based on the perception of marketplace participants and recent and projected trends in oil and gas price and production, continued growth in CWLDLP demand in the United States as observed since 2016 was unlikely.⁷⁶

Current Review. Demand for CWLDLP continues to be driven by oil and gas sector activity.⁷⁷ The overall demand for CWLDLP is likely to experience small changes in response to changes in price, mainly due to the lack of practical substitute products and the way pipeline operators account for the cost of pipeline construction.⁷⁸ Spot prices for oil and natural gas

⁷² Confidential First Reviews Determination, EDIS Doc. 661447 (Nov. 9, 2018) at 18; *First Reviews*, USITC Pub. 3953 at 18.

⁷³ *Second Review*, USITC Pub. 4427 at 13-14.

⁷⁴ *Third Review*, USITC Pub. 4973 at 19.

⁷⁵ *Third Review*, USITC Pub. 4973 at 19.

⁷⁶ *Third Review*, USITC Pub. 4973 at 19.

⁷⁷ CR/PR at 2.10, 2.13, 2.30.

⁷⁸ CR/PR at 2.10.

fluctuated between January 2019 and March 2025, with the price of oil increasing overall by 32.8 percent and the price of natural gas increasing by 32.5 percent overall.⁷⁹ Rig count is a leading indicator of oil and gas sector activity, and the number of rigs declined irregularly over the POR.⁸⁰ Installed mileage was driven mainly by gas distribution mileage, which increased by 4.5 percent; gas transmission and hazardous liquids pipeline mileage decreased by 0.5 percent and 1.4 percent between 2019 and 2024, respectively.⁸¹

Most U.S. producers reported that U.S. demand had decreased during 2019 to 2024, and were split in their expectations of demand in the future.⁸² Most importers reported that they did not experience changes in demand, nor do they generally expect demand for CWLDLP to change in the future.⁸³ Importer *** reported that there is increased demand for pipes with larger outside diameters and thicker walls for gas and carbon capture pipelines in response to the “public perception of safety issues with pipelines.”⁸⁴ Half of the responding purchasers reported that there had been no change in the demand for end uses, while the remaining firms were equally split between experiencing increased and decreased demand for CWLDLP end uses.⁸⁵ Responding purchasers reported mixed expectations of demand.⁸⁶

Apparent U.S. consumption of CWLDLP increased irregularly by 120.4 percent from 2022 to 2024, from 551,590 short tons in 2022 to 1.4 million short tons in 2023⁸⁷ and 1.2 million short tons in 2024; it was lower in interim (January through March) 2024 (at 353,726 short tons) than in interim 2025 (at 343,129 short tons).⁸⁸

⁷⁹ CR/PR at Figure 2.1 and Tables 2.6, 2.7.

⁸⁰ CR/PR at Figure 2.2 and Table 2.8.

⁸¹ CR/PR at Figure 2.3 and Table 2.9.

⁸² CR/PR at 2.18.

⁸³ CR/PR at 2.18.

⁸⁴ CR/PR at 2.1.

⁸⁵ CR/PR at 2.18.

⁸⁶ CR/PR at Table 2.12. Five of 13 expected demand to fluctuate up, one expected demand to steadily increase, five of 13 expected no changes in demand, one expected demand to fluctuated down, and one expected demand to steadily decrease. *Id.*

⁸⁷ The increase in apparent U.S. consumption of CWLDLP between 2022 and 2023 was largely driven by an increase in shipments by U.S. producers and reflected the industry’s recovery from the COVID-19 pandemic. CR/PR at 2.11.

⁸⁸ CR/PR at Table C.1.

2. Supply Conditions

Original Investigations and Prior Reviews. In the original investigations, the Commission found that the domestic industry supplied between *** and *** percent of the U.S. market by quantity over the 1998-2000 period. Cumulated subject imports from Japan and Mexico supplied between *** and *** percent of the market over this period, whereas nonsubject imports supplied between *** and *** percent.⁸⁹ The Commission also found that the domestic industry's production capacity declined by 2.3 percent over the POI, whereas total production declined by 73.5 percent.⁹⁰

In the first five-year review, the domestic industry's share of supply of the U.S. market declined irregularly, from *** percent in 2001 to *** percent in 2006. The share of subject imports from Japan also declined, from *** percent in 2001 to *** percent in 2006, whereas imports from sources other than Japan increased their share of supply from *** percent in 2001 to *** percent in 2006.⁹¹ The Commission attributed the increase in volume of imports from sources other than Japan to strong demand and increasing market acceptance of HSAW CWLDLP.⁹²

In the second five-year review, the Commission found that the domestic industry, which supplied between 32.3 to 37.5 percent of apparent U.S. consumption from 2007 to 2009, became the largest supplier during 2010 to 2012, with market shares ranging from 57.2 to 67.2 percent. The share of supply held by nonsubject imports, the largest source of supply in the earlier half of the period reviewed, declined irregularly from *** percent in 2007 to *** percent in 2012, whereas subject imports accounted for *** of apparent U.S. consumption throughout the period.⁹³ The Commission found that shipments of all large diameter line pipe from Japan to the U.S. market, including CWLDLP and products excluded from the scope of review, almost

⁸⁹ *Original Investigations*, USITC Pub. 3464 at 15 and Table IV-7; *Confidential Original Determination* at 22-23; Original Determination Commission Report, Memorandum INV-Y-214 (Oct. 17, 2001), EDIS Doc. 661452 ("*Original Determination CR*") at Table IV-7.

⁹⁰ *Original Investigations*, USITC Pub. 3464 at 15.

⁹¹ First Reviews Determination Commission Report, Memorandum INV-EE-129 (Sep. 14, 2007), EDIS Doc. 661448 ("*First Reviews Determination CR*") at Table I-11; *First Reviews*, USITC Pub. 3953 at Table I-11.

⁹² *First Reviews*, USITC Pub. 3953 at 20-21.

⁹³ Confidential Second Review Determination, EDIS Doc. 661445 (Nov. 9, 2018) ("*Confidential Second Review Determination*") at 22-23; *Second Review*, USITC Pub. 4427 at 15.

tripled from 2010 to 2012.⁹⁴ The domestic industry had also added over 900,000 short tons of HSAW capacity in the second review period.⁹⁵

In the third five-year review, the Commission found that the domestic industry supplied the majority of the U.S. market during the POI, though its share of apparent U.S. consumption declined irregularly from 70.3 percent in 2016 to 58.2 percent in 2018.⁹⁶ Nonsubject imports were the next largest supplier of the U.S. market at *** percent in 2018, followed by subject imports at *** percent.⁹⁷ The Commission also found that the domestic industry modestly increased its production capacity from 2016 to 2018, from 3.48 million short tons in 2016 to 3.52 million short tons in 2018.⁹⁸

Current Review. From 2022 to 2024, the domestic industry remained the largest supplier of CWLDLP to the U.S. market, followed by imports of CWLDLP from nonsubject sources and imports of subject CWLDLP from Japan.⁹⁹

The domestic industry's share of apparent U.S. consumption increased irregularly from 2022 to 2024, increasing from 55.9 percent in 2022 to 80.7 percent in 2023, before decreasing to 77.0 percent in 2024; it was lower in interim 2025, at 69.0 percent, than in interim 2024, at 79.1 percent.¹⁰⁰

The domestic industry's practical production capacity increased from 2022 to 2024, from 435,462 short tons in 2022 to 1.1 million short tons in 2023 and 940,856 million short tons in 2024.¹⁰¹ Two domestic producers permanently ceased production operations since the third review: Evraz Oregon, which ceased all production in 2020; and Stupp, which ceased all production in 2022.¹⁰² In addition, several domestic producers reported prolonged shutdowns related to the COVID-19 pandemic and weak demand.¹⁰³ The domestic industry's practical

⁹⁴ *Second Review*, USITC Pub. 4427 at 15.

⁹⁵ *Second Review*, USITC Pub. 4427 at 15.

⁹⁶ *Third Review*, USITC Pub. 4973 at 15.

⁹⁷ *Third Review*, USITC Pub. 4973 at 15 n.70; Confidential Third Review at 22-23.

⁹⁸ *Third Review*, USITC Pub. 4973 at 15.

⁹⁹ CR/PR at Table 1.12.

¹⁰⁰ CR/PR at Table 1.12.

¹⁰¹ It was 283,441 short tons in interim 2025 and 306,564 short tons in interim 2024. CR/PR at Table 3.4.

¹⁰² CR/PR at Table 3.1.

¹⁰³ CR/PR at Table 3.2.

capacity utilization rate was 14.9 percent in 2022, 43.3 percent in 2023, and 37.9 percent in 2024.¹⁰⁴

Imports of CWLDLP from nonsubject sources were the second largest source of supply.¹⁰⁵ Their share of apparent U.S. consumption decreased from *** percent in 2022 to *** percent in 2023, before increasing to *** percent in 2024; it was higher in interim 2025, at *** percent, than in interim 2024, at *** percent.¹⁰⁶ In 2024, the largest sources of nonsubject imports were South Korea, Turkey, and Germany.¹⁰⁷

Subject imports of CWLDLP from Japan were the smallest source of supply to the U.S. market, accounting for less than *** percent of apparent U.S. consumption by quantity in each year for which data was collected.¹⁰⁸

Five of six U.S. producers and 12 of 19 importers reported that they had not experienced supply constraints since January 1, 2019.¹⁰⁹ Importers reported that section 232 quotas on nonsubject South Korean imports and closures of mills in Japan constrained supply.¹¹⁰ Ten of 13 purchasers reported that they had not experienced supply constraints from U.S. producers since January 1, 2019, and seven of 11 purchasers reported that they had not experienced supply constraints from importers.¹¹¹ *** purchasers reported that section 232 measures on CWLDLP from nonsubject source South Korea have impacted supply.¹¹²

3. Substitutability and Other Conditions

Original Investigations and Prior Reviews. In the original investigations and first and second reviews, the Commission found that subject imports and the domestic like product were generally substitutable when made to the same specifications.¹¹³ In the third review, the Commission found that there was a high degree of substitutability between subject and

¹⁰⁴ It was *** percent in interim 2025 and *** percent in interim 2024. CR/PR at Table 3.4.

¹⁰⁵ U.S. imports of CWLDLP from Canada, China, Greece, India, South Korea, and Turkey are subject to antidumping and/or countervailing duty orders as of April 9, 2025. CR/PR at Table 1.2.

¹⁰⁶ CR/PR at Table 1.12.

¹⁰⁷ CR/PR at 4.2.

¹⁰⁸ CR/PR at Table 1.12.

¹⁰⁹ CR/PR at 2.9.

¹¹⁰ CR/PR at 2.9.

¹¹¹ CR/PR at 2.9.

¹¹² CR/PR at 2.9.

¹¹³ *Original Investigations*, USITC Pub. 3464 at 17; *First Reviews*, USITC Pub. 3953 at 28; *Second Review*, USITC Pub. 4427 at 16.

domestically produced CWLDLP.¹¹⁴ Moreover, in each of the prior reviews, the Commission found that price was an important factor in purchasing decisions.¹¹⁵

Current Review. In these reviews, we find that there is a moderate-to-high degree of substitutability between domestically produced CWLDLP and CWLDLP imported from Japan.¹¹⁶ U.S. producers reported that CWLDLP from any source is always interchangeable.¹¹⁷ A majority of importers reported that U.S.-produced CWLDLP is sometimes or never interchangeable with CWLDLP from Japan.¹¹⁸ Most purchasers reported that domestically produced CWLDLP and CWLDLP from Japan is always interchangeable.¹¹⁹

U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CWLDLP. Most U.S. producers reported that differences other than price were never significant in sales of CWLDLP from any source.¹²⁰ A majority of importers indicated that differences other than price between U.S.-produced CWLDLP and CWLDLP from Japan were always or sometimes significant.¹²¹ Most purchasers reported that differences other than price were sometimes significant in the comparison of CWLDLP from any source.¹²² Importers and purchasers indicated that there were significant differences in availability, quality, acceptability and ability to meet customer-specific requirements, lead times, and technical support.¹²³

When asked to compare CWLDLP produced by different sources with respect to 15 factors, most purchasers reported that U.S.-produced CWLDLP and CWLDLP imported from Japan were comparable on all factors that most purchasers rated as “very important,” except delivery time, for which U.S. product was considered superior to subject and nonsubject imports.¹²⁴

¹¹⁴ *Third Review*, USITC Pub. 4973 at 17.

¹¹⁵ *First Reviews*, USITC Pub. 3953 at 28; *Second Review*, USITC Pub. 4427 at 22-23; *Third Review*, USITC Pub. 4973 at 17.

¹¹⁶ CR/PR at 2.20.

¹¹⁷ CR/PR at Table 2.19.

¹¹⁸ CR/PR at Table 2.19.

¹¹⁹ CR/PR at Table 2.19.

¹²⁰ CR/PR at Table 2.20.

¹²¹ CR/PR at Table 2.20.

¹²² CR/PR at Table 2.20.

¹²³ CR/PR at 2.29.

¹²⁴ CR/PR at Table 2.18. A plurality of purchasers reported that delivery time was comparable when comparing U.S.- produced CWLDLP and CWLDLP from nonsubject sources. *Id.*

Most purchasers always or usually make purchasing decisions based on the producer, and half of the responding purchasers always or usually make purchasing decisions based on the country-of-origin.¹²⁵ Most purchasers reported that their customers only sometimes or never make purchasing decisions based on the producer or country of origin.¹²⁶ Six of 14 purchasers reported that there are certain types of CWLDLP that are only available from certain sources.¹²⁷ Purchasers reported that domestic mills have limited capabilities with larger wall thickness compared to mills in Greece, Germany, India, Japan, and the United Kingdom.¹²⁸

U.S. producers sold CWLDLP primarily to oil and gas end users throughout the period for which data was collected, increasing from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.¹²⁹ Subject importers sold mainly to oil and gas end users in 2022 (*** percent), and to a mix of both distributors and oil and gas end users in 2023 (*** percent and *** percent, respectively).¹³⁰

As noted above, although the Commission in the third review found a high degree of substitutability between subject imports and the domestic like product, we find a moderate-to-high degree of substitutability in this current review. Relative to the third review, a greater number and share of responding importers reported that U.S. and Japanese CWLDLP is only sometimes or never interchangeable (rather than always or frequently) and slightly more U.S. producers reported that factors other than price were always or frequently significant in purchasing decisions. The record also contains information regarding differing concentration across production methods and product types for the subject and domestic industry, including Japanese producers' asserted focus on high-margin, specialty forms of line pipe beginning in 2022/2023.¹³¹ As discussed in further section III.E., however, although subject exporters appear to have concentrated a greater portion of their production on these products after the 2022/23 strategy change, subject exporters nonetheless maintain substantial production and exports to third country markets of more commodity-like CWLDLP,¹³² and the domestic industry is ramping

¹²⁵ CR/PR at Table 2.13.

¹²⁶ CR/PR at Table 2.13.

¹²⁷ CR/PR at 2.21.

¹²⁸ CR/PR at 2.21.

¹²⁹ It was higher in interim 2024 (*** percent) than in interim 2025 (*** percent). CR/PR at Table 2.3.

¹³⁰ There were no sales by subject importers in 2024, interim 2024, or interim 2025. CR/PR at Table 2.3.

¹³¹ See JFE Steel Posthearing Br. at 2-5, Att. A, B.

¹³² *Id.* at 3, Att. A (explaining that JFE ***).

up capacity for production of the high-margin, specialty product, such as pipe for deep-sea environments and sour service.¹³³ On balance, we find the data in the current to review to demonstrate a moderate-to-high degree of substitutability as compared to the high degree of substitutability from the third review.

We find that price continues to be an important factor in purchasing decisions. Price was most frequently identified by responding purchasers as among their top three factors in purchasing decisions (14 firms), followed by meeting specifications and lead times/delivery (7 firms each), and quality (6 firms).¹³⁴ Price was the only factor (out of 15 total factors) that all 14 responding purchasers rated as very important in their purchasing decisions.¹³⁵ In addition, a majority of responding purchasers (10 of 17) reported that they usually purchase the lowest-priced product.¹³⁶

The vast majority of responding purchasers reported that domestically produced product always or usually met minimum quality specifications.¹³⁷ Similarly, purchasers reported that CWLDLP from Japan and from other non-U.S. sources always or usually met minimum quality specifications.¹³⁸ Most responding purchasers (10 of 14) require their suppliers to become certified or qualified to sell CWLDLP to their firm, and most purchasers reported that no suppliers failed to certify since 2019.¹³⁹

The CWLDLP market is driven by large projects and a bidding process during which there is a formal request for quotations to all firms on the approved manufacturers' list that are able to quote.¹⁴⁰ According to the Domestic Interested Parties, the differentiating factor among bids is price.¹⁴¹

¹³³ Hearing Tr. (Kirkland) at 113 (“That market, no U.S. producer currently makes those specialty niche products for offshore. That is what we’re doing in Panama City, to be able to make those products here locally in the United States We are currently in construction, and we plan by the end of ’26, early 2027 to be commissioned and full production and operation.”).

¹³⁴ CR/PR at Table 2.14.

¹³⁵ CR/PR at Table 2.15.

¹³⁶ CR/PR at 2.22.

¹³⁷ CR/PR at Table 2.16.

¹³⁸ CR/PR at Table 2.16.

¹³⁹ CR/PR at 2.24. One purchaser reported that it has removed Axis (Thailand) from its approved manufacturer list due to quality issues. *Id.*

¹⁴⁰ CR/PR at 2.24.

¹⁴¹ Hearing Tr. at 50-51 (Kirkland).

The primary raw material used in the production of CWLDLP differs according to the method of production.¹⁴² For ERW pipe, hot-rolled steel coil is the principal raw material.¹⁴³ For SAW pipe, the principal raw materials are cut-to-length plate (for LSAW) or hot-rolled steel coil (for HSAW).¹⁴⁴ These pipes can be used interchangeably, although HSAW and LSAW methods can produce larger diameters than ERW.¹⁴⁵ U.S. producers use all three welding processes.¹⁴⁶ U.S. producers reported that raw materials as a share of cost of goods sold fluctuated between *** percent and *** percent during the period for which data were collected (January 2022 through March 2025).¹⁴⁷ The price for hot-rolled steel bars, plates, and structural shapes decreased from the beginning of 2019 until mid-2020 when prices began to increase sharply, peaking between May and July 2022, before trending downward again through the first quarter of 2025.¹⁴⁸ Prices turned upward again, showing a noticeable and sustained increase through August 2025.¹⁴⁹

The Commission conducted several previous import relief investigations on CWLDLP or similar merchandise, including recently continued antidumping and/or countervailing duty orders on large diameter welded line pipe from Canada, India, China, South Korea, Turkey, and Greece.¹⁵⁰

Effective March 23, 2018, CWLDLP originating in Japan were subject to an additional 25 percent *ad valorem* under section 232.¹⁵¹ Effective April 1, 2022, CWLDLP originating in Japan became subject to tariff-rate quotas (“TRQs”), and only imports that exceeded the TRQ limits were subject to the section 232 duties.¹⁵² Effective March 12, 2025, the TRQs for Japan were terminated and CWLDLP originating in Japan became subject to an additional 25 percent *ad valorem* duty under section 232.¹⁵³ Effective June 4, 2025, the section 232 duties increased to

¹⁴² CR/PR at 5.1.

¹⁴³ CR/PR at 5.1.

¹⁴⁴ CR/PR at 5.1.

¹⁴⁵ Hearing Tr. at 91 (Phillips).

¹⁴⁶ See CR/PR at Table 3.11 (ERW accounted for *** percent of U.S. producers’ U.S. shipments in 2024, LSAW accounted for *** percent, and HSAW *** percent); see also CR/PR at Tables 4.5 (nonsubject) and 4.17 (Japanese producers), and Fig. 1.8 (showing shipments of imports by production method).

¹⁴⁷ CR/PR at 5.1, Table 4.5.

¹⁴⁸ CR/PR at Table 5.1, Figure 5.1.

¹⁴⁹ CR/PR at Table 5.1, Figure 5.1.

¹⁵⁰ CR/PR at Table 1.2.

¹⁵¹ CR/PR at 1.20 n.35.

¹⁵² CR/PR at 1.20 n.35.

¹⁵³ CR/PR at 1.20 n.35.

50 percent.¹⁵⁴ CWLDLP originating in Japan is not subject to the tariffs initiated in April 2025 under the International Emergency Economic Powers Act.¹⁵⁵ The trade agreement between the United States and Japan, announced on July 22, 2025, did not impact the tariff treatment for CWLDLP.¹⁵⁶

Most responding firms reported that section 232 tariffs on steel and aluminum impacted the CWLDLP market.¹⁵⁷ Half of the responding U.S. producers reported that new or modified tariffs did not have an impact on the market whereas most importers, purchasers, and foreign producers reported that they had.¹⁵⁸ U.S. producers reported that section 232 measures caused an increase in steel prices and large diameter line pipe but indicated that the antidumping duties had a greater impact. U.S. importers and purchasers reported higher domestic prices and restricted supply due to import measures related to section 232 and uncertainty associated with the new or modified tariffs.¹⁵⁹ Domestic Interested Parties reported that steel input prices, which accounted for two-thirds of its CWLDLP price, increased substantially due to section 232 tariffs.¹⁶⁰

C. Likely Volume of Subject Imports

1. The Prior Proceedings

Original Investigation. The Commission found that cumulated subject imports from Japan and Mexico increased significantly between 1999 and 2000.¹⁶¹ The absolute volume of subject imports declined from 241,691 short tons in 1998 to 173,525 short tons in 1999, before increasing to 200,689 short tons in 2000.¹⁶² The subject imports' share of apparent U.S. consumption similarly declined from *** percent in 1998 to *** percent in 1999, before rising to *** percent in 2000.¹⁶³ Acknowledging that subject import volume and market share had declined between 1998 and 1999, and that absolute subject import volume in 2000 remained

¹⁵⁴ CR/PR at 1.20 n.35.

¹⁵⁵ CR/PR at 1.20.

¹⁵⁶ CR/PR at 1.20.

¹⁵⁷ CR/PR at Table 2.1.

¹⁵⁸ CR/PR at Table 2.2.

¹⁵⁹ CR/PR at 2.2.

¹⁶⁰ Hearing Tr. at 82 (Noland).

¹⁶¹ Confidential Original Determination at 23; *Original Investigations*, USITC Pub. 3464 at 16.

¹⁶² Confidential Original Determination at 23; *Original Investigations*, USITC Pub. 3464 at 16.

¹⁶³ Confidential Original Determination at 23; *Original Investigations*, USITC Pub. 3464 at 16.

below 1998 levels, the Commission found the increase in cumulated subject import volume and market share in 2000 significant because much of the increase had come at the expense of domestic shipments to distributors, which were needed to compensate for a steep decline in sales to end users.¹⁶⁴

Prior Five-Year Reviews. In the first reviews, the Commission found that subject imports from Japan maintained a presence in the U.S. market over the period of review, indicating that Japanese producers maintained both an interest in, and the ability to serve, U.S. customers. Further, subject Japanese producers had affiliations with U.S. importers and were able to maintain their relationships with U.S. pipeline operators by exporting a significant quantity of excluded line pipe products. The Commission found that subject Japanese producers could increase their production of CWLDLP notwithstanding their reported high-capacity utilization rate, as reported capacity fluctuated in tandem with production. It also cited a sharp decline in subject producers' exports to China, which suggested that Japanese CWLDLP producers likely possessed the capacity to shift lost exports to China to other markets, such as the large and attractive U.S. market. Trends in reported downtime for Japanese CWLDLP mills over the first review period corroborated that subject producers had the ability to significantly increase CWLDLP production at the end of the period. The Commission further explained that two of the three Japanese CWLDLP producers reported the ability to switch production between CWLDLP and other products at very little cost, in response to changes in the relative price of CWLDLP and other products. The Commission concluded that the likely subject import volume would be significant either in absolute terms or relative to U.S. production or consumption, were the order revoked.¹⁶⁵

In the second review, the Commission found that reported Japanese production and capacity were significant throughout the period of review; there was excess capacity because Japanese producers' shipments of line pipe declined during the period. The subject producers produced CWLDLP and several other pipe products on the same equipment and with the same employees, and the Commission found that their declining shipments of products other than CWLDLP made at the same facilities indicated that product shifting was likely should the order be revoked. The Commission also found the Japanese CWLDLP industry to be export oriented,

¹⁶⁴ *Original Investigations*, USITC Pub 3464 at 16. The Commission discounted the significance of the decline in subject import volume and market share in interim 2001 because it partly resulted from the filing of the petitions. *Id.*

¹⁶⁵ *First Reviews*, USITC Pub. 3953 at 22-25.

with virtually no home market.¹⁶⁶ During this time, the Japanese industry faced increasing competition in its export markets, with large diameter line pipe exports declining from 1.5 million short tons in 2007 to 1.2 million short tons in 2012. Furthermore, the U.S. market remained attractive for exporters, accounting for 35.8 percent of global large diameter gas pipeline construction and 26.9 percent of large diameter pipeline construction for crude oil; even with the order in place, the United States was the third largest export market for Japanese producers due primarily to their exports of excluded line pipe products. The Commission concluded that the likely subject import volume from Japan would be significant either in absolute terms or relative to U.S. production or consumption, were the order revoked.¹⁶⁷

In the third review, the Commission found that, despite the limited presence of subject imports of the POR, several factors—including the subject industry’s reported substantial production and capacity—still indicated that the subject producers had the ability and incentive to significantly increase exports of CWLDLP if the order was revoked.¹⁶⁸ The Commission found that the Japanese industry was export oriented, with small home market sales of CWLDLP, and subject producers would have the incentive to increase their exports of CWLDLP to the U.S. market if the order was revoked.¹⁶⁹ Accordingly, the Commission concluded that subject imports from Japan were likely to increase to significant levels if the order was revoked.¹⁷⁰

2. The Current Review

In this review, subject imports entered the U.S. in small quantities. Subject import volume was *** short tons in 2022 and *** short tons in 2023.¹⁷¹ Subject imports accounted for less than *** percent of apparent U.S. consumption in each year for which data was collected and during the interim period.¹⁷² Despite the limited presence of subject imports under the order from 2022 to 2024, we find that several factors indicate that the subject producers have the ability and incentive to increase significantly exports of CWLDLP if the order were revoked.

¹⁶⁶ Confidential Second Review Determination at 25-28; *Second Review*, USITC Pub. 4427 at 17-19.

¹⁶⁷ *Second Review*, USITC Pub. 4427 at 19-22.

¹⁶⁸ *Third Review*, USITC Pub. 4973 at 20-21.

¹⁶⁹ *Third Review*, USITC Pub. 4973 at 22-23.

¹⁷⁰ *Third Review*, USITC Pub. 4973 at 23-25.

¹⁷¹ CR/PR at Table 1.12.

¹⁷² CR/PR at Table 1.12.

First, the subject industry maintains substantial capacity, production, and unused capacity that could be directed to the U.S. market were the order revoked. From 2022 to 2024, the subject industry's practical CWLDLP capacity ranged between a low of *** short tons in 2022 and a high of *** short tons in 2023, and increasing overall by *** percent to *** short tons in 2024.¹⁷³ Over that period, the subject industry reported an overall increase in production, from *** short tons of CWLDLP in 2022 to *** short tons in 2023 and *** short tons in 2024.¹⁷⁴ The subject industry's capacity utilization rate fell overall from 2022 to 2024, declining from *** percent in 2022 to *** percent in 2023, before increasing to *** percent in 2024.¹⁷⁵ Thus, the industry's excess practical production capacity for CWLDLP increased overall from *** short tons in 2022 to *** short tons in 2024, an amount equivalent to *** percent of apparent U.S. consumption that year.¹⁷⁶

Although the subject industry's excess practical production for CWLDLP is limited relative to apparent U.S. consumption, we note also the subject industry's practical overall capacity, its installed capacity, and its demonstrated ability to expand its practical capacity for CWLDLP production when market conditions favor such a change.¹⁷⁷ The subject industry has maintained an installed capacity of *** short tons from 2022 to 2024, compared to apparent U.S. consumption of 1.2 million short tons in 2024, indicating that utilization of even a small portion of that excess installed capacity to produce exports for the U.S. market (capacity beyond the calculated practical capacity for CWLDLP production) could translate to a significant volume of U.S. imports.¹⁷⁸ JFE indicated that ***¹⁷⁹ Nonetheless, JFE ***.¹⁸⁰ We therefore consider the Japanese industry's broader capacity figures probative of additional CWLDLP production that is likely absent the discipline of the order.

¹⁷³ CR/PR at Table 4.12. In interim 2024, the practical CWLDLP capacity was *** short tons, as compared to *** in interim 2025. *Id.* at Tables 4.12, 4.14. The interim period consists of only January through March 2025, and we therefore place more weight on the three years of data 2022-2024 absent any particular circumstance indicating it is appropriate to give the interim data special consideration.

¹⁷⁴ CR/PR at Table 4.12. The subject industry reported production of *** short tons in interim 2024 and *** short tons in interim 2025. *Id.*

¹⁷⁵ CR/PR at Table 4.14. It was *** percent in interim 2024 and *** percent in interim 2025. *Id.*

¹⁷⁶ *Calculated from* CR/PR at Tables 4.14 and C.1.

¹⁷⁷ CR/PR at Table 4.12. The subject industry's practical capacity for CWLDLP production more than doubled from *** short tons in 2022 to *** short tons in 2023, while its installed and overall practical capacity remained relatively steady.

¹⁷⁸ *See* CR/PR at Tables 1.3 and 4.12.

¹⁷⁹ Foreign Producer Questionnaire at II-4(b).

¹⁸⁰ Foreign Producer Questionnaire at II-3a.

In addition, the Japanese industry is *** export-oriented, with very limited home market sales of CWLDLP.¹⁸¹ As a percentage of total shipments, subject producers' home market shipments of CWLDLP *** from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.¹⁸² By contrast, subject producers' exports of CWLDLP increased from *** percent of total shipments in 2022 to *** percent in 2023 and *** percent in 2024.¹⁸³ The Japanese industry's (including resellers) total export shipments of CWLDLP increased from 2022 to 2024, from *** short tons in 2022 to *** in 2023 and *** in 2024.¹⁸⁴ We find that the subject industry's export orientation, in addition to its increasing capacity, production, and excess capacity, further indicates that the industry would have the ability to increase significantly exports of CWLDLP to the U.S. market if the order were revoked.

The record further indicates that subject producers would have the incentive to increase their exports of CWLDLP to the U.S. market if the order were revoked. The United States remains a large and attractive market for subject producers; information on the record indicates that, in 2024, the United States was the Japanese industry's second largest export market for the broader category of large diameter welded line pipe, accounting for 32.6 percent of the industry's exports.¹⁸⁵ Indeed, JFE's information indicates that *** of out-of-scope line pipe were to the United States in 2024,¹⁸⁶ and that JFE would seek to build on these relationships to sell in-scope product to existing customers were the order revoked.¹⁸⁷ Further, Canada and the European Union have imposed import restraints on large diameter line pipe

¹⁸¹ Hearing Tr. at 156 (Shimbo); *id.* at 156-57 (Husisian); *id.* at 43 (Kaplan).

¹⁸² CR/PR at Table 4.14. It was higher in interim 2025 (at *** percent) than in interim 2024 (at *** percent). *Id.*

¹⁸³ CR/PR at Table 4.14. It was lower in interim 2025 (at *** percent) than in interim 2024 (at *** percent). *Id.*

¹⁸⁴ CR/PR at Table 4.15. The industry's exports were lower in interim 2025 (at *** short tons) than in interim 2024 (at *** short tons). *Id.*

¹⁸⁵ CR/PR at Table 4.20. The GTA data present welded large diameter line pipe, a category that includes CWLDLP and out-of-scope products. For example, the outside diameter of in-scope product for this review range from 16 to 64 inches. However, exports from Japan presented in table 4.20 likely include line pipe with outside diameters greater than 64 inches. Additionally, out-of-scope products include certain high end, specialty, or "niche" line pipe with relatively thick walls, often intended for use in high-pressure environments such as offshore, deep water applications. These line pipes can command higher prices and tend to have higher costs of production. Hearing Tr. at 42 (Kaplan), 130-133 (Shimbo), 206 (Husisian); JFE Posthearing Br., Attachment A at 12-13.

¹⁸⁶ JFE Posthearing Br., Attachment A.

¹⁸⁷ Hearing Tr. at 133 (Shimbo), 192 (Shimbo).

from Japan.¹⁸⁸ These import restraints, coupled with the increased competition that subject producers will likely face in other export markets from large diameter line pipe exporters in Canada, China, Greece, India, Korea, and Turkey, which are also subject to antidumping and countervailing duty orders in the United States, provide added incentive for the subject industry to direct exports to the United States if the order were revoked.¹⁸⁹

Japanese Producers argue that, even if the order is revoked, Japanese producers would not increase exports to the U.S. market because changes in the Japanese market, including shuttered capacity, labor shortages, rising input costs, and the strategic focus on alternative products have removed their ability and incentive to increase exports of CWLDLP to the United States.¹⁹⁰ We disagree. The majority of Japanese producers' production on the equipment used to produce CWLDLP consisted of out-of-scope products.¹⁹¹ The industry's overall production of pipe products, which included out-of-scope line pipe, declined overall from 2022 to 2024.¹⁹² Indeed, although JFE argued that its worldwide strategy to switch towards producing "high-value specialty products" indicates that it would not increase exports of more standard pipe to the U.S. market, JFE acknowledged a desire to "supply the full package" of pipe products to its customers by selling both in-scope and out-of-scope products.¹⁹³ Further, although JFE contends it is now focused on higher-priced out-of-scope products, as noted above in Section III.B.3, the record continues to demonstrate substantial exports by the Japanese industry of in-scope products to non-U.S. markets.¹⁹⁴ Record evidence further suggests Japanese producers have recently increased the production of CWLDLP, reduced the production of out-of-scope products, and maintained a high ratio of CWLDLP to out-of-scope exports.¹⁹⁵ Similarly, AUV data on the record are not consistent with respondents' arguments

¹⁸⁸ CR/PR at 4.29.

¹⁸⁹ See CR/PR at Table 1.2.

¹⁹⁰ JFE Prehearing Br. at 2-3, 27-28, 29-34; JFE Posthearing Br. Attachment at A-21 to A-25.

¹⁹¹ CR/PR at Table 4.19.

¹⁹² CR/PR at Table 4.19. Japanese producers' overall production of out-of-scope products was *** short tons in 2022, *** short tons in 2023, and *** short tons in 2024; it was lower in interim 2025 (at *** short tons) than in interim 2024 (at *** short tons). *Id.* This out-of-scope production accounted for *** percent of all production in 2022, *** percent in 2023, and *** percent in 2024; it was *** percent in interim 2024 and *** percent in interim 2025. *Id.*

¹⁹³ Hearing Tr. at 133 (Shimbo), 192 (Shimbo).

¹⁹⁴ See JFE Posthearing Br. at 3, Att. A (indicating that ***); CR/PR at Table 4.14 (export shipments' share of total shipment *** percent).

¹⁹⁵ See, e.g., CR/PR at Table 4.19 (indicating out-of-scope line pipe and other products produced on the same equipment as in-scope production both accounted for a decreasing portion of the industry's production while production of CWLDLP increased). Further, while JFE submitted information (Continued...)

that out-of-scope line pipe has a substantially higher AUV than subject line pipe or that Japanese producers have shifted to higher-value products worldwide.¹⁹⁶ In view of the foregoing, we are not persuaded that the changes identified by JFE would likely dissuade the Japanese industry from exporting a significant volume of subject imports to the U.S. market absent the discipline of the order.

JFE additionally argues that the Japanese industry is unlikely to increase exports to the U.S. market if the order is revoked because the U.S. market is not profitable for Japanese producers given increased section 232 duties.¹⁹⁷ We disagree. As an initial matter, the section 232 duties have been in place since March 2018 but have been adjusted several times since their original implementation, indicating that the section 232 duties remain subject to change.¹⁹⁸ These duties were modified in 2022 and twice in 2025.¹⁹⁹ Further, we note that certain nonsubject producers have continued to export line pipe to the United States even after the 50 percent section 232 duties went into effect,²⁰⁰ indicating that the section 232 duties, even at recently elevated levels, are not a complete barrier to import competition. In addition, antidumping duties function separately from section 232 duties. Whereas the section 232 duties are fixed at 50 percent, antidumping duties are subject to annual administrative reviews at Commerce that adjust to address any changes in dumping from year to year, and thereby may have *ex ante* effects on the pricing behavior of subject imports in the U.S. market²⁰¹ that

(...Continued)

indicating an increase in its *** over the 2022 to 2024 period. See JFE's Posthearing Br. at Attachment A; JFE Foreign Producer Questionnaire at II-3a. At the same time, JFE's production of ***. *Id.* Finally, as the domestic industry notes, most of Japan's in-scope and out-of-scope line pipe exported to non-U.S. destinations in 2024 were subject CWLDLP (*** short tons of CWLDLP out of a total of 104,827 short tons of in-scope and out-of-scope line pipe). ALPPA Final Comments at 7, *comparing* CR/PR at Tables 4.15 and 4.20.

¹⁹⁶ Data submitted by JFE indicate that in 2024 there was a relatively ***. JFE's Posthearing Br. at Attachment A (showing \$*** for CWLDLP versus \$*** for out-of-scope line pipe in 2024). Furthermore, GTA export data for the broader category of line pipe show the \$1,186 AUV to non-U.S. destination markets was markedly lower than the \$*** AUV to the United States in 2024, cutting against the argument that Japan is shipping high value out-of-scope products worldwide. CR/PR at Table 4.20.

¹⁹⁷ JFE Prehearing Br. at 5-6; JFE Posthearing Br. Attachment at A-9 to A-11, A-44.

¹⁹⁸ Based on this record, Commissioner Johanson finds that the current section 232 duties are a relevant condition of competition for the Commission's analysis of likely injury, especially as these duties have increased since the last five-year review and remain in place following the trade agreement between the United States and Japan announced in July 2025. See, e.g., CR/PR at 1.19-1.20; *Third Review*, USITC Pub. 4973 at 18 and 27 n.135.

¹⁹⁹ CR/PR at 1.20 n.35.

²⁰⁰ ALPPA Posthearing Br., Exhibit 1 at 11-12.

²⁰¹ Commissioner Johanson does not join the remainder of this sentence.

make it disadvantageous for foreign producers to simply lower export prices to keep prices in the U.S. market low despite the antidumping duties.²⁰²

Further, even with the 50 percent section 232 duties and including transportation costs to the United States, subject producers' export AUVs were lower than the domestic industry's U.S. shipment AUVs in the last two full years of the period of review, suggesting that subject imports from Japan would be price-competitive in the absence of the order notwithstanding 50 percent section 232 duties.²⁰³ At the same time, as the domestic industry argues, there will likely be upward pressure on domestic prices going forward to allow U.S. producers to maintain profitability while incurring section 232 duties on any imported raw materials.²⁰⁴ Given the record as a whole, including the changes to the section 232 duties on this record and additional considerations discussed above, we find that the additional section 232 duties on subject imports from Japan are not likely to prevent subject exporters from exporting significant volumes of CWLDLP to the United States in the reasonably foreseeable future if the order were revoked.

In light of the foregoing, we conclude that subject imports from Japan are likely to increase to significant levels if the order is revoked. Accordingly, we conclude that the volume of subject imports from Japan, both in absolute terms and relative to production and consumption in the United States, would likely be significant in the reasonably foreseeable future absent the restraining effect of the order.

D. Likely Price Effects

1. The Prior Proceedings

Original Investigation. In the original investigations, the Commission found that subject imports pervasively undersold the domestic like product and depressed domestic prices to a significant degree. Cumulated subject imports undersold the domestic like product in 30 of 46

²⁰² See ALPPA Posthearing Br., Exhibit 1 at 15.

²⁰³ Compare CR/PR at Table 4.15, with *id.* at Table 3.9. The subject industry's export AUVs to non-U.S. destination markets, as compiled from the questionnaire response data submitted by the responding Japanese producers, were *** in 2023 and *** in 2024. *Id.* at Table 4.15. In contrast, U.S. producers' U.S. shipment AUVs were \$1,719 in 2023 and \$1,666 in 2024. *Id.* at Table 3.9. Transportation costs for welded large diameter line pipe shipped from Japan to the United States, which are available for 2024, averaged 9.6 percent that year. *Id.* at 5.3.

²⁰⁴ ALPPA Posthearing Br., Exhibit 1 at 13-14.

quarterly comparisons.²⁰⁵ Trends in the AUVs of subject imports and the domestic like product were consistent with the trends observed in pricing product data, and the record contained evidence of significant confirmed lost sales and revenue.²⁰⁶

Prior Five-Year Reviews. In each of the prior reviews, Commission found that subject imports from Japan and the domestic like product were highly substitutable and that price was an important factor in purchasing decisions. The Commission observed that subject imports from Japan undersold the domestic like product in most of the limited price comparisons available in each review.²⁰⁷ The Commission found that Japanese producers had significant incentives to increase their exports to the United States and their only means of doing so was to underbid domestic and nonsubject producers. The Commission thus concluded in each review that the likely underselling of a significant volume of subject imports from Japan, at significant margins, would likely depress or suppress domestic prices to a significant degree.²⁰⁸

²⁰⁵ *Original Investigations*, USITC Pub. 3464 at 17-18. Underselling by subject imports from Japan in the original investigations occurred in *** of *** comparisons at margins ranging from *** to *** percent. CR/PR at 5.11 n.10.

²⁰⁶ *Original Investigations*, USITC Pub. 3464 at 17-18.

²⁰⁷ In the first reviews, subject imports from Japan undersold the domestic like product in *** of *** price comparisons at margins ranging from *** to *** percent. CR/PR at 5.11 n.10. The Commission recognized that the probative value of the pricing comparisons was limited by the fact that most U.S. sales were to end users, while most subject import sales were to distributors. *First Reviews*, USITC Pub. 3953 at 29, n.206. In the second review, subject imports undersold the domestic like product in *** of *** price comparisons at margins ranging from *** to *** percent. CR/PR at 5.11 n.10. The Commission found that prices for domestically produced CWLDLP generally increased, notwithstanding continued underselling by subject imports. The Commission noted Japanese producers' challenge to the probative value of the pricing comparisons on the basis that they were made at different levels of trade, and indicated in response that it had followed its normal practice of collecting price information for the first available U.S. arms-length transaction, and that the Japanese producers had not proffered an alternative method for collecting price data. *Second Review*, USITC Pub. 4427 at 23-24, n.151. In the third review, subject imports undersold the domestic like product in *** of *** price comparisons at margins ranging from *** to *** percent. CR/PR at 5.11 n.10. Given the limited number of price comparisons and small quantities of subject imports present in the U.S. market during the POR, the Commission gave limited weight to these price comparisons in its analysis. *Third Review*, USITC Pub. 4973 at 26-27.

²⁰⁸ *First Reviews*, USITC Pub. 3953, at 27-29; *Second Review*, USITC Pub. 4427 at 22-24; *Third Review*, USITC Pub. 4973 at 26-27. In the first reviews, the Commission also found that pervasive underselling that restrained necessary price increases in the bidding processes for major projects would likely place domestic producers in a cost-price squeeze if the order were revoked. *First Reviews*, USITC Pub. 3953 at 29.

2. The Current Review

As discussed in Section III.B.3 above, we have found that there is a moderate-to-high degree of substitutability between domestically produced CWLDLP and subject imports, and that price is an important factor in purchasing decisions.

The Commission requested pricing data for four pricing products in these reviews.²⁰⁹ Eight U.S. producers and one importer of subject merchandise provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.²¹⁰ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' commercial U.S. shipments of CWLDLP.²¹¹ No pricing data were reported for subject imports from Japan in 2024, and *** short tons of subject imports from Japan were the basis of the single quarterly price comparison.²¹² Given the virtual absence of price comparisons and small quantities of subject imports present in the U.S. market from 2022 to 2024, we give limited weight to these price comparisons in our analysis of likely price effects.²¹³

However, we find that the significant underselling found in the original investigation and consistent, continued pattern of underselling in the prior reviews under the discipline of the order is probative of the likely pricing of the subject imports upon revocation. Given the continued attractiveness of the U.S. market and the importance of price in purchasing decisions, we find that if the order is revoked the likely significant volume of subject imports would likely undersell domestically produced CWLDLP to a significant degree, as observed historically, to gain sales and market share in the U.S. market.²¹⁴ Given the moderate-to-high

²⁰⁹ CR/PR at 5.6. The pricing product definitions are as follows:

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

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

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

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

²¹⁰ CR/PR at 5.6.

²¹¹ CR/PR at 5.6.

²¹² CR/PR at 5.6, Tables 5.4, 5.5 and Figure 5.2.

²¹³ See CR/PR at Table 5.6.

²¹⁴ The current section 232 tariffs would not prevent price competition based on this record. As explained above in the discussion of likely subject import volume, the differences between the domestic industry's U.S. shipment AUVs and Japanese producers' export AUVs to export markets indicate that (Continued...)

degree of substitutability between U.S. and Japanese CWLDLP, this likely underselling would likely force the domestic industry to lower prices or lose sales. As a result, subject imports are likely to have significant price-suppressing and -depressing effects and/or take sales and market share from the domestic industry if the order is revoked. In light of these considerations, we conclude that subject imports would likely have significant price effects upon revocation of the order.

E. Likely Impact

1. The Prior Proceedings

Original Investigation. In the original investigations, the Commission found that the domestic industry's condition deteriorated between 1999 and 2000 according to virtually every indicator, with some modest improvements in the post-petition period. In considering alternative explanations for these trends, the Commission found that the domestic industry's declining exports were a contributing factor, but one largely confined to the 1998-99 period, and that nonsubject imports, though significant, had not targeted the distributor market where domestic producers lost the most sales, and were sold at relatively higher prices than subject imports. Thus, the Commission concluded that subject imports were having a significant impact on the domestic industry, based on their significant volume and significant price effects.²¹⁵

Prior Five-Year Reviews. In each of the prior reviews, the Commission found that the domestic industry was not vulnerable to the recurrence of material injury.²¹⁶ In the first reviews, the Commission found that, while the domestic industry performed poorly throughout much of the period due to the Enron-related collapse in CWLDLP demand, its performance rebounded in 2006 owing to a strong recovery in demand. Most indicators were positive toward the end of the period, including net sales and operating income, which initially declined before recovering at the end of the period. The domestic industry's capacity and production generally declined, and capacity utilization fluctuated in a narrow range, whereas employment indicators increased overall. The Commission also found that the domestic industry benefitted significantly from the order on CWLDLP from Japan, as the pendency of the investigation and

(...Continued)

subject producers have the ability to compete on price in the U.S. market notwithstanding the section 232 tariffs.

²¹⁵ *Original Investigations*, USITC Pub. 3464, at 19-22.

²¹⁶ *First Reviews*, USITC Pub. 3953 at 30; *Second Review*, USITC Pub. 4427 at 24; *Third Review*, USITC Pub. 4973 at 30.

the imposition of the order in 2001 had an immediate effect on the volume and market share of subject imports from Japan, which declined. The Commission concluded that if the order were revoked, the likely significant increase in the volume of subject imports, coupled with their likely adverse price effects, would likely have a significant negative impact on the domestic industry. It found that subject imports would be a distinct cause of likely material injury since their likely underselling would take market share away from the domestic industry.²¹⁷

In the second review, the Commission found that U.S. demand for the subject merchandise had not met the domestic industry's expectations and approval of the fourth stage of the Keystone XL project remained pending, depressing demand and adding to uncertainty in the project market. In addition, the financial performance of the domestic industry fluctuated during the review period and was worse in 2012 than in 2007, although net sales, market share, and a number of employment indicators improved. The Commission found that the likely increase in subject import volume would likely outpace any increase in likely demand, given that demand trends were uncertain and apparent U.S. consumption declined during the period of review. In light of this, the likely increase in low-priced subject imports would likely lead to declines in the domestic industry's production, shipments, market share, employment, and financial performance. Therefore, the Commission concluded that revocation of the order would likely have a significant impact on the domestic industry.²¹⁸

In the third review, the Commission found that the industry's production, employment, and financial performance improved during the POR, but acknowledged that the industry's capacity utilization remained low and its operating performance, while improved, was still modest in 2018. It found that if the order were revoked, the likely significant volume of subject imports would likely undersell the domestic like product and likely force the domestic industry to lower prices or lose sales and have price-suppressing and depressing effects. Accordingly, the Commission found that any increase in subject import volume would likely lead to declines in the domestic industry's production, shipments, market share, and employment indicators.²¹⁹

²¹⁷ *First Reviews*, USITC Pub. 3953 at 30-33.

²¹⁸ *Second Review*, USITC Pub. 4427 at 24-27.

²¹⁹ *Third Review*, USITC Pub. 4973 at 29-30.

2. The Current Review²²⁰

The domestic industry's performance generally improved from 2022 to 2024 as demand rebounded after the COVID-19 pandemic. U.S. shipments increased irregularly by 203.5 percent,²²¹ and apparent U.S. consumption increased by 120.4 percent.²²² Domestic producers were also able to increase their market share by 21.1 percentage points as nonsubject sources receded from the market.²²³

The domestic industry's output indicators mostly improved from 2022 to 2024. The domestic industry's production increased irregularly by *** percent,²²⁴ and its capacity utilization rate increased irregularly by *** percentage points.²²⁵ On the other hand, its production capacity declined by *** percent,²²⁶ and its end-of-period inventories declined irregularly by *** percent.²²⁷

²²⁰ In its fourth review of the antidumping duty order, Commerce determined that revocation of the antidumping duty order would likely result in the continuation or recurrence of dumping with margins of up to 30.80 percent for Nippon Steel Corp., up to 30.80 percent for Kawasaki Steel Corp., and up to 30.80 percent for all others. *Welded Large Diameter Line Pipe from Japan: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 303 (Jan. 3, 2025).

²²¹ The domestic industry's U.S. shipments by quantity were 308,252 short tons in 2022, 1.1 million short tons in 2023, and 935,499 short tons in 2024; it was 279,628 short tons in interim 2024 and 236,748 short tons in interim 2025. CR/PR at Table C.1.

²²² Apparent U.S. consumption was 551,590 short tons in 2022, 1.4 million short tons in 2023, and 1.2 million short tons in 2024; it was 353,726 short tons in interim 2024 and 343,129 short tons in interim 2025. CR/PR at Table C.1.

²²³ The domestic industry's share of apparent U.S. consumption was 55.9 percent in 2022, 80.7 percent in 2023, and 77.0 percent in 2024; it was 79.1 percent in interim 2024 and 69.0 percent in interim 2025. CR/PR at Table 1.12.

²²⁴ The domestic industry's production was 435,462 short tons in 2022, 1.1 million short tons in 2023, and 940,856 short tons in 2024; it was 306,564 short tons in interim 2024 and 283,441 short tons in interim 2025. CR/PR at Table C.1.

²²⁵ The domestic industry's capacity utilization rate was 14.9 percent in 2022, 43.3 percent in 2023, and 37.9 percent in 2024; it was 47.8 percent in interim 2024 and 48.2 percent in interim 2025. CR/PR at Table C.1.

²²⁶ The domestic industry's practical production capacity was 2.9 million short tons in 2022, 2.5 million short tons in 2023, and 2.5 million short tons in 2024; it was 642,013 short tons in interim 2024 and 588,456 in interim 2025. CR/PR at Table C.1.

²²⁷ The domestic industry's end-of-period inventories were 156,432 short tons in 2022, 111,580 short tons in 2023, and 115,905 short tons in 2024; it was 138,138 short tons in interim 2024 and 109,072 short tons in interim 2025. CR/PR at Table C.1.

With respect to the domestic industry's employment indicators, from 2022 to 2024, the number of production and related workers ("PRWs") increased by 75.8 percent,²²⁸ the total hours worked also increased by 122.8 percent,²²⁹ and the wages paid by increased by 121.9 percent.²³⁰ Hourly wages, on the other hand, decreased slightly by 0.4 percent from 2022 to 2024, though they were 3.8 percent higher in interim 2025 than in interim 2024.²³¹ Productivity also decreased slightly by 3.0 percent from 2022 to 2024, and was 12.4 percent lower in interim 2025 than in interim 2024.²³² Unit labor costs increased slightly by 2.7 percent, and were 18.4 percent higher in interim 2025 than in interim 2024.²³³

By most measures, the domestic industry's financial performance generally improved from 2022 to 2024 and was generally stronger in interim 2025 than in interim 2024. The domestic industry's gross profits,²³⁴ net income,²³⁵ net income margin,²³⁶ operating income,²³⁷

²²⁸ The industry's number of PRWs increased from 1,186 in 2022 to 1,944 in 2023 and 2,085 in 2024; it was lower in interim 2025, at 2,258 than in interim 2024, at 2,119. CR/PR at Tables 3.13, C.1.

²²⁹ The domestic industry's number of hours worked increased from 2.1 million in 2022 to 4.1 million in 2023 and 4.8 million in 2024; they were greater in interim 2025, at 1.3 million, than in interim 2024, at 1.2 million. CR/PR at Tables 3.13, C.1.

²³⁰ Wages paid were \$70.8 million in 2022, \$128.8 million in 2023, and \$157.1 million in 2024; they were \$39.8 million in interim 2024 and \$43.5 million in interim 2025. CR/PR at Tables 3.13, C.1.

²³¹ Hourly wages were \$32.94 per hour in 2022, \$31.74 per hour in 2023, and \$32.81 per hour in 2024; they were \$32.75 per hour in interim 2024, and \$33.99 in interim 2025. CR/PR at Tables 3.13, C.1.

²³² Productivity measured in short tons per 1,000 hours was 202.6 in 2022, 266.6 in 2023, and 196.5 in 2024; it was 252.5 in interim 2024 and 221.3 in interim 2025. CR/PR at Tables 3.13, C.1. The decrease in productivity from 2023 to 2025 was largely driven by U.S. producer ***, which reported that even as production decreased from 2022 to 2024, it maintained employees in anticipation of future demand. CR/PR at 3.19 n.12.

²³³ Unit labor costs were \$163 per short ton in 2023, \$119 per short ton in 2023, and \$167 per short ton in 2024; they were \$130 per short ton in interim 2024 and \$154 per short ton in interim 2025. CR/PR at Tables 3.13, C.1.

²³⁴ The domestic industry's gross profits were \$*** in 2022, \$*** in 2023, and \$*** in 2024; they were \$*** in interim 2024 and \$*** in interim 2025. CR/PR at Table 3.14.

²³⁵ The domestic industry reported net income was \$*** in 2022, \$*** in 2023, and \$*** in 2024; it was \$*** in interim 2024 and \$*** in interim 2025. CR/PR at Table 3.14.

²³⁶ The domestic industry reported a net income margin of negative 5.8 percent in 2022, 5.9 percent in 2023, and 4.0 percent in 2024; it was 2.5 percent in interim 2024 and 7.7 percent in interim 2025. CR/PR at Table 3.14.

²³⁷ The domestic industry reported operating income was \$*** in 2022, \$*** in 2023, and \$*** in 2024; it was \$*** in interim 2024 and \$*** in interim 2025. CR/PR at Table 3.14.

operating income margin,²³⁸ and capital expenditures²³⁹ each increased irregularly from 2022 and 2024 and were higher in interim 2025 than in interim 2024. The domestic industry's revenues also increased irregularly between 2022 and 2024, but were lower in interim 2025 than in interim 2024.²⁴⁰ Research and development ("R&D") spending was only reported by ***, and *** by *** percent from 2022 to 2024 but were *** percent *** in interim 2025 compared to interim 2024.²⁴¹ The U.S. producers' return on assets followed the general trend of its financial results, improving from 2022 to 2023, then declining from 2023 to 2024;²⁴² and the U.S. producer's total net assets increased by 21.4 percent from 2022 to 2024.²⁴³

On the basis of the foregoing, we do not find the domestic industry to be in a vulnerable condition, as production, employment, and financial performance generally improved over the period of review, and the industry experienced operating margins that rose to *** percent in interim 2025 and held substantial market share of *** percent in 2024 with practical capacity *** than at the beginning of the original POI (** short tons in 2024 compared to *** short tons in 1998).²⁴⁴ We acknowledge that the industry's net sales values, production capacity, end-of-period inventories, hourly wages, and productivity decreased during the same time period, but on the whole do not find the domestic industry to be in a vulnerable condition.

Nonetheless, we find that revocation of the order would likely have a significant impact on the domestic industry. We have found that the volume of subject imports would likely be significant in the reasonably foreseeable future if the order were revoked, and that, if the order was revoked, this likely significant volume of subject imports would likely undersell the domestic like product to a significant degree and likely force the domestic industry to lower prices or lose sales. Thus, the likely significant volume of subject imports would lead to declines

²³⁸ The domestic industry reported an operating income margin of negative 6.4 percent in 2022, 5.5 percent in 2023, and 4.3 in interim 2024; it was 1.3 percent in interim 2024 and 8.5 percent in interim 2025. CR/PR at Table 3.14.

²³⁹ The domestic industry's capital expenditures were \$12.5 million in 2022, \$20.3 million in 2023, and \$19.7 million in 2024; they were \$2.4 million in interim 2024 and \$6.4 million in interim 2025. CR/PR at Table 3.19.

²⁴⁰ The domestic industry's net sales revenues were \$*** in 2022, \$*** in 2023, and \$*** in 2024; they were \$*** in interim 2024 and \$*** in interim 2025. CR/PR at Table 3.14.

²⁴¹ CR/PR at Table C.1. ***. *** U.S. producers' questionnaire response, section 3.13a and 3.13c.

²⁴² The domestic industry's return on assets was negative 5.6 percent in 2022, 10.1 percent in 2023, and 7.7 percent in 2024. CR/PR at Table 3.22.

²⁴³ The domestic industry's total net assets were \$718.2 million in 2022, \$1.1 billion in 2023, and \$872.1 million in 2024. CR/PR at Tables 3.21, C.1.

²⁴⁴ CR/PR at C-12 and Table C-1.

in the domestic industry's production, shipments, market share, and employment indicators. We have also found that subject imports would be priced in a manner that would likely have significant price-suppressing and -depressing effects. Consequently, to compete with the likely additional volume of subject imports, the domestic industry would need to cut prices, forego needed price increases, or lose sales, as it did in the original investigations. The resulting loss of revenue would likely have a direct adverse impact on the domestic industry's profitability and employment levels, as well as its ability to raise capital and make and maintain necessary capital investments. Therefore, we find that revocation of the order would likely have a significant impact on the domestic industry.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Nonsubject imports irregularly declined in the U.S. market from *** percent in 2022 to *** percent in 2024.²⁴⁵ We observe that, during the original period of investigation, nonsubject imports accounted for between *** percent and *** percent of apparent U.S. consumption,²⁴⁶ but they did not prevent significant quantities of low-priced subject imports from entering the U.S. market and capturing sales from the domestic industry. Given that the domestic industry accounted for 77.0 percent of apparent U.S. consumption in 2024,²⁴⁷ as well as the moderate-to-high degree of substitutability and the importance of price in purchasing decisions, the presence of nonsubject imports in the U.S. market would likely not prevent the significant volume of low-priced subject imports that is likely if the order were revoked from taking market share from the domestic industry or from forcing domestic producers to lower their prices or forego price increases in order to retain market share. For these reasons, we find that any effects of nonsubject imports would be distinct from the likely effects attributable to subject imports.

We also do not agree with JFE's argument that the domestic industry is protected from subject imports by the increased section 232 duties, and multiple orders covering line pipe from various countries.²⁴⁸ As the Commission noted earlier, the level of the section 232 duties has changed during the POR and is unlikely to prevent a significant volume of subject imports in the reasonably foreseeable future if the order were revoked.

²⁴⁵ Their share of apparent U.S. consumption decreased from *** percent in 2022 to *** percent in 2023, before increasing to *** percent in 2024; it was higher in interim 2025, at *** percent, than in interim 2024, at *** percent. CR/PR at Table C.1.

²⁴⁶ CR/PR at Appendix D, Table C.2.

²⁴⁷ CR/PR at Table C.1.

²⁴⁸ JFE Prehearing Br. at 21; JFE Posthearing Br. Attachment at A-59.

JFE also argues that competition would be attenuated were the order revoked because Japanese CWLDLP differs from domestic CWLDLP by manufacturing method and by product type.²⁴⁹ We disagree. Although the record generally reflects differing concentration across production methods and product types for the subject and domestic industry, the record also reflects substantial overlap in terms of both considerations. With respect to production methods, over half of U.S. production of CWLDLP is made by the ERW and LSAW production methods, the same production methods used by Japanese producers of CWLDLP.²⁵⁰ With respect to product type and JFE's claim that subject producers specialize in "high end" line pipe, as opposed to more commodity-like products supplied by the domestic industry, the Japanese industry produces substantial quantities of more commodity-like product that it exports to third country markets.²⁵¹ Moreover, as discussed in section III.C., the Japanese industry maintains substantial overall practical capacity including excess capacity that it could engage to ramp up production and exports to the United States of more commodity-like products. Indeed, as noted above, the subject industry has produced and exported in increasing quantities more commodity-like CWLDLP during the POR at the same time its production of out-of-scope line pipe and other products declined.²⁵² Further, the domestic industry produces and has plans to expand such production in the reasonably foreseeable future of what Japanese respondents characterize as "high end" line pipe, specifically pipe for use in deep-sea environments and in sour service.²⁵³ Accordingly, even if future subject imports were limited to "high end" line pipe, this would not insulate the domestic industry from the likely injury if the order is revoked. In sum, the record supports a substantial overlap in CWLDLP production between the subject and domestic industries.

We have also considered the likely effects of demand trends on the domestic industry. Apparent U.S. consumption increased irregularly by 120.4 percent from 2022 to 2024, but was

²⁴⁹ JFE Prehearing Br. at 49; JFE Posthearing Br. at 10.

²⁵⁰ See CR/PR at Figure 1.8.

²⁵¹ See JFE Posthearing Br. at 3, Att. A (indicating that *** percent of its production is of more commodity-type product).

²⁵² See Hearing Tr. at 133 (Shimbo), 192 (Shimbo).

²⁵³ Hearing Tr. (Kirkland) at 113 ("That market, no U.S. producer currently makes those specialty niche products for offshore. That is what we're doing in Panama City, to be able to make those products here locally in the United States We are currently in construction, and we plan by the end of '26, early 2027 to be commissioned and full production and operation.").

3.0 percent higher in interim 2024 than interim 2025.²⁵⁴ As discussed above, U.S. producers, importers, and purchasers provided mixed responses regarding anticipated demand.²⁵⁵ Even if demand were to decline, the significant volume of low-priced subject imports that is likely if the order were revoked would exacerbate any negative effects caused by adverse demand trends by further reducing the industry's sales and placing additional downward pressure price pressure on domestic producers.

In summary, we conclude that if the order was revoked, subject imports of CWLDLP from Japan would likely have a significant 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 CWLDLP from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

²⁵⁴ CR/PR at Table C.1. Apparent U.S. consumption of CWLDLP increased from 551,590 short tons in 2022 to 1,350,169 short tons in 2023 and 1,215,437 short tons in 2024; and decreased from 353,726 short tons in interim 2024 to 343,129 short tons in interim 2025. *Id.*

²⁵⁵ CR/PR at Table 2.18.

Part 1: Introduction

Background

On September 3, 2024, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted a review to determine whether revocation of the antidumping duty order on certain welded large diameter line pipe (“CWLDLP”) from Japan would likely lead to the continuation or recurrence of material injury to a domestic industry.^{2 3} On December 9, 2024, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table 1.1 presents information relating to the background and schedule of this proceeding.⁵

¹ 19 U.S.C. 1675(c).

² 89 FR 71417, September 3, 2024. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of the five-year review of the subject antidumping duty order. 89 FR 71252, September 3, 2024.

⁴ 90 FR 6010, January 17, 2025. The Commission found that both the domestic and respondent interest party group responses to its notice of institution were adequate and determined to conduct a full review of the order on imports of CWLDLP from Japan.

⁵ The Commission’s notice of institution, notice to conduct full reviews, and scheduling notice are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B presents witnesses appearing at the Commission’s hearing.

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

Effective date	Action
December 6, 2001	Commerce's antidumping duty order on CWLDLP from Japan (66 FR 63368)
September 3, 2024	Commission's institution of five-year review (89 FR 71417)
September 3, 2024	Commerce's initiation of five-year review (89 FR 71252)
December 9, 2024	Commission's determination to conduct full five-year review (90 FR 6010)
January 3, 2025	Commerce's final results of expedited five-year review of the antidumping duty order (90 FR 303)
March 13, 2025	Commission's scheduling of the review (90 FR 11995)
November 21, 2025	Commission's revised scheduling of the review (90 FR 52696)
September 11, 2025	Commission's hearing
December 3, 2025	Commission's vote
December 19, 2025	Commission's determination and views

Note: Due to the lapse in appropriations and ensuing cessation of government operations, all import injury investigations and reviews conducted under authority of Title VII of the Tariff Act of 1930 have been tolled.

The original investigations

The original investigations resulted from petitions filed by Berg Steel Pipe Corp. ("Berg"), Panama City, Florida; American Steel Pipe Division of American Cast Iron Pipe Co. ("ACIPCO"), Birmingham, Alabama; and Stupp Corp. ("Stupp"), Baton Rouge, Louisiana, on January 10, 2001, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value ("LTFV") imports of CWLDLP from Japan and Mexico. Following notification of a final determination by Commerce that imports of CWLDLP from Japan were being sold at LTFV, the Commission determined on October 25, 2001, that the domestic industry was materially injured by reason of LTFV imports of CWLDLP from Japan.⁶ Commerce published the antidumping duty order on CWLDLP from Japan on December 6, 2001.⁷

On January 4, 2002, Commerce determined that imports of CWLDLP from Mexico were being sold at LTFV.⁸ On February 19, 2002, the Commission determined that an industry in the United States was materially injured by reason of LTFV imports of CWLDLP from Mexico.⁹ On February 27, 2002, Commerce issued an antidumping duty order on subject imports from Mexico.¹⁰

⁶ Certain Welded Large Diameter Line Pipe from Japan, Inv. No. 731-TA-919 (Final), USITC Publication 3464, November 2001 ("Original publication"), p. 1.1.

⁷ 66 FR 63368, December 6, 2001.

⁸ 67 FR 566, January 4, 2002.

⁹ 67 FR 8556, February 25, 2002.

¹⁰ 67 FR 8937, February 27, 2002.

Subsequent five-year reviews

In October 2007, the Commission completed full five-year reviews of the antidumping duty orders on CWLDLP from Japan and Mexico and determined that revocation of the antidumping duty order on CWLDLP from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time and that revocation of the antidumping duty order on CWLDLP from Mexico would not be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.¹¹ Following determinations in the first five-year reviews by Commerce and the Commission,¹² Commerce issued a continuation of the antidumping order on imports of CWLDLP from Japan, effective November 5, 2007.¹³ Commerce issued a revocation of the antidumping duty order on imports of CWLDLP from Mexico, effective February 27, 2007.^{14 15}

In September 2013, the Commission completed a full five-year review of the subject order and determined that revocation of the antidumping duty order on CWLDLP from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁶ Following affirmative determinations in the second five year reviews by Commerce and the Commission,¹⁷ Commerce issued a continuation of the antidumping duty order on imports of CWLDLP from Japan, effective October 29, 2013.¹⁸

¹¹ Certain Welded Large Diameter Line Pipe from Japan and Mexico, Inv. Nos. 731-TA-919 and 920 (Review), USITC Publication 3953, October 2007 (“First review publication”), p. 37.

¹² 72 FR 10498, March 8, 2007; and 72 FR 59551, October 22, 2007.

¹³ 72 FR 62435, November 5, 2007.

¹⁴ 72 FR 62436, November 5, 2007.

¹⁵ On November 21, 2007, U.S. Steel requested a binational panel review of the Commission’s negative five-year review determination with respect to the antidumping duty order on CWLDLP from Mexico. On January 18, 2011, the Panel issued its decision, affirming in part and remanding in part the Commission’s determination. The Panel remanded the determination so that the Commission could consider new information from Mexican producer Procarsa. Upon consideration of the remand order and evidence submitted into the record, the Commission majority determined upon remand that revocation of the antidumping duty order covering CWLDLP from Mexico would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. Certain Welded Large Diameter Line Pipe from Japan, Inv. No. 731-TA-919 (Second Review), USITC Publication 4427, September 2013 (“Second review publication”), pp. 1.3 and 1.4.

¹⁶ Second review publication, p. 27.

¹⁷ 78 FR 10134, February 13, 2013; and 78 FR 60897, October 2, 2013.

¹⁸ 78 FR 64477, October 29, 2013.

In September 2019, the Commission completed a full five-year review of the subject order and determined that revocation of the antidumping duty order on CWLDLP from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁹ Following affirmative determinations in the third five year reviews by Commerce and the Commission,²⁰ Commerce issued a continuation of the antidumping duty order on imports of CWLDLP from Japan, effective October 11, 2019.²¹

¹⁹ Certain Welded Large Diameter Line Pipe from Japan, Inv. No. 731-TA-919 (Third Review), USITC Publication 4973, September 2019 (“Third review publication”), p. 32.

²⁰ 84 FR 1059, February 1, 2019; and 84 FR 52896, October 3, 2019.

²¹ 84 FR 54837, October 11, 2019.

Previous and related investigations

The Commission has conducted several previous import relief investigations on CWLDLP or similar merchandise, as presented in Table 1.2.

Table 1.2
CWLDLP: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
1984	731-TA-183	Brazil	---	Petition withdrawn
2014	701-TA-524	South Korea	Terminated	---
2014	701-TA-525	Turkey	Affirmative	Orders continued after first review
2014	731-TA-1260	South Korea	Affirmative	Orders continued after first review
2014	731-TA-1261	Turkey	Affirmative	Orders continued after first review
2018	701-TA-593	China	Affirmative	Orders continued after first review
2018	701-TA-594	India	Affirmative	Orders continued after first review
2018	701-TA-595	South Korea	Affirmative	Orders continued after first review
2018	701-TA-596	Turkey	Affirmative	Orders continued after first review
2018	731-TA-1401	Canada	Affirmative	Orders continued after first review
2018	731-TA-1402	China	Affirmative	Orders continued after first review
2018	731-TA-1403	Greece	Affirmative	Orders continued after first review
2018	731-TA-1404	India	Affirmative	Orders continued after first review
2018	731-TA-1405	South Korea	Affirmative	Orders continued after first review
2018	731-TA-1406	Turkey	Affirmative	Orders continued after first review

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

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

Note: In the 2014 proceedings, the scope of the subject merchandise consisted of circular welded carbon and alloy steel (other than stainless steel) pipe of a kind used for oil or gas pipelines, not more than 24 inches in nominal outside diameter, regardless of wall thickness, length, surface finish, end finish or stenciling.

Safeguard investigations

The Commission has conducted two global safeguard investigations on welded pipe and other steel products since 1984. In 1984, the Commission conducted an investigation under Section 201 of the Trade Act of 1974 regarding imports of a wide range of carbon and certain alloy steel products. The Commission made affirmative determinations with respect to five of the nine investigated products, and the Commission majority recommended various relief measures.²² On September 18, 1984, President Reagan announced that he would not implement the remedies proposed by the Commission, however he recommended the negotiation of voluntary restraint agreements (“VRAs”) with trading partners to address unfair surges in imports of steel products.²³ Between October 1, 1984, and March 31, 1992, the United States limited imports into the U.S. market of non-alloy carbon steel products from the European Union and 19 other sources through VRAs.

In 2001, the Commission determined that certain carbon and alloy steel welded tubular products other than oil country tubular goods (“OCTG”) were being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat thereof, to the domestic industry producing such articles, and recommended certain remedy measures to the President.²⁴ On March 5, 2002, the President announced the implementation of steel safeguard measures. Import relief relating to welded tubular products (other OCTG) consisted of an additional tariff for a period of three years and one day (15 percent ad valorem on imports in the first year, 12 percent in the second year, and 9 percent in the third year).²⁵ Following receipt of the Commission’s mid-term monitoring report in September 2003, the President determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.²⁶

²² Carbon and Certain Alloy Steel Products, Inv. No. TA-201-51, USITC Publication 1553, July 1984.

²³ 49 FR 36813, September 20, 1984 (President’s Memorandum).

²⁴ 66 FR 67304, December 28, 2001.

²⁵ Presidential Proclamation 7529 of March 5, 2002, To Facilitate Positive Adjustment to Competition from Imports of Certain Steel Products, 67 FR 10553, March 7, 2002. The President also instructed the Secretaries of Commerce and the Treasury to establish a system of import licensing to facilitate steel import monitoring.

²⁶ Presidential Proclamation 7741 of December 4, 2003, To Provide for the Termination of Action Taken With Regard to Imports of Certain Steel Products, 68 FR 68483, December 8, 2003. Import licensing, however, remained in place through March 21, 2005, and continues in modified form at this time.

Summary data

Table 1.3 presents a summary of data from the original investigations, prior reviews, and the current full five-year review.²⁷ Apparent U.S. consumption for CWLDLP by quantity and value was lower in 2024 (1.2 million short tons with a value of \$1.9 billion) than in 2018 (2.3 million short tons with a value of \$2.8 billion). U.S. producers' CWLDLP market share by quantity and by value were higher in 2024 than in 2018. U.S. producers' CWLDLP capacity, production, and U.S. shipments by quantity were lower in 2024 than 2018. In addition, U.S. imports of CWLDLP were substantially lower by quantity and value in 2024 than in 2018.

²⁷ Two domestic producers of CWLDLP have exited the market since the third review: Evraz Oregon and Stupp. Evraz Oregon ceased all production of CWLDLP in 2020, and Stupp ceased all production of CWLDLP in 2022. See table 3.1.

Table 1.3 CWLDLP: Comparative data from the original investigation and subsequent reviews, by terminal years

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares in percent.

Item	Measure	2000	2006	2012	2018	2024
Apparent consumption	Quantity	***	***	1,588,332	2,287,916	1,215,437
U.S. producers' market share	Share of quantity	***	***	57.2	58.2	77.0
Japan market share	Share of quantity	***	***	***	***	***
Nonsubject market share	Share of quantity	***	***	***	***	***
Import market share	Share of quantity	***	***	42.8	41.8	23.0
Apparent consumption	Value	***	***	2,268,623	2,794,923	1,923,566
U.S. producers' market share	Share of value	***	***	55.3	57.9	81.0
Japan market share	Share of value	***	***	***	***	***
Nonsubject market share	Share of value	***	***	***	***	***
Import market share	Share of value	***	***	44.7	42.1	19.0
Japan	Quantity	173,062	13,198	***	***	***
Japan	Value	78,065	13,693	***	***	***
Japan	Unit value	\$451	\$1,038	***	***	***
Nonsubject sources	Quantity	***	729,700	***	***	***
Nonsubject sources	Value	***	753,756	***	***	***
Nonsubject sources	Unit value	***	\$1,033	***	***	***
All import sources	Quantity	451,317	742,898	680,039	957,375	279,938
All import sources	Value	226,331	767,449	1,013,639	1,176,110	364,837
All import sources	Unit value	\$501	\$1,033	\$1,491	\$1,228	\$1,303

Table continued.

Table 1.3 (Continued) CWLDLP: Comparative data from the original investigations and subsequent reviews, by terminal years

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Item	Measure	2000	2006	2012	2018	2024
Capacity	Quantity	2,317,620	***	3,286,271	3,522,604	2,485,486
Production	Quantity	320,425	***	1,215,399	1,398,252	940,856
Capacity utilization	Ratio	13.8	***	37.0	39.7	37.9
Producer U.S. shipments	Quantity	312,593	***	908,293	1,330,541	935,499
Producer U.S. shipments	Value	176,889	***	1,254,984	1,618,813	1,558,729
Producer U.S. shipments	Unit value	\$566	***	\$1,382	\$1,217	\$1,666
Producer inventories	Quantity	54,331	***	***	161,723	115,905
Producer inventory ratio to total shipments	Ratio	16.8	***	***	***	***
Production workers (number)	Noted in label	520	***	1,668	2,580	2,085
Hours worked (1,000 hours)	Noted in label	899	***	3,403	4,899	4,787
Wages paid (\$1,000)	Value	17,047	***	87,156	140,251	157,064
Hourly wages (dollars per hour)	Value	18.96	***	25.61	28.63	32.81
Productivity (short tons per 1,000 hours)	Noted in label	356.4	***	357.2	285.4	196.5
Net sales	Quantity	323,850	***	1,182,305	1,404,261	***
Net sales	Value	189,647	***	1,648,784	1,783,024	***
Net sales	Unit value	\$586	***	\$1,395	\$1,270	\$1,612
Cost of goods sold	Value	192,182	***	1,420,466	1,572,711	***
Gross profit or (loss)	Value	(2,535)	***	228,318	210,313	***
SG&A expense	Value	19,663	***	115,694	117,275	***
Operating income or (loss)	Value	(22,198)	***	112,624	93,038	***
Unit COGS	Unit value	\$593	***	\$1,201	\$1,120	\$1,444
Unit operating income	Unit value	\$(69)	***	\$95	\$66	\$69
COGS/ Sales	Ratio	101.3	***	86.2	88.2	89.6
Operating income or (loss)/ Sales	Ratio	(11.7)	***	6.8	5.2	4.3

Source: Office of Investigations memorandum INV-Y-214 (October 17, 2001), memorandum INV-EE-129 (September 14, 2007), memorandum INV-LL-067 (August 28, 2013), memorandum INV-RR-082 (August 28, 2019), official U.S. import statistics, and compiled from data submitted in response to Commission questionnaires in this review.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2000 are from the last year of the original investigations; 2006 from the last year of the first reviews; 2012 the last year of the second review; 2018 the last year of the third review; and 2024 the last full year of the current review. Mexico was a subject source in the original investigations and the first reviews. Import treatment from the original investigations and prior and current reviews are not the same. The original investigations adjusted official import statistics for reported excluded pipe for Japan and nonsubject sources. The first reviews used questionnaire data of in-scope imports from Japan and official import statistics for nonsubject sources with a minor exclusion for one firm's imports. The second review used questionnaire data of in-scope imports from Japan and adjusted official import statistics for reported excluded pipe from nonsubject sources. The third review used dutied imports from Japan and adjusted official import statistics for reported excluded pipe from nonsubject sources. The current review uses questionnaire data of in-scope imports from Japan and adjusted official import statistics for reported excluded pipe from nonsubject sources.

Table 1.4 and figure 1.1 presents U.S. producers' U.S. shipments and U.S. imports from the original investigations, prior reviews, and the current full five-year review.

Table 1.4 CWLDLP: U.S. producers' U.S. shipments and U.S. imports, by period

Quantity in short tons

Source	Measure	2000	2006	2012	2018
U.S. producers	Quantity	312,593	***	908,293	1,330,541
Japan	Quantity	173,062	13,198	***	***
Nonsubject sources	Quantity	***	729,700	***	***
All import sources	Quantity	***	742,898	680,039	957,375
All sources	Quantity	***	***	1,588,332	2,287,916

Table continued.

Table 1.4 (Continued) CWLDLP: U.S. producers' U.S. shipments and U.S. imports, by period

Quantity in short tons

Source	Measure	2019	2020	2021	2022	2023	2024
U.S. producers	Quantity	1,752,472	1,130,385	264,434	308,252	1,089,772	935,499
Japan	Quantity	***	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***	***
All import sources	Quantity	757,896	178,395	128,473	243,338	260,397	279,938
All sources	Quantity	2,510,368	1,308,780	392,907	551,590	1,350,169	1,215,437

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Imports from Japan reflect in-scope imports from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review from responses to Commission questionnaires.

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

Figure 1.1 CWLDLP: U.S. producers' U.S. shipments and U.S. imports, by period

* * * * *

Source: Office of Investigations memorandum INV-Y-214 (October 17, 2001), memorandum INV-EE-129 (September 14, 2007), memorandum INV-LL-067 (August 28, 2013), memorandum INV-RR-082 (August 28, 2019), official U.S. import statistics, and compiled from data submitted in response to Commission questionnaires in this review and presented in Tables 1.3 and 1.4. For the current review, quantity is based on data submitted in response to Commission questionnaires and official U.S. import statistics as adjusted using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2000 are from the last year of the original investigation; 2006 from the last year of the first review; 2012 the last year of the second review; 2018 the last year of the third review; and 2024 the last full year of the current review. Import treatment from the original investigation and prior and current review is not the same. The original investigations adjusted official import statistics for reported excluded pipe for Japan and nonsubject sources. The first review used questionnaire data of in-scope imports from Japan and official import statistics for nonsubject sources with a minor exclusion for one firm's imports. The second review used questionnaire data of in-scope imports from Japan and adjusted official import statistics for reported excluded pipe from nonsubject sources. The third review used dutied imports from Japan and adjusted official import statistics for reported excluded pipe from nonsubject sources. The current review uses questionnaire data of in-scope imports from Japan and adjusted official import statistics for reported excluded pipe from nonsubject sources.

Statutory criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation “would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury.”

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury--

(I) IN GENERAL.— . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account—

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce’s findings) regarding duty absorption

(II) VOLUME.—In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including—

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.

(III) PRICE.—In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(IV) IMPACT ON THE INDUSTRY.—In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to—

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(VI) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider

information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of report

Information obtained during the course of the proceeding that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for CWLDLP as collected in the original investigation, prior reviews, and the current full five-year review is presented in appendix C. U.S. industry data are based on the questionnaire responses of nine current and former U.S. producers of CWLDLP that are believed to have accounted for all known domestic production of CWLDLP in 2024. U.S. import data and related information are based on Commerce’s official import statistics as adjusted to remove excluded merchandise and the questionnaire responses of 24 U.S. importers of CWLDLP. Based on official Commerce import statistics of in scope CWLDLP and excluded large diameter line pipe provided for by the specified HTS statistical reporting numbers,²⁸ importers’ questionnaire data accounted for virtually all (***) percent) imports from Japan by quantity, and a large majority of imports from all other sources (***) percent) and of total U.S. imports (***) percent) by quantity during 2024. Foreign industry data and related information are based on the questionnaire responses of two producers and three current and former exporters of CWLDLP in Japan that are believed to have accounted for all known production. Responses by U.S. producers, importers, purchasers, and foreign producers of CWLDLP to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

²⁸ Commerce statistics are based on HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, as accessed July 16, 2025. (Imports for consumption data series).

Commerce's reviews

Administrative reviews and duty absorption findings

Commerce has completed no administrative reviews of the subject order and has issued no duty absorption findings with respect to CWLDLP from Japan since the original investigations.

Changed circumstances reviews

Commerce has conducted two changed circumstances reviews with respect to CWLDLP from Japan. In the first changed circumstances review, BP America requested that Commerce revoke in part the antidumping duty order with respect to imports meeting the following specifications: American Petroleum Institute ("API") grades X- 80 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.90 inch or more; and, in API grades X-100 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.54 inch or more. Having received no comments from domestic parties opposing the partial revocation of the order, Commerce made an affirmative determination that the order on imports from Japan be revoked with respect to imports meeting the above-mentioned specifications.²⁹

In the second changed circumstances review, BP America requested an exclusion involving large diameter line pipe with an API grade X-80 having an outside diameter of 21 inches and wall thickness of 0.625 inch or more and the domestic interested parties (American, Berg, and Stupp) consented to the request. Commerce made an affirmative determination, that large diameter line pipe with the above-mentioned specifications be excluded from the order on Japan.³⁰

Scope rulings

Commerce has conducted one scope ruling with respect to CWLDLP from Japan, in which it determined that CSA 550 pipe having an outside diameter of 48 inches up to and including 52 inches and a wall thickness of 0.90 inches or more is comparable to API X80 (as described above) and thus is excluded from the scope of the order on Japan.³¹

²⁹ 67 FR 64870, October 22, 2002.

³⁰ 71 FR 62584, October 26, 2006.

³¹ 79 FR 30821, May 29, 2014.

Five-year reviews

Commerce has issued the final results of its expedited review with respect to Japan.³² Table 1.5 presents the dumping margins calculated by Commerce in its original investigations and first, second, third, and fourth reviews.

Table 1.5 CWLDLP: Commerce’s original and first, second, third, and fourth five-year dumping margins for producers/exporters in Japan

Producer / exporter	Original margin (percent)	First five-year review margin (percent)	Second five- year review margin (percent)	Third five- year review margin (percent)	Fourth five- year review margin (percent)
Nippon Steel Corp.	30.80	30.80	30.80	See note	See note
Kawasaki Steel Corp.	30.80	30.80	30.80	See note	See note
All others	30.80	30.80	30.80	See note	See note

Source: 66 FR 47172, September 11, 2001; 72 FR 10498, March 8, 2007; 78 FR 10134, February 13, 2013; 84 FR 1059, February 1, 2019; 90 FR 303, January 3, 2025.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 30.80 percent.

³² 90 FR 303, January 3, 2025.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:

The product covered by this order is certain welded carbon and alloy line pipe, of circular cross section and with an outside diameter greater than 16 inches, but less than 64 inches, in diameter, whether or not stenciled. This product is normally produced according to American Petroleum Institute (API) specifications, including Grades A25, A, B, and X grades ranging from X42 to X80, but can also be produced to other specifications.

- *Specifically not included within the scope of this investigation is American Water Works Association (AWWA) specification water and sewage pipe and the following size/grade combinations; of line pipe: Having an outside diameter greater than or equal to 18 inches and less than or equal to 22 inches, with a wall thickness measuring 0.750 inch or greater, regardless of grade.*
- *Having an outside diameter greater than or equal to 24 inches and less than 30 inches, with wall thickness measuring greater than 0.875 inches in grades A, B, and X42, with wall thickness measuring greater than 0.750 inches in grades X52 through X56, and with wall thickness measuring greater than 0.688 inches in grades X60 or greater.*
- *Having an outside diameter greater than or equal to 30 inches and less than 36 inches, with wall thickness measuring greater than 1.250 inches in grades A, B, and X42, with wall thickness measuring greater than 1.000 inches in grades X52 through X56, and with wall thickness measuring greater than 0.875 inches in grades X60 or greater.*
- *Having an outside diameter greater than or equal to 36 inches and less than 42 inches, with wall thickness measuring greater than 1.375 inches in grades A, B, and X42, with wall thickness*

measuring greater than 1.250 inches in grades X52 through X56, and with wall thickness measuring greater than 1.125 inches in grades X60 or greater.

- *Having an outside diameter greater than or equal to 42 inches and less than 64 inches, with a wall thickness measuring greater than 1.500 inches in grades A, B, and X42, with wall thickness measuring greater than 1.375 inches in grades X52 through X56, and with wall thickness measuring greater than 1.250 inches in grades X60 or greater.*
- *Having an outside diameter equal to 48 inches, with a wall thickness measuring 1.0 inch or greater, in grades X-80 or greater. In API grades X80 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.90 inch or more.*
- *In API grades X100 or above, having an outside diameter of 48 inches to and including 52 inches, and with a wall thickness of 0.54 inch or more.*
- *An API grade X-80 having an outside diameter of 21 inches and wall thickness of 0.625 inch or more.³³*

³³ 84 FR 54837, October 11, 2019.

Tariff treatment

CWLDLP is imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000. The general rate of duty is “free” for HTS subheadings 7305.11.10, 7305.11.50, 7305.12.10, 7305.12.50, 7305.19.10, and 7305.19.50.³⁴ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

³⁴ These HTS provisions under which CWLDLP is imported may contain products excluded from the scope of the review.

CWLDLP originating in Japan is subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.³⁵ Measures imposed on CWLDLP under section 232 of the Trade Expansion Act of 1962 as amended, apply to all countries. While the section 232 measures implemented in 2018 changed over time for various countries, effective June 4, 2025, all countries were subject to a 50 percent duty under section 232, with the exception of the United Kingdom that is subject to a 25 percent duty.

CWLDLP originating in Japan is not subject to the tariffs initiated in April 2025 under the International Emergency Economic Powers Act (“IEEPA”).³⁶ The trade agreement between the United States and Japan which was announced on July 22, 2025, does not impact the tariff treatment for CWLDLP.³⁷

³⁵ The history of section 232 measures on CWLDLP from Japan are as follows: Effective March 23, 2018, steel articles originating in Japan were subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective April 1, 2022, steel articles originating in Japan became subject to tariff-rate quotas (“TRQs”), and imports that exceeded the TRQ limits became subject to the section 232 duties. Effective March 12, 2025, the TRQs for Japan were terminated and steel articles originating in Japan were subject to an additional 25 percent ad valorem duty under section 232. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product. 83 FR 11625, March 15, 2018; 87 FR 19351, March 31, 2022; 90 FR 9817, February 18, 2025; 90 FR 24199, June 9, 2025. See also HTS heading 9903.81.87 and U.S. note 16(i) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 29, USITC Publication 5685, November 2025, pp. 99.3.39 to 99.3.40, 99.3.411 to 99.3.412.

³⁶ Articles subject to section 232 tariffs, including CWLDLP, are not subject to the tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 and 9903.01.33 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 29, Publication 5685, November 2025, pp. 99.3.5 to 99.3.15, 99.3.343, 99.3.345.

³⁷ The agreement modifies the application of the tariffs initiated in April 2025 under IEEPA and reduces various sector-specific tariffs, among other provisions. However, as stated above products subject to section 232 tariffs, including CWLDLP, are not subject to tariffs initiated in April 2025 under IEEPA. See also HTS headings 9903.02.72 and 9903.02.73 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. 90 FR 43535, September 4, 2025. 90 FR 44638, September 16, 2025. USITC, HTS (2025) Revision 29, Publication 5685, November 2025, p. 99.3.374.

The product

Description and uses³⁸

Line pipe is used for conveyance of gas, oil, or water, generally in a pipeline or utility distribution system. It is produced to API specifications.³⁹ CWLDLP is line pipe with an outside diameter greater than 16 inches but less than 64 inches, excluding water pipe as specified by the American Water Works Association and certain size/grade combinations of line pipe.⁴⁰

Line pipe can be produced from certain carbon or alloy steel. Carbon steel contains controlled amounts of carbon and manganese. Alloy steels contain measured amounts of alloying elements, typically including nickel, chromium, and molybdenum and provide physical properties not feasible with carbon steels. Line pipe is typically produced domestically in lengths of 40 feet or greater with a bare finish or a lacquered finish to protect the pipe from rusting, which is vital for storage in humid regions or for waterborne transportation.

CWLDLP generally bears an API line pipe stencil and is normally produced in conformance with API 5L specifications. The API 5L specification for line pipe indicates grades A25, A, B, and "X" grades from X-42 through X-80; process of manufacture (seamless pipe, electric resistance welded pipe, or continuous welded pipe); product specification levels (PSL 1 and PSL 2); and heat treatment and test pressure. The API 5L grades define the strength level of the pipe and the steel used to make the pipe. For grades A25 and X42 to X80, the last two digits reflect the yield strength of the steel in thousands of pounds per square inch ("psi"). Lower grades of line pipe, specifically grades A25, A, and B have lower strength but have other desirable properties such as superior malleability and weldability. CWLDLP can have multiple stencils, signifying compliance with more than one line pipe certification such as grade B/X42, as well as standard pipe, piling, or structural pipe certifications.

³⁸ Unless otherwise noted, this information is based on Certain Welded Large Diameter Line Pipe from Japan, Inv. No. 731-TA-919 (Third Review), USITC Publication 4973, September 2019 ("Third review publication"), pp. 1.15 to 1.17.

³⁹ API specification 5L provides standards for "pipe suitable for use in conveying gas, water, and oil in both the oil and natural gas industries." The specification covers seamless and welded steel line pipe. Seamless pipe, although covered by the 5L specification, is outside the scope of this review. Although pipe can be used to convey water, pipe certified to American Water Works Association specifications is likewise outside the scope of this review.

⁴⁰ Refer to section below for more information on excluded products.

CWLDLP is produced by one of two major manufacturing methods. The first method, submerged arc welding (“SAW”), encompasses both helical (or spiral) welding (“HSAW”) and longitudinal welding (“LSAW”). Further, double submerged arc welded (“DSAW”) steel pipe is available in straight and spiral-welded formats and used in a variety of applications, as discussed below. The second method is electric resistance welding (“ERW”).⁴¹

HSAW and ERW pipe are both made from steel coils whereas LSAW pipe is made from steel plates. Because of the helical wrap of the steel, HSAW pipe size is not limited by the coil width and is generally used for larger diameter pipe projects in the United States. ERW is limited by the coil width and is suitable for thinner walled and smaller diameter pipes. LSAW is limited by the width of the plates. The manufacturing of HSAW and ERW is a continuous forming process versus the piece-by-piece production of LSAW. HSAW and ERW pipe are generally used in less demanding applications, while LSAW is preferred in more demanding applications.⁴² The HSAW method of pipe production has become more common due to technological advances such as the ability to produce wider and thicker hot-rolled coils and improvements in welding technology. Pipe is usually furnished in nominal lengths and within certain length tolerances. Nominal lengths typically range from a minimum of 20 feet to a maximum of 80 feet. However, tolerance lengths widen the minimum range from 9 feet to a maximum length of 100 feet⁴³ depending on whether the pipe is threaded-and-coupled or plain-end. Tables 1.6, 1.7, and 1.8 summarize this information.

⁴¹ Industry practitioners now generally employ high frequency welding (“HFW”) which is a type of ERW that contrasts with low-frequency welding (“LFW”). HFW has been adopted because technological improvements in welding and steel production have allowed producers to avoid LFW that is associated with defects. HFW is the industry standard recognized by the API for welded pipes. Staff field trip report, Welspun Tubular, July 11, 2025; JD Fields & Company, Inc., *The Evolution of High-Frequency Welded Line Pipe*, February 20, 2025, <https://www.jdfields.com/news-and-case-studies/the-evolution-of-high-frequency-welded-line-pipe>, retrieved July 24, 2025.

⁴² LSAW pipes tend to be stronger, more durable, and more resistant to internal pressure. Therefore, LSAW pipes are considered more suitable in applications such as the conveyance of higher-pressure oil and natural gas. Octal Steel, *LSAW Pipe and SSAW Pipe Specifications, Differences*, <https://www.octalsteel.com/faq/law-pipe-and-ssaw-pipe>, retrieved August 19, 2025.

⁴³ Staff field trip report, Welspun Tubular, July 11, 2025.

Table 1.6 CWLDLP: Maximum and minimum length specifications for threaded-and-coupled pipe

Lengths in feet

Nominal length	Minimum length	Minimum average length for each order item	Maximum length
20	16	17.5	22.5
40	22	35	45

Source: Third review publication, p. 1.17, Octal Steel, API 5L Steel Line Pipe Length Tolerance Designation, <https://www.octalsteel.com/steel-pipe-length-tolerance/>, retrieved September 16, 2025.

Table 1.7 CWLDLP: Maximum and minimum length specifications for plain-end pipe

Lengths in feet

Nominal length	Minimum length	Minimum average length for each order item	Maximum length
20	9	17.5	22.5
40	14	35	45
50	17.5	43.8	55
60	21	52.5	65
80	28	70	85

Source: Third review publication, p. 1.17. Octal Steel, API 5L Steel Line Pipe Length Tolerance Designation, <https://www.octalsteel.com/steel-pipe-length-tolerance/>, retrieved September 16, 2025.

Typically, LSAW is the most expensive form of CWLDLP. A summary of the cost differences among ERW, LSAW, and HSAW pipe produced in the United States is presented in table 1.8.

Table 1.8 CWLDLP: Cost differences by manufacturing process⁴⁴

Manufacturing method	Typical maximum outside diameter (inches)	Typical maximum length (feet)	Cost	Typical maximum pipe wall thickness (inches)
ERW	24	80	Least expensive production method	0.63
LSAW	48	60	Most expensive production method	1.25
HSAW	64	100	N/A	1.03

Source: Third review publication, p. 1.17; Staff field trip report, Welspun Tubular, July 11, 2025.

⁴⁴ Although these size/grade maximums are typical, most producers take custom orders and can produce line pipe that exceeds these thresholds. For example, Dura-Bond advertises its ERW pipe outer diameter up to 28 inches with a wall thickness up to one inch. Staff field trip report, Welspun Tubular, July 11, 2025; SMS Group, “World’s Largest Continuous ERW Tube Welding Machine”, <https://www.sms-group.com/en-mx/insights/all-insights/worlds-largest-continuous-erw-tube-welding-machine>, March 26, 2024.

Excluded line pipe

Certain size/grade combinations of line pipe are excluded from the antidumping order. For example, any line pipe with an outer diameter measuring 28 inches that has a grade of X54 (in-scope characteristics) that also has a wall thickness greater than 0.75 inches (excluded product characteristic) is excluded from this review. Generally, the line pipe products excluded from the scope are considered high-end, specialty, or “niche.”⁴⁵ Such line pipe products can command higher prices, but they also tend to have higher costs of production.⁴⁶ Included among these products are very thick-walled line pipe used in Arctic⁴⁷ or offshore deep-water environments, or to convey highly corrosive (“sour”) gases.⁴⁸

⁴⁵ Hearing transcript, pp. 42, 130 to 133 (Kaplan, Shimbo).

⁴⁶ Hearing transcript, pp. 206 to 207 (Husisian).

⁴⁷ External arctic conditions can subject pipelines to very low temperatures that require the steel to be able to demonstrate resistance to fracture initiation and propagation at these extremities of service. Longitudinal welding pipes made of nickel alloys and nickel-based alloys have excellent strength and toughness at low temperatures and so are used in cryogenic environments. However, some pipelines have used X100 grades or higher, manufactured using the Thermo-Mechanical Control Process, which produces microstructures and mechanical properties that give the steel higher strength and toughness, including through combining low carbon content with the addition of manganese, niobium, and titanium. JFE Steel Corporation, Posthearing brief, Attachment A, p. 12.

⁴⁸ Sour gas line pipe is usually produced to the National Association of Corrosion Engineers (“NACE”) standards, MR0175, which sets out the material requirements for hydrogen sulfide containing oil and gas production and equipment. For carbon and alloy steel pipes, NACE MR0175 has content limits of sulfur ($S \leq 0.002$ percent), phosphorus ($P \leq 0.020$ percent), and carbon ($C \leq 0.10$ percent). Mechanical properties of tensile strength and yield strength are generally the same as general line pipes referred to in the standards. Line pipe steels used in sour service are prone to hydrogen-induced cracking (“HIC”) depending on metallurgical and environmental factors and sulfide stress cracking (“SSC”). HIC testing is a mandatory test for NACE pipe and fittings while SSC testing is specific to alloy steel, which puts the test material in a corrosive environment plus a constant pulling force. Resistance to such HIC is achieved with stringent inclusion control, minimizing manganese sulfide, aluminum oxide, and niobium carbide. See Gnee Corton Steel, What is NACE MR0175/ISO 15156 Pipe and Fittings, <https://www.cortensteels.com/nace-mr0175-pipe>, retrieved August 1, 2025. JFE Steel Corporation, Posthearing brief, Attachment A, pp. 12 to 13.

Manufacturing process⁴⁹

The API 5L specification allows for a number of line pipe manufacturing processes and permits both ERW and SAW processes in all grades and classes of large diameter line pipe. During the original investigation instituted in 2001, domestic producers made CWLDLP using only one production method, either the LSAW or the ERW process. Currently, several domestic producers reportedly employ multiple production methods. All CWLDLP production includes forming, welding, and finishing operations, but the details of these steps differ by production method as described below.

SAW manufacturing

HSAW pipe is produced by spiral welding. The coiled steel strip is straightened by a decoiler machine. The edges of the strip are trimmed to the desired size. The strip is guided into a forming station to produce a cylindrical hollow body, at a predetermined forming angle, ensuring a proper welding gap between the abutting edges. Inside outside welding is performed by an automatic submerged arc process. Pipe produced by the HSAW process has some advantages compared to pipe produced by the ERW and LSAW processes. ERW and LSAW pipe diameters are limited by the maximum width of the available coil or plate. By contrast, HSAW pipe diameter is determined by the forming angle, during the formation of the cylindrical hollow body, allowing a pipe's diameter to be much larger than the width of the coiled steel input. In addition, HSAW pipe can be produced up to 100-foot lengths while LSAW pipe is limited to 60-foot lengths in most mills.⁵⁰

LSAW pipe is produced from cut-to-length steel plate. Each individual plate moves through various steps prior to welding including (a) shearing and edge planning to ensure that the plate is flat and aligned so that the two edges of the steel plate are parallel and square with the ends, (b) crimping or bending of the plate edges in order to avoid a flat surface along the seam of the pipe, and (c) bending the plate to the desired form.

⁴⁹ Unless otherwise noted, this information is based on the third review publication, pp. 1.18 to 1.23.

⁵⁰ Staff field trip report, Welspun Tubular, July 11, 2025.

The two primary methods of shaping line pipe in the LSAW process are the pyramid rolling and the U-O-E methods. The pyramid rolling machine consists of an elongated three-roll bending apparatus with the two bottom rolls fixed and the top roll movable along a vertical plane. The steel plate moves into position beneath the top roll and, through the proper combination of force and counterpressure, is shaped into a cylinder around the top roll. The edges of the pipe are formed by a continuous crimping machine, which prepares the edges for welding. When this is accomplished, the pipe is welded along the joint axis. In some cases, a second welding seam is welded along the axis, a process known as double submerged arc welding. In the DSAW process, both inside and outside welds are performed. The submerged welding process protects the steel from contamination from impurities in the air.

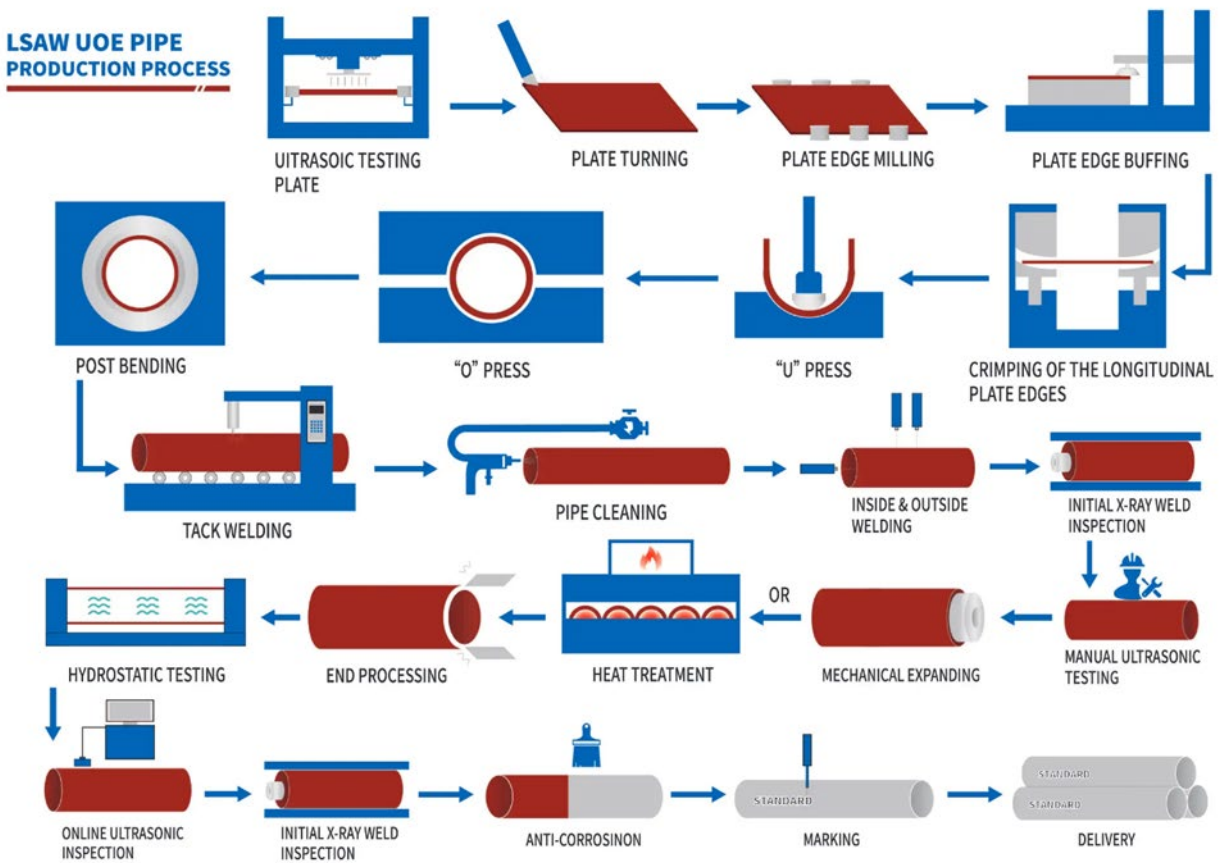
DSAW pipe has a longitudinal butt joint welded in at least two passes, one of which is on the inside of the pipe. These welds are made by heating with an electric arc between the bare metal electrodes. Pressure is not used. Filler metal is inserted into the welds through the electrodes. For diameters above 36 inches, double seam welded pipe is specified as an alternative in API 5L. This has two longitudinal seams 180 degrees apart, formed by the SAW process. Finally, the pipe is sized to ensure that it meets specifications on roundness and diameter at the ends. The sizing machine consists of a top and bottom roll shaped to the desired configuration of the pipe. Pressure is applied on the top roll to exert a force on the pipe as it passes between the rolls.

In the U-O-E method, the plate is crimped by bending the edges upward; it then enters the U-press, where a die bends it into a "U" shape. Next, the "U" enters the O-press, where the walls of the "U" are forced together, resulting in an "O" shaped pipe. The pipe is then welded along the joint axis. To round the pipe and ensure proper yield strength (which may be reduced in the O-press), two methods of expansion can be used: mechanical or hydraulic. In the mechanical expander, the pipe is moved over a head mechanism with symmetrical segments that can exert force on the inside of the pipe, causing it to expand. In the hydraulic expander, the pipe is closed at both ends, filled with water and then pressurized. Under high pressure, the pipe expands to fill outside dies of the desired size. The pipe is then tested and inspected.

LSAW pipe is welded with the metal edges heated with an electric arc between the edges and a consumable electrode or electrodes, which provide the filler metal. The weld is blanketed by a shield of granular, fusible flux to protect the hot weld from chemically reacting with the surrounding air. Pipes usually are welded on both the outside and inside of the same seam. Following the welding process, the leftover scaly flux deposit is scraped away, and the pipe is cleaned. The weld is then inspected to correct any defects. Specific heat treatments can be performed to achieve the desired physical properties for the weld section.

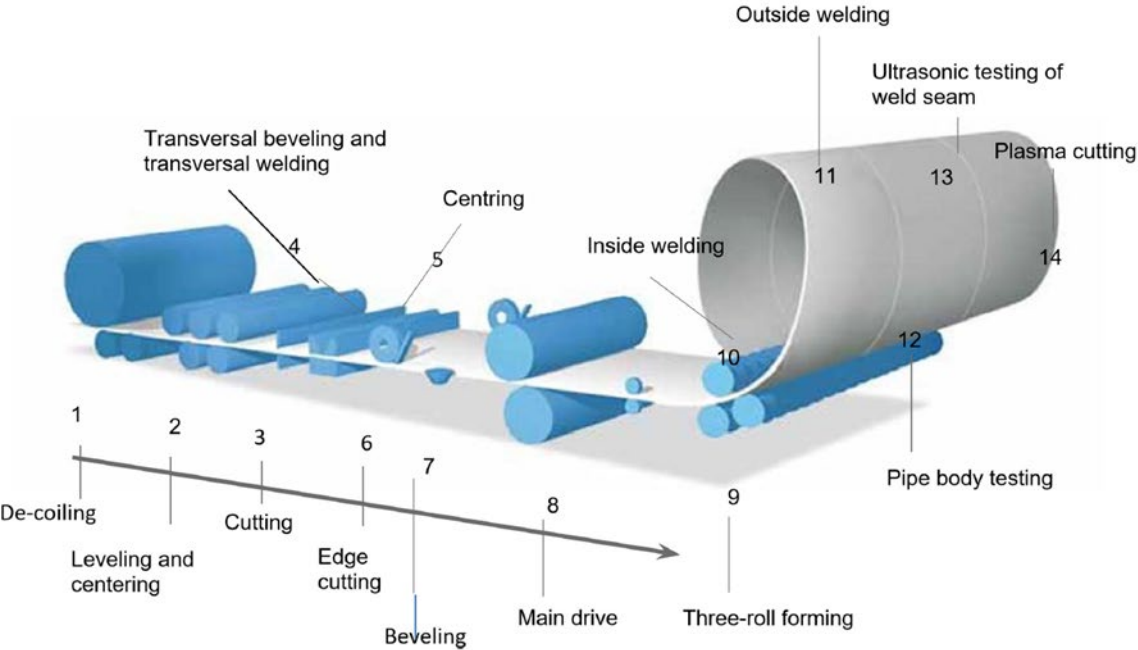
Subsequent to the welding stage, the final diameter for the pipe is obtained by means of a hydraulic press that forces the pipe shell against an outside retaining jacket. Alternatively, expansion can also be achieved mechanically by inserting a mandrel inside the pipe. Following this stage, the pipe may be subject to various tests including hydrostatic testing and X-ray examination of the weld to detect any defects and, if necessary, would undergo finishing of the pipe ends including beveling. Figures 1.2 and 1.3 illustrate the LSAW and HSAW manufacturing processes.

Figure 1.2 CWLDLP: LSAW manufacturing processes



Source: Uniasen, LSAW Steel Pipe: UOE LSAW Pipe Forming Process, found at: <https://uniasen.com/products/law-pipe/>, retrieved July 30, 2025.

Figure 1.3 CWLDLP: HSAW manufacturing process

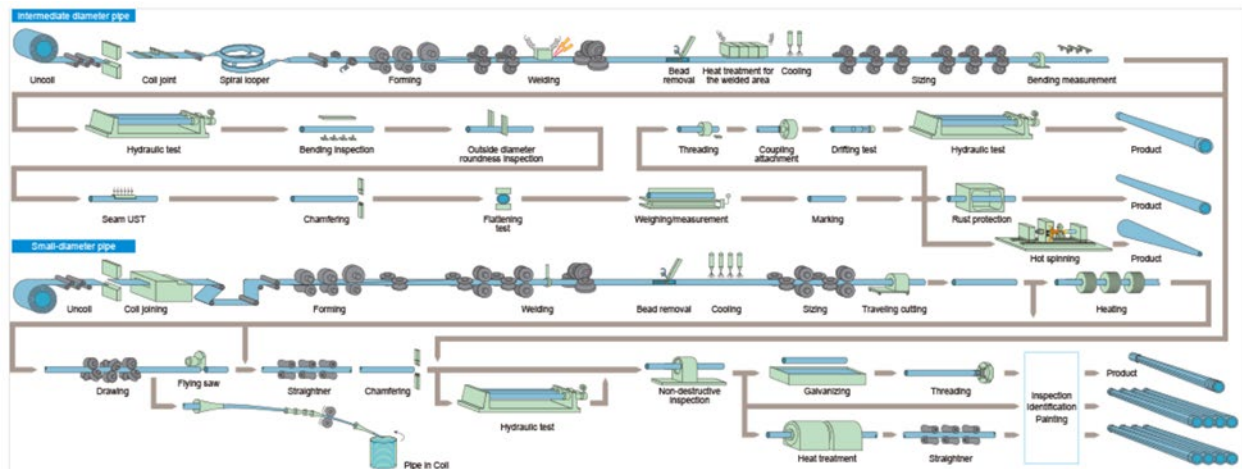


Source: ArcelorMittal, Projects Europe: Spirally Welded Steel Pipe, p. 7, found at: <https://projects.arcelormittal.com/media/apzevnbu/amfs-spirally-welded-foundation-tubes-2015.pdf>, retrieved July 30, 2025.

ERW manufacturing

ERW is the dominant manufacturing method for producing welded line pipe with an outside diameter (“O.D.”) up to 24 inches. ERW pipe is formed from hot-rolled coil produced on a hot-strip mill. The forming stage of ERW pipe begins with a single-width strip, sometimes referred to as “skelp.” The width of the strip is equal to the perimeter of the pipe to be welded but the edges may be sheared to pre-specified widths. The lead end of each coil is squared for threading into the mill. The cold strip is continuously formed into a circular shape by shaped rolls. In the welding stage, the unwelded pipe is heated by electric resistance or electric induction to the desired temperature, then the formed edges are mechanically pressed together to form a seam. This welding process does not need a filler metal. Instead, the welding pressure causes some of the metal to be squeezed from the joint, forming a bead of metal on the inside and the outside of the tube. This bead, or welding flash, is usually trimmed from both the inside and the outside surfaces. The pipe is then cut to length and final testing and finishing are highly similar to those of the SAW production process. Figure 1.4 illustrates the ERW manufacturing process.

Figure 1.4 CWLDLP: ERW manufacturing process



Source: Nippon Steel, Pipes and Tubes: Electric resistance-welded pipes & tubes, found at <https://www.nipponsteel.com/en/product/pipe/process/>, retrieved August 6, 2025.

Domestic like product issues

In its original determinations and its full first, second, and third five-year review determinations, the Commission found a single domestic like product consisting of CWLDLP, coextensive with Commerce's scope.⁵¹ In its notice of institution in these current five-year reviews, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.⁵² The American Line Pipe Producers Association ("ALPPA") commented on the Commission's definition of the domestic like product and indicated that it agreed with the Commission's domestic like product definition. JFE responded that it did not have any comments regarding the scope of the domestic like product or the definition of the domestic industry,⁵³ No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires. No other interested party provided further comment on the domestic like product. In its prehearing brief, counsel for ALPPA agreed with the definition of the domestic like product set forth in the original investigations.⁵⁴

⁵¹ Original publication, p. 6; First review publication, p. 6; Second review publication, p. 7; Third review publication, p. 8.

⁵² 89 FR 71417, September 3, 2024.

⁵³ *Substantive Response of the American Line Pipe Producers Association*, p. 24; *Substantive Response of JFE Steel Corporation*, p. 9 to 10.

⁵⁴ Prehearing brief of the American Line Pipe Producers' Association, pp. 5.

U.S. market participants

U.S. producers

During the original investigations, seven firms supplied the Commission with information on their U.S. operations with respect to CWLDLP. These firms accounted for all known U.S. production of CWLDLP in 2000.⁵⁵ During the first full five-year review, eight firms, representing all known production of CWLDLP in the United States in 2006, provided the Commission with at least partial information on their line pipe operations.⁵⁶ During the second full five-year review, 10 firms, representing all known production of CWLDLP in the United States in 2012, provided the Commission with information on their line pipe operations.⁵⁷ During the third full five-year review, nine firms, representing all known production of CWLDLP in the United States in 2018, provided the Commission with information on their line pipe operations.⁵⁸ In these current proceedings, the Commission issued U.S. producers' questionnaires to nine firms, all of which provided the Commission with full or partial information on their product operations. These firms are believed to account for all known U.S. production of CWLDLP in 2024. Presented in table 1.9 is a list of the seven current domestic producers of product and each company's position on continuation of the orders, production locations, and share of reported production of CWLDLP in 2024.

⁵⁵ The seven U.S. producers that supplied the Commission with usable questionnaire information during the original investigations were: ACIPCO, Berg, Stupp, Bethlehem, Napa Pipes, SAW Pipes, and U.S. Steel. Original publication, table 3.1.

⁵⁶ The seven U.S. producers that supplied the Commission with usable questionnaire information during the first five-year review were: ACIPCO, Berg, Camp-Hill/U.S. Steel, Dura-Bond Pipe ("Dura-Bond"), Evraz Oregon Steel Mills, SAW Pipes, and Stupp. During the review period, the subject products were produced for U.S. Steel under a toll processing agreement with Camp-Hill. First review publication, table 1.8.

⁵⁷ The ten U.S. producers that supplied the Commission with usable questionnaire information during the second five-year review were: ACIPCO, Berg, Dura-Bond, Evraz Oregon Steel Tubular, JSW Steel, PSL North America, Stupp, United Spiral Pipe, U.S. Steel, and Welspun. Second review publication, table 1.5.

⁵⁸ The nine U.S. producers that supplied the Commission with useable questionnaire information during the third five-year review were: ACIPCO, Berg, CSI, Dura-Bond, Evraz Oregon Steel Tubular, Jindal, JSW Steel, Stupp, and Welspun. Third review publication, table 1.7.

Table 1.9 CWLDLP: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2024

Share in percent

Firm	Position on continuation of orders	Production locations	Share of production
ACIPCO	***	Birmingham, AL	***
Berg	***	Panama City, FL Mobile, AL	***
Dura-Bond	***	Steelton, PA McKeesport, PA	***
Jindal Pipe	***	Baytown, TX	***
Jindal Tubular	***	Bay St. Louis, MS	***
JSW	***	Baytown, TX	***
Welspun	***	Little Rock, AR	***
All firms	Various	Various	100.0

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

Note: Evraz Oregon and Stupp are not included in this summation of 2024 operations. Evraz Oregon stopped producing CWLDLP in 2020, and Stupp stopped producing CWLDLP in 2022.

As indicated in table 1.10, three current U.S. producers⁵⁹ are related to current foreign producers of CWLDLP,⁶⁰ while none are related to U.S. importers of CWLDLP. In addition, as discussed in greater detail in Part 3, one U.S. producer directly imports CWLDLP, while none purchase the subject merchandise from U.S. importers.⁶¹ No U.S. producer reported importing or purchasing imports of subject CWLDLP from Japan.

⁵⁹ U.S. producer *** reported in its questionnaire response that it is related to U.S. producers ***.

⁶⁰ U.S. producer *** identified in its questionnaire response *** as its parent company and related producer. The firm also reported that ***. See correspondence with ***, August 4, 2025.

⁶¹ U.S. producer ***.

U.S. importers

In the original investigations, 22 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of CWLDLP, accounting for almost all subject imports from Japan between January 1998 to June 2001.⁶² In the first five-year review, the Commission received usable data from 21 importing firms.⁶³ In the second five-year review, the Commission received usable data from 15 importing firms.⁶⁴ In the third five-year review, the Commission received useable data from 22 firms.⁶⁵

In the current proceedings, the Commission issued U.S. importers' questionnaires to 51 potential importers of CWLDLP, as well as to all U.S. producers of CWLDLP. The Commission received usable questionnaire responses from 24 firms. Based on official Commerce import statistics of in scope CWLDLP and excluded large diameter line pipe provided for by the specified HTS statistical reporting numbers,⁶⁶ importers' questionnaire data accounted for virtually all (***) percent) imports from Japan by quantity, and a large majority of imports from all other sources (***) percent) and of total U.S. imports (***) percent) by quantity during 2024. Table 1.11 lists all responding U.S. importers of CWLDLP from Japan and other sources, their locations, and their shares of U.S. imports in 2024. One responding importer, Berg, currently produces CWLDLP in the United States.⁶⁷

⁶² Original publication, p. 4.1.

⁶³ First review publication, p. 1.28.

⁶⁴ Second review publication p. 1.28.

⁶⁵ Third review publication, p. 1.27.

⁶⁶ Commerce statistics are based on HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, as accessed July 16, 2025. (Imports for consumption data series).

⁶⁷ ***. As noted above, U.S. producer Evraz Oregon ceased production of CWLDLP at its Portland, Oregon facility in 2020, and has de-commissioned and removed all of the equipment used to produce CWLDLP. ***. See table 3.1 and email correspondence with *** July 15, 2025.

Table 1.11 CWLDLP: U.S. importers, their headquarters, and share of imports within a given source, 2024

Shares in percent

Firm	Headquarters	Japan	Nonsubject sources	All import sources
Bechtel	Houston, TX	***	***	***
Berg	Panama City, FL	***	***	***
CCZJV-GPX	Houston, TX	***	***	***
Chevron	Houston, TX	***	***	***
Corpac	Aventura, FL	***	***	***
Edgen Murray	Houston, TX	***	***	***
Europipe	Muelheim An Der Ruhr/ Germany	***	***	***
Evraz Inc NA Canada	Rm Of Sherwood, SK	***	***	***
Forza	Brownsville, TX	***	***	***
Genesis Energy	Houston, TX	***	***	***
Histeel	Houston, TX	***	***	***
Hyundai Steel	Houston, TX	***	***	***
Interpipe	Houston, TX	***	***	***
JFE Shoji America	Long Beach, CA	***	***	***
Marubeni-Itochu	Houston, TX	***	***	***
Master Pipe Distribution	Los Angeles, CA	***	***	***
Metal One America	Rosemont, IL	***	***	***
Mitsui & Co (USA)	New York, NY	***	***	***
National Oilwell Varco	Houston, TX	***	***	***
Rushmore	Baytown, TX	***	***	***
Salzgitter	Houston, TX	***	***	***
Shawcor	Houston, TX	***	***	***
Sumitomo Corporation of Americas	Houston, TX	***	***	***
Tata International	Schaumburg, IL	***	***	***
All firms	Various	—	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". These shares are based on included products for both Japan and nonsubject sources. However, firms that show zero shares may have imported included product from 2019 to 2023, or they may have imported excluded product exclusively.

U.S. purchasers

The Commission received 14 usable questionnaire responses from firms that bought CWLDLP during 2022 to 2024.⁶⁸ Eight responding purchasers are distributors, four are end users, and two identified themselves as “other” end user. Most responding U.S. purchasers were located in Texas. The responding purchasers primarily represented firms in the oil and gas industry. Large purchasers of CWLDLP include ***.

⁶⁸ Of the 14 responding purchasers, nine purchased the domestic product, one purchased imports of the subject merchandise from Japan, nine purchased imports of CWLDLP from other sources, and one reported that at least some of its purchases were of unknown country source(s).

Apparent U.S. consumption and market shares

Quantity

Table 1.12 and figure 1.5 present apparent U.S. consumption and U.S. market shares by quantity for CWLDLP. Apparent U.S. consumption based on quantity increased sharply from 2022 to 2023, then declined in 2024 and was lower in interim 2025 than in interim 2024. The increase from 2022 to 2023 was largely driven by an increase in shipments by U.S. producers.⁶⁹ U.S. producers' market share based on quantity also increased from 2022 to 2023 but was lower in 2024 and in interim 2025 relative to interim 2024. Subject import market share based on quantity was less than *** percent throughout the 2022 to 2024 period and both interim periods. The market share of imports from nonsubject sources and all import sources based on quantity decreased over the 2022 to 2024 period but was higher in interim 2025 than in interim 2024.

⁶⁹ U.S. producers *** reported poor market conditions in 2022 that led to low levels of production of CWLDLP that year. See correspondence with ***, July 18; July 21; July 15; and July 31, 2025. In addition, Stupp, which exited the market in December 2022 ***. See *** U.S. producer questionnaire response, question 2.3a. See Part 3 for further details.

Table 1.12 CWLDLP: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; Shares in percent; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	308,252	1,089,772	935,499	279,628	236,748
Japan	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	243,338	260,397	279,938	74,098	106,381
All sources	Quantity	551,590	1,350,169	1,215,437	353,726	343,129
U.S. producers	Share of quantity	55.9	80.7	77.0	79.1	69.0
Japan	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	44.1	19.3	23.0	20.9	31.0
All sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Imports from Japan reflect only included product from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review.

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

Figure 1.5 CWLDLP: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Imports from Japan reflect only included product from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review.

Value

Table 1.13 and figure 1.6 present apparent U.S. consumption and U.S. market shares by value for CWLDLP. Apparent U.S. consumption based on value fluctuated and increased from 2022 to 2024, more than doubling from 2022 to 2023, and was higher in interim 2025 than in interim 2024. The increase from 2022 to 2023 was largely driven by an increase in shipments by U.S. producers. U.S. producers' market share based on value fluctuated and increased from 2022 to 2024 and was lower in interim 2025 than in interim 2024. Subject import market share based on value was less than *** percent throughout the period for which data were collected. The market shares of imports from nonsubject and all import sources based on value fluctuated and decreased from 2022 to 2024 but were higher in interim 2025 than in interim 2024.

Table 1.13 CWLDLP: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; Shares in percent; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	568,453	1,873,060	1,558,729	454,571	391,278
Japan	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	979,577	2,260,994	1,923,566	546,407	574,963
U.S. producers	Share of value	58.0	82.8	81.0	83.2	68.1
Japan	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	42.0	17.2	19.0	16.8	31.9
All sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Import values are based on landed duty paid values. Imports from Japan reflect only included product from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review.

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

Figure 1.6 CWLDLP: Apparent U.S. consumption based on value, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Import values are based on landed duty paid values. Imports from Japan reflect only included product from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review.

Figure 1.7 presents U.S. producers' and U.S. importers' U.S. shipments and Japanese producers' shipments to all destination markets by source and grade in 2024. See Parts 3 and 4 of this report for a discussion of the data.

Figure 1.7 CWLDLP: U.S. producers' and U.S. importers' U.S. shipments and Japanese producers' shipments to all destination markets, by source and grade, 2024

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and presented in Table 3.10, Table 4.4, and Table 4.16. There were no U.S. shipments of included product from Japan in 2024.

Figure 1.8 presents data on U.S. producers' and U.S. importers' U.S. shipments and Japanese producers' shipments to all destination markets by source and production method in 2024. See Parts 3 and 4 of this report for a discussion of the data.

Figure 1.8 CWLDLP: U.S. producers' and U.S. importers' U.S. shipments and Japanese producers' shipments to all destination markets, by source and production method, 2024

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and presented in Table 3.11, Table 4.5, and Table 4.17. There were no U.S. shipments of included product from Japan in 2024.

Figure 1.9 presents data on U.S. producers' and U.S. importers' U.S. shipments and Japanese producers' shipments to all destination markets by source and outside diameter. See Parts 3 and 4 of this report for a discussion of the data.

Figure 1.9 CWLDLP: U.S. producers' and U.S. importers' U.S. shipments and Japanese producers' shipments to all destination markets, by source and outside diameter, 2024

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and presented in Table 3.11, Table 4.5, and Table 4.17. There were no U.S. shipments of included product from Japan in 2024.

Part 2: Conditions of competition in the U.S. market

U.S. market characteristics

CWLDLP is used to convey gas, oil, and other liquids, generally in a pipeline or utility distribution system. It is produced from cut-to-length plate and hot-rolled coil.¹ CWLDLP is typically sold to distributors and to end users in the project sector (such as pipelines for energy applications).²

Half of responding U.S. producers and the majority of responding importers and purchasers indicated that the market was not subject to distinctive conditions of competition. Firms that did identify distinctive conditions reported that steel prices, demand for natural gas and crude oil drilling, regulatory policies, and tight supply were distinct to the CWLDLP market. U.S. producers and importers reported that there had not been any major changes in product mix or marketing for CWLDLP in the U.S. market. Importer *** reported that there is increased demand for pipes with larger outside diameters and thicker walls for gas and carbon capture pipelines in response to the “public perception of safety issues with pipelines.”

Apparent U.S. consumption of CWLDLP decreased from January 2022 to December 2024 and was lower in January through March 2025 than in January through March 2024.

¹ *Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey, Inv. Nos. 701-TA-593-596 and 731-TA-1401-1406 (Review)*, USITC Publication 5609, April 2025.

² *Certain Welded Large Diameter Line Pipe From Japan, Inv. No. 731-TA-919 (Final)*, USITC Publication 3464, November 2001; *Certain Welded Large Diameter Line Pipe From Japan, Inv. No. 731-TA-919 (Third Review)*, USITC Publication 4973, September 2019.

Impact of section 301 tariffs and new and modified tariffs

Most responding firms reported that the 232 tariffs on steel and aluminum impacted the CWLDLP market (table 2.1) and while half of responding U.S. producers reported that new or modified tariffs did not have an impact on the market, most importers, purchasers, and foreign producers reported that they had (table 2.2). U.S. producers reported that section 232 measures caused an increase in steel prices and large diameter line pipe but indicated that the antidumping duties had a greater impact. Producer *** reported that the cost of raw materials increased but the “delta between costs and selling prices stayed about the same.” U.S. importers and purchasers reported higher domestic prices and restricted supply due to import measures related to section 232 and uncertainty associated with the new or modified tariffs.³

Table 2.1 CWLDLP: Firms' responses regarding the impact of the 232 tariffs on steel and aluminum imports

Count in firms responding

Firm type	Yes	No	Don't know
U.S. producers	8	0	0
Importers	15	4	5
Purchasers	12	0	2
Foreign producers	1	2	1

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

Table 2.2 CWLDLP: Firms' responses regarding the impact of the new or modified tariffs

Count in firms responding

Firm type	Yes	No	Don't know
U.S. producers	3	4	1
Importers	13	3	8
Purchasers	12	0	2
Foreign producers	2	0	2

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

³ For additional background information regarding section 232 and prices, see Economic Impact of Section 232 and 301 Tariffs on U.S. Industries, Investigation No. 332-591, USITC Publication 5405, March 2023. This retrospective analysis of U.S. trade, production, and prices in the industries directly and most affected by any section 232 or section 301 tariffs active as of March 15, 2022, was prepared in response to an explanatory statement accompanying the Consolidated Appropriations Act, 2022.

Channels of distribution

As shown in table 2.3, U.S. producers sold CWLDLP primarily to oil and gas end users throughout the period for which data were collected. U.S. importers of CWLDLP sold mainly to distributors in 2022 and 2023, then shifted toward oil and gas end users in 2024 and into 2025.

Table 2.3 CWLDLP: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January through March

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors	***	***	***	***	***
United States	Oil and gas end users	***	***	***	***	***
United States	Other end users	***	***	***	***	***
Japan	Distributors	***	***	***	***	***
Japan	Oil and gas end users	***	***	***	***	***
Japan	Other end users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Oil and gas end users	***	***	***	***	***
Nonsubject	Other end users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Oil and gas end users	***	***	***	***	***
All imports	Other end users	***	***	***	***	***

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

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

Geographic distribution

U.S. producers reported selling CWLDLP to all regions in the contiguous United States and importers reported selling only to the Central Southwest (table 2.4). For U.S. producers, 6.7 percent of sales were within 100 miles of their production facility, 75.0 percent were between 101 and 1,000 miles, and 18.3 percent were over 1,000 miles.⁴

Table 2.4 CWLDLP: Count of U.S. producers' and U.S. importers' geographic markets

Count in firms responding

Region	U.S. producers	Japan
Northeast	5	0
Midwest	6	0
Southeast	7	0
Central Southwest	8	2
Mountains	5	0
Pacific Coast	4	0
Other	0	0
All regions (except Other)	4	0
Reporting firms	8	2

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

Note: Other U.S. markets include AK, HI, PR, and VI.

⁴ No importers provided information regarding the distances from their points of shipment.

Supply and demand considerations

U.S. supply

Table 2.5 provides a summary of the supply factors regarding CWLDLP from U.S. producers and from Japan.

Table 2.5 CWLDLP: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	United States	Japan
Capacity 2022	Quantity	2,921,047	***
Capacity 2024	Quantity	2,485,486	***
Capacity utilization 2022	Ratio	14.9	***
Capacity utilization 2024	Ratio	37.9	***
Inventories to total shipments 2022	Ratio	***	***
Inventories to total shipments 2024	Ratio	***	***
Home market shipments 2024	Share	***	***
Non-US export market shipments 2024	Share	***	***
Ability to shift production	Count	***	***

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

Note: Responding U.S. producers accounted for all known U.S. production of CWLDLP in 2024. Responding foreign producer/exporter firms accounted for virtually all of U.S. imports of CWLDLP from Japan during 2024. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part 1, "Summary Data and Data Sources."

Domestic production

Based on available information, U.S. producers of CWLDLP have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced CWLDLP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the large availability of unused capacity and the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include a limited ability to shift shipments from alternate markets or inventories.

Capacity decreased and producers increased their production at a greater rate, so that capacity utilization increased from 2022 to 2024, yet remained relatively low. U.S. producers' inventories decreased throughout the period and were just over one-fourth of the starting inventories at the end of the period. Other products that producers reportedly can produce on the same equipment as CWLDLP are out-of-scope line pipe that is less than or equal to 16 inches, structural pipe, slurry and AWWA pipe, crop ends, and casing for ordnance. Factors affecting U.S. producers' ability to shift production include relative prices, and the costs of lost time on high value equipment, and the time required to switch over.

Subject imports from Japan

Based on available information, producers of CWLDLP from Japan have the ability to respond to changes in demand with moderate changes in the quantity of shipments of CWLDLP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are a sizable share of shipments to non-U.S. export markets and some ability to shift production. Factors mitigating responsiveness of supply include limited availability of unused capacity and virtually no inventories.

Reported allocated capacity increased and production increased as well so that capacity utilization increased substantially. Inventories decreased throughout the period from approximately *** percent in 2022 to approximately *** percent in 2024. Japanese producers reported selling almost *** of their shipments of CWLDLP in non-U.S. markets. Other products that responding foreign producer *** reportedly can produce on the same equipment as CWLDLP are ***. Japanese producer JFE reported that “***.” Factors affecting JFE's ability to shift production include ***.

Three responding Japanese manufacturers and exporters⁵ reported that there had not been any significant changes in the product range of CWLDLP, but ***. Four responding Japanese manufacturers and exporters reported that there have been changes in any factors affecting the supply of CWLDLP produced in Japan since 2019, including the closures at Nippon Steel, the closures of the Kahima and Kimitsu mills, and increased costs (e.g. transportation costs and interest rates), and reported that they do not anticipate future changes.

⁵ Five firms (two foreign producers and three exporters) provided data, one of which ceased production/export activities in 2019.

Japanese producer JFE reported that ***. It added that ***.⁶

⁶ JFE reported “***.”
“***.”

Imports from nonsubject sources

Imports from nonsubject sources accounted for *** percent of total U.S. imports in 2024, based on questionnaire data. In 2024, the largest nonsubject sources for U.S. imports for CWLDLP were South Korea, Turkey, and Germany, based on quantity.

Supply constraints

Five of 6 U.S. producers and 12 of 19 importers reported that they had not experienced supply constraints since January 1, 2019. U.S. producer *** reported that it stopped production in 2022. Importers reported that section 232 quotas on nonsubject Korean imports and closures of Nippon Steel and Kimitsu mill constrained supply.

Ten of 13 purchasers reported that they had not experienced supply constraints from U.S. producers since January 1, 2019, and 7 of 11 purchasers reported that they had not experienced supply constraints from importers. Purchaser *** reported that domestic mills sometimes cannot meet required delivery times, and purchaser *** reported that U.S. mills tend to not cater to spot purchasers and prioritized large volume pipeline orders and that U.S.-produced CWLDLP does not satisfy its technical requirements. Purchaser *** reported that Evraz North America declined supply (but for reasons “unknown”). Several purchasers (***) reported that section 232 measures on CWLDLP from nonsubject source South Korea have impacted supply.

New suppliers

Eight of 13 purchasers indicated that no new suppliers entered the U.S. market since January 1, 2019, and do not expect additional entrants. The remaining purchasers reported that domestic producers Jindal (3 purchasers) and Dura-Bond Pipe (1 purchaser) entered the market since 2019.⁷

U.S. demand

Based on available information, the overall demand for CWLDLP is likely to experience small changes in response to changes in price. The main contributing factors are the lack of practical substitute products and the way pipeline operators account for the cost of pipeline construction.⁸

Because CWLDLP is used as an intermediate product, demand for CWLDLP depends on the price and productivity of the end product for which it is used. Most CWLDLP is used in the transmission of oil and gas, including liquefied natural gas (“LNG”); therefore, demand for CWLDLP has historically been sensitive to changes in oil and gas prices which affect the capital investment in the production of oil and gas, where a large portion of CWLDLP is used.⁹ Domestic interested parties stated that demand is difficult to predict and requests for CWLDLP are sometimes made before pipelines are approved or funded, so it is not uncommon for projects to be canceled after the bidding process.¹⁰ It added that when oil prices are low, demand for CWLDLP for drilling and pipeline projects will also be low.¹¹

⁷ One purchaser each also reported JD Fields and Tex-Isle, which are producers of structural pipe.

⁸ *Certain Welded Large Diameter Line Pipe from Japan, Inv. Nos. 731-TA-919 (Third Review)*, USITC Publication 4973, September 2019, p. 2.9.

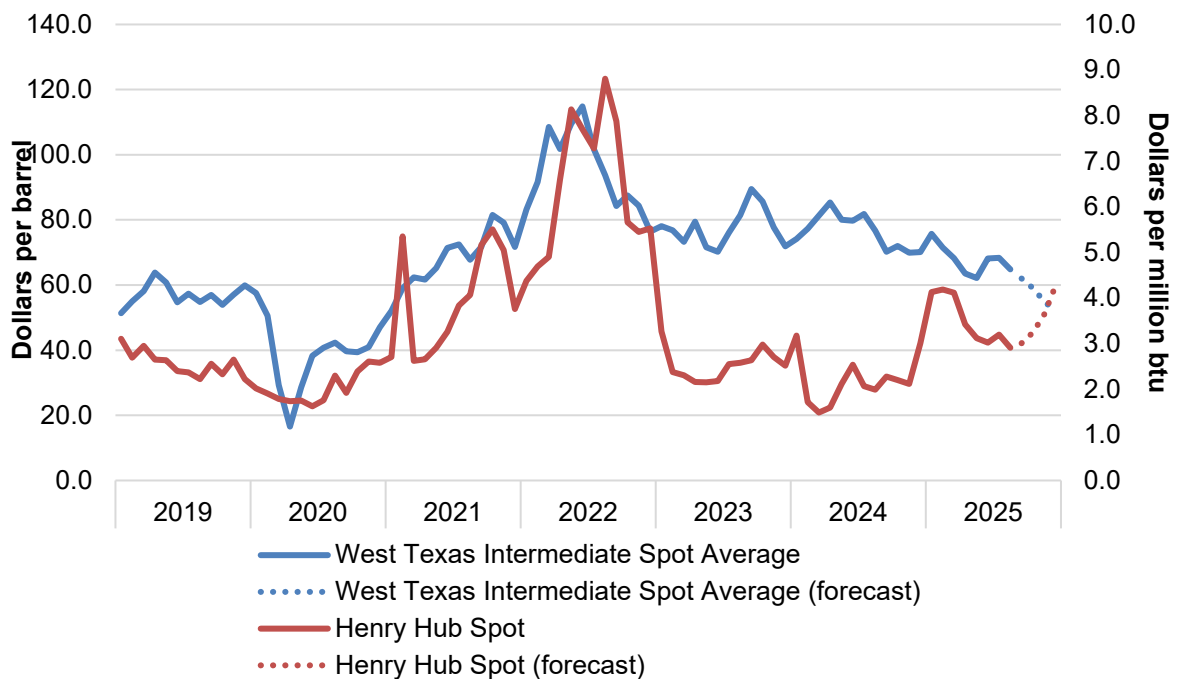
⁹ Domestic interest parties stated that when oil prices are low, domestic oil producers are not going to increase oil production.

¹⁰ Hearing transcript, pp. 19-20 (Kirkland); ALPPA posthearing brief, pp. 11-12.

¹¹ Hearing transcript, p. 65 (Kaplan, Nolan).

Spot prices for oil and natural gas fluctuated between January 2019 and March 2025, with the price of oil increasing overall by 32.8 percent and the price of natural gas increasing by 32.5 percent overall (figure 2.1 and tables 2.6 and 2.7). Initially, the WTI spot price for crude oil decreased with the nadir of April 2020 coinciding with the greatest impact of the COVID-19 pandemic in the United States, then increased through July 2022, peaking at 123.5 percent higher than in January 2019. Since that time, the WTI spot price decreased irregularly, and is forecasted to remain near its December 2024 level. The Henry Hub spot price of natural gas followed a similar pattern, and in August 2022 was 183.3 percent higher than in January 2019. After that point, natural gas prices dropped to below the January 2019 price in early 2023 but increased irregularly through March 2025 and is forecasted to continue to increase through December 2025.

Figure 2.1 CWLDLP: West Texas Intermediate average crude oil prices and Henry Hub average natural gas prices, spot, monthly, January 2022 through September 2025, and October 2025 through December 2025 (forecasted)



Source: U.S. Energy Information Administration, <https://www.eia.gov/outlooks/steo/>, accessed September 17, 2025.

Table 2.6 CWLDLP: West Texas intermediate spot average monthly crude oil prices, January 2022 through September 2025, and October 2025 through December 2025 (forecasted)

Dollars per barrel

Month	2019	2020	2021	2022	2023	2024	2025
January	51.4	57.5	52.0	83.2	78.1	74.2	75.7
February	55.0	50.5	59.0	91.6	76.8	77.3	71.5
March	58.2	29.2	62.3	108.5	73.3	81.3	68.2
April	63.9	16.6	61.7	101.8	79.5	85.4	63.5
May	60.8	28.6	65.2	109.6	71.6	80.0	62.2
June	54.7	38.3	71.4	114.8	70.3	79.8	68.2
July	57.4	40.7	72.5	101.6	76.1	81.8	68.4
August	54.8	42.3	67.7	93.7	81.4	76.7	64.9
September	57.0	39.6	71.7	84.3	89.4	70.2	62.0
October	54.0	39.4	81.5	87.6	85.6	72.0	59.0
November	57.0	40.9	79.2	84.4	77.7	70.0	55.0
December	59.9	47.0	71.7	76.4	71.9	70.1	52.0

Source: U.S. Energy Information Administration, <https://www.eia.gov/outlooks/steo/>, accessed September 17, 2025.

Table 2.7 CWLDLP: Natural gas Henry Hub spot prices, January 2022 through September 2025, and October 2025 through December 2025 (forecasted)

Dollars per million btu

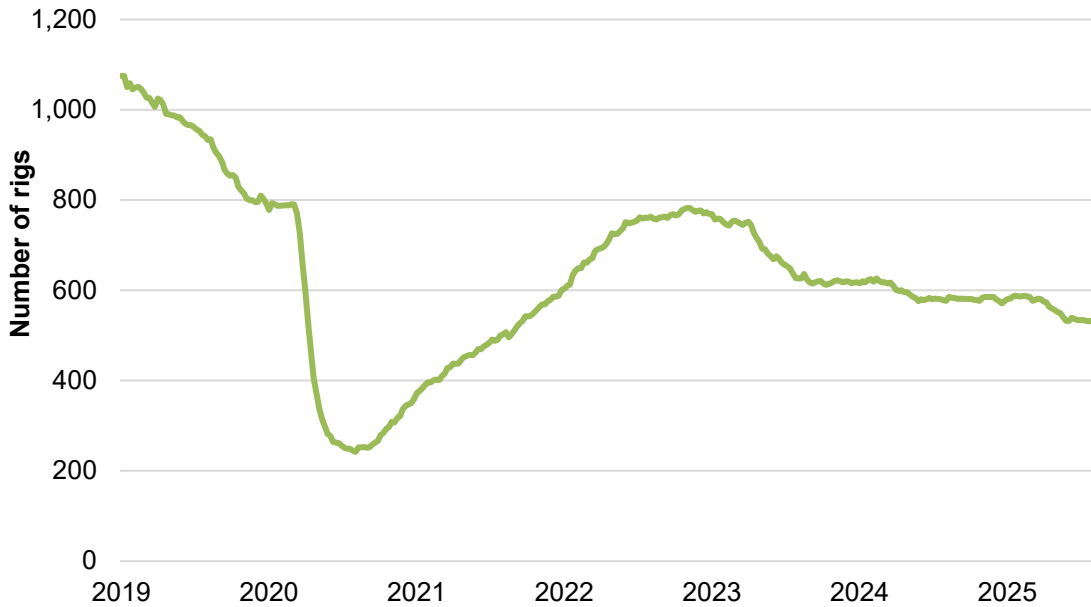
Month	2019	2020	2021	2022	2023	2024	2025
January	3.1	2.0	2.7	4.4	3.3	3.2	4.1
February	2.7	1.9	5.4	4.7	2.4	1.7	4.2
March	3.0	1.8	2.6	4.9	2.3	1.5	4.1
April	2.7	1.7	2.7	6.6	2.2	1.6	3.4
May	2.6	1.8	2.9	8.1	2.2	2.1	3.1
June	2.4	1.6	3.3	7.7	2.2	2.5	3.0
July	2.4	1.8	3.8	7.3	2.6	2.1	3.2
August	2.2	2.3	4.1	8.8	2.6	2.0	2.9
September	2.6	1.9	5.2	7.9	2.6	2.3	3.0
October	2.3	2.4	5.5	5.7	3.0	2.2	3.3
November	2.7	2.6	5.1	5.5	2.7	2.1	3.6
December	2.2	2.6	3.8	5.5	2.5	3.0	4.3

Source: U.S. Energy Information Administration, <https://www.eia.gov/outlooks/steo/>, accessed September 17, 2025.

Production of oil and gas can affect demand conditions for CWLDLP, and rig count is a leading indicator of oil and gas sector activity. The number of oil rigs and rotary rigs used for natural gas decreased irregularly over the period (figure 2.2 and table 2.8).¹² After decreasing from the start of 2019 through the COVID-19 pandemic, rig counts increased until the beginning of 2023 and decreased through mid 2024 before leveling out over the first three months of 2025. Installed mileage, shown in table 2.9 and figure 2.3, was driven mainly by gas distribution mileage, which increased by 4.5 percent; gas transmission and hazardous liquids pipeline mileage decreased by 0.5 and 1.4 percent between 2019 and 2024, respectively.

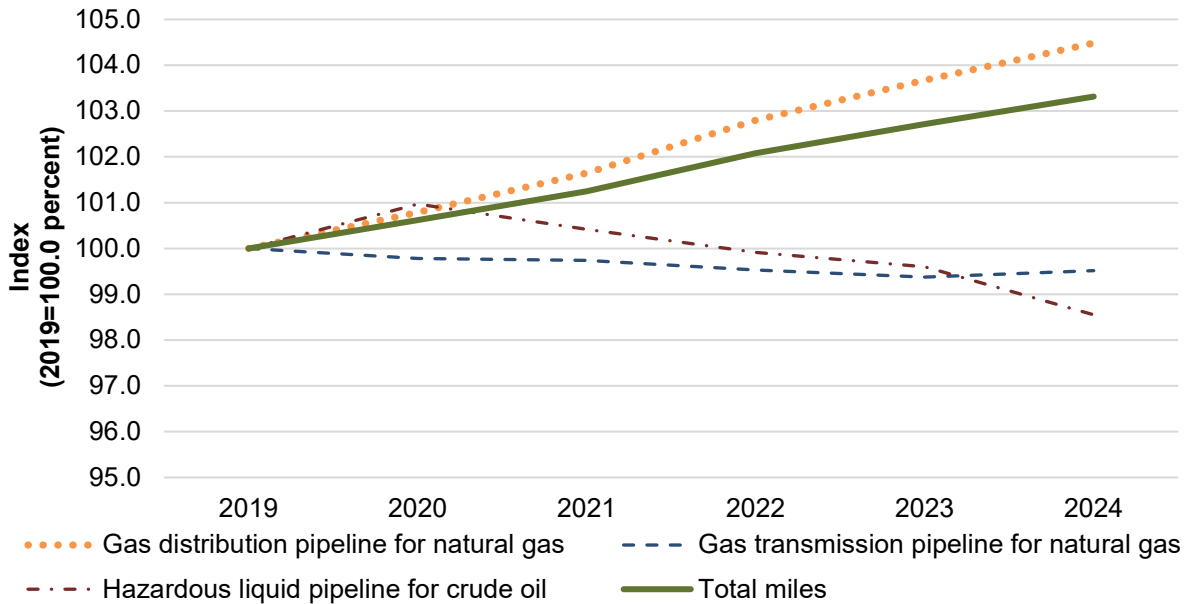
¹² As noted by the Federal Energy Regulatory Commission (“FERC”), “The rig count is used to measure exploration activity by assessing the number of rotary drilling rigs actively drilling for oil and gas. Historically, rig counts were used as a rough predictor of future production. However, improvements in drilling technology and practices have caused a decoupling between rig count and production. The adoption of horizontal drilling significantly increased production per rig, making historical comparisons of rig counts problematic as horizontal rigs are considerably more productive than vertical rigs. Within the total rig count, the use of horizontal drilling rigs, used in the production of natural gas and oil in shale formations, has been growing for years, while the traditional vertical rig count has steadily declined.” 2024 Energy Primer: A Handbook for Energy Market Basics, FERC, https://www.ferc.gov/sites/default/files/2024-01/24_Energy-Markets-Primer_0117_DIGITAL_0.pdf, p. 11.

Figure 2.2 Rotary rig count: Average weekly rig counts, January 4, 2019 to September 12, 2025



Source: Hughes Incorporated, <https://rigcount.bakerhughes.com/na-rig-count>, retrieved September 2025.

Figure 2.3 CWLDLP: Miles of gas distribution mains, gas transmission pipeline, and hazardous liquid pipeline, annual, indexed, 2019 to 2024



Source: U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Miles by Year, <https://portal.phmsa.dot.gov/analytics/saw.dll?Portalpages>, retrieved July 30, 2025.

Note: Gas distribution pipeline miles represent miles of main pipeline not including service pipeline. Gas transmission pipeline and hazardous liquid pipeline includes interstate and intrastate pipeline.

Table 2.8 Rotary rig count: Average weekly rig counts, January 4, 2019 to September 12, 2025

Count in number of rotary rigs

Month	2019	2020	2021	2022	2023	2024	2025
Week 1	1,075	793	359	588	770	619	585
Week 2	1,075	778	372	601	773	616	580
Week 3	1,050	793	377	604	769	617	576
Week 4	1,059	791	383	610	769	618	571
Week 5	1,045	787	391	613	757	616	577
Week 6	1,049	787	396	634	759	620	580
Week 7	1,051	788	396	644	758	618	582
Week 8	1,047	789	401	649	751	623	587
Week 9	1,038	788	402	649	746	625	588
Week 10	1,027	791	401	662	743	619	587
Week 11	1,026	790	410	661	751	626	587
Week 12	1,016	770	416	668	755	621	588
Week 13	1,006	726	428	671	752	618	587
Week 14	1,025	662	430	687	748	618	585
Week 15	1,022	600	438	691	745	615	577
Week 16	1,012	527	437	693	750	617	579
Week 17	991	463	438	696	752	611	582
Week 18	990	406	447	703	745	601	580
Week 19	988	372	452	712	727	599	575
Week 20	987	337	455	726	716	600	573
Week 21	983	316	457	725	707	596	563
Week 22	984	299	456	725	692	596	560
Week 23	975	282	461	731	691	590	556
Week 24	969	277	470	738	682	586	552
Week 25	966	264	470	751	676	583	549
Week 26	966	263	475	748	669	576	541
Week 27	962	261	479	750	675	580	533
Week 28	956	256	484	752	670	578	532
Week 29	953	251	491	754	661	580	539
Week 30	945	249	488	762	657	583	537
Week 31	941	249	490	759	653	580	534
Week 32	933	245	500	761	648	582	534
Week 33	935	242	502	760	637	581	534
Week 34	916	252	507	763	627	580	533
Week 35	904	252	496	758	626	578	531
Week 36	898	253	502	757	626	577	532
Week 37	886	251	511	761	636	585	534
Week 38	867	252	520	762	625	584	—
Week 39	859	258	527	763	618	583	—
Week 40	854	263	532	760	615	581	—
Week 41	855	266	543	767	618	582	—
Week 42	850	279	542	769	620	581	—
Week 43	829	284	544	766	621	581	—

Table continued.

Table 2.8 (Continued) Rotary rig count: Average weekly rig counts, January 4, 2019 to September 12, 2025

Count in number of rotary rigs

Month	2019	2020	2021	2022	2023	2024	2025
Week 44	821	293	550	768	614	581	—
Week 45	814	297	556	777	612	581	—
Week 46	803	309	563	780	614	579	—
Week 47	800	307	569	782	617	578	—
Week 48	799	318	569	782	621	577	—
Week 49	796	321	576	778	622	584	—
Week 50	796	337	579	774	620	585	—
Week 51	810	344	586	777	618	585	—
Week 52	802	347	586	777	620	585	—
Week 53	—	350	—	—	—	—	—

Source: Hughes Incorporated, <https://rigcount.bakerhughes.com/na-rig-count>, retrieved September 2025.

Table 2.9 CWLDLP: Miles of gas distribution mains, gas transmission pipeline, and hazardous liquid pipeline, annual, 2019 to 2024

Index in percent; 2019=100.0 percent

Item	Measure	2019	2020	2021	2022	2023	2024
Gas distribution pipeline for natural gas	Miles (thousands)	1,317	1,328	1,339	1,354	1,366	1,376
Gas transmission pipeline for natural gas	Miles (thousands)	299	299	298	298	297	298
Hazardous liquid pipeline for crude oil	Miles (thousands)	84	85	85	84	84	83
Total miles	Miles (thousands)	1,701	1,712	1,722	1,736	1,747	1,757
Gas distribution pipeline for natural gas	Index	100.0	100.8	101.6	102.8	103.7	104.5
Gas transmission pipeline for natural gas	Index	100.0	99.8	99.7	99.5	99.4	99.5
Hazardous liquid pipeline for crude oil	Index	100.0	101.0	100.4	99.9	99.6	98.6
Total miles	Index	100.0	100.6	101.3	102.1	102.7	103.3

Source: U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Miles by Year, <https://portal.phmsa.dot.gov/analytics/saw.dll?Portalpages>, retrieved July 30, 2025.

Note: Gas distribution pipeline miles represent miles of main pipeline not including service pipeline. Gas transmission pipeline and hazardous liquid pipeline includes interstate and intrastate pipeline.

End uses and cost share

As stated earlier, U.S. demand for CWLDLP depends on the demand for oil and gas pipeline construction and exploration. All responding U.S. producers, and nearly all importers, purchasers, and foreign producers reported no changes in end uses. Importer *** reported that there has been an increase in CWLDLP usage in data center projects and purchaser *** reported that CWLDLP can be used occasionally in buried water transfer pipelines. Foreign producer *** reported that there have been no changes to end uses ***. Foreign producer *** added that its “***” of CWLDLP.

CWLDLP accounts for a small share of the cost of the end-use products in which it is used.¹³ Reported cost shares for some end uses were as follows pipelines, for which purchasers estimated CWLDLP accounted for 11 to 15 percent of the cost of the project, and facilities, for which a purchaser estimated CWLDLP account for approximately one percent of the project.

Business cycles

Most U.S. producers and importers reported that the market is not subject to business cycles. Seven of 13 purchasers reported that the CWLDLP market was subject to business cycles during 2019 through 2021, and 8 of 13 purchasers reported the CWLDLP market was subject to business cycles during 2022 through 2024, mainly driven by the oil and gas sector, and some firms noted that the COVID-19 pandemic also had an impact on the market. One witness stated that the CWLDLP market is cyclical and that demand is hard to predict.¹⁴

¹³ During the original investigation, CWLDLP was estimated to account for 30-50 percent of the cost of a project. *Certain Welded Large Diameter Line Pipe from Japan and Mexico, Inv. Nos. 731-TA-919-920 (Final)*, USITC Publication 3464, November 2001, p. 5.1.

¹⁴ Hearing transcript, p. 62 (Kirkland).

Demand trends

Firms were asked about how demand for CWLDLP changed during 2019 to 2021, as well as during 2022 to 2024 (tables 2.10 and 2.11), and how they expect demand to change over the next two years (table 2.12). Most U.S. producers reported that U.S. demand had decreased during 2019 to 2024 and were split in their expectations for demand in the future. Most importers reported that they did not experience changes in demand, nor do they expect for demand for CWLDLP to change in the future. Purchasers' experiences and expectations for demand were varied throughout.

Half of the responding purchasers reported that there had been no change in the demand for end uses, with the remaining firms equally split between experiencing increased and decreased demand for CWLDLP end uses. Nearly all responding purchasers reported that any demand changes for end uses did not affect the demand for CWLDLP.

Table 2.10 CWLDLP: Count of firms' responses regarding overall domestic and foreign demand for 2019 to 2021, by firm type

Count in firms responding

Market	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
U.S. demand	U.S. producers	1	0	0	5	0
U.S. demand	Importers	1	3	11	2	2
U.S. demand	Purchasers	1	3	4	5	1
U.S. demand	Foreign producers	0	0	1	2	0
Foreign demand	U.S. producers	0	0	0	1	0
Foreign demand	Importers	0	3	10	2	2
Foreign demand	Purchasers	0	1	6	1	1
Demand in subject home market	Foreign producers	0	0	2	1	0
Demand in other export markets	Foreign producers	0	0	1	2	1

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

Table 2.11 CWLDLP: Count of firms' responses regarding overall domestic and foreign demand since 2022, by firm type

Count in firms responding

Market	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
U.S. demand	U.S. producers	3	1	0	3	0
U.S. demand	Importers	2	2	13	2	0
U.S. demand	Purchasers	1	4	5	4	0
U.S. demand	Foreign producers	2	0	0	0	0
Foreign demand	U.S. producers	0	0	0	0	0
Foreign demand	Importers	2	3	10	2	0
Foreign demand	Purchasers	0	1	6	2	0
Demand in subject home market	Foreign producers	0	0	3	0	0
Demand in other export markets	Foreign producers	2	0	1	0	0

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

Table 2.12 CWLDLP: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type

Count in firms responding

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decreased
U.S. demand	U.S. producers	1	4	1	1	1
U.S. demand	Importers	4	3	10	1	1
U.S. demand	Purchasers	1	5	5	1	1
U.S. demand	Foreign producers	2	0	0	0	0
Foreign demand	U.S. producers	0	0	0	1	1
Foreign demand	Importers	3	3	9	2	2
Foreign demand	Purchasers	0	3	5	1	1
Demand in subject home market	Foreign producers	1	0	3	0	0
Demand in other export markets	Foreign producers	2	0	1	0	0

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

Substitute products

There are no substitutes for CWLDLP, and virtually all responding U.S. producers, importers, and purchasers reported that this had not changed since January 2019. Two of five responding foreign producers reported that there have been changes to available substitutes, but did not provide additional information.

Substitutability issues

This section assesses the degree to which U.S.-produced CWLDLP and imports of CWLDLP from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of CWLDLP from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced CWLDLP and CWLDLP imported from Japan.¹⁵ One witness states that this product is highly substitutable.¹⁶

Factors contributing to this level of substitutability include similar quality, availability, and lead times for CWLDLP that are produced-to-order, similarities between domestically produced CWLDLP and CWLDLP imported from Japan across most purchase factors, interchangeability between domestic and subject sources, and limited significant factors other than price. Factors reducing substitutability include some difference in lead times from Japanese producers, some purchasers' preference for a certain producer or country-of-origin, and some domestic content requirements.

¹⁵ The degree of substitution between domestic and imported CWLDLP depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced CWLDLP to the CWLDLP imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

¹⁶ Hearing transcript, p. 53 (Kaplan).

Factors affecting purchasing decisions¹⁷

Purchaser decisions based on source

As shown in table 2.13, most purchasers always or usually make purchasing decisions based on the producer and half of responding purchasers always or usually make purchasing decisions based on the country-of-origin. Most purchasers reported that their customers only sometimes or never make purchasing decisions based on the producer or country-of-origin. Purchaser *** reported that its purchase decisions are driven more by a pipe mill’s capabilities to produce a certain type of pipe rather than country-of-origin, and purchaser *** reported that its preference for country-of-origin is highly subjective and depends on customer needs.

Six of 14 purchasers reported that there are certain types of CWLDLP that are only available from certain sources. Purchaser *** reported that “***”. Purchasers reported that domestic mills have limited capabilities with larger wall thicknesses compared to mills in Greece, Germany, India, Japan, and the United Kingdom.

Table 2.13 CWLDLP: Count of purchasers’ responses regarding frequency of purchasing decisions based on producer and country of origin

Count in firms responding

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	4	6	2	2
Customer	Producer	1	4	3	4
Purchaser	Country	4	4	4	2
Customer	Country	2	2	4	4

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

¹⁷ Thirteen purchasers indicated they had marketing/pricing knowledge of domestic product, 6 of CWLDLP from Japan, and 11 of product from nonsubject countries.

Importance of purchasing domestic product

Eight purchasers reported that at least 85 percent of their purchases did not require purchasing U.S.-produced product. Overall, *** percent of purchases did not have domestic requirements, *** percent were required to be domestic by law, *** percent were required by customers to be domestically produced, and *** percent had other domestic requirements (“client’s personal preference”). Domestic interested party witnesses stated that Buy America clauses are more commonly seen in the market for structural pipe (out of scope), but not in the oil and gas sector in which pipeline projects tend to be privately held and without domestic requirements.¹⁸

Most important purchase factors

The most often cited top three factors that firms consider in their purchasing decisions for CWLDLP were price or cost (14 firms), meeting specifications and lead times/delivery (7 firms each), and quality (6 firms) as shown in table 2.14. Meeting specifications was the most frequently cited first-most important factor (cited by 6 firms), followed by price or cost and quality (4 firms each); lead times/delivery was the most frequently reported second-most important factor (4 firms); and price or cost was the most frequently reported third-most important factor (7 firms).

Table 2.14 CWLDLP: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Count in firms responding

Firm making decision	First	Second	Third	Total
Price or cost	4	3	7	14
Meeting specifications	6	0	1	7
Lead times/delivery	0	4	3	7
Quality	4	2	0	6
Availability of supply	0	3	2	5
All other factors	1	1	1	3

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

Note: All other factors include availability of supply (4 purchasers), product range (3), traditional supplier, credit, safety/quality control, stock versus new, lead time transparency, current or future tariff exposure (1 each).

The majority of purchasers (10 of 17) reported that they usually purchase the lowest-priced product.

¹⁸ Hearing transcript, pp. 97-98 (Norris, Kirkland).

Importance of specified purchase factors

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table 2.15). The factors rated as very important by more than half of responding purchasers were price (14 firms), availability, delivery time, and product consistency (13 firms each), quality meets industry standards and reliability of supply (12 each), delivery terms and technical support/service (11 each), quality exceeds industry standards (10), and payment terms (9).

Table 2.15 CWLDLP: Count of purchasers' responses regarding importance of purchase factors, by factor

Count in firms responding

Factor	Very important	Somewhat important	Not important
Availability	13	1	0
Delivery terms	11	3	0
Delivery time	13	1	0
Discounts offered	5	8	1
Minimum quantity requirements	6	5	3
Packaging	4	5	5
Payment terms	9	5	0
Price	14	0	0
Product consistency	13	1	0
Product range	5	6	3
Quality meets industry standards	12	2	0
Quality exceeds industry standards	10	2	2
Reliability of supply	12	2	0
Technical support/service	11	2	1
U.S. transportation costs	6	7	1

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

Lead times

The vast majority of U.S.-produced CWLDLP was produced-to-order in 2024 with lead times averaging approximately 100 days.¹⁹

¹⁹ No importers reported shipments of CWLDLP in 2024.

Supplier certification

Ten of 14 responding purchasers require their suppliers to become certified or qualified to sell CWLDLP to their firm. Five purchasers reported that the time to qualify a new supplier ranged from 60 to 120 days and three purchasers reported that the time to qualify was a month or less. Most purchasers reported that no suppliers failed to certify since 2019. One purchaser reported that it had removed Axis (Thailand) from its approved manufacturer list due to quality issues.

The CWLDLP market is driven by large projects and a bidding process during which there is a formal request for quotation to all firms on the approved manufacturers' list that are able to quote. One witness stated that at this point, all manufacturers that bid are technically equal and the differentiating factor is price.²⁰

Minimum quality specifications

As can be seen from table 2.16, the vast majority of responding purchasers reported that domestically produced product always or usually met minimum quality specifications. Similarly, purchasers reported that CWLDLP from Japan and from other non-U.S. sources always or usually met minimum quality specifications.

Table 2.16 CWLDLP: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Count in firms responding

Source of purchases	Always	Usually	Sometimes	Rarely or never
United States	6	7	0	1
Japan	5	4	0	0
Nonsubject sources	3	5	1	0

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

Note: Purchasers were asked how often domestically produced or imported CWLDLP meets minimum quality specifications for their own or their customers' uses.

Fourteen purchasers reported factors that determined quality including suppliers' response to claims, meets API, ISO, or other specifications, age of product, origin of the steel material, welding consistency, frequency of anomalies and failures, and yield strength.

²⁰ Hearing transcript, pp. 50-51 (Kirkland).

Changes in purchasing patterns

Nine purchasers reported that they had changed suppliers since January 1, 2019, while five reported that they had not. Specifically, firms dropped or reduced purchases from Evraz because of the conflict in Ukraine, Axis due to quality issues, Stupp ceased production, and JSW Steel (U.S.) due to late delivery. Purchasers reported adding JSW (U.S.), Forza (Mexico), and JD Fields & Company.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2019 (table 2.17). Most purchasers reported no change in their purchases of U.S.-produced CWLDLP or of CWLDLP from nonsubject sources. Most purchasers reported that they had not purchased CWLDLP from Japan, but those that had indicated that there had been no change in their purchasing patterns.

Table 2.17 CWLDLP: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Count in firms responding

Source of purchases	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased	Did not purchase
United States	1	3	7	2	0	1
Japan	0	0	5	1	0	8
Nonsubject sources	0	2	8	2	2	0
Sources unknown	0	0	3	1	0	6

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

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing CWLDLP produced in the United States, Japan, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (table 2.18) for which they were asked to rate the importance.

Most purchasers reported that U.S.-produced CWLDLP and CWLDLP imported from Japan and for CWLDLP from nonsubject sources were comparable on all factors for which most purchasers rated as “very important,” except delivery time, for which U.S. product was considered superior to subject and nonsubject product.²¹

Table 2.18 CWLDLP: Count of purchasers’ responses comparing U.S.-produced and imported product, by factor and country pair

Count in firms responding

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Japan	3	5	1
Delivery terms	U.S. v. Japan	2	4	2
Delivery time	U.S. v. Japan	5	2	2
Discounts offered	U.S. v. Japan	1	5	1
Minimum quantity requirements	U.S. v. Japan	0	6	2
Packaging	U.S. v. Japan	0	8	0
Payment terms	U.S. v. Japan	0	8	1
Price	U.S. v. Japan	3	4	1
Product consistency	U.S. v. Japan	0	8	1
Product range	U.S. v. Japan	0	5	3
Quality meets industry standards	U.S. v. Japan	0	8	1
Quality exceeds industry standards	U.S. v. Japan	0	7	1
Reliability of supply	U.S. v. Japan	1	5	1
Technical support/service	U.S. v. Japan	1	7	1
U.S. transportation costs	U.S. v. Japan	4	3	0

Table continued.

²¹ A plurality of purchasers reported that delivery time was comparable when comparing U.S.-produced CWLDLP and CWLDLP from nonsubject sources.

Table 2.18 (Continued) CWLDLP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in firms responding

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	3	7	1
Delivery terms	U.S. v. Nonsubject	3	6	1
Delivery time	U.S. v. Nonsubject	5	5	1
Discounts offered	U.S. v. Nonsubject	0	9	1
Minimum quantity requirements	U.S. v. Nonsubject	2	7	2
Packaging	U.S. v. Nonsubject	0	10	0
Payment terms	U.S. v. Nonsubject	1	9	1
Price	U.S. v. Nonsubject	0	6	5
Product consistency	U.S. v. Nonsubject	1	9	1
Product range	U.S. v. Nonsubject	2	6	3
Quality meets industry standards	U.S. v. Nonsubject	2	8	1
Quality exceeds industry standards	U.S. v. Nonsubject	3	7	1
Reliability of supply	U.S. v. Nonsubject	5	5	1
Technical support/service	U.S. v. Nonsubject	2	8	1
U.S. transportation costs	U.S. v. Nonsubject	4	4	1

Table continued.

Table 2.18 (Continued) CWLDLP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Japan v. Nonsubject sources	3	3	0
Delivery terms	Japan v. Nonsubject sources	1	3	1
Delivery time	Japan v. Nonsubject sources	2	2	1
Discounts offered	Japan v. Nonsubject sources	0	5	0
Minimum quantity requirements	Japan v. Nonsubject sources	2	3	0
Packaging	Japan v. Nonsubject sources	1	3	0
Payment terms	Japan v. Nonsubject sources	0	6	0
Price	Japan v. Nonsubject sources	0	4	2
Product consistency	Japan v. Nonsubject sources	3	2	0
Product range	Japan v. Nonsubject sources	1	5	0
Quality meets industry standards	Japan v. Nonsubject sources	1	5	0
Quality exceeds industry standards	Japan v. Nonsubject sources	2	4	0
Reliability of supply	Japan v. Nonsubject sources	3	2	0
Technical support/service	Japan v. Nonsubject sources	2	3	0
U.S. transportation costs	Japan v. Nonsubject sources	1	3	0

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

Note: With respect to cost/price factors, a rating of superior means that the cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported CWLDLP

In order to determine whether U.S.-produced CWLDLP can generally be used in the same applications as imports from Japan, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table 2.19, U.S. producers reported that CWLDLP from any source is always comparable. A plurality of importers reported that U.S.-produced CWLDLP is sometimes interchangeable with CWLDLP from subject and nonsubject sources. Most purchasers reported that CWLDLP from the United States and from Japan is always interchangeable, and their responses were split in regard to the comparison of CWLDLP from the United States and nonsubject sources. All responding foreign producers reported that CWLDLP produced by their firms is interchangeable with CWLDLP that is exported to the U.S. market and third-country markets.

Several importers and purchasers reported that U.S. suppliers were unable to supply CWLDLP with certain grades, wall thicknesses, quality requirements, corrosion protection coatings, or lead times.

Table 2.19 CWLDLP: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
United States vs. Japan	Producers	6	0	0	0
United States vs. Other	Producers	6	0	0	0
Japan vs. Other	Producers	6	0	0	0
United States vs. Japan	Importers	4	2	7	2
United States vs. Other	Importers	5	4	9	0
Japan vs. Other	Importers	5	6	4	0
United States vs. Japan	Purchasers	6	3	1	0
United States vs. Other	Purchasers	2	3	2	0
Japan vs. Other	Purchasers	1	0	3	0

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CWLDLP from the United States, subject, or nonsubject countries. As seen in table 2.20, most U.S. producers reported that differences other than price were never significant in sales CWLDLP from any source. Importers' responses were mixed, with a plurality reporting that differences between U.S.-produced CWLDLP and CWLDLP from Japan were always significant, and were sometimes significant for comparisons of both U.S.-produced and Japanese CWLDLP to CWLDLP from nonsubject sources. Most purchasers reported that differences other than price were only sometimes significant in the comparison of CWLDLP from any source.

Importers and purchasers indicated that availability, quality, acceptability and ability to meet customer-specific requirements, lead times, and technical support were significant differences.

Table 2.20 CWLDLP: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
United States vs. Japan	Producers	0	2	0	4
United States vs. Other	Producers	0	2	0	4
Japan vs. Other	Producers	0	0	0	4
United States vs. Japan	Importers	5	4	3	1
United States vs. Other	Importers	6	4	7	1
Japan vs. Other	Importers	1	4	5	2
United States vs. Japan	Purchasers	4	0	6	0
United States vs. Other	Purchasers	4	0	4	0
Japan vs. Other	Purchasers	2	0	4	0

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

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates and their comments have been included.

U.S. supply elasticity

The domestic supply elasticity for CWLDLP measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CWLDLP. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced CWLDLP. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 9 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for CWLDLP measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CWLDLP. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CWLDLP in the production of any downstream products. As noted earlier, there are few, if any, substitutes for CWLDLP. In addition, the cost component of CWLDLP is likely relatively moderate for its main uses, though still an important share of the total cost of an oil and gas pipeline project. Based on the available information, the aggregate demand for CWLDLP is likely to be inelastic; a range of -0.25 to -0.50 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.²² Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced CWLDLP and imported CWLDLP is likely to be in the range of 3 to 5.²³ Factors contributing to this level of substitutability include similar quality, availability, and lead times for CWLDLP from that are produced-to-order, similarities between domestically produced CWLDLP and CWLDLP imported from Japan across most purchase factors, interchangeability between domestic and subject sources, and limited significant factors other than price. Factors reducing substitutability include some difference in lead times from Japanese producers, some purchasers' preference for a certain producer or country-of-origin, and some domestic content requirements.

²² The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

²³ The economic consultant for ALPPA noted that this elasticity range is consistent with previous opinions but that the qualitative characterization of "moderate to high substitutability" differs. Hearing transcript, p. 97 (Kaplan).

U.S. demand elasticity

The U.S. demand elasticity for CWLDLP measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CWLDLP. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CWLDLP in the production of any downstream products. As noted earlier, there are few, if any, substitutes for CWLDLP. In addition, the cost component of CWLDLP is likely relatively moderate for its main uses, though still an important share of the total cost of an oil and gas pipeline project. Based on the available information, the aggregate demand for CWLDLP is likely to be inelastic; a range of -0.25 to -0.50 is suggested.

Substitution elasticity

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²² The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

²³ The economic consultant for ALPPA noted that this elasticity range is consistent with previous opinions but that the qualitative characterization of "moderate to high substitutability" differs. Hearing transcript, p. 97 (Kaplan).

Part 3: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires and from publicly available sources. Nine firms, which accounted for all known U.S. production of CWLDLP during 2024, supplied full or partial information on their operations in these reviews and other proceedings on CWLDLP.¹

Table 3.1 presents events in the U.S. industry since January 1, 2019.

¹ Included in this count are two former producers of CWLDLP, Evraz Oregon and Stupp, which ceased production prior to 2024, and provided partial information on their operations to the Commission.

Table 3.1 CWLDLP: Developments in the U.S. industry since 2019

Item	Firm	Event
Plant Closure	Evraz Oregon	2020 - In 2020 Evraz North America ceased all large diameter welded line pipe at its facility in Portland, OR. The facility was sold and all assets were liquidated. The mill is still in Portland and was recently purchased by Atlas Holdings who expect to open soon.
Plant opening	American SpiralWeld Pipe	March 2021 - American SpiralWeld Pipe, a subsidiary of American Cast Iron Pipe Company and producer of CWLDLP, announced the opening of its Paris, TX, spiral welded pipe mill.
Acquisition	Dura-Bond	2022 - Dura-Bond purchased the U.S. Steel McKeesport Tubular Operations facility in McKeesport, PA, which produces ERW pipe in sizes from 8" to 20" O.D. Dura-Bond had leased the McKeesport ERW mill since 2017.
Acquisition	California Steel Industries Inc. (Nucor)	2022 - Nucor purchased a majority ownership of California Steel Industries (CSI). In 2023, the pipe mill was shut down permanently. Welspun purchased the CSI facility and is moving it to Little Rock, AR.
Market exit	Stupp Corp	Late 2022 - In its supplemental response to the notice of institution, the domestic interested parties reported that Stupp Corp., a petitioner in the original investigations, exited the line pipe market prior to 2023. Stupp's ERW line was purchased by a structural pipe producer that is planning to use it for parts, and the spiral line went to Mexico.
Acquisition	Borson Mannesmann	April 2023 - Borusan Mannesmann, a Turkish steel producer, announced it had acquired Berg Pipe, a U.S. producer of CWLDLP with facilities in Panama City, FL and Mobile, AL.
Expansion	JSW Steel	2023 - Jindal finished the expansion of their pipe and plate mill in Baytown, Texas. JSW Steel invested \$260 million into the mill.
Certification	Jindal Pipe	April 2024 - Jindal successfully met the requirements for hydrogen transportation in line pipe manufactured from coils produced by ArcelorMittal's AM/NS Calvert joint venture, at its Baytown facility.
Equipment Modernization Investment	JSW Steel	June 2024 - JSW Steel USA announced plans to invest \$110 million in steel plate mill modernization projects in its Baytown, Texas, manufacturing facilities.
Expansion	Welspun Tubular	November 2024 - Welspun Tubular announced a \$100 million expansion of its Little Rock, AR pipe mill. Welspun is installing the CSI facility that it purchased after the liquidation of CSI. The expansion will increase the facility's capacity to produce large diameter line pipe to 24 inches outside diameter and wall thicknesses up to 0.75." The expansion is also expected to create 160 new jobs and be completed by December 2025.
Investment and Partnership	Borusan Pipe	January 2025 - Borusan Pipe announced a \$68 million investment to their pipe production facility in Panama City, FL, to increase their LDWP production capacity.
Investment	Atlas Holdings	June 2025 - Atlas Holdings, a private equity firm, announced that it had an agreement to purchase Evraz North America (Evraz Oregon) and expects to finalize the transaction in 2025.
Investment and Partnership	United States Steel Corporation (U.S. Steel)	June 2025 - Nippon Steel Corporation finalized a partnership with U.S. Steel through which Nippon Steel will invest \$11 billion in U.S. Steel by 2028, including in a greenfield integrated steel mill to be completed after 2028.

Sources: Large Diameter Welded Pipe from Canada, China, Greece, India, South Korea, and Turkey, Inv. Nos. 701-TA-593-596 and 731-TA-1401-1406 (Review), USITC Publication 5609, May 2025, p. 3.18; Portland Business Journal, "Evraz Oregon Steel Mills Cutting 230 Jobs in Portland," April 6, 2020,

<https://www.bizjournals.com/portland/news/2020/04/06/evraz-oregon-steel-mills-cutting-230-jobs-in.html>; American SpiralWeld Pipe, “American Invests in the Future of Southwestern Economic Development with a SpiralWeld Pipe Plant in Paris, Texas,” March 15, 2021, <https://american-usa.com/news/2021/03/15/american-invests-in-the-future-of-southwestern-economic-development-with-a-spiralweld-pipe-plant-in-paris-texas/>; The Tube City Almanac, “Dura-Bond Purchases Former U.S. Steel Facility,” April 11, 2022, <http://almanac.tubecityonline.com/almanac/?e=2704>; Nucor, “Nucor Completes Acquisition of California Steel Industries,” February 3, 2022, <https://nucor.com/news-release/nucor-completes-acquisition-of-california-steel-industries-122593>; The Branford Group “Stupp Corporation,” accessed August 5, 2025, <https://www.thebranfordgroup.com/STUP0824>; Domestic interested parties’ supplemental response to the notice of institution, October 29, 2024, pp. 3-4; Borusan Pipe, “Our Press Release on Berg Pipe Acquisition,” undated, <https://borusanboru.com/news-list/our-press-release-on-berg-pipe-acquisition>; Business Standard, “JSW Steel USA begins Phase II upgrade of plate mill facility in Texas, US,” November 1, 2021, https://www.business-standard.com/article/pti-stories/jsw-steel-usa-begins-phase-ii-upgrade-of-plate-mill-facility-in-texas-us-121110100530_1.html; ArcelorMittal, “Testing success for hydrogen transportation by ArcelorMittal and Jindal Pipe USA,” April 8, 2024, <https://northamerica.arcelormittal.com/media/news-articles/testing-success-for-hydrogen-transportation-by-arcelormittal-and-jindal-pipe-usa>; JSW USA, “JSW Steel USA to invest US \$110 million to upgrade Baytown, TX manufacturing operations,” June 24, 2024, <https://jswsteel.us/media/>; JSW USA, “DSAW Pipe,” accessed August 13, 2025, <https://jswsteel.us/dsaw-pipe/>; Global Newswire, “Welspun Tubular to invest \$100 million in Little Rock plant to expand and upgrade current pipe portfolio,” November 1, 2024, <https://www.globenewswire.com/news-release/2024/11/01/2973417/0/en/Welspun-Tubular-to-invest-100-million-in-Little-Rock-plant-to-expand-and-upgrade-current-pipe-portfolio.html>; Atlas Holdings, “Atlas Holdings to Acquire EVRAZ North America,” June 27, 2025, <https://www.atlasholdingsllc.com/news/atlas-holdings-to-acquire-evraz-north-america-a-leading-steel-producer-in-the-u-s-and-canada/>; PR Newswire, “Borusan Pipe Invests \$68 million to Expand U.S. Operations and Advance Pipe Production Technology,” December 27, 2024, <https://www.prnewswire.com/news-releases/borusan-pipe-invests-68-million-to-expand-us-operations-and-advance-pipe-production-technology-302339608.html>; United States Steel Corporation, “Nippon Steel Corporation and U.S. Steel finalize historic partnership,” June 18, 2025, https://www.nipponsteel.com/en/news/20250618_100.html. Hearing transcript, p. 30, 32, 63, 118 to 119, (Noland, Corkran, Phillips, Norris).

Changes experienced by the industry

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of CWLDLP since 2019. All responding producers indicated in their questionnaires that they had experienced such changes. Table 3.2 presents the changes identified by these producers.

Table 3.2 CWLDLP: Reported changes in operations since January 1, 2019, by type of change and firm

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Production curtailments	***

Table Continued

Table 3.2 (Continued) CWLDLP: Reported changes in operations since January 1, 2019, by type of change and firm

Type of change	Firm name and narrative on changes in operations
Expansions	***
Expansions	***
Acquisitions	***
Weather related or force majeure events	***
COVID-19 related disruptions	***
COVID-19 related disruptions	***
COVID-19 related disruptions	***
COVID-19 related disruptions	***
COVID-19 related disruptions	***
COVID-19 related disruptions	***
COVID-19 related disruptions	***
Other	***

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

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of CWLDLP. Their responses appear in table 3.3.

Table 3.3 CWLDLP: Anticipated changes in operations

Firm name	Narrative on changes in operations
***	***
***	***
***	***
***	***

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

U.S. production, capacity, and capacity utilization

Table 3.4 presents U.S. producers' installed and practical capacity and production on the same equipment. Overall installed capacity decreased after 2022, consistent with the exit of U.S. producer Stupp from the CWLDLP market late in the year. Practical overall capacity exhibited a similar initial decline followed by a period of stability. Overall production of CWLDLP and other tubular products on the same equipment increased substantially between 2022 and 2023, then stabilized.²

Table 3.4 CWLDLP: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	4,529,000	3,767,000	3,767,000	941,750	941,750
Installed overall	Production	537,670	1,207,373	1,066,871	334,158	323,311
Installed overall	Utilization	11.9	32.1	28.3	35.5	34.3
Practical overall	Capacity	3,328,295	2,788,295	2,788,295	697,074	697,074
Practical overall	Production	537,670	1,207,373	1,066,871	334,158	323,311
Practical overall	Utilization	16.2	43.3	38.3	47.9	46.4
Practical CWLDLP	Capacity	2,921,047	2,496,138	2,485,486	642,013	588,456
Practical CWLDLP	Production	435,462	1,081,397	940,856	306,564	283,441
Practical CWLDLP	Utilization	14.9	43.3	37.9	47.8	48.2

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

² Multiple responding U.S. producers reported poor market conditions in 2022 which led to low capacity utilization and production that year. See footnote 4 for details.

Capacity Constraints

Table 3.5 presents U.S. producers’ reported narratives regarding practical capacity constraints.

Table 3.5 CWLDLP: U.S. producers’ reported capacity constraints since January 1, 2019

Type of change	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
COVID-19 disruptions	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table 3.6 presents U.S. producers' capacity, production, and capacity utilization. U.S. producers' capacity to produce CWLDLP fluctuated, ending lower in 2024 than in 2022, and was lower in interim 2025 than in interim 2024.³ In contrast, U.S. production of CWLDLP fluctuated year to year, increasing from 2022 to 2024 but lower in interim 2025 than in interim 2024. U.S. production was substantially higher in 2023 than in 2022, reflecting poor market conditions in 2022, as reported by almost all responding U.S. producers.⁴ Market conditions in 2022 were such that *** allocated part of its production to ***.⁵ U.S. producers' capacity utilization increased over the 2022 to 2024 period, rising sharply in 2023 before declining moderately in 2024 and stabilizing in interim 2025. All responding U.S. producers reported lower capacity utilization ratios in 2022 than in 2023, consistent with aforementioned reported poor market conditions.

³ The lower level of practical capacity in interim 2025 reflects reporting by U.S. producer **. See correspondence with **, July 15, 2025.

⁴ Multiple responding U.S. producers reported poor market conditions in 2022 that led to low production levels that year. ** See correspondence with **, July 18; July 21; July 20; July 15; and July 31, 2025. See also ** U.S. producer questionnaire responses, question 2.2a. In addition, Stupp, which ceased production at the end of 2022, noted ** U.S. producer questionnaire, question 2.3d. See also table 3.1.

⁵ See ** U.S. producer questionnaire response, question 2.3a.

Table 3.6 CWLDLP: U.S. producers' output, by firm and period
Practical capacity

Capacity in short tons, interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	2,921,047	2,496,138	2,485,486	642,013	588,456

Table continued.

Table 3.6 (Continued) CWLDLP: U.S. producers' output, by firm and period
Production

Production in short tons, interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	435,462	1,081,397	940,856	306,564	283,441

Table continued.

Table 3.6 (Continued) CWLDLP: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent, interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	14.9	43.3	37.9	47.8	48.2

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity

Table continued.

Table 3.6 (Continued) CWLDLP: U.S. producers' output, by firm and period

Share of production

Share in percent, interim period is January through March

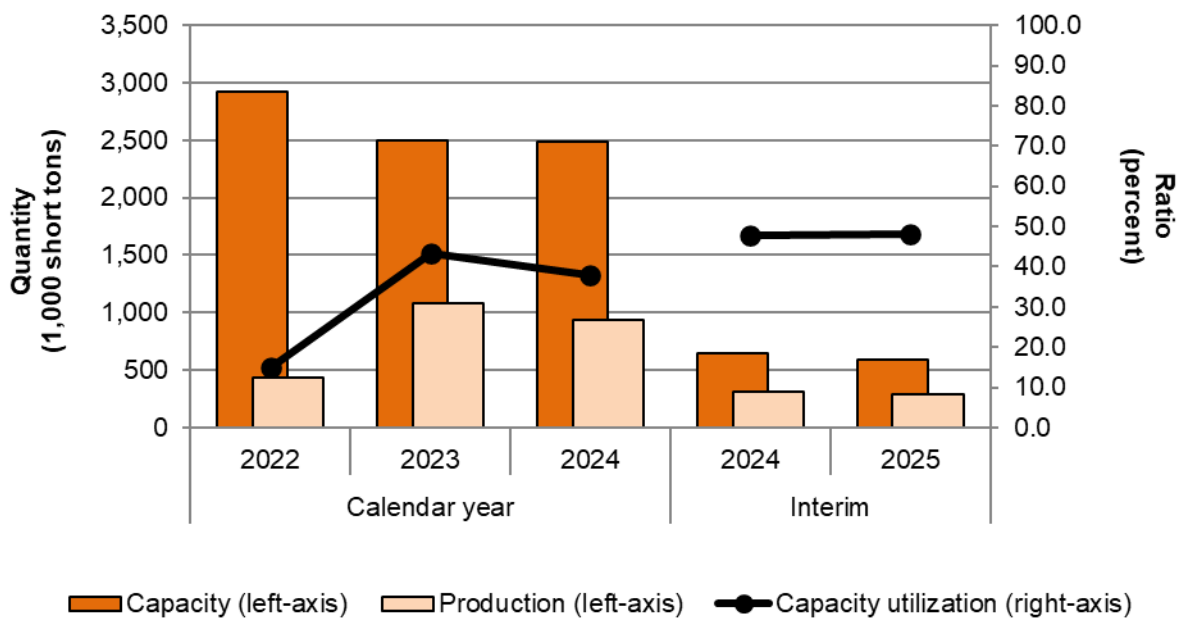
Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

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

Note: Evraz Oregon is not shown in this table or any firm-by-firm table that shows 2022 to 2024 data because it ceased production prior to 2022.

Figure 3.1 CWLDLP: U.S. producers' output, by period



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

Table 3.7 presents U.S. producers' production capability, by production method in 2024. U.S. producers can produce CWLDLP with the ERW production method between *** and *** inches in outer diameter size and between *** and *** inches in wall thickness. All ERW mills have a capacity range that includes CWLDLP and smaller diameter pipe. In the original investigations and in all prior reviews, U.S. producers reported that the ERW production method was ***.⁶ U.S. producers can produce CWLDLP with the HSAW production method between *** and *** inches in outer diameter size and between *** and *** inches in wall thickness, and with the LSAW production method between *** and *** inches in outer diameter size and *** and *** inches in wall thickness.

⁶ Original Publication, p.1.9; Certain Welded Large Diameter Line Pipe from Japan (First Review), Confidential Report, INV-EE-129, September 14, 2007, Table 1.4; Certain Welded Large Diameter Line Pipe from Japan (Second Review), Confidential Report, INV-LL-067, August 28, 2013, Table 3.2; Certain Welded Large Diameter Line Pipe from Japan (Third Review), Confidential Report, INV-RR-082, August 28, 2019, Table 3.4; and *** U.S. producer questionnaire response, question 2.5.

Table 3.7: CWLDLP: U.S. producers' production capability, by production method and firm, 2024

Quantity in short tons; Dimensions in inches

Firm	Production method	Minimum size (O.D. in inches)	Maximum size (O.D. in inches)	Minimum wall thickness (inches)	Maximum wall thickness (inches)
ACIPCO	ERW	***	***	***	***
Dura-Bond	ERW	***	***	***	***
Jindal Pipe	ERW	***	***	***	***
Jindal Tubular	ERW	***	***	***	***
Welspun	ERW	***	***	***	***
All firms (ERW)	ERW	***	***	***	***
Berg	HSAW	***	***	***	***
Jindal Tubular	HSAW	***	***	***	***
Stupp	HSAW	***	***	***	***
Welspun	HSAW	***	***	***	***
All firms (HSAW)	HSAW	***	***	***	***
Berg	LSAW	***	***	***	***
Dura-Bond	LSAW	***	***	***	***
JSW	LSAW	***	***	***	***
All firms (LSAW)	LSAW	***	***	***	***

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

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

Note: Stupp is not shown in this table because it ceased production in 2022.

Alternative products

As shown in table 3.8, a substantial majority of product produced from 2022 to 2024 by U.S. producers was CWLDLP. In addition, *** reported producing alternative products, specifically structural pipe, small diameter pipe, crop ends, and slurry/AWWA tubular goods. No production of excluded line pipe was reported.⁷

Table 3.8 CWLDLP: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; shares in percent; interim period is January through March

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
CWLDLP	Quantity	435,462	1,081,397	940,856	306,564	283,441
Excluded line pipe	Quantity	—	—	—	—	—
Other products	Quantity	102,208	125,976	126,015	27,594	39,870
All out-of-scope products	Quantity	102,208	125,976	126,015	27,594	39,870
All products	Quantity	537,670	1,207,373	1,066,871	334,158	323,311
CWLDLP	Share	81.0	89.6	88.2	91.7	87.7
Excluded line pipe	Share	—	—	—	—	—
Other products	Share	19.0	10.4	11.8	8.3	12.3
All out-of-scope products	Share	19.0	10.4	11.8	8.3	12.3
All products	Share	100.0	100.0	100.0	100.0	100.0

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

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

⁷ U.S. producers Berg and Welspun reported that they are planning investments to produce "niche products," i.e., excluded line pipe including offshore, heavier, and smaller diameter pipe, beginning late 2026 to early 2027 in Panama City and in the first quarter of 2027 in Little Rock, respectively. Hearing transcript, pp. 56 to 57; 107; 113 (Kirkland, Phillips).

U.S. producers' U.S. shipments and exports

Table 3.9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for nearly all shipments from 2022 to 2024 and virtually all shipments in both interim periods.⁸ The quantity of U.S. shipments increased irregularly over the 2022 to 2024 period, peaking in 2023, but was lower in interim 2025 than in interim 2024. The value of U.S. producers' U.S. shipments likewise increased irregularly from 2022 to 2024 but was lower in interim 2025 than in interim 2024. The substantial increase in quantity and value of U.S. producers' U.S. shipments in 2023 is consistent with improvement from the reported poor market conditions in 2022. The average unit value of U.S. producers' U.S. shipments decreased from 2022 to 2024 but was higher in interim 2025 than in interim 2024.

Table 3.9 CWLDLP: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. shipments	Quantity	308,252	1,089,772	935,499	279,628	236,748
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	568,453	1,873,060	1,558,729	454,571	391,278
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	1,844	1,719	1,666	1,626	1,653
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

⁸ None of the responding firms reported internal consumption or transfers to related parties.

Table 3.10 presents data on U.S. producers' U.S. shipments by grade in 2024. The largest volume of shipments was in the X-70 to X-79 range followed by the X-69 and below range. There were limited shipments of lower graded/lower AUV CWLDLP and of "other"/higher AUV CWLDLP, and no reported shipments of X-80 and greater CWLDLP.

Table 3.10 CWLDLP: U.S. producers' U.S. shipments, by grade, 2024

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Grade	Quantity	Value	Unit Value	Share of quantity	Share of value
API-5/Grade B	***	***	***	***	***
X-69 and below	***	***	***	***	***
X-70 to X-79	***	***	***	***	***
X-80 and above	***	***	***	***	***
All other grades	***	***	***	***	***
All grades	935,498	1,558,727	1,666	100.0	100.0

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

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

Table 3.11 presents data on U.S. producers' U.S. shipments by production method and outer diameter in 2024. The largest volume of shipments was in the 24(+)-to-48-inch outer diameter range, largely produced with the HSAW production method. A smaller volume of shipments was in the 16(+)-to-24-inch outer diameter range, largely produced with the ERW production method and *** volume of shipments had an outer diameter size greater than 48 inches, *** produced with the LSAW production method. The largest share of U.S. producers' shipments in 2024 across all outer diameter ranges were produced with the HSAW production method.

Table 3.11 CWLDLP: U.S. producers' U.S. shipments, by production method and outer diameter, 2024

Quantity in short tons; Shares in percent

Outer diameter	Measure	ERW	HSAW	LSAW	All methods
16 to 24 OD	Quantity	***	***	***	***
24 to 48 OD	Quantity	***	***	***	***
Greater than 48 OD	Quantity	***	***	***	***
All outer diameter ranges	Quantity	***	***	***	935,497
16 to 24 OD	Share across	***	***	***	100.0
24 to 48 OD	Share across	***	***	***	100.0
Greater than 48 OD	Share across	***	***	***	100.0
All outer diameter ranges	Share across	***	***	***	100.0
16 to 24 OD	Share down	***	***	***	***
24 to 48 OD	Share down	***	***	***	***
Greater than 48 OD	Share down	***	***	***	***
All outer diameter ranges	Share down	100.0	100.0	100.0	100.0
16 to 24 OD	Share across and down	***	***	***	***
24 to 48 OD	Share across and down	***	***	***	***
Greater than 48 OD	Share across and down	***	***	***	***
All outer diameter ranges	Share across and down	***	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". 16 to 24 OD includes product greater than 16 inches or less than and equal to 24 inches. 24 to 48 OD includes product greater than 24 inches or less than and equal to 48 inches.

U.S. producers' inventories

Table 3.12 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' end-of-period inventories fluctuated downward from 2022 to 2024 and were lower in interim 2025 than in interim 2024.⁹ The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments also fluctuated downward over the 2022 to 2024 period and were lower in interim 2025 than in interim 2024.

Table 3.12 CWLDLP: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio are inventories to production and shipments and reported in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory	Quantity	156,432	111,580	115,905	138,138	109,072
Inventory to U.S. production	Ratio	35.9	10.3	12.3	11.3	9.6
Inventory to U.S. shipments	Ratio	50.7	10.2	12.4	12.4	11.5
Inventory to total shipments	Ratio	***	***	***	***	***

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

U.S. producers' imports from subject sources

No responding U.S. producer reported imports of CWLDLP from Japan during the period for which data were collected. U.S. producer *** reported importing ***.¹⁰

No responding U.S. producer reported purchases of CWLDLP during the period for which data were collected.

⁹ U.S. producers *** held the largest shares of end-of-period inventories throughout the annual and interim periods.

¹⁰ See Part 4, table 4.3 and importer *** questionnaire response, questions 2.4 and 2.6a.

U.S. employment, wages, and productivity

Table 3.13 shows U.S. producers' employment-related data. The number of production and related workers increased from 2022 to 2024 and was higher in interim 2025 than in interim 2024.¹¹ Hours worked by PRWs and wages paid to PRWs also increased from 2022 to 2024 but were mixed when comparing interim periods. Productivity fluctuated from 2022 to 2024, ended 2024 lower than 2022, and was lower in interim 2025 than in interim 2024.¹² Unit labor costs fluctuated upward from 2022 to 2024, ended 2024 higher than 2022 and were higher in interim 2025 than in interim 2024.

Table 3.13 CWLDLP: U.S. producers' employment related information, by period

Interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	1,186	1,944	2,085	2,119	2,258
Total hours worked (1,000 hours)	2,149	4,057	4,787	1,214	1,281
Hours worked per PRW (hours)	1,812	2,087	2,296	573	567
Wages paid (\$1,000)	70,782	128,764	157,064	39,763	43,545
Hourly wages (dollars per hour)	\$32.94	\$31.74	\$32.81	\$32.75	\$33.99
Productivity (short tons per 1,000 hours)	202.6	266.6	196.5	252.5	221.3
Unit labor costs (dollars per short ton)	\$163	\$119	\$167	\$130	\$154

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

¹¹ All responding U.S. producers except for Stupp, which ceased production in 2022, reported an increase in production and related workers from 2022 to 2024. The largest increase in production and related workers was reported by U.S. producer ***.

¹² The decrease in productivity from 2023 to 2024 was largely driven by U.S. producer ***, which reported that even as production decreased from 2022 to 2024, it maintained employees in anticipation of future demand. See correspondence with ***, September 25, 2025.

Financial experience of U.S. producers

Background¹³

Of the nine firms that provided questionnaire responses to the Commission regarding their CWLDLP operations since January 1, 2019, all eight U.S. producers that were operational for some or all of the period for which data were collected (ACIPCO, Berg, Dura-Bond, Jindal Pipe, Jindal Tubular, JSW, Stupp, and Welspun) provided usable financial results on their CWLDLP operations. Evraz submitted a U.S. producers' questionnaire, however, the company permanently closed its CWLDLP operations in Portland, Oregon in 2020 and is not included in the aggregated financial data and analysis. Stupp provided financial data for only 2022, as it exited the market in late 2022. Most U.S. producers reported financial data on a calendar year basis for 2022, 2023, 2024 as well as the first quarter interim period data for 2024 and 2025.¹⁴ All U.S. producers provided their financial data on the basis of GAAP.

Figure 3.2 presents each responding firm's share of the total reported net sales quantity in 2024.

¹³ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

¹⁴ *** reported financial results on the basis of a fiscal year ending ***. U.S. producers' questionnaire, section 3.2A.1.

Figure 3.2 CWLDLP: U.S. producers' share of net sales quantity in 2024, by firm

* * * * *

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

Note: Evraz and Stupp are not included in this figure as both companies stopped producing CWLDLP before 2024.

Operations on CWLDLP

Table 3.14 presents aggregated data on U.S. producers' operations in relation to CWLDLP, while table 3.15 presents corresponding changes in AUVs. Table 3.16 presents selected company-specific financial data.

Table 3.14 CWLDLP: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	71.2	69.5	67.9	71.8	67.0
COGS: Direct labor	Ratio to NS	10.2	7.8	10.3	9.1	8.7
COGS: Other factory	Ratio to NS	14.6	8.9	11.4	10.4	9.0
COGS: Total	Ratio to NS	96.0	86.2	89.6	91.4	84.6
Gross profit	Ratio to NS	4.0	13.8	10.4	8.6	15.4
SG&A expense	Ratio to NS	10.4	8.3	6.1	7.3	6.8
Operating income or (loss)	Ratio to NS	(6.4)	5.5	4.3	1.3	8.5
Net income or (loss)	Ratio to NS	(5.8)	5.9	4.0	2.5	7.7

Table continued.

Table 3.14 (Continued) CWLDLP: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw materials	Share	74.2	80.6	75.8	78.6	79.1
COGS: Direct labor	Share	10.7	9.0	11.5	10.0	10.3
COGS: Other factory	Share	15.2	10.4	12.7	11.4	10.6
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	1,886	1,740	1,612	1,566	1,650
COGS: Raw materials	Unit value	1,343	1,209	1,095	1,125	1,105
COGS: Direct labor	Unit value	193	135	166	143	144
COGS: Other factory	Unit value	275	155	184	164	148
COGS: Total	Unit value	1,810	1,500	1,444	1,431	1,396
Gross profit or (loss)	Unit value	76	240	168	135	253
SG&A expenses	Unit value	196	145	99	115	113
Operating income or (loss)	Unit value	(121)	95	69	20	141
Net income or (loss)	Unit value	(109)	103	65	39	128
Operating losses	Count	6	—	1	2	2
Net losses	Count	6	—	2	3	2
Data	Count	8	7	7	7	7

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

Note: Shares represent the share of COGS. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 3.15 CWLDLP: Changes in AUVs between comparison periods

Changes in percent; interim is January through March

Item	2022-24	2022-23	2023-24	Interim 2024-25
Total net sales	▼(14.5)	▼(7.7)	▼(7.4)	▲5.4
COGS: Raw materials	▼(18.5)	▼(9.9)	▼(9.5)	▼(1.8)
COGS: Direct labor	▼(14.1)	▼(29.7)	▲22.2	▲0.8
COGS: Other factory	▼(33.0)	▼(43.5)	▲18.5	▼(9.6)
COGS: Total	▼(20.2)	▼(17.1)	▼(3.7)	▼(2.4)

Table continued.

Table 3.15 (Continued) CWLDLP: Changes in AUVs between comparison periods

Changes in dollars per short ton; interim is January through March

Item	2022-24	2022-23	2023-24	Interim 2024-25
Total net sales	▼(274)	▼(146)	▼(128)	▲84
COGS: Raw materials	▼(248)	▼(133)	▼(115)	▼(20)
COGS: Direct labor	▼(27)	▼(57)	▲30	▲1
COGS: Other factory	▼(91)	▼(119)	▲29	▼(16)
COGS: Total	▼(366)	▼(310)	▼(56)	▼(35)
Gross profit or (loss)	▲92	▲164	▼(72)	▲119
SG&A expense	▼(98)	▼(52)	▼(46)	▼(2)
Operating income or (loss)	▲190	▲216	▼(26)	▲120
Net income or (loss)	▲174	▲213	▼(38)	▲89

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

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table 3.16 CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	96.0	86.2	89.6	91.4	84.6

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	4.0	13.8	10.4	8.6	15.4

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	10.4	8.3	6.1	7.3	6.8

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	(6.4)	5.5	4.3	1.3	8.5

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	(5.8)	5.9	4.0	2.5	7.7

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	1,886	1,740	1,612	1,566	1,650

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	1,343	1,209	1,095	1,125	1,105

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	193	135	166	143	144

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	275	155	184	164	148

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	1,810	1,500	1,444	1,431	1,396

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	76	240	168	135	253

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	196	145	99	115	113

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	(121)	95	69	20	141

Table continued.

Table 3.16 (Continued) CWLDLP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	(109)	103	65	39	128

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

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

Net sales

Commercial sales accounted for all sales during the period for which data were collected. Because commercial sales are the only sales category represented, a single sales line is presented in the relevant tables above.

Total net sales quantity and value followed the same directional trend, increasing irregularly from 2022 to 2024 but lower in interim 2025 compared to interim 2024, with the majority of the increase occurring from 2022 to 2023.¹⁵ The directional trends of U.S. producers were similar; most reported increases in total net sales from 2022 to 2024, and lower net sales in interim 2025 compared to interim 2024.¹⁶

On a per-short ton basis, net sales values decreased from 2022 to 2024 but were higher in interim 2025 compared to interim 2024. Directionally, most U.S. producers reported a decrease in net sales AUVs from 2022 to 2024 but higher net sales AUVs in interim 2025 compared to interim 2024.

¹⁵ ***. Email from ***, July 18, 2025.

***. Email from ***, August 25, 2025.

¹⁶ ***. Email from ***, July 18, 2025.

***. Email from ***, July 20, 2025.

***. Email from ***, July 28, 2025.

Cost of goods sold and gross profit or loss

Raw material costs represented the largest component of COGS in all years, accounting for approximately four-fifths of COGS. Raw material costs increased irregularly from 2022 to 2024 but were lower in interim 2025 compared to interim 2024.¹⁷ On a per-short ton basis, raw material costs decreased from 2022 to 2024 and were lower in interim 2025 compared to interim 2024. Directionally, on a company-specific basis, raw material cost AUVs decreased from 2022 to 2024 for all U.S. producers, and four U.S. producers reported lower raw material cost AUVs in interim 2025 compared to interim 2024.¹⁸ Table 3.17 presents raw materials, by type. Sheet or coils represented the largest component of raw material costs, followed by CTL plate. Other raw material inputs reported include ***.¹⁹

Table 3.17 CWLDLP: U.S. producers' raw material costs in 2024

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
CTL plate	***	***
Sheet or coils	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

¹⁷ ***. Email from ***, July 18, 2025.

¹⁸ ***. Email from ***, July 30, 2025.

¹⁹ ***'s U.S. producers' questionnaire response, section 3.9c

Direct labor costs, the smallest component of COGS, increased from 2022 to 2024 but were lower in interim 2025 compared to interim 2024. Direct labor costs on a per-short ton basis decreased irregularly from 2022 to 2024 but were somewhat higher in interim 2025 compared to interim 2024.²⁰ Other factory costs were the second-largest component of COGS and increased from 2022 to 2024 but were lower in interim 2025 compared to interim 2024. On a per-short ton basis, other factory costs decreased irregularly from 2022 to 2024 and were lower in interim 2025 compared to interim 2024. Most U.S. producers reported decreases in direct labor cost AUVs and other factory cost AUVs from 2022 to 2024. Comparing the interim periods, most U.S. producers reported higher direct labor cost AUVs in interim 2025 relative to interim 2024, but lower other factory cost AUVs in interim 2025.²¹

Total COGS increased irregularly from 2022 to 2024 but was lower in interim 2025 compared to interim 2024. Total COGS AUVs, on a per-short ton basis, decreased from 2022 to 2024 and were lower in interim 2025 compared to interim 2024. All but one U.S. producer reported decreases in total COGS per short ton from 2022 to 2024, and most U.S. producers reported higher COGS per short ton in interim 2025 compared to interim 2024. Gross profit, both absolute and on a per-short ton basis, increased irregularly from 2022 to 2024 and was higher in interim 2025 compared to interim 2024.

SG&A expenses and operating income or loss

SG&A expenses increased irregularly from 2022 to 2024 but were lower in interim 2025 compared to interim 2024. On a per short ton basis, SG&A expenses decreased from 2022 to 2024 and were lower in interim 2025 compared to interim 2024. The SG&A expense ratio (SG&A expenses divided by net sales value) followed the same trend as SG&A expenses on a per-short ton basis.

²⁰ ***. Email from ***, September 23, 2025.

²¹ ***. Email from ***, July 18, 2025.

Operating income increased irregularly from 2022 (an operating loss) to 2024 (an operating income), with the majority of the increase occurring from 2022 to 2023. It was higher in interim 2025 compared to interim 2024.²² The operating income margin increased irregularly from 2022 to 2024 and was higher in interim 2025 compared to interim 2024.

All other expenses and net income or loss

Interest expense increased from 2022 to 2024 and was higher in interim 2025 compared to interim 2024. All other expenses increased from 2022 to 2024 and were higher in interim 2025 compared to interim 2024.²³ All other income accounted for the majority of net all other expenses/income and increased irregularly from 2022 to 2024 but was lower in interim 2025 compared to interim 2024.²⁴

Compared to operating income discussed previously, net income was higher in 2022, 2023 and interim 2024, but lower in 2024 and interim 2025 as a result of the net effects of combined all other expense/income.²⁵ Directionally, the trend for net income was similar to operating income, increasing irregularly from 2022 (a net loss) to 2024 (a net income) and higher in interim 2025 compared to interim 2024.

²² Operating losses were reported by ***.

²³ ***. U.S. producers' questionnaire response, section 3.10.

²⁴ ***. U.S. producers' questionnaire response, section 3.10.

²⁵ ***.

Variance analysis

A variance analysis for the operations of U.S. producers of CWLDLP is presented in table 3.18.²⁶ The information for this variance analysis is derived from table 3.14. The variance analysis shows that the increase in operating income from 2022 to 2024 was due to a favorable cost variance that outweighed unfavorable price and volume variances, indicating that the positive effects of the decline in costs and expense were greater than the negative effects of the decline in net sales AUVs. The higher operating income in interim 2025 was due to favorable price and cost variances outweighing an unfavorable volume variance.

Table 3.18 CWLDLP: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars; interim is January through March

Item	2022-24	2022-23	2023-24	Interim 2024-25
Net sales price variance	***	***	***	***
Net sales volume variance	***	***	***	***
Net sales total variance	***	***	***	***
COGS cost variance	***	***	***	***
COGS volume variance	***	***	***	***
COGS total variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

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

Note: These data are derived from the data in table 3.14. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

²⁶ The Commission's variance analysis is calculated in three parts: Net sales variance, COGS variance, and SG&A expense variance. Each part consists of a price variance (in the case of the net sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variances are calculated as the change in unit price or per-unit cost/expense, respectively, times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the operating income price variance is from sales; the operating income cost/expense variance is the sum of the cost components in the COGS and SG&A expense variances, and the operating income volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances.

Capital expenditures and research and development expenses

Table 3.19 presents capital expenditures, by firm. Table 3.20 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures. Capital expenditures were higher in 2023 and 2024 than in 2022 and were higher in interim 2025 compared to interim 2024. R&D expenses, which were only reported by ***, increased from 2022 to 2024 but were lower in interim 2025 compared to interim 2024.²⁷

Table 3.19 CWLDLP: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
ACIPCO	***	***	***	***	***
Berg	***	***	***	***	***
Dura-Bond	***	***	***	***	***
Jindal Pipe	***	***	***	***	***
Jindal Tubular	***	***	***	***	***
JSW	***	***	***	***	***
Stupp	***	***	***	***	***
Welspun	***	***	***	***	***
All firms	12,487	20,302	19,651	2,357	6,343

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

²⁷ ***. *** U.S. producers' questionnaire response, section 3.13a and 3.13c.

Table 3.20 CWLDLP: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
ACIPCO	***
Berg	***
Dura-Bond	***
Jindal Pipe and Jindal Tubular	***
JSW	***
Stupp	***
Welspun	***

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

Assets and return on assets

Table 3.21 presents data on the U.S. producers' total net assets, while table 3.22 presents their operating ROA.²⁸ Table 3.23 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Assets increased irregularly from 2022 to 2024, peaking in 2023, and return on assets followed the same directional trend.

Table 3.21 CWLDLP: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
ACIPCO	***	***	***
Berg	***	***	***
Dura-Bond	***	***	***
Jindal Pipe	***	***	***
Jindal Tubular	***	***	***
JSW	***	***	***
Stupp	***	***	***
Welspun	***	***	***
All firms	718,244	1,060,337	872,097

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

Table 3.22 CWLDLP: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2022	2023	2024
ACIPCO	***	***	***
Berg	***	***	***
Dura-Bond	***	***	***
Jindal Pipe	***	***	***
Jindal Tubular	***	***	***
JSW	***	***	***
Stupp	***	***	***
Welspun	***	***	***
All firms	(5.6)	10.1	7.7

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

²⁸ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table 3.23 CWLDLP: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
ACIPCO	***
Berg	***
Dura-Bond	***
Jindal Pipe and Jindal Tubular	***
JSW	***
Stupp	***
Welspun	***

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

Part 4: U.S. imports and the foreign industry

U.S. imports

Overview

The Commission issued questionnaires to 52 potential importers of CWLDLP. Twenty-four firms provided data and information in response to the questionnaires, and an additional nine firms indicated that they had not imported product since 2019.¹ Based on official Commerce statistics provided for by the specified HTS statistical reporting numbers, importers' questionnaire data accounted for virtually all (***) imports from Japan by quantity, and a large majority of imports from all other sources (***) and of total U.S. imports (***) by quantity during 2024. This coverage calculation consists of imports of in scope CWLDLP as well as excluded large diameter line pipe.

Import data in this report are based on official Commerce statistics for CWLDLP, as adjusted using questionnaire responses for product exclusions.^{2 3}

¹ Despite numerous contacts by staff, Husteel and SeAH Steel did not respond to the Commission's U.S. importer questionnaire. These two affiliates of South Korean manufacturers/exporters are believed to account for a substantial share of CWLDLP.

² Commerce statistics are based on HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, as accessed July 16, 2025. (Imports for consumption data series). Specifically excluded from the scope is certain American Water Works Association (AWWA) specification water and sewage pipe. See "Commerce's scope," page 1.12 for further details on product exclusions.

³ U.S. importers *** indicated in their questionnaire responses that all of their imported welded large diameter line pipe from Japan is product that is specifically excluded from the scope. U.S. importers *** indicated in their questionnaire responses that they imported welded large diameter line pipe from Japan that is both included and specifically excluded from the scope. U.S. importer *** indicated in its questionnaire response that it imported CWLDLP from Japan that is included in the scope and also imported CWLDLP from nonsubject sources.

Imports from subject and nonsubject countries

Table 4.1 and figure 4.1 present information on U.S. imports of CWLDLP from Japan and all other sources during the period for which data were collected. U.S. imports from Japan accounted for *** percent of U.S. imports by quantity and value in 2022 and 2023. There were no reported imports of CWLDLP from Japan in 2024 and both interim periods. Conversely, U.S. imports from nonsubject sources, which accounted for virtually all U.S. imports during the period for which data were collected, were higher in 2024 than in 2022 based on quantity and higher in interim 2025 than in interim 2024, based on quantity. In 2024, the largest nonsubject sources for U.S. imports of welded large diameter line pipe were South Korea, Turkey, and Germany based on quantity. As summarized in Part 1 of this report, imports of welded large diameter welded line pipe from South Korea and Turkey are subject to antidumping and/or countervailing duty orders.⁴

Unit values for U.S. imports from Japan decreased from 2022 to 2023. Unit values for nonsubject sources and all import sources decreased over the 2022 to 2024 period but were higher in interim 2025 than in interim 2024.⁵ The ratio of CWLDLP imports from Japan to U.S. production was *** percent in 2022 and 2023. The ratio of CWLDLP imports from nonsubject sources and from all import sources to U.S. production fluctuated over the 2022 to 2024 period, ending lower in 2024 than in 2022 but higher in interim 2025 than in interim 2024.

⁴ Certain imports from South Korea and Turkey are not subject to these orders, in part due to coverage under existing orders on smaller diameter line pipe. After the original investigations were completed in 2019, Turkish producer Borusan was excluded from the antidumping duty order on large diameter welded line pipe from Turkey, and as a result all large diameter welded line pipe produced by Borusan is excluded from both the antidumping and countervailing duty orders on Turkey. 80 FR 75056, December 1, 2015; 84 FR 6362, February 27, 2019; 85 FR 35262, June 9, 2020.

⁵ Evraz closed its LSAW mill in Camrose at the end of 2019 and idled Evraz Regina HSAW mills during this time, contributing to low production quantity and value of CWLDLP from Canada from 2022 to 2024, as seen in table 4.2.

Table 4.1 CWLDLP: U.S. imports by source and period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares and ratios in percent; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Japan	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	243,338	260,397	279,938	74,098	106,381
Japan	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	411,124	387,934	364,837	91,836	183,685
Japan	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	1,690	1,490	1,303	1,239	1,727
Japan	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Japan	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Japan	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	55.9	24.1	29.8	24.2	37.5

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Imports from Japan reflect only included non-excluded product from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review. Ratio represents ratio to U.S. production.

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

Note: The preponderance of U.S. imports of large diameter welded line pipe from Japan is excluded from the scope of the subject orders. See Appendix E for details.

Figure 4.1 CWLDLP: U.S. import quantities and average unit values, by source and by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series.

Table 4.2 CWLDLP: U.S. nonsubject imports, by source and by period

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
South Korea	Quantity	134,042	127,952	134,381	35,981	41,356
Turkey	Quantity	4,425	35,033	56,365	19,020	3,666
Germany	Quantity	26,972	57,763	49,110	15,407	32,660
Greece	Quantity	—	—	10,522	—	15,602
United Kingdom	Quantity	4,944	7,314	10,189	3,878	2,389
China	Quantity	141	233	4,251	—	—
Canada	Quantity	138	200	1,805	597	80
India	Quantity	40,848	25,008	91	69	—
All other sources	Quantity	36,498	22,428	18,676	2,161	12,155
Nonsubject sources	Quantity	248,008	275,931	285,390	77,113	107,908
Questionnaire adjustment for excluded imports	Quantity	***	***	***	***	***
Adjusted nonsubject sources	Quantity	***	***	***	***	***
South Korea	Value	221,969	168,794	162,110	41,243	47,731
Turkey	Value	10,825	53,624	77,603	26,016	12,773
Germany	Value	54,045	101,508	75,290	21,784	78,737
Greece	Value	—	—	15,421	—	28,652
United Kingdom	Value	8,309	12,452	12,621	4,548	2,756
China	Value	222	359	3,956	—	—
Canada	Value	53	538	2,454	686	102
India	Value	64,529	37,124	203	137	—
All other sources	Value	61,396	45,428	26,889	2,617	16,099
Nonsubject sources	Value	421,349	419,828	376,547	97,031	186,850
Questionnaire adjustment for excluded imports	Value	***	***	***	***	***
Adjusted nonsubject sources	Value	***	***	***	***	***
South Korea	Unit value	1,656	1,319	1,206	1,146	1,154
Turkey	Unit value	2,446	1,531	1,377	1,368	3,484
Germany	Unit value	2,004	1,757	1,533	1,414	2,411
Greece	Unit value	—	—	1,466	—	1,836
United Kingdom	Unit value	1,681	1,703	1,239	1,173	1,154
China	Unit value	1,581	1,540	931	—	—
Canada	Unit value	387	2,693	1,360	1,150	1,277
India	Unit value	1,580	1,484	2,225	1,981	—
All other sources	Unit value	1,682	2,026	1,440	1,211	1,324
Nonsubject sources	Unit value	1,699	1,521	1,319	1,258	1,732
Questionnaire adjustment for excluded imports	Unit value	***	***	***	***	***
Adjusted nonsubject sources	Unit value	***	***	***	***	***

Table continued

Table 4.2 (Continued) CWLDLP: U.S. nonsubject imports, by source and by period

Shares of quantity prior to adjustment in percent; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
South Korea	Share of quantity	54.0	46.4	47.1	46.7	38.3
Turkey	Share of quantity	1.8	12.7	19.8	24.7	3.4
Germany	Share of quantity	10.9	20.9	17.2	20.0	30.3
Greece	Share of quantity	—	—	3.7	—	14.5
United Kingdom	Share of quantity	2.0	2.7	3.6	5.0	2.2
China	Share of quantity	0.1	0.1	1.5	—	—
Canada	Share of quantity	0.1	0.1	0.6	0.8	0.1
India	Share of quantity	16.5	9.1	0.0	0.1	—
All other sources	Share of quantity	14.7	8.1	6.5	2.8	11.3
Nonsubject sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Questionnaire adjustment for excluded imports	Share of quantity	***	***	***	***	***
Adjusted nonsubject sources	Share of quantity	***	***	***	***	***
South Korea	Share of value	52.7	40.2	43.1	42.5	25.5
Turkey	Share of value	2.6	12.8	20.6	26.8	6.8
Germany	Share of value	12.8	24.2	20.0	22.5	42.1
Greece	Share of value	—	—	4.1	—	15.3
United Kingdom	Share of value	2.0	3.0	3.4	4.7	1.5
China	Share of value	0.1	0.1	1.1	—	—
Canada	Share of value	0.0	0.1	0.7	0.7	0.1
India	Share of value	15.3	8.8	0.1	0.1	—
All other sources	Share of value	14.6	10.8	7.1	2.7	8.6
Nonsubject sources	Share of value	100.0	100.0	100.0	100.0	100.0
Questionnaire adjustment for excluded imports	Share of value	***	***	***	***	***
Adjusted nonsubject sources	Share of value	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Nonsubject sources are ordered by descending quantity in 2024.

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

Table 4.3 presents data on U.S. producers' and their affiliates' imports by source and period. During the 2022 to 2024 period, one U.S. producer (***) imported CWLDLP from ***.

Table 4.3 CWLDLP: U.S. producers' and affiliates' imports, by source and period

Quantity in short tons; shares and ratios in percent; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Japan	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
Japan	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Shares compare the quantities from this table to the import sources in Table 4.1. ***.

No U.S. importers reported U.S. shipments of CWLDLP from Japan in 2024. Two U.S. importers, ***, reported a small amount of U.S. shipments from Japan in 2023.⁶ One additional importer, ***, reported a small amount of U.S. shipments in 2022.⁷

⁶ ***. ***. See importer *** and importer *** questionnaire responses, question 2.5a.

⁷ ***. See importer *** questionnaire response, question 2.5a.

Table 4.4 presents data on U.S. importers' U.S. shipments of imports from nonsubject sources by grade in 2024. The large majority of U.S. shipments by quantity was in the X-69 and below and X-70 to X-79 ranges, while a smaller share was API-5/Grade B, X-80 and above, or all other grades. API-5/Grade B CWLDLP had the lowest AUVs in 2024, while X-80 and above CWLDLP had the highest AUVs.

Table 4.4 CWLDLP: U.S. importers' U.S. shipments from nonsubject sources, by grade, 2024

Grade	Quantity	Value	Unit Value	Share of quantity	Share of value
API-5/Grade B	***	***	***	***	***
X-69 and below	***	***	***	***	***
X-70 to X-79	***	***	***	***	***
X-80 and above	***	***	***	***	***
All other grades	***	***	***	***	***
All grades	***	***	***	100.0	100.0

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

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

Table 4.5 presents data on U.S. importers' U.S. shipments from nonsubject sources, by production method and outer diameter in 2024. The largest share of U.S. shipments by quantity were produced with the ERW production method while a smaller volume of shipments by quantity were produced with the HSAW production method, and the smallest volume of shipments by quantity were produced with the LSAW production method. The vast majority of U.S. shipments produced with the ERW production method were in the 16(+)-to-24-inch outer diameter range, by quantity. U.S. shipments produced with the HSAW production method had an outer diameter range of greater than 48 inches.⁸ The majority of U.S. shipments produced with the LSAW production method were in the 24(+)-to-48-inch outer diameter range, by quantity.

Table 4.5 CWLDLP: U.S. importers' U.S. shipments from nonsubject sources, by production method and outer diameter, 2024

Quantity in short tons; shares in percent

Outer diameter	Measure	ERW	HSAW	LSAW	All methods
16 to 24 OD	Quantity	***	***	***	***
24 to 48 OD	Quantity	***	***	***	***
Greater than 48 OD	Quantity	***	***	***	***
All outer diameter ranges	Quantity	***	***	***	***
16 to 24 OD	Share across	***	***	***	100.0
24 to 48 OD	Share across	***	***	***	100.0
Greater than 48 OD	Share across	***	***	***	100.0
All outer diameter ranges	Share across	***	***	***	100.0
16 to 24 OD	Share down	***	***	***	***
24 to 48 OD	Share down	***	***	***	***
Greater than 48 OD	Share down	***	***	***	***
All outer diameter ranges	Share down	100.0	100.0	100.0	100.0
16 to 24 OD	Share across and down	***	***	***	***
24 to 48 OD	Share across and down	***	***	***	***
Greater than 48 OD	Share across and down	***	***	***	***
All outer diameter ranges	Share across and down	***	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". 16 to 24 OD includes product greater than 16 inches or less than and equal to 24 inches. 24 to 48 OD includes product greater than 24 inches or less than and equal to 48 inches.

⁸ U.S. importer *** accounted for *** U.S. shipments of CWLDLP produced with the HSAW production method in 2024.

U.S. importers' imports subsequent to March 31, 2025

The Commission requested importers to indicate whether they had imported or arranged for the importation of CWLDLP from Japan for delivery after March 21, 2025; such imports are presented in table 4.6. There were no reported arranged imports of CWLDLP from Japan after March 31, 2025. Eight U.S. importers reported arranged imports of CWLDLP from nonsubject sources after March 31, 2025.

Table 4.6 CWLDLP: Arranged imports, by source and projected quarter

Quantity in short tons

Source	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Total
Japan	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

U.S. inventories of imported merchandise

Table 4.7 presents data for inventories of U.S. imports of CWLDLP from Japan and all other sources held in the United States. There were no reported end-of-period inventories of CWLDLP from Japan during December of 2022, 2023, or 2024 or March 2024 or 2025. Four importers reported holding end-of-period inventories, however. Importer *** held the largest share of end-of-period inventories during the 2022 to 2024 period and during interim 2024. The quantity of end-of-period inventories in interim 2024 was higher than interim 2025, largely driven by a decrease in reported end-of-period inventories by importer ***.⁹

Table 4.7 CWLDLP: U.S. importers' end-of-period inventories and their ratio to select items, by source and period

Quantity in short tons; ratios in percent; interim period is January through March

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	Japan	***	***	***	***	***
Ratio to imports	Japan	***	***	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***	***	***
Ratio to total shipments of imports	Japan	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

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

⁹ Importer *** reported that it is not a regular importer of CWLDLP but rather a ***. See correspondence with ***, July 15, 2025.

The industry in Japan

Overview

In the original investigation, four producers in Japan provided the Commission with complete data: Kawasaki Steel Corp. (“Kawasaki”), Nippon Steel Corp. (“Nippon”), NKK Corp. (“NKK”), and Sumitomo Metal Industries, Ltd. (“Sumitomo”).¹⁰ In 2003, JFE Steel Corp. (“JFE”) was created as a result of the merger of Kawasaki and NKK and JFE subsequently operated the CWLDLP production facilities of the former Kawasaki and NKK. In the first five-year review, three producers in Japan provided responses to the Commission’s questionnaire: JFE, Nippon, and Sumitomo. In October 2012, Nippon and Sumitomo integrated their businesses to become Nippon Steel & Sumitomo Metal Corp. (“NSSMC”). In the second five-year review, two known producers of CWLDLP in Japan (JFE and NSSMC) provided complete responses to the Commission’s questionnaire.¹¹ In the third five-year review, two known producers of CWLDLP in Japan, JFE and Nippon Steel Corp. (“Nippon”), provided complete responses to the Commission’s questionnaire.^{12 13}

The Commission issued questionnaires to nine potential producers/exporters of CWLDLP in Japan. Five firms (two foreign producers and three exporters) provided data and information in response to the questionnaires,¹⁴ while four firms indicated that they have not produced and/or exported CWLDLP during the period for which data were collected. The data presented in this section of the report are believed to represent the entire CWLDLP industry in Japan.¹⁵

¹⁰ Original publication, p. 7.2.

¹¹ Second review publication, p. 4.8.

¹² Third review publication, p. 4.12.

¹³ Effective April 1, 2019, the trade name of NSSMC was changed to Nippon Steel Corporation. Nippon webpage, <https://www.nst.nipponsteel.com/en/news/assets/pdf/385.pdf>, retrieved July 2, 2019.

¹⁴ Exporter *** indicated in its questionnaire response that ***.

¹⁵ In response to the notice of institution for this current review, JFE reported that it accounted for all known production of CWLDLP in Japan. Upon follow up from staff, Nippon submitted a questionnaire response that indicated it had produced line pipe, including CWLDLP, in Japan during the period for which data were collected. JFE noted during the hearing that it was their understanding that Nippon still owns ERW mills and is capable of producing smaller diameter pipes. In its posthearing brief, the domestic industry asserted that Nippon Steel has at least three plants with ERW capacity to produce subject pipe. Respondent interested party’s supplemental response to the notice of institution, October 29, 2024, pp. 7, 9; Nippon Steel foreign producer questionnaire response, question 2.3a; hearing transcript, p. 164 (Shimbo (through interpreter)); ALPPA posthearing brief, pp. 4.

Tables 4.8 and 4.9 present information on the CWLDLP operations of the responding producers and exporters/resellers in Japan.

Table 4.8 CWLDLP: Summary data on Japanese producers, 2024

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
JFE	***	***	***	***	***	***
Nippon	***	***	***	***	***	***
All firms	***	100.0	***	100.0	***	***

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

Table 4.9 CWLDLP: Summary data on resellers in Japan, 2024

Firm	Resales exported to the United States (short tons)	Share of resales exported to the United States (percent)	Resales exported to all destination markets (short tons)	Share of resales exported to all destination markets (percent)
Metal One	***	***	***	***
Mitsui & Co Steel	***	***	***	***
All firms	***	***	***	100.0

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

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

Table 4.10 presents events in Japan’s industry since January 1, 2019.¹⁶

Table 4.10 CWLDLP: Developments in Japan industry since 2019

Item	Firm	Event
Mill Closure and Consolidation	Nippon Steel	2019 - Nippon Steel announced that it would integrate the steel pipe production from its Kashima mill into its Kimitsu mill. The transition was set to be completed by October 2019.
Market Exit	Nippon Steel	2021 - Nippon Steel announced that it planned to withdraw from the large-diameter steel pipe market. Its pipe mill in Kimitsu was scheduled to shut down by the end of the company’s fiscal year 2021.
Decrease in Production	JFE	Since last review - JFE reported that it has scaled down its own production capacity for CWLDLP. It noted that there are fewer skilled workers with experience manufacturing CWLDLP due to worker retirements and factory shutdowns.

Source: Yieh Corp., Nippon Steel plans to close UO pipe mill at Kashima Works in Oct, May 14, 2019, <https://www.yieh.com/en/News/nippon-steel-plans-to-close-uo-pipe-mill-at-kashima-works-in-oct//103737>, accessed July 30, 2025; Nippon Steel Corporation, News Release: Nippon Steel Corporation Announces Medium- to Long-term Management Plan, March 5, 2021, <https://www.bing.com/ck/a?!&p=f02ae5538c761a3382414ead6a188782bf38e74ff724d2b896124486550f6191JmltdHM9MTc1MzgzMzYwMA&ptn=3&ver=2&hsh=4&fclid=39e9ec5f-3155-6859-24aa-fa413059690f&psq=Nippon+closes+kimitsu+mill&u=a1aHR0cHM6Ly93d3cubmlwcG9uc3RIZWwuY29tL2VuL2lyL2xpYnJhcnkvcGRmLzlwMjEwMzA1XzEwMC5wZGY&ntb=1>, accessed July 30, 2025, p. 4; Respondent interested party’s supplemental response to the notice of institution, October 29, 2024, pp. 2 to 3.

¹⁶ Nippon reported in its questionnaire response that ***. See Nippon foreign producer questionnaire response, question 1.2.

Changes in operations

Producers in Japan were asked to report any change in the character of their operations or organization relating to the production of CWLDLP since 2019. Both producers indicated in their questionnaires that they had experienced such changes. Table 4.11 presents the changes identified by these producers.

Table 4.11 CWLDLP: Reported changes in operations in Japan, since January 1, 2019, by firm

Item	Firm name and narrative on changes in operations
Plant closings	***
Plant closings	*** ¹⁷
Production curtailments	***

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

¹⁷ ***. See correspondence with ***, September 25, 2025.

Operations on CWLDLP

Table 4.12 presents data on Japanese producers’ installed capacity, practical capacity, and production on the same equipment. Installed overall capacity increased from 2022 to 2023 and ***.¹⁸ Overall production decreased modestly over the 2022 to 2024 period but was noticeably lower in interim 2025 than in interim 2024. Practical overall capacity decreased over the 2022 to 2024 period and was lower in interim 2025 than in interim 2024. CWLDLP production and allocated capacity represented a minority of overall production and capacity.

Table 4.12 CWLDLP: Japanese producers’ installed and practical capacity, production, and utilization, by measure and period

Capacity and production in short tons; utilization in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CWLDLP	Capacity	***	***	***	***	***
Practical CWLDLP	Production	***	***	***	***	***
Practical CWLDLP	Utilization	***	***	***	***	***

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

¹⁸ The Commission asked firms to report “installed overall capacity” as the level of production that an establishment could have attained, assuming the firm’s optimal product mix, and based solely on existing capital investments, and “practical overall capacity” as the level of production that an establishment could reasonably have expected to attain, taking into account the firm’s actual product mix over the period. JFE asserts that nominal excess nameplate capacity does not translate into economically deployable capacity for subject output. JFE posthearing brief, p. A-10.

Table 4.13 presents Japanese producers' reported narratives regarding practical capacity constraints.

Table 4.13 CWLDLP: Japanese producers' reported capacity constraints since January 1, 2022

Item	Narrative on constraints to practical overall capacity
Existing labor force	***
Supply of material inputs	***

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

Table 4.14 presents data for Japanese producers. Responding Japanese producers' capacity and production fluctuated over the 2022 to 2024 period and ended 2024 higher than 2022; capacity more than doubled and production nearly doubled from 2022 to 2023.¹⁹ Capacity and production were lower in interim 2025 than in interim 2024. Capacity utilization decreased from 2022 to 2024 but was higher in interim 2025 than in interim 2024. Japanese producers' share of home shipments fluctuated but was consistently less than *** percent during 2022 to 2024 and both interim periods. *** of Japanese producers' shipments were exported during the 2022 to 2024 period and both interim periods.²⁰ The primary destinations for Japanese producers' exports of CWLDLP were ***.²¹ Japanese producers' inventory to production ratio fluctuated and decreased from 2022 to 2024.

¹⁹ Both responding foreign producers reported large increases in CWLDLP capacity from 2022 to 2023. JFE indicated in its questionnaire response that ***. See JFE foreign producer questionnaire response, questions 2.11a and 2.18. Nippon reported that ***. See correspondence with ***, September 16, 2025.

²⁰ The decrease in export AUVs from 2022 to 2023 and subsequent stabilization at the lower level in 2024 was largely driven by Japanese producer ***. See correspondence with ***, September 25, 2025.

²¹ See correspondence with ***, August 6, 2025, and *** foreign producer questionnaire response, question 2.14.

Table 4.14 CWLDLP: Data for Japanese producers, by item and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

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

Table 4.14 (Continued) CWLDLP: Data for Japanese producers, by item and period

Unit values in dollars per short ton; Ratio and shares in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	100.0	100.0	100.0	100.0	100.0

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

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

Table 4.15 presents Japanese producers' and resellers' (***) exports from Japan, by destination market and period over the 2022 to 2024 period and both interim periods.²²

²² ***. Upon follow up from staff, all firms reported that their data are accurate.

Table 4.15 CWLDLP: Japanese producers' and resellers' exports from Japan, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; Shares and ratios in percent; interim period is January through March

Destination market	Measure	2022	2023	2024	Interim 2024	Interim 2025
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Ratios represent the portion of exports by producers and resellers for each destination market to the producers' total shipments across all destination markets.

Table 4.16 presents data on Japanese producers' total shipments by grade in 2024. The largest volume of shipments in 2024 by quantity and value was in the X-69 and below range and a smaller volume of shipments was in the X-70 to X-79, with a *** of shipments in the X-80 and above and API-5/Grade B categories.

Table 4.16 CWLDLP: Japanese producers' total shipments, by grade, 2024

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

Grade	Quantity	Value	Unit Value	Share of quantity	Share of value
API-5/Grade B	***	***	***	***	***
X-69 and below	***	***	***	***	***
X-70 to X-79	***	***	***	***	***
X-80 and above	***	***	***	***	***
All other grades	***	***	***	***	***
All grades	***	***	***	100.0	100.0

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

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

Table 4.17 presents Japanese producers' total shipments by production method and outer diameter in 2024. The largest volume of shipments in 2024 were in the 24(+)- to-28- inch outer diameter range produced with the LSAW production method, with a smaller volume in the 16(+)-to-24- inch outer diameter range, largely produced with the ERW production method.²³ There were no reported shipments produced with the HSAW production method in 2024.

Table 4.17 CWLDLP: Japanese producers' total shipments, by production method and outer diameter, 2024

Quantity in short tons; Shares in percent

Outer diameter	Measure	ERW	HSAW	LSAW	All methods
16 to 24 OD	Quantity	***	***	***	***
24 to 48 OD	Quantity	***	***	***	***
Greater than 48 OD	Quantity	***	***	***	***
All outer diameter ranges	Quantity	***	***	***	***
16 to 24 OD	Share across	***	***	***	100.0
24 to 48 OD	Share across	***	***	***	100.0
Greater than 48 OD	Share across	***	***	***	—
All outer diameter ranges	Share across	***	***	***	100.0
16 to 24 OD	Share down	***	***	***	***
24 to 48 OD	Share down	***	***	***	***
Greater than 48 OD	Share down	***	***	***	***
All outer diameter ranges	Share down	100.0	***	100.0	100.0
16 to 24 OD	Share across and down	***	***	***	***
24 to 48 OD	Share across and down	***	***	***	***
Greater than 48 OD	Share across and down	***	***	***	***
All outer diameter ranges	Share across and down	***	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". 16 to 24 OD includes product greater than 16 inches or less than and equal to 24 inches. 24 to 48 OD includes product greater than 24 inches or less than and equal to 48 inches.

²³ *** of Nippon's shipments in 2024 were produced with the ERW production method. See Nippon Steel foreign producer questionnaire response, question 2.17.

Table 4.18 presents Japanese producers' production characteristics by production method.

Table 4.18 CWLDLP: Japanese producers' production characteristics, by production method

Quantity in short tons; Dimensions in inches

Firm	Production method	Minimum size (O.D. in inches)	Maximum size (O.D. in inches)	Minimum wall thickness (inches)	Maximum wall thickness (inches)
JFE	ERW	***	***	***	***
Nippon	ERW	***	***	***	***
All firms (ERW)	ERW	***	***	***	***
JFE	LSAW	***	***	***	***

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

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

Alternative products

As shown in table 4.19, Japanese producers produced other products on the same equipment and machinery used to produce CWLDLP. Other out-of-scope products produced on the same equipment as CWLDLP accounted for *** from 2022 to 2024 and interim 2025, and *** in interim 2024. Excluded line pipe and CWLDLP accounted for smaller shares. Alternative products produced included ***.²⁴

Table 4.19 CWLDLP: Japanese producers' overall production on the same equipment as in-scope production, period

Quantity in short tons; share and ratio in percent

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
CWLDLP	Quantity	***	***	***	***	***
Excluded line pipe	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
CWLDLP	Share	***	***	***	***	***
Excluded line pipe	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

²⁴ See correspondence with ***, September 25, 2025.

Exports

According to GTA, the leading export markets for welded large diameter line pipe from Japan are Malaysia, the United States, and Canada (table 4.20). During 2024, Malaysia was the top export market for welded large diameter line pipe from Japan, accounting for 33.8 percent and the United States was the number two export market for welded large diameter line pipe from Japan, accounting for 32.6 percent, followed by Canada, accounting for 14.3 percent.²⁵

²⁵ The GTA data present welded large diameter line pipe, a category that includes CWLDLP and out-of-scope products. For example, the outside diameter of in-scope product for this review can range from 16 to 64 inches. However, exports from Japan presented in table 4.20 may include line pipe with outside diameters greater than 64 inches. Additionally, out-of-scope products include certain high end, specialty, or “niche” line pipe with relatively thick walls, often intended for use in high-pressure environments such as offshore, deep water applications. These line pipes can command higher prices and tend to have higher costs of production. Hearing transcript, September 11, 2025, p. 42, 130-133, 206 (Kaplan, Shimbo, Husain). JFE Steel Corporation, Posthearing brief, Attachment A, pp. 12; JFE Steel Corporation, Posthearing brief, Attachment A, pp. 12 to 13.

Table 4.20 Welded large diameter line pipe: Exports from Japan, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2022	2023	2024
United States	Quantity	40,514	29,337	50,673
Malaysia	Quantity	9,047	62,962	52,561
Canada	Quantity	24,188	25,599	22,183
Indonesia	Quantity	16,312	16,553	14,911
Saudi Arabia	Quantity	7,051	1,097	8,548
Singapore	Quantity	14,949	9,004	4,006
Vietnam	Quantity	1,883	841	2,098
Taiwan	Quantity	115	225	202
Netherlands	Quantity	—	584	121
All other destination markets	Quantity	13,986	3,953	198
Non-U.S. destination markets	Quantity	87,529	120,819	104,827
All destination markets	Quantity	128,043	150,156	155,500
United States	Value	58,259	42,014	67,685
Malaysia	Value	14,567	67,299	51,395
Canada	Value	37,056	42,291	33,196
Indonesia	Value	22,258	21,912	20,273
Saudi Arabia	Value	32,688	2,714	10,893
Singapore	Value	17,724	11,643	5,005
Vietnam	Value	2,431	992	2,502
Taiwan	Value	131	232	208
Netherlands	Value	—	1,072	162
All other destination markets	Value	18,458	7,744	726
Non-U.S. destination markets	Value	145,312	155,899	124,362
All destination markets	Value	203,571	197,913	192,047

Table continued

Table 4.20 (Continued) Welded large diameter line pipe: Exports from Japan, by destination market and by period

Unit values in dollars per short ton; Shares in percent

Destination market	Measure	2022	2023	2024
United States	Unit value	1,438	1,432	1,336
Malaysia	Unit value	1,610	1,069	978
Canada	Unit value	1,532	1,652	1,496
Indonesia	Unit value	1,364	1,324	1,360
Saudi Arabia	Unit value	4,636	2,473	1,274
Singapore	Unit value	1,186	1,293	1,250
Vietnam	Unit value	1,291	1,179	1,193
Taiwan	Unit value	1,137	1,032	1,029
Netherlands	Unit value	—	1,834	1,345
All other destination markets	Unit value	1,320	1,959	3,678
Non-U.S. destination markets	Unit value	1,660	1,290	1,186
All destination markets	Unit value	1,590	1,318	1,235
United States	Share of quantity	31.6	19.5	32.6
Malaysia	Share of quantity	7.1	41.9	33.8
Canada	Share of quantity	18.9	17.0	14.3
Indonesia	Share of quantity	12.7	11.0	9.6
Saudi Arabia	Share of quantity	5.5	0.7	5.5
Singapore	Share of quantity	11.7	6.0	2.6
Vietnam	Share of quantity	1.5	0.6	1.3
Taiwan	Share of quantity	0.1	0.1	0.1
Netherlands	Share of quantity	—	0.4	0.1
All other destination markets	Share of quantity	10.9	2.6	0.1
Non-U.S. destination markets	Share of quantity	68.4	80.5	67.4
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7305.11, 7305.12, and 7305.19 as reported by Japan Ministry of Finance in the Global Trade Atlas Suite database, accessed July 29, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by the top destination markets in descending order of 2024 quantity data. Data above include both included and excluded product.

Third-country trade actions

There are trade remedies in effect on large diameter carbon and alloy steel line pipe in multiple third-country markets. Canada issued antidumping duty orders on certain welded large diameter carbon and alloy steel line pipe originating in or exported from China and Japan. The Canadian International Trade Tribunal's ("CITT") final finding was issued on October 20, 2016. On August 3, 2022, CITT continued the finding.²⁶ It is currently set to expire on August 2, 2027, unless continued.²⁷

On February 1, 2019, the European Commission ("EU"), imposed definitive safeguard measures against imports of certain steel products. The EU placed TRQs on various types of large, welded tubes including HS subheadings 7305.11, 7305.12, and 7305.19.²⁸ These measures were extended on June 24, 2024, until June 30, 2026.²⁹

²⁶ Domestic producers referenced the continuation of antidumping duties on CWLDLP from Japan in their response to the notice of institution. Domestic interested parties' supplemental response to the notice of institution, October 29, 2024, p. 14 and exh. 5.

²⁷ Canadian International Trade Tribunal, Press Release: Tribunal Continues Finding—Large Line Pipe from China and Japan, August 3, 2022, <https://www.citt-tcce.gc.ca/en/news/tribunal-continues-finding-large-line-pipe-china-and-japan>, retrieved July 25, 2025. The CITT made final determinations on goods under the following Harmonized System ("HS") classification numbers at the 6-digit level: 7305.11, 7305.12, and 7305.19. Further, in its final finding, the CITT described the goods as "outside diameter greater than 24 inches (609.6 mm), and less than or equal to 60 inches (1524 mm), regardless of wall thickness, length, surface finish (coated or uncoated), end finish (plain end or beveled end), or stenciling and certification (including multiple-stenciled/multiple-certified line pipe for oil and gas transmission and other applications)." The duties were set at 95 percent percent of the export price. Canadian International Trade Tribunal, Measures in force and expiry time lines, <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/llp-eng.html>, retrieved July 25, 2025.

²⁸ European Commission, Commission Implementing Regulation {EU} 2019/159 of 31 January 2019 imposing definitive safeguard measures against imports of certain steel products, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>, retrieved July 25, 2025, 41-42, 48-55, 59.

²⁹ "Other countries" (including Japan) were allocated 121,581 net tons from January 7, 2024, to September 9, 2024; 121,581 net tons from October 1, 2024, to December 31, 2024; 118,938 net tons from January 1, 2025 to March 31, 2025; 120,259 net tons from April 1, 2025 to June 30, 2025; 122,797 net tons from July 1, 2025 to September 30, 2025; 122,797 net tons from October 1, 2025 to December 31, 2025; 120,127 net tons from January 1, 2026 to March 31, 2026; and 121,465 net tons from April 1, 2026 to June 30, 2026. An additional 25-percent duty rate applies to imports in excess of the aforementioned quantities. European Commission, EU prolongs steel safeguard measure until June 2026, June 25, 2024, https://policy.trade.ec.europa.eu/news/eu-prolongs-steel-safeguard-measure-until-june-2026-2024-06-25_en#:~:text=Following, retrieved July 25, 2025.

Global market

Table 4.21 presents global export data for welded large diameter line pipe, a category that includes CWLDLP and out-of-scope products (by source in descending order of quantity for 2024). Generally, these out-of-scope products are considered high-end, specialty, or “niche,” can command higher prices, and tend to have higher costs of production.³⁰ In 2024, the largest global exporters of welded large diameter line pipe were India, China, and Indonesia, together accounting for nearly 54 percent of all global exports. Between 2022 and 2024, global exports rose by 49 percent, from 2.5 million short tons to 3.7 million short tons.

³⁰ Hearing transcript, September 11, 2025, p. 42, 130-133, 206 (Kaplan, Shimbo, Husain).

Table 4.21 Welded large diameter line pipe: Global exports by exporter and period

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2022	2023	2024
United States	Quantity	77,922	101,649	24,961
Japan	Quantity	128,043	150,156	155,500
India	Quantity	318,262	635,365	755,798
China	Quantity	503,203	526,761	736,560
Indonesia	Quantity	89,013	152,614	476,510
South Korea	Quantity	372,408	373,529	382,131
Germany	Quantity	346,533	774,504	234,341
Malaysia	Quantity	2,729	197,701	213,881
Greece	Quantity	205,647	158,320	192,683
Brazil	Quantity	22,693	187,535	130,650
Turkey	Quantity	101,937	146,534	114,360
Russia	Quantity	90,020	296,500	84,191
Finland	Quantity	595	462	703
Sweden	Quantity	96	24	2
All other exporters	Quantity	203,333	367,067	175,324
All reporting exporters	Quantity	2,462,434	4,068,721	3,677,596
United States	Value	129,440	205,260	43,682
Japan	Value	203,571	197,913	192,047
India	Value	396,465	758,382	890,617
China	Value	532,608	577,978	750,793
Indonesia	Value	152,676	261,448	610,128
South Korea	Value	521,468	454,112	402,861
Germany	Value	661,436	1,424,672	726,895
Malaysia	Value	3,396	156,607	170,224
Greece	Value	201,565	257,790	392,251
Brazil	Value	53,978	329,695	160,300
Turkey	Value	135,126	196,071	148,547
Russia	Value	195,176	457,150	143,397
Finland	Value	1,226	1,165	1,364
Sweden	Value	171	163	54
All other exporters	Value	322,154	599,743	344,455
All reporting exporters	Value	3,510,458	5,878,149	4,977,615

Table continued.

Table 4.21 (Continued) Welded large diameter line pipe: Global exports by exporter and period

Unit values in dollars per short ton; shares in percent

Exporting country	Measure	2022	2023	2024
United States	Unit value	1,661	2,019	1,750
Japan	Unit value	1,590	1,318	1,235
India	Unit value	1,246	1,194	1,178
China	Unit value	1,058	1,097	1,019
Indonesia	Unit value	1,715	1,713	1,280
South Korea	Unit value	1,400	1,216	1,054
Germany	Unit value	1,909	1,839	3,102
Malaysia	Unit value	1,244	792	796
Greece	Unit value	980	1,628	2,036
Brazil	Unit value	2,379	1,758	1,227
Turkey	Unit value	1,326	1,338	1,299
Russia	Unit value	2,168	1,542	1,703
Finland	Unit value	2,060	2,522	1,940
Sweden	Unit value	1,787	6,723	24,416
All other exporters	Unit value	1,584	1,634	1,965
All reporting exporters	Unit value	1,426	1,445	1,353
United States	Share of quantity	3.2	2.5	0.7
Japan	Share of quantity	5.2	3.7	4.2
India	Share of quantity	12.9	15.6	20.6
China	Share of quantity	20.4	12.9	20.0
Indonesia	Share of quantity	3.6	3.8	13.0
South Korea	Share of quantity	15.1	9.2	10.4
Germany	Share of quantity	14.1	19.0	6.4
Malaysia	Share of quantity	0.1	4.9	5.8
Greece	Share of quantity	8.4	3.9	5.2
Brazil	Share of quantity	0.9	4.6	3.6
Turkey	Share of quantity	4.1	3.6	3.1
Russia	Share of quantity	3.7	7.3	2.3
Finland	Share of quantity	0.0	0.0	0.0
Sweden	Share of quantity	0.0	0.0	0.0
All other exporters	Share of quantity	8.3	9.0	4.8
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics and official global imports statistics from Russia under HS subheading 7305.11, 7305.12, and 7305.19 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed September 17, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by Japan, then all remaining top exporting countries in descending order of 2024 quantity data. Finland and Sweden are included in the table since they are major exporters in 2019 even though their global exports are much lower in 2024. Data above include both included and excluded product.

Part 5: Pricing data

Factors affecting prices

Raw material costs

The primary raw material used in the production of CWLDLP differs according to the method of production. For ERW pipe, hot-rolled steel coil is the principal raw material. For SAW pipe, the principal raw materials are cut-to-length plate (for LSAW) or hot-rolled steel coil (for HSAW).¹ These pipes can be used interchangeably, although ERW pipe is for smaller diameters and HSAW and LSAW methods can produce larger diameters.² U.S. producers use all three welding processes – ERW, LSAW, and HSAW.³

U.S. producers reported that raw materials as a share of cost of goods sold fluctuated between *** percent and *** percent during the period for which data were collected (January 2022 through March 2025). As shown below, the price for hot-rolled steel bars, plates, and structural shapes decreased from the beginning of 2019 until mid-2020 when prices began to increase sharply. Specifically, prices for hot-rolled steel bars, plates, and structural shapes declined steadily from early 2019 through mid-2020 before beginning a sharp upward trajectory in late 2020 and 2021. The index reached its highest level between May and July 2022, then trended downward through the first quarter of 2025. Beginning in April 2025, prices turned upward again, showing a noticeable and sustained increase through August 2025 (Table 5.1 and Figure 5.1). Domestic interested parties reported that steel input prices account for two-thirds of its CWLDLP price and increased substantially due to section 232 tariffs.⁴

¹ *Certain Welded Large Diameter Line Pipe from Japan, Investigation No. 731-TA-919 (Third Review)*, USITC Publication 4973, September 2019, p. 5.1.

² Hearing transcript, p. 91 (Phillips).

³ ALPPA posthearing brief, p. 7.

⁴ Hearing transcript, p. 82 (Noland).

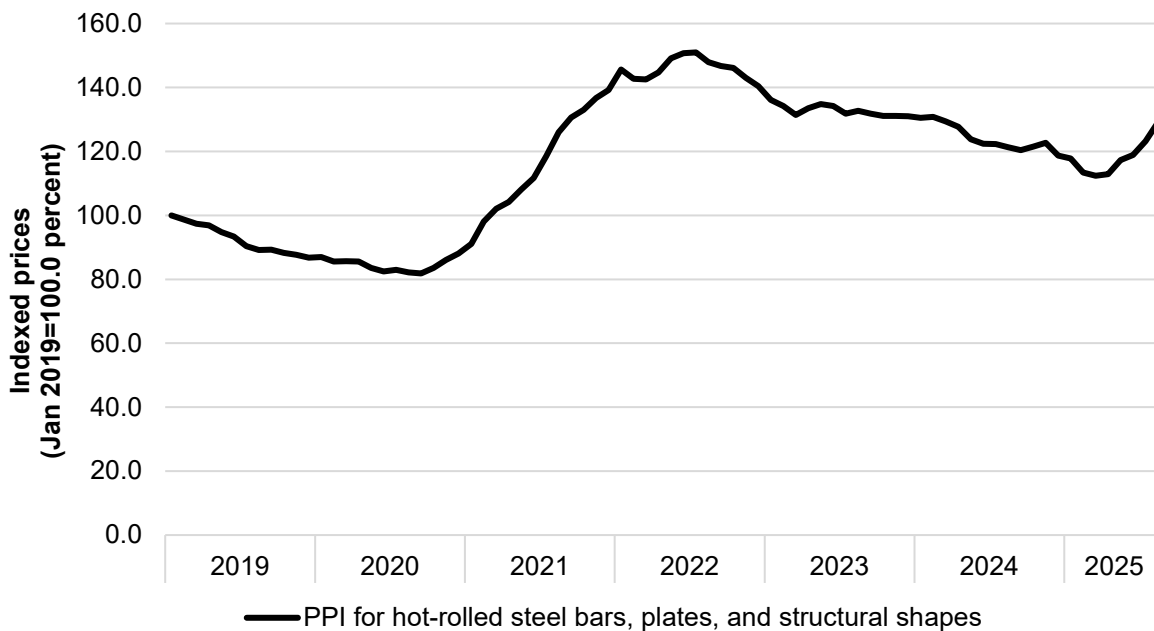
Table 5.1 Producer price index for hot-rolled steel bars, plates, and structural shapes, monthly, seasonally adjusted, January 2019 to August 2025

Index in percent; Jan 2019=100.0 percent

Month	2019	2020	2021	2022	2023	2024	2025
January	100.0	87.0	91.1	145.7	136.1	130.5	117.8
February	98.7	85.5	98.1	142.7	134.2	130.8	113.4
March	97.4	85.6	102.1	142.5	131.4	129.4	112.4
April	96.9	85.6	104.2	144.7	133.5	127.7	112.9
May	94.8	83.6	108.1	149.2	134.8	123.8	117.3
June	93.4	82.4	111.7	150.7	134.2	122.4	118.9
July	90.3	83.0	118.5	151.0	131.8	122.3	123.2
August	89.2	82.2	126.0	147.9	132.7	121.3	129.1
September	89.3	81.8	130.6	146.7	131.8	120.4	—
October	88.3	83.6	133.0	146.1	131.1	121.5	—
November	87.7	86.1	136.7	143.0	131.1	122.7	—
December	86.7	88.0	139.2	140.4	131.0	118.7	—

Source: U.S. Bureau of Labor Statistics, Producer Price Index by Commodity: Metals and Metal Products: Hot Rolled Steel Bars, Plates, and Structural Shapes (WPS101704), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/WPS101704>, retrieved September 17, 2025.

Figure 5.1 Producer price index for hot-rolled steel bars, plates, and structural shapes, monthly, seasonally adjusted, January 2019 to August 2025



Source: U.S. Bureau of Labor Statistics, Producer Price Index by Commodity: Metals and Metal Products: Hot Rolled Steel Bars, Plates, and Structural Shapes (WPS101704), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/WPS101704>, retrieved September 17, 2025.

Transportation costs to the U.S. market

Transportation costs for welded large diameter line pipe shipped from Japan to the United States averaged 9.6 percent during 2024. This estimate was derived from official import data and represents the transportation and other charges on imports.⁵

U.S. inland transportation costs

The majority of responding U.S. producers reported that they typically arrange transportation to their customers while the majority of importers reported that their customers typically arrange transportation. Most U.S. producers reported that their U.S. inland transportation costs ranged from 8.0 to 15.0 percent while those importers who reported arranging transportation to their customers reported transportation costs were minimal (generally less than one percent).

⁵ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000.

Pricing practices

Pricing methods

U.S. producers reported setting prices through transaction-by-transaction negotiations, contracts, price lists, and other methods. U.S. producer *** reported that it implemented a master distributor agreement with pipe distributor **. Importers reported setting prices using transaction-by-transaction negotiations and contracts (table 5.2).

Table 5.2 CWLDLP: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Importers
Transaction-by-transaction	8	16
Contract	4	6
Set price list	2	0
Other	1	0
Responding firms	8	18

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers reported selling a substantial majority of CWLDLP under short-term sales and in the spot market. Importers and foreign producers reported selling virtually all of their CWLDLP in the spot market (table 5.3).⁶

Table 5.3 CWLDLP: U.S. producers', importers', and foreign producers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

Type of sale	U.S. producers	Importers	Foreign producers
Long-term contracts	***	***	***
Annual contracts	***	***	***
Short-term contracts	***	***	***
Spot sales	***	***	***
Total	100.0	—	100.0

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

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

⁶ U.S. importers *** were the *** importers to report commercial shipment data for subject merchandise. *** reported *** percent of total sales **. *** reported **. Their sales amount was too insignificant to calculate shipment data.

U.S. producers reported that they fixed both prices and quantities, did not renegotiate prices during a contract and did not index prices to raw materials in their contracts. U.S. producers reported that the average length of short-term contracts ranged from 60 to 180 days. U.S. producers reported that the average length of long-term contracts ranged from 450 to 550 days. Importers of subject CWLDLP from Japan reported that they *** prices, fixed both price and quantity in their short-term and annual contracts and *** for price renegotiation in their long-term contracts. Importers reported that all contracts were indexed to raw material prices.

Most purchasers (11 of 14) reported that they are familiar with raw material costs and eight of those purchasers reported that raw material costs (particularly of hot rolled coil and steel plate) affected contracts, and purchaser *** will purchase CWLDLP earlier than needed when prices of hot-rolled coil decrease. Most purchasers (11 of 14) also reported that their purchases involve negotiations including delivery terms, payment terms, price, quantity discounts, and technical specifications, and *** reported that it does not share pricing to competing suppliers.

Five purchasers reported that they purchased product monthly, three reported purchasing quarterly, two annually, one weekly, and four reported purchasing product with another frequency. Purchasers who reported purchasing with other frequency reported that their purchasing fluctuated based on the projects or business needs or as market conditions dictate. Purchaser *** reported that it purchased CWLDLP two to three times per year.

Sales terms and discounts

U.S. producers and importers typically quote prices on a delivered basis. The majority of U.S. producers and importers reported having no discount policy. Importer *** reported offering quantity discounts and total volume discounts. Importer *** reported that customers might receive a 1-2 percent discount for paying invoices early.

Price leadership

Two purchasers reported that there were no price leaders in the CWLDLP market, seven purchasers did not respond to the question, while one purchaser (***) reported that American Steel Pipe (ACIPCO) was a price leader.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following CWLDLP products shipped to unrelated U.S. customers during January 2022 to March 2025.

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

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

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

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

Eight U.S. producers and one importer provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁷ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of CWLDLP.⁸ No pricing data were reported for imports from Japan in 2024. Price data for products 1 to 4 are presented in table 5.4 and figure 5.2.

⁷ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

⁸ Pricing coverage is based on U.S. shipments reported in questionnaires.

Table 5.4 CWLDLP: Weighted-average f.o.b. prices and quantities of domestic and imported products 1 to 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Product 1: U.S. price	Product 1: U.S. quantity	Product 1: Japan price	Product 1: Japan quantity	Product 1: Japan margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***

Table continued.

Table 5.4 (Continued) CWLDLP: Weighted-average f.o.b. prices and quantities of domestic and imported products 1 to 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Product 2: U.S. price	Product 2: U.S. quantity	Product 3: U.S. price	Product 3: U.S. quantity	Product 4: U.S. price	Product 4: U.S. quantity
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***

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

Note: Product 1: Line pipe, coated, 42" OD, 0.600"- 1.000" wall, API 5L X52-X70, regardless of length;
 Product 2: Line pipe, coated, 32"- 36" OD, 0.350"- 0.800" wall, API 5L X52-X70, regardless of length;
 Product 3: Line pipe, coated, 26"- 30" OD, 0.350"- 0.800" wall, API 5L X52-X70, regardless of length;
 Product 4: Line pipe, coated 20"- 24" OD, 0.300"- 0.500" wall, API 5L X60-X70, regardless of length.

Note: ***.

Figure 5.2 CWLDLP: Weighted-average f.o.b. prices and quantities of U.S. product 1 to 4, by quarter, January 2022 through March 2025

Price of products 1 through 4

* * * * *

Volume of products 1 through 4

* * * * *

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

Price trends

In general, prices decreased from January 2022 to March 2025. Table 5.5 summarizes the price trends, by country and by product. As shown in the table, domestic price decreases ranged from *** to *** percent.⁹

Table 5.5 CWLDLP: Instances of underselling/overselling and the range and average of margins, by product

Quantity in short tons, price in dollars per short ton

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	13	***	***	***	***	***	***
Product 1	Japan	1	***	***	***	***	***	***
Product 2	United States	13	***	***	***	***	***	***
Product 2	Japan	0	***	***	***	***	***	***
Product 3	United States	13	***	***	***	***	***	***
Product 3	Japan	0	***	***	***	***	***	***
Product 4	United States	13	***	***	***	***	***	***
Product 4	Japan	0	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2022 to the first quarter in 2025.

⁹ The Commission only received one quarter of import pricing data and was therefore unable to identify price trend for imports

Price comparisons

As shown in table 5.6, prices for CWLDLP imported from Japan were above U.S.-produced product in the only comparison and oversold U.S. products by *** percent.¹⁰

Table 5.6 CWLDLP: Instances of underselling and overselling and the range and average of margins, by product

Quantity in short tons; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	—	***	***	***	***
Product 2	Underselling	—	***	***	***	***
Product 3	Underselling	—	***	***	***	***
Product 4	Underselling	—	***	***	***	***
Total, all products	Underselling	—	***	***	***	***
Product 1	Overselling	1	***	***	***	***
Product 2	Overselling	—	***	***	***	***
Product 3	Overselling	—	***	***	***	***
Product 4	Overselling	—	***	***	***	***
Total, all products	Overselling	1	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

¹⁰ In the original investigations, subject imports from Japan were priced lower than domestic product in *** of *** comparisons, with underselling margins ranging from *** to *** percent. In the first review, subject imports from Japan were priced lower than domestic product in *** of *** comparisons, with underselling margins ranging from *** to *** percent. In the second review, subject imports from Japan were priced lower than domestic product in *** of *** comparisons, with underselling margins ranging from *** to *** percent. In the third review, subject imports from Japan were priced lower than domestic product in *** of *** comparisons, with underselling margins ranging from *** to *** percent. Inv. No. 731-TA-919 (Third Review): Certain Welded Large Diameter Line Pipe from Japan – Staff Report to the Commission, Confidential Report, INV-RR-082, August 28, 2019.

APPENDIX A
FEDERAL REGISTER NOTICES

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

Citation	Title	Link
89 FR 71252, September 3, 2024	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2024-09-03/pdf/2024-19716.pdf
89 FR 71417 September 3, 2024	Certain Welded Large Diameter Line Pipe from Japan; Institution of a Five-Year Review	https://www.govinfo.gov/content/pkg/FR-2024-09-03/pdf/2024-19665.pdf
90 FR 303, January 3, 2025	Welded Large Diameter Line Pipe from Japan: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order	https://www.govinfo.gov/content/pkg/FR-2025-01-03/pdf/2024-31593.pdf
90 FR 6010, January 17, 2025	Certain Welded Large Diameter Line Pipe from Japan; Notice of Commission Determination to Conduct a Full Five-Year Review	https://www.govinfo.gov/content/pkg/FR-2025-01-17/pdf/2025-01146.pdf
90 FR 11995, March 13, 2025	Certain Welded Large Diameter Line Pipe from Japan; Scheduling of a Full Five-Year Review	https://www.govinfo.gov/content/pkg/FR-2025-03-13/pdf/2025-04012.pdf
90 FR 52696, November 21, 2025	Certain Welded Large Diameter Line Pipe from Japan: Revised Schedule for the Subject Proceeding	https://www.govinfo.gov/content/pkg/FR-2025-11-21/pdf/2025-20485.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission’s hearing:

Subject: Certain Welded Large Diameter Line Pipe from Japan
Inv. No.: 731-TA-919 (Fourth Review)
Date and Time: September 11, 2025 - 9:30 a.m.

Sessions were held in connection with this investigation in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Continuation (**Laura El-Sabaawi**, Wiley Rein LLP)
In Opposition to Continuation (**Gregory Husisian**, Foley & Lardner LLP)

**In Support of the Continuation of the
Antidumping Duty Order:**

Wiley Rein LLP
Washington, DC
on behalf of

American Cast Iron Pipe Company (“ALPPA”)

Jonathan Kirkland, Vice President, Sales and Logistics, Berg Pipe Panama City Corp. and Berg Pipe Mobile Corp.

Jon Noland, Vice President, Sales, American Cast Iron Pipe Company

Jason Norris, President, Dura-Bond Pipe, LLC

Todd Phillips, Vice President, N&S America Sales, Welspun Tubular LLC

Seth Kaplan, President, International Economic Research LLC

Nathan Smith, Research Analyst, Capital Trade

Timothy C. Brightbill)
Laura El-Sabaawi) – OF COUNSEL
Elizabeth S. Lee)

**In Opposition to the Continuation of the
Antidumping Duty Order:**

Foley & Lardner LLP
Washington, DC
on behalf of

JFE Steel Corporation

Kohei Takakura, Section Manager, Line Pipe Section, JFE Steel Corporation

Yusuke Shimbo, Senior Staff, Export Planning & Coordination Section, JFE Steel Corporation

Junko Salmon, Translator

Gregory Husisian)
John Turlais) – OF COUNSEL
Lindsey Zirkle)

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**Timothy C. Brightbill**, Wiley Rein LLP)

In Opposition to Continuation (**Gregory Husisian**, Foley & Lardner LLP)

-END-

APPENDIX C
SUMMARY DATA

Table C.1

CWLDLP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent, exceptions noted; Interim period is January through March

Item	Reported data					Period changes			
	2022	Calendar year 2023	2024	Interim 2024	2025	2022-24	Calendar year 2022-23	2023-24	Interim 2024-25
U.S. consumption quantity:									
Amount.....	551,590	1,350,169	1,215,437	353,726	343,129	▲120.4	▲144.8	▼(10.0)	▼(3.0)
Producers' share (fn1).....	55.9	80.7	77.0	79.1	69.0	▲21.1	▲24.8	▼(3.7)	▼(10.1)
Importers' share (fn1):									
Japan.....	***	***	***	***	***	▼***	▼***	▼***	***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▲***	▲***
All import sources.....	44.1	19.3	23.0	20.9	31.0	▼(21.1)	▼(24.8)	▲3.7	▲10.1
U.S. consumption value:									
Amount.....	979,577	2,260,994	1,923,566	546,407	574,963	▲96.4	▲130.8	▼(14.9)	▲5.2
Producers' share (fn1).....	58.0	82.8	81.0	83.2	68.1	▲23.0	▲24.8	▼(1.8)	▼(15.1)
Importers' share (fn1):									
Japan.....	***	***	***	***	***	▼***	▼***	▼***	***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▲***	▲***
All import sources.....	42.0	17.2	19.0	16.8	31.9	▼(23.0)	▼(24.8)	▲1.8	▲15.1
U.S. imports from:									
Japan:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	***
Value.....	***	***	***	***	***	▼***	▲***	▼***	***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources:									
Quantity.....	243,338	260,397	279,938	74,098	106,381	▲15.0	▲7.0	▲7.5	▲43.6
Value.....	411,124	387,934	364,837	91,836	183,685	▼(11.3)	▼(5.6)	▼(6.0)	▲100.0
Unit value.....	\$1,690	\$1,490	\$1,303	\$1,239	\$1,727	▼(22.9)	▼(11.8)	▼(12.5)	▲39.3
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. producers':									
Practical capacity quantity.....	2,921,047	2,496,138	2,485,486	642,013	588,456	▼(14.9)	▼(14.5)	▼(0.4)	▼(8.3)
Production quantity.....	435,462	1,081,397	940,856	306,564	283,441	▲116.1	▲148.3	▼(13.0)	▼(7.5)
Capacity utilization (fn1).....	14.9	43.3	37.9	47.8	48.2	▲22.9	▲28.4	▼(5.5)	▲0.4
U.S. shipments:									
Quantity.....	308,252	1,089,772	935,499	279,628	236,748	▲203.5	▲253.5	▼(14.2)	▼(15.3)
Value.....	568,453	1,873,060	1,558,729	454,571	391,278	▲174.2	▲229.5	▼(16.8)	▼(13.9)
Unit value.....	\$1,844	\$1,719	\$1,666	\$1,626	\$1,653	▼(9.6)	▼(6.8)	▼(3.1)	▲1.7
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	156,432	111,580	115,905	138,138	109,072	▼(25.9)	▼(28.7)	▲3.9	▼(21.0)
Inventories/total shipments (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Production workers.....	1,186	1,944	2,085	2,119	2,258	▲75.8	▲63.9	▲7.3	▲6.6
Hours worked (1,000 hours).....	2,149	4,057	4,787	1,214	1,281	▲122.8	▲88.8	▲18.0	▲5.5
Wages paid (\$1,000).....	70,782	128,764	157,064	39,763	43,545	▲121.9	▲81.9	▲22.0	▲9.5
Hourly wages (dollars per hour).....	\$32.94	\$31.74	\$32.81	\$32.75	\$33.99	▼(0.4)	▼(3.6)	▲3.4	▲3.8
Productivity (short tons per 1,000 hours).....	202.6	266.6	196.5	252.5	221.3	▼(3.0)	▲31.5	▼(26.3)	▼(12.4)
Unit labor costs.....	\$163	\$119	\$167	\$130	\$154	▲2.7	▼(26.7)	▲40.2	▲18.4

Table continued.

Table C.1 Continued

CWLDLP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent, exceptions noted; Interim period is January through March

Item	Reported data					Period changes			
	Calendar year			Interim		Calendar year			Interim
	2022	2023	2024	2024	2025	2022-24	2022-23	2023-24	2024-25
U.S. producers':									
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	\$1,886	\$1,740	\$1,612	\$1,566	\$1,650	▼(14.5)	▼(7.7)	▼(7.4)	▲5.4
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit COGS.....	\$1,810	\$1,500	\$1,444	\$1,431	\$1,396	▼(20.2)	▼(17.1)	▼(3.7)	▼(2.4)
Unit SG&A expenses.....	\$196	\$145	\$99	\$115	\$113	▼(49.8)	▼(26.4)	▼(31.8)	▼(1.4)
Unit operating income or (loss) (fn2).....	\$(121)	\$95	\$69	\$20	\$141	▲—	▲—	▼(27.5)	▲593.4
Unit net income or (loss) (fn2).....	\$(109)	\$103	\$65	\$39	\$128	▲—	▲—	▼(37.1)	▲230.8
COGS/sales (fn1).....	96.0	86.2	89.6	91.4	84.6	▼(6.4)	▼(9.8)	▲3.4	▼(6.8)
Operating income or (loss)/sales (fn1)....	(6.4)	5.5	4.3	1.3	8.5	▲10.7	▲11.9	▼(1.2)	▲7.2
Net income or (loss)/sales (fn1).....	(5.8)	5.9	4.0	2.5	7.7	▲9.8	▲11.7	▼(1.9)	▲5.3
Capital expenditures.....	12,487	20,302	19,651	2,357	6,343	▲57.4	▲62.6	▼(3.2)	▲169.1
Research and development expenses....	***	***	***	***	***	▲***	▲***	▲***	▼***
Total assets.....	718,244	1,060,337	872,097	NA	NA	▲21.4	▲47.6	▼(17.8)	NA

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. Imports from Japan reflect only included product from responses to Commission questionnaires. Nonsubject imports reflect official import statistics less line pipe excluded from the scope of this review from responses to Commission questionnaires.

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

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

Note: Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. 508 compliant tables for these data are contained in Parts 1, 3, and 4 of this report.

HISTORIC DATA

Table C-1

CWLDLP: Summary data concerning the U.S. market, 2016-18, January to March 2018, and January to March 2019

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

	Reported data					Period changes			
	Calendar year			January to March		Comparison years			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption quantity:									
Amount.....	1,891,028	2,008,442	2,287,916	364,716	807,281	21.0	6.2	13.9	121.3
Producers' share (fn1).....	70.3	53.8	58.2	54.1	56.2	(12.1)	(16.5)	4.4	2.1
Importers' share (fn1):									
Japan	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	29.7	46.2	41.8	45.9	43.8	12.1	16.5	(4.4)	(2.1)
U.S. consumption value:									
Amount.....	1,903,168	1,949,168	2,794,923	395,392	1,177,290	46.9	2.4	43.4	197.8
Producers' share (fn1).....	72.5	59.3	57.9	56.4	59.6	(14.6)	(13.2)	(1.4)	3.3
Importers' share (fn1):									
Japan	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	27.5	40.7	42.1	43.6	40.4	14.6	13.2	1.4	(3.3)
U.S. imports from:									
Japan:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	561,549	928,309	957,375	167,531	353,485	70.5	65.3	3.1	111.0
Value.....	522,952	793,222	1,176,110	172,559	475,212	124.9	51.7	48.3	175.4
Unit value.....	\$931	\$854	\$1,228	\$1,030	\$1,344	31.9	(8.2)	43.8	30.5
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
U.S. producers':									
Average capacity quantity.....	3,484,986	3,236,506	3,522,604	847,923	981,310	1.1	(7.1)	8.8	15.7
Production quantity.....	1,234,945	1,057,031	1,398,252	205,103	479,394	13.2	(14.4)	32.3	133.7
Capacity utilization (fn1).....	35.4	32.7	39.7	24.2	48.9	4.3	(2.8)	7.0	24.7
U.S. shipments:									
Quantity.....	1,329,479	1,080,133	1,330,541	197,185	453,796	0.1	(18.8)	23.2	130.1
Value.....	1,380,216	1,155,946	1,618,813	222,833	702,078	17.3	(16.2)	40.0	215.1
Unit value.....	\$1,038	\$1,070	\$1,217	\$1,130	\$1,547	17.2	3.1	13.7	36.9
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	136,543	94,175	161,723	102,004	187,322	18.4	(31.0)	71.7	83.6
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	2,235	2,026	2,580	1,637	2,857	15.4	(9.4)	27.3	74.5
Hours worked (1,000s).....	4,649	4,048	4,899	805	1,751	5.4	(12.9)	21.0	117.5
Wages paid (\$1,000).....	139,388	119,913	140,251	24,136	49,220	0.6	(14.0)	17.0	103.9
Hourly wages (dollars per hour).....	\$29.98	\$29.62	\$28.63	\$29.98	\$28.11	(4.5)	(1.2)	(3.4)	(6.2)
Productivity (short tons per 1,000 hours).....	265.6	261.1	285.4	254.8	273.8	7.4	(1.7)	9.3	7.5
Unit labor costs (dollars per short ton).....	\$112.87	\$113.44	\$100.30	\$117.68	\$102.67	(11.1)	0.5	(11.6)	(12.8)

Table continued on next page.

Table C-1--Continued

CWLDLP: Summary data concerning the U.S. market, 2016-18, January to March 2018, and January to March 2019

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

	Reported data					Period changes			
	Calendar year			January to March		Comparison years			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers':--Continued									
Net sales:									
Quantity.....	1,331,127	1,099,399	1,404,261	203,056	453,796	5.5	(17.4)	27.7	123.5
Value.....	1,441,194	1,208,398	1,783,024	246,108	702,078	23.7	(16.2)	47.6	185.3
Unit value.....	\$1,083	\$1,099	\$1,270	\$1,212	\$1,547	17.3	1.5	15.5	27.6
Cost of goods sold (COGS).....	1,344,477	1,104,806	1,572,711	211,713	600,974	17.0	(17.8)	42.4	183.9
Gross profit of (loss).....	96,717	103,592	210,313	34,395	101,104	117.5	7.1	103.0	193.9
SG&A expenses.....	143,554	75,726	117,275	20,292	42,920	(18.3)	(47.2)	54.9	111.5
Operating income or (loss).....	(46,837)	27,866	93,038	14,103	58,184	fn2	fn2	233.9	312.6
Net income or (loss).....	(54,144)	17,940	76,726	10,596	52,255	fn2	fn2	327.7	393.2
Capital expenditures.....	28,933	14,791	20,102	2,586	6,077	(30.5)	(48.9)	35.9	135.0
Unit COGS.....	\$1,010	\$1,005	\$1,120	\$1,043	\$1,324	10.9	(0.5)	11.4	27.0
Unit SG&A expenses.....	\$108	\$69	\$84	\$100	\$95	(22.6)	(36.1)	21.2	(5.4)
Unit operating income or (loss).....	(\$35)	\$25	\$66	\$69	\$128	fn2	fn2	161.4	84.6
Unit net income or (loss).....	(\$41)	\$16	\$55	\$52	\$115	fn2	fn2	fn2	120.7
COGS/sales (fn1).....	93.3	91.4	88.2	86.0	85.6	(5.1)	(1.9)	(3.2)	(0.4)
Operating income or (loss)/sales (fn1).....	(3.2)	2.3	5.2	5.7	8.3	8.5	5.6	2.9	2.6
Net income or (loss)/sales (fn1).....	(3.8)	1.5	4.3	4.3	7.4	8.1	5.2	2.8	3.1

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires, official U.S. import statistics, and from proprietary Customs records using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed May 23, 2019.

Table C-2

CWLDLP: Summary data concerning the U.S. market, 1998-2000, January-June 2000, and January-June 2001

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

Item	Reported data					Period changes			
	1998	1999	2000	January-June		1998-2000	1998-1999	1999-2000	Jan.-June 2000-2001
				2000	2001				
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
Japan	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
Japan	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. imports (adjusted) from:									
Japan:									
Quantity	217,138	141,955	173,062	103,769	37,410	-20.3	-34.6	21.9	-63.9
Value	152,754	67,209	78,065	45,214	18,143	-48.9	-56.0	16.2	-59.9
Unit value	\$703.49	\$473.45	\$451.08	\$435.72	\$484.98	-35.9	-32.7	-4.7	11.3
Ending inventory quantity	14,497	10,139	14,447	10,013	8,610	-0.3	-30.1	42.5	-14.0
Mexico:									
Quantity	24,553	31,570	27,627	22,886	13,178	12.5	28.6	-12.5	-42.4
Value	13,063	14,193	12,615	10,553	6,583	-3.4	8.7	-11.1	-37.6
Unit value	\$532.03	\$449.57	\$456.62	\$461.11	\$499.54	-14.2	-15.5	1.6	8.3
Ending inventory quantity	0	0	0	0	0	(2)	(2)	(2)	(2)
Subtotal:									
Quantity	241,691	173,525	200,689	126,655	50,588	-17.0	-28.2	15.7	-60.1
Value	165,817	81,402	90,680	55,767	24,726	-45.3	-50.9	11.4	-55.7
Unit value	\$686.07	\$469.11	\$451.84	\$440.31	\$488.77	-34.1	-31.6	-3.7	11.0
Ending inventory quantity	14,497	10,139	14,447	10,013	8,610	-0.3	-30.1	42.5	-14.0
All other sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-2 --Continued

CWLDP: Summary data concerning the U.S. market, 1998-2000, January-June 2000, and January-June 2001

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

Item	Reported data					Period changes			
	1998	1999	2000	January-June		1998-2000	1998-1999	1999-2000	Jan.-June 2000-2001
				2000	2001				
U.S. producers:									
Average capacity quantity	2,371,246	2,333,217	2,317,620	1,157,984	1,173,603	-2.3	-1.6	-0.7	1.3
Production quantity	1,209,835	901,760	320,425	156,248	433,254	-73.5	-25.5	-84.5	177.3
Capacity utilization (1)	51.0	38.6	13.8	13.5	36.9	-37.2	-12.4	-24.8	23.4
U.S. shipments:									
Quantity	862,663	697,870	312,593	148,538	377,964	-63.8	4.1	-65.2	154.5
Value	568,660	575,557	176,889	85,892	201,182	-68.9	1.2	-69.3	134.2
Unit value	\$659.19	\$841.02	\$565.88	\$578.25	\$532.28	-14.2	-2.8	-11.7	-8.0
Export shipments:									
Quantity	315,797	51,905	10,085		5,152	-96.8	-83.6	-80.8	
Value	211,720	32,845	8,757		3,086	-96.8	-84.5	-79.4	
Unit value	\$670.43	\$632.79	\$670.00	\$597.05	\$598.99	-0.1	-5.6	5.9	0.3
Ending inventory quantity	97,803	53,882	54,331	60,899	104,469	-44.4	-45.1	1.2	71.5
Inventories/total shipments (1)	8.3	5.6	18.8		13.6	8.5	-2.6	11.2	
Production workers	1,318	979	520	518	789	-60.5	-25.7	-46.9	52.3
Hours worked (1,000s)	2,714	1,869	899	366	842	-68.9	-31.1	-51.9	75.6
Wages paid (\$1,000s)	50,495	37,709	17,047	8,813	15,869	-66.2	-25.3	-54.8	60.1
Hourly wages	\$18.60	\$20.17	\$18.98	\$24.09	\$24.71	1.9	8.4	-6.0	2.6
Productivity (tons/1,000 hours)	445.7	482.4	356.5	427.1	674.5	-20.0	8.2	-26.1	57.9
Unit labor costs	\$41.74	\$41.82	\$53.20	\$58.40	\$36.83	27.5	0.2	27.2	-35.1
Net sales:									
Quantity	1,143,435	987,880	323,850	148,582	386,518	-71.7	-15.4	-66.5	160.1
Value	758,831	638,986	189,847	84,757	213,831	-75.0	-15.8	-70.3	152.3
Unit value	\$663.64	\$660.19	\$585.60	\$570.44	\$553.23	-11.8	-0.5	-11.3	-3.0
Cost of goods sold (COGS)	676,419	540,980	192,182	87,267	191,141	-71.8	-20.0	-64.5	119.0
Gross profit or (loss)	82,412	98,006	(2,535)	(2,510)	22,690	(3)	18.9	(3)	(3)
SG&A expenses	25,662	35,852	19,663	10,309	15,381	-23.4	39.7	-45.2	49.2
Operating income or (loss)	56,750	82,154	(22,198)	(12,819)	7,309	(3)	9.5	(3)	(3)
Capital expenditures	13,685	12,614	4,073	1,758	1,640	-70.2	-7.8	-67.7	4.7
Unit COGS	\$591.57	\$558.93	\$593.43	\$587.33	\$494.52	0.3	-5.5	6.2	-15.8
Unit SG&A expenses	\$22.44	\$37.04	\$60.72	\$69.38	\$39.79	170.5	65.0	63.9	-42.8
Unit operating income or (loss)	\$49.63	\$64.22	(\$88.54)	(\$88.28)	\$18.91	(3)	29.4	(3)	(3)
COGS/sales (1)	89.1	84.7	101.3	103.0	89.4	12.2	-4.5	16.7	-13.8
Operating income or (loss)/ sales (1)	7.5	9.7	-11.7	-15.1	3.4	-19.2	2.2	-21.4	18.5

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

(2) Undefined.

(3) Not applicable.

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. Import figures are official Commerce trade statistics adjusted for U.S. shipments of excluded ERW and SAW. Production and related ratios include toll production.

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

Table C-3
CWLDLP: Summary data concerning the U.S. market, 2001-06, January-June 2006, and January-June 2007

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

Item	Reported data						Period changes								
	2001	2002	2003	2004	2005	2006	January-June 2006		2001-06	2001-02	2002-03	2003-04	2004-05	2005-06	Jan.-June 2006-07
U.S. consumption quantity:															
Amount	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Importers' share (1):															
Japan	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
U.S. consumption value:															
Amount	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Importers' share (1):															
Japan	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Imports from:															
Japan:															
Quantity	29,795	3,986	3,376	7,594	25,232	13,198	10,483	7,356	-55.7	-86.6	-15.3	124.9	232.3	-47.7	-29.8
Value	16,549	1,969	1,710	5,030	28,323	13,693	10,880	14,661	-17.3	-88.1	-13.2	194.2	463.1	-51.7	34.8
Unit value	\$555	\$494	\$507	\$662	\$1,123	\$1,038	\$1,038	\$1,993	86.8	-11.1	2.5	30.8	69.5	-7.6	92.0
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Mexico:															
Quantity	13,265	6,245	8,302	159	35	125	101	0	-99.1	-52.9	32.9	-98.1	-78.2	260.1	-100.0
Value	6,624	4,229	5,486	111	59	190	142	0	-97.1	-36.2	29.7	-98.0	-47.1	223.1	-100.0
Unit value	\$499	\$677	\$661	\$696	\$1,692	\$1,518	\$1,415	(2)	203.9	35.6	-2.4	5.4	142.9	-10.3	(2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal:															
Quantity	43,060	10,231	11,678	7,753	25,267	13,323	10,584	7,356	-69.1	-76.2	14.1	-33.6	225.9	-47.3	-30.5
Value	23,173	6,198	7,196	5,141	28,382	13,883	11,022	14,661	-40.1	-73.3	16.1	-28.6	452.1	-51.1	33.0
Unit value	\$538	\$606	\$616	\$663	\$1,123	\$1,042	\$1,041	\$1,993	93.6	12.6	1.7	7.6	69.4	-7.2	91.4
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources:															
Quantity	***	***	***	***	422,023	729,575	262,679	827,728	***	***	***	***	***	72.9	215.1
Value	***	***	***	***	428,421	753,567	269,889	1,002,845	***	***	***	***	***	75.9	271.6
Unit value	***	***	***	***	\$1,015	\$1,033	\$1,027	\$1,212	***	***	***	***	***	1.7	17.9
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All sources:															
Quantity	***	***	***	***	447,289	742,898	273,262	835,084	***	***	***	***	***	66.1	205.6
Value	***	***	***	***	456,803	767,449	280,912	1,017,506	***	***	***	***	***	68.0	262.2
Unit value	***	***	***	***	\$1,021	\$1,033	\$1,028	\$1,218	***	***	***	***	***	1.2	18.5
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
U.S. producers:															
Average capacity quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Capacity utilization (1)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
U.S. shipments:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Export shipments:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Inventories/total shipments (1)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000s)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Hourly wages	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Productivity (tons/1,000 hours)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Net sales:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
COGS/sales (1)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Operating income or (loss)/ sales (1)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***

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

(2) Not applicable.

(3) Undefined.

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

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

Table C-4

CWLDLP: Summary data concerning the U.S. market, 2007-12, January-March 2012, and January-March 2013

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

	Report data								Period changes						
	Calendar year					January to March			Calendar year					Jan-Mar	
	2007	2008	2009	2010	2011	2012	2012	2013	2007-12	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13
U.S. consumption quantity:															
Amount.....	2,575,655	2,798,201	1,532,985	1,763,724	1,504,156	1,588,332	484,758	357,193	(38.3)	8.6	(45.2)	15.1	(14.7)	5.6	(26.3)
Producers' share (1).....	32.3	36.6	37.5	59.6	67.2	57.2	51.8	37.9	24.9	4.2	0.9	22.2	7.6	(10.1)	(13.9)
Importers' share (1):															
Japan.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports.....	67.7	63.4	62.5	40.4	32.8	42.8	48.2	62.1	(24.9)	(4.2)	(0.9)	(22.2)	(7.6)	10.1	13.9
U.S. consumption value:															
Amount.....	3,249,990	3,932,145	2,373,233	2,624,954	2,044,810	2,268,623	715,385	464,159	(30.2)	21.0	(39.6)	10.6	(22.1)	10.9	(35.1)
Producers' share (1).....	32.4	38.2	38.4	61.2	70.9	55.3	49.3	37.2	22.9	5.8	0.1	22.8	9.6	(15.5)	(12.2)
Importers' share (1):															
Japan.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports.....	67.6	61.8	61.6	38.8	29.1	44.7	50.7	62.8	(22.9)	(5.8)	(0.1)	(22.8)	(9.6)	15.5	12.2
U.S. imports from:															
Japan:															
Quantity.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources:															
Quantity.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports:															
Quantity.....	1,743,090	1,774,983	958,438	711,823	492,690	690,039	233,488	221,754	(61.0)	1.8	(46.0)	(25.7)	(30.8)	38.0	(5.0)
Value.....	2,197,032	2,429,639	1,462,880	1,018,372	596,045	1,013,639	362,551	291,706	(53.9)	10.6	(39.8)	(30.4)	(41.5)	70.1	(19.5)
Unit value.....	1,260	1,369	1,526	1,431	1,210	1,491	1,553	1,315	18.3	8.6	11.5	(6.3)	(15.4)	23.2	(15.3)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
U.S. producers':															
Average capacity quantity.....	2,009,374	2,089,813	2,981,639	3,060,619	3,156,264	3,286,271	812,785	887,158	63.5	4.0	42.7	2.6	3.1	4.1	9.2
Production quantity.....	869,953	1,081,380	620,885	1,096,689	1,132,088	1,215,399	256,660	308,437	39.7	24.3	(42.6)	76.6	3.2	7.4	20.2
Capacity utilization (1).....	43.3	51.7	20.8	35.8	35.9	37.0	31.6	34.8	(6.3)	8.5	(30.9)	15.0	0.0	1.1	3.2
U.S. shipments:															
Quantity.....	832,565	1,023,218	574,547	1,051,901	1,011,466	908,293	251,270	135,439	9.1	22.9	(43.8)	83.1	(3.8)	(10.2)	(46.1)
Value.....	1,052,958	1,502,506	910,353	1,606,582	1,448,765	1,254,984	352,834	172,453	19.2	42.7	(39.4)	76.5	(9.8)	(13.4)	(51.1)
Unit value.....	1,265	1,468	1,584	1,527	1,432	1,382	1,404	1,273	9.2	16.1	7.9	(3.8)	(6.2)	(3.5)	(9.3)
Export shipments:															
Quantity.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	86,523	54,816	107,668	152,176	256,553	344,249	261,943	427,987	297.9	(36.6)	96.4	41.3	68.6	34.2	63.4
Inventories/total shipments (1).....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Production workers.....	1,044	1,701	1,504	1,575	1,389	1,668	1,407	1,361	59.8	62.9	(11.6)	4.7	(11.8)	20.1	(3.3)
Hours worked (1,000s).....	2,129	3,685	3,029	3,567	3,044	3,403	796	757	59.8	73.1	(17.8)	17.8	(14.7)	11.8	(4.9)
Wages paid (\$1,000).....	60,488	113,421	76,606	85,540	67,305	87,156	20,645	18,142	44.1	87.5	(32.5)	11.7	(21.3)	29.5	(12.1)
Productivity (1,000 short tons per hour)	408.8	305.5	205.0	309.0	374.6	357.2	324.5	407.4	(12.6)	(25.3)	(32.9)	50.8	21.2	(4.7)	25.6
Unit labor costs.....	69	102	123	77	59	72	79	59	3.8	47.1	21.4	(37.5)	(24.0)	22.5	(25.9)
Net Sales:															
Quantity.....	878,107	1,123,111	518,022	953,011	1,028,235	1,182,305	251,271	224,684	34.6	27.9	(53.9)	84.0	7.9	15.0	(10.6)
Value.....	1,126,816	1,676,641	784,297	1,439,109	1,487,041	1,648,784	352,834	288,917	46.3	48.8	(53.2)	83.5	3.3	10.9	(18.1)
Unit value.....	1,283	1,493	1,514	1,510	1,446	1,395	1,404	1,286	8.7	16.3	1.4	(0.3)	(4.2)	(3.6)	(8.4)
Cost of goods sold (COGS).....	966,709	1,401,062	763,130	1,205,060	1,288,000	1,420,466	314,107	256,229	46.9	44.9	(45.5)	57.9	6.9	10.3	(18.4)
Gross profit of (loss).....	160,107	275,579	21,167	234,049	199,041	228,318	38,727	32,688	42.6	72.1	(92.3)	1,005.7	(15.0)	14.7	(15.6)
SG&A expenses.....	31,626	55,458	72,878	79,501	96,385	115,694	39,223	41,090	265.8	75.4	31.4	9.1	21.2	20.0	4.8
Operating income or (loss).....	128,481	220,121	(51,711)	154,548	102,656	112,624	(496)	(8,402)	(12.3)	71.3	(2)	(2)	(33.6)	9.7	(1,594.0)
Capital expenditures.....	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit COGS.....	1,101	1,247	1,473	1,264	1,253	1,201	1,250	1,140	9.1	13.3	18.1	(14.2)	(0.9)	(4.1)	(8.8)
Unit SG&A expenses.....	36	49	141	83	94	98	156	183	171.7	37.1	184.9	(40.7)	12.4	4.4	17.2
Unit operating income or (loss).....	146	196	(100)	162	100	95	(2)	(37)	(34.9)	34.0	(2)	(2)	(38.4)	(4.6)	(1,794.4)
COGS/sales (1).....	85.8	83.6	97.3	83.7	86.6	86.2	89.0	88.7	0.4	(2.2)	13.7	(13.6)	2.9	(0.5)	(0.3)
Operating income or (loss)/sales (fn1)	11.4	13.1	(6.6)	10.7	6.9	6.8	(0.1)	(2.9)	(4.6)	1.7	(2)	(2)	(3.8)	(0.1)	(2.8)

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

(2) Undefined.

Source: Compiled from responses to questionnaires and from official statistics of the U.S. Department of Commerce, adjusted for excluded line pipe.

APPENDIX D

COMMENTS ON EFFECTS OF ORDERS AND LIKELY EFFECTS OF REVOCATION

Table D.1 CWLDLP: Firms' narratives on the impact of the order and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Table continued.

Table D.1 (Continued) CWLDLP: Firms' narratives on the impact of the order and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Table continued.

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

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

APPENDIX E

IMPORTS OF EXCLUDED PRODUCT

Table E.1 CWLDLP: U.S. importers' imports of excluded product, by source

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Ratio is excluded product to included product; Ratio in percent

Source	Measure	2019	2020	2021
Japan	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	38,297	29,070	111,380
Japan	Value	***	***	***
Nonsubject sources	Value	***	***	***
All import sources	Value	49,110	38,989	121,774
Japan	Unit value	***	***	***
Nonsubject sources	Unit value	***	***	***
All import sources	Unit value	1,282	1,341	1,093
Japan	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0
Japan	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	100.0	100.0	100.0
Japan	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	5.1	16.3	86.7

Table continued.

Table E.1 Continued CWLDLP: U.S. importers' imports of excluded product, by source

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Ratio is excluded product to included product; Ratio in percent; Interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Japan	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	48,449	48,330	46,731	7,762	24,056
Japan	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	83,831	88,057	78,808	12,364	38,197
Japan	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	1,730	1,822	1,686	1,593	1,588
Japan	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Japan	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Japan	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	19.9	18.6	16.7	10.5	22.6

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

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

Figure E.1 CWLDLP: Excluded and included import average unit values, by source and by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and presented in Table 4.1 and official U.S. import statistics using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed July 16, 2025. Imports are based on the imports for consumption data series. There are no AUVs for included product from Japan in 2024, interim 2024, and interim 2025 since there were no reported imports during those periods from Commission questionnaires.

Table E.2 CWLDLP: U.S. importers' description of excluded product from Japan

Interim period is January through March

Firm name	Period of imports	Description of excluded product from Japan
***	2022 to 2024 with interim period 2024 and 2025	***
***	2019 to 2021	***
***	2022 to 2024 with interim period 2024 and 2025	***
***	2022 to 2024 with interim period 2024 and 2025	***
***	2019 to 2021	***
***	2022 to 2024 with interim period 2024 and 2025	***
***	2019 to 2021	***
***	2022 to 2024 with interim period 2024 and 2025	***

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

Note: Certain imports of excluded product from U.S. importer *** may be included in the scope. Firm did not respond to repeated follow-up from staff. See correspondence with ***, September 12, 2025.

