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A-583-830
Sunset Reviews
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October 31 2016

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Enforcement and Compliance

FROM: Christian Marsh *CM*
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Expedited Sunset
Reviews of the Antidumping Duty Orders on Stainless Steel Plate
in Coils from Belgium, South Africa, and Taiwan

I. Summary

We have analyzed the responses of the interested parties in the sunset reviews of the antidumping duty orders covering stainless steel plate in coils (SSPC) from Belgium, South Africa, and Taiwan. We recommend that you approve the positions described in the “Discussion of the Issues” section of this memorandum. Below is the complete list of the issues in these sunset reviews for which we received substantive responses:

1. Likelihood of the Continuation or Recurrence of Dumping
2. Magnitude of the Margin of Dumping Likely to Prevail

II. Background

On July 1, 2016, the Department of Commerce (Department) published the notice of initiation of the third sunset reviews of the antidumping duty orders on SSPC from Belgium, South Africa, and Taiwan, pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act).¹ The Department received a notice of intent to participate from Allegheny Ludlum, LLC d/b/a ATI Flat Rolled Products; North American Stainless; and Outokumpu Stainless USA LLC; collectively, domestic interested parties, within the deadline specified in 19 CFR 351.218(d)(1)(i).² These domestic interested parties claimed interested party status under section 771(9)(C) of the Act, as manufacturers of a domestic like product in the United States.

¹ See *Initiation of Five-Year (“Sunset”) Reviews*, 81 FR 43185 (July 1, 2016).

² See July 15, 2016 letters regarding “Five-Year (“Sunset”) Review of the Antidumping Duty Order on Stainless Steel Plate in Coils from Belgium – Petitioners’ Notice of Intent to Participate”, “Five-Year (“Sunset”) Review of the

The Department received complete substantive responses to the notice of initiation from the domestic interested parties within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i).³ We received no substantive responses from respondent interested parties with respect to any of the orders covered by these sunset reviews, nor was a hearing requested. As a result, pursuant to 19 CFR 351.218(e)(1)(ii)(C)(2), the Department is conducting expedited (120-day) sunset reviews of the antidumping duty orders on SSPC from Belgium, South Africa, and Taiwan.

The orders on SSPC from Belgium, South Africa, and Taiwan remain in effect for all manufacturers, producers, and exporters of the subject merchandise.

III. Scope of the Orders

The product covered by this order is certain stainless steel plate in coils. Stainless steel is alloy steel containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements. The subject plate products are flat-rolled products, 254 mm or over in width and 4.75 mm or more in thickness, in coils, and annealed or otherwise heat treated and pickled or otherwise descaled. The subject plate may also be further processed (*e.g.*, cold-rolled, polished, *etc.*) provided that it maintains the specified dimensions of plate following such processing. Excluded from the scope of this order are the following: (1) plate not in coils, (2) plate that is not annealed or otherwise heat treated and pickled or otherwise descaled, (3) sheet and strip, and (4) flat bars.

The merchandise subject to this order is currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings: 7219.11.00.30, 7219.11.00.60, 7219.12.00.02, 7219.12.00.05, 7219.12.00.06, 7219.12.00.20, 7219.12.00.21, 7219.12.00.25, 7219.12.00.26, 7219.12.00.50, 7219.12.00.51, 7219.12.00.55, 7219.12.00.56, 7219.12.00.65, 7219.12.00.66, 7219.12.00.70, 7219.12.00.71, 7219.12.00.80, 7219.12.00.81, 7219.31.00.10, 7219.90.00.10, 7219.90.00.20, 7219.90.00.25, 7219.90.00.60, 7219.90.00.80, 7220.11.00.00, 7220.20.10.10, 7220.20.1 0.15, 7220.20.1 0.60, 7220.20.1 0.80, 7220.20.60.05, 7220.20.60.1 0, 7220.20.60.15, 7220.20.60.60, 7220.20.60.80, 7220.90.00.1 0, 7220.90.00.15, and 7220.90.00.60. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise subject to this order is dispositive.

IV. History of the Orders

Antidumping Duty Order on Stainless Steel Plate in Coils from South Africa – Petitioners’ Notice of Intent to Participate”, and “Five-Year (“Sunset”) Review of the Antidumping Duty Order on Stainless Steel Plate in Coils from Taiwan – Petitioners’ Notice of Intent to Participate.”

³ See July 29, 2016 letters from the domestic interested parties regarding “Stainless Steel Plate in Coils from Belgium – Five Year (“Sunset”) Review of the Antidumping Duty Order – Domestic Interested Parties’ Substantive Response to Notice of Initiation” (Belgium Substantive Response), “Stainless Steel Plate in Coils from South Africa – Five Year (“Sunset”) Review of the Antidumping Duty Order – Domestic Interested Parties’ Substantive Response to Notice of Initiation” (South Africa Substantive Response), and “Stainless Steel Plate in Coils from Taiwan – Five Year (“Sunset”) Review of the Antidumping Duty Order – Domestic Interested Parties’ Substantive Response to Notice of Initiation” (Taiwan Substantive Response).

The Department published its final affirmative determinations of sales at less than fair value (LTFV) in the *Federal Register* with respect to imports of SSPC from Belgium, South Africa, and Taiwan⁴ at the following percentage rates:

Belgium

AMS Belgium*	8.54 ⁵
All-Others Rate	8.54 ⁶

*AMS Belgium is the successor-in-interest to ALZ N.V.

South Africa

Columbus Stainless	41.63
All-Others Rate	41.63

Taiwan

Yieh United Steel Corporation	8.02
YUSCO/Ta Chen	10.20
All-Others Rate	7.39

The Department later published in the *Federal Register* antidumping duty orders on SSPC from Belgium, South Africa, and Taiwan.⁷

⁴ See *Notice of Final Determination of Sales at Less Than Fair Value: Stainless Steel Plate in Coils from Belgium*, 64 FR 15476 (March 31, 1999); *Notice of Final Determination of Sales at Less Than Fair Value: Stainless Steel Plate in Coils from South Africa*, 64 FR 15459 (March 31, 1999); and *Notice of Final Determination of Sales at Less Than Fair Value: Stainless Steel Plate in Coils from Taiwan*, 64 FR 15493 (March 31, 1999) (*Taiwan Final LTFV Determination*).

⁵ As a result of the Section 129 proceedings to implement the findings of the WTO Panel in US-Zeroing (EC), the margin changed from 9.86 percent to 8.54 percent. See *Implementation of the Findings of the WTO Panel in US – Zeroing (EC): Notice of Determinations Under Section 129 of the Uruguay Round Agreements Act and Revocations and Partial Revocations of Certain Antidumping Duty Orders*, 72 FR 25261 (May 4, 2007) (*Section 129 Determination*).

⁶ *Id.*

⁷ See *Antidumping Duty Orders; Certain Stainless Steel Plate in Coils From Belgium, Canada, Italy, the Republic of Korea, South Africa, and Taiwan*, 64 FR 27756 (May 21, 1999); as amended by *Notice of Amended Antidumping Duty Orders; Certain Stainless Steel Plate in Coils From Belgium, Canada, Italy, the Republic of Korea, South Africa, and Taiwan*, 68 FR 11520 (Mar. 11, 2003); as corrected by *Notice of Amended Antidumping Duty Orders; Certain Stainless Steel Plate in Coils From Belgium, Canada, Italy, the Republic of Korea, South Africa, and Taiwan*, 68 FR 16117 (Apr. 2, 2003); and as corrected by *Notice of Correction to the Amended Antidumping Duty Orders; Certain Stainless Steel Plate in Coils From Belgium, Canada, Italy, the Republic of Korea, South Africa, and Taiwan*, 68 FR 20114 (Apr. 24, 2003) (*Order*).

Administrative Reviews and Section 129 Proceeding

Since the issuance of the antidumping duty orders, the Department has conducted no administrative reviews with respect to SSPC from South Africa or Taiwan. The Department has conducted nine administrative reviews with respect to SSPC from Belgium.

On May 4, 2007, the Department published a Notice of Determination under section 129 of the Uruguay Round Agreements Act (URAA) in response to the report of a World Trade Organization (WTO) dispute settlement panel.⁸ One of the proceedings covered by the section 129 determination was the LTFV investigation of SSPC from Belgium. The recalculated margin for respondent AMS Belgium and the all-others rate decreased from 9.84 percent to 8.54 percent.

Duty Absorption, Changed Circumstances Reviews, and Scope Inquiries

On July 22, 2011, the Department initiated a changed circumstances review in response to a request from Aperam Stainless Belgium N.V. (AS Belgium) that the Department find AS Belgium to be the successor-in-interest to AMS Belgium.⁹ In its final results of the changed circumstance review, the Department determined that AS Belgium is the successor-in-interest to AMS Belgium.¹⁰

The Department has conducted one scope ruling with respect to SSPC from Belgium, South Africa, and Taiwan, in which the Department initially determined that SSPC with a nominal thickness of 4.75 millimeters (mm), but with an actual thickness that is less than 4.75 mm, is within the scope of all of the orders on SSPC.¹¹ The scope ruling was challenged by AMS Belgium, appealed to the Federal Circuit, and reversed.¹² As a result of the litigation, the Department ultimately determined that SSPC with an actual thickness of less than 4.75 mm was not subject to the antidumping duty and countervailing duty orders on SSPC, regardless of its nominal thickness.¹³

V. Legal Framework

In accordance with section 751(c)(1) of the Act, the Department is conducting these sunset reviews to determine whether revocation of the antidumping duty orders would be likely to lead to a continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations, the Department shall consider both the weighted-average dumping margins determined in the investigations and subsequent reviews, and the volume of

⁸ See *Section 129 Determination*.

⁹ See *Stainless Steel Plate in Coils From Belgium: Notice of Initiation of Antidumping Duty Changed Circumstances Review*, 76 FR 45511 (July 29, 2011).

¹⁰ See *Stainless Steel Plate in Coils From Belgium: Notice of Final Results of Antidumping Duty Changed Circumstances Review*, 77 FR 21963 (April 12, 2012).

¹¹ See *Notice of Scope Rulings*, 74 FR 14521, 14522 (March 31, 2009).

¹² See *ArcelorMittal Stainless Belgium N.V. v. United States*, 694 F.3d 82 (Fed. Cir. 2012).

¹³ See *Stainless Steel Plate in Coils From Belgium, South Africa, and Taiwan: Notice of Court Decision Not in Harmony With Final Scope Ruling and Notice of Amended Final Scope Ruling Pursuant to Court Decision*, 78 FR 30271 (May 22, 2013).

imports of the subject merchandise for the periods before and the periods after the issuance of the antidumping duty orders.

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action, H.R. Doc. 103-316, vol. 1 (1994) (SAA), the House Report, H. Rep. No. 103-826, pt. 1 (1994) (House Report), and the Senate Report, S. Rep. No. 103-412 (1994) (Senate Report), the Department's determinations of likelihood will be made on an order-wide, rather than company-specific, basis.¹⁴ In addition, the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when, among other scenarios: (a) dumping continued at any level above *de minimis* after the issuance of the order; (b) imports of the subject merchandise ceased after issuance of the order; or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.¹⁵

In addition, as a base period of import volume comparison, it is the Department's practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew the comparison.¹⁶ Also, when analyzing import volumes for second and subsequent sunset reviews, the Department's practice is to compare import volumes during the year preceding initiation of the underlying investigation to import volumes since the issuance of the last continuation notice.¹⁷

Further, section 752(c)(3) of the Act states that the Department shall provide to the International Trade Commission (ITC) the magnitude of the margin of dumping likely to prevail if the order were revoked. Generally, the Department selects the dumping margins from the final determination in the original investigation, as these rates are the only calculated rates that reflect the behavior of exporters without the discipline of an order in place.¹⁸ However, in certain circumstances, a more recently calculated rate may be more appropriate (*e.g.*, "if dumping margins have declined over the life of an order and imports have remained steady or increased, {the Department} may conclude that exporters are likely to continue dumping at the lower rates found in a more recent review").¹⁹

¹⁴ See SAA at 879 and House Report at 56.

¹⁵ See SAA at 889-90, House Report at 63-64, and Senate Report at 52. See also *Policies Regarding the Conduct of Five-Year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders*; *Policy Bulletin 98.3*, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*).

¹⁶ See, *e.g.*, *Stainless Steel Bar from Germany: Final Results of the Sunset Review of the Antidumping Duty Order*, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

¹⁷ See *Ferrovaniadium from the People's Republic of China and the Republic of South Africa: Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders*, 79 FR 14216 (March 13, 2014) and accompanying Issues and Decision Memorandum.

¹⁸ See SAA at 890; see also *Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

¹⁹ See SAA at 890-91.

In February 2012, the Department announced it was modifying its practice in sunset reviews such that it will not rely on weighted-average dumping margins that were calculated using the methodology found to be WTO-inconsistent (*i.e.*, zeroing/the denial of offsets).²⁰ In the *Final Modification for Reviews*, the Department stated that “only in the most extraordinary circumstances” would it rely on margins other than those calculated and published in prior determinations.²¹ The Department further stated that apart from the “most extraordinary circumstances,” it would “limit its reliance to margins determined or applied during the five-year sunset period that were not determined in a manner found to be WTO-inconsistent” and that it “may also rely on past dumping margins that were not affected by the WTO-inconsistent methodology, such as dumping margins recalculated pursuant to Section 129 proceedings, dumping margins determined based on the use of total adverse facts available, and dumping margins where no offsets were denied because all comparison results were positive.”²²

Pursuant to section 752(c)(4)(A) of the Act, a dumping margin of zero or *de minimis* shall not by itself require the Department to determine that revocation of an antidumping duty order would not be likely to lead to a continuation or recurrence of sales at LTFV.²³

VI. Discussion of the Issues

1. Likelihood of Continuation or Recurrence of Dumping

Domestic Interested Parties

- The domestic interested parties believe that revocation of these antidumping duty orders would likely lead to a continuation or recurrence of dumping by the manufacturers/producers and exporters of the subject merchandise, as well as material injury to the U.S. industry.²⁴
- With respect to volume of exports, the domestic interested parties assert that the imposition of the orders has had a dramatic impact on the volume of imports of SSPC from producers and exporters. The domestic interested parties point to record history of the orders to demonstrate that the discipline of the orders has forced foreign producers of subject merchandise to significantly reduce their volume of sales to the United States.²⁵
- Citing to the Department’s *Sunset Policy Bulletin*, the domestic interested parties conclude that the Department should determine that revocation of an antidumping duty order is inappropriate where dumping continued at any level above *de minimis* after the issuance of the order.²⁶ In sum, the domestic interested parties argue that record evidence strongly

²⁰ See *Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification*, 77 FR 8101, 8103 (February 14, 2012) (*Final Modification for Reviews*).

²¹ *Id.*

²² *Id.*

²³ See *Folding Gift Boxes from the People’s Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 72 FR 16765 (April 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

²⁴ See Belgium Substantive Response, South Africa Substantive Response, and Taiwan Substantive Response (collectively, SSPC Substantive Responses).

²⁵ *Id.*

²⁶ See Belgium SSPC Substantive Response at 24. See also *Sunset Policy Bulletin*.

supports the conclusion that dumping of SSPC by producers, manufacturers, and exporters from Belgium, South Africa, and Taiwan would be likely to continue or recur if the orders were to be revoked.

Department's Position: As explained in the "Legal Framework" section above, when determining whether revocation of the order would be likely to lead to continuation of dumping, sections 752(c)(1)(A) and (B) of the Act instruct the Department to consider: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews; and (2) the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty order. According to the SAA, existence of dumping margins after the order "is highly probative of the likelihood of continuation or recurrence of dumping. If companies continue to dump with the discipline of an order in place, it is reasonable to assume that dumping would continue if the discipline were removed. If imports cease after the order is issued, it is reasonable to assume that the exporters could not sell in the United States without dumping and that, to reenter the U.S. market, they would have to resume dumping."²⁷ In addition, "declining import volumes accompanied by the continued existence of dumping margins after the issuance of the order may provide a strong indication that, absent an order, dumping would be likely to continue, because the evidence would indicate that the exporter needs to dump to sell at pre-order volumes."²⁸

Alternatively, the legislative history provides that declining (or no) dumping margins accompanied by steady or increasing imports may indicate that foreign companies do not have to dump to maintain market share in the United States and that dumping is less likely to continue or recur if the order were revoked.²⁹

As noted above, when analyzing import volumes for second and subsequent sunset reviews, the Department's practice is to compare import volumes during the year preceding initiation of the underlying investigation, to import volumes since the issuance of the last continuation notice. The last continuation notice for these sunset reviews was issued in August 2011.³⁰ Therefore, for these sunset reviews we examined import volumes prior to the antidumping duty orders as compared to import volumes during the sunset review period (*i.e.*, 2011-2015).³¹ Furthermore, the Department examined the weighted-average dumping margins in effect to determine whether dumping continued at above *de minimis* levels during the sunset review period. In accordance with the *Final Modification for Reviews*, the Department did not rely on weighted-average dumping margins that were calculated using a WTO-inconsistent methodology for any country.

²⁷ See SAA at 890.

²⁸ *Id.* at 889, the House Report at 63, and the Senate Report at 52.

²⁹ See SAA at 889-90, House Report at 63, and Senate Report at 52.

³⁰ See *Continuation of Antidumping and Countervailing Duty Orders: Stainless Steel Plate in Coils from Belgium, the Republic of Korea, South Africa, and Taiwan*, 76 FR 53882, 53883 (August 30, 2011).

³¹ See BWPF Substantive Responses.

Belgium:

We examined the ITC Dataweb statistics for the relevant period which show that imports of SSPC from Belgium remain well below pre-order levels.³² Additionally, the Department has conducted nine administrative reviews of the order for Belgium and found that the producers/exporters continued to dump at levels above *de minimis*. Three of these nine administrative reviews were conducted during this third sunset period and completed after the *Final Modification for Reviews*, thereby making them WTO-consistent, and resulted in above *de minimis* dumping margins.³³ Further, we note that, pursuant to the *Section 129 Proceeding*, the margin from the investigation is WTO-consistent. Accordingly, the Department finds that dumping would likely continue or recur if the order were revoked, pursuant to section 752(c)(1) of the Act.

South Africa:

We examined the ITC Dataweb statistics for the relevant period which show that imports of SSPC from South Africa were negligible.³⁴ Subsequent to the imposition of the antidumping duty order, imports from South Africa are significantly below pre-order volumes.³⁵ The margins determined in the underlying investigation remain in effect for the all companies. Further, we note that this margin is WTO-consistent, as it was based on adverse facts available and margins where no offsets were denied.³⁶ Accordingly, the Department finds that dumping would likely continue or recur if the order were revoked, pursuant to section 752(c)(1) of the Act.

Taiwan:

The Department has not conducted any administrative review of the order for Taiwan. We examined the ITC Dataweb statistics for the relevant period which show that imports of SSPC from Taiwan were negligible.³⁷ Subsequent to the imposition of the antidumping duty order, imports from Taiwan are significantly below pre-order volumes.³⁸ The margins determined in the underlying investigation remain in effect for the all companies. Further, we note that the margins determined for mandatory respondents Yieh United Steel Corporation and YUSCO/Ta Chen are WTO-consistent, as they were based on total adverse facts available and there is no other indication that the zeroing methodology was applied.³⁹ Accordingly, the Department finds that dumping would likely continue or recur if the order were revoked, pursuant to section 752(c)(1) of the Act.

³² See Belgium Substantive Response at 23.

³³ See *Stainless Steel Plate in Coils From Belgium: Antidumping Duty Administrative Review, 2010-2011*, 77 FR 73013 (December 7, 2012); *Stainless Steel Plate in Coils From Belgium: Final Results of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 79662 (December 31, 2013); *Stainless Steel Plate in Coils From Belgium: Final Results of Antidumping Duty Administrative Review; 2012-2013*, 79 FR 64365 (October 29, 2014).

³⁴ See South Africa Substantive Response at 13.

³⁵ *Id.*

³⁶ *Id.* at 17.

³⁷ See Taiwan Substantive Response at 17-18.

³⁸ *Id.*

³⁹ See *Taiwan Final LTFV Determination*.

2. Magnitude of the Margins of Dumping Likely to Prevail

Domestic Interested Parties

- The domestic interested parties request that the Department report to the ITC the dumping margins that were determined in the investigations, as amended and in accordance with the *Sunset Policy Bulletin*, as the magnitude of the margins of dumping likely to prevail if the findings were revoked. These rates are set forth in the “History of the Orders” section, above.

Department’s Position: Pursuant to section 752(c)(3) of the Act, the administering authority shall provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. Normally, the Department will select a weighted-average dumping margin from the investigation to report to the ITC.⁴⁰ The Department’s preference is to select a weighted-average dumping margin from the LTFV investigation because it is the only calculated rate that reflects the behavior of the producers and exporters without the discipline of an order or suspension agreement in place.⁴¹ Under certain circumstances, however, the Department may select a more recent rate to report to the ITC. Finally, as explained above, in accordance with the *Final Modification for Reviews*, the Department will not rely on weighted average dumping margins that were calculated using the methodology found to be WTO-inconsistent.⁴²

Given that dumping continued following the issuance of the orders and given the absence of argument and evidence to the contrary, the Department finds that the margins calculated in the original investigations, as amended by the *Section 129 Determination* for Belgium, are probative of the behavior of producers and exporters of subject merchandise from Belgium, South Africa, and Taiwan if these orders were revoked. Consistent with section 752(c) of the Act, the Department will report to the ITC the margins up to the highest rate from the investigations concerning subject merchandise from Belgium, South Africa, and Taiwan as indicated in the “Final Results of Reviews” section of this memorandum. As described above, the margin for Belgium was amended by the *Section 129 Determination* to implement the findings of a WTO dispute settlement panel. The margins for South Africa and Taiwan were based on adverse facts available and there is no other indication that the zeroing methodology was applied. Thus, the margins from Belgium, South Africa, and Taiwan are WTO-consistent because they did not involve zeroing.

VII. Final Results of Sunset Reviews

We determine that revocation of the antidumping duty orders on SSPC from Belgium, South Africa, and Taiwan would likely lead to continuation or recurrence of dumping, and that the

⁴⁰ See SAA at 890; see also, e.g., *Persulfates from the People’s Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

⁴¹ See *Eveready Battery Company v. United States*, 77 F. Supp. 2d 1327, 1333 (CIT 1999); see also SAA at 890.

⁴² See *Final Modification for Reviews*, 77 FR at 8103.

magnitude of the dumping margins likely to prevail would be weighted-average margins up to the following percentages:

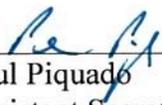
Belgium	8.54
South Africa	41.63
Taiwan	10.20

VIII. Recommendation

Based on our analysis of the responses received, we recommend adopting all of the above positions. If these recommendations are accepted, we will publish these final results of reviews in the *Federal Register*.

Agree

Disagree



Paul Piquado
Assistant Secretary
for Enforcement and Compliance

31 OCTOBER 2016
Date