



A-570-849
Sunset Review
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March 2, 2021

MEMORANDUM TO: Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance

FROM: James Maeder
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Expedited Fourth Sunset
Review of the Antidumping Duty Order on Certain Cut-to-Length
Carbon Steel Plate from the People's Republic of China

I. SUMMARY

We conducted an expedited (120-day) sunset review of the antidumping duty (AD) order¹ on certain cut-to-length carbon steel plate (CTL plate) from the People's Republic of China (China) in accordance with section 751(c)(1) of the Tariff Act of 1930, as amended (the Act). We recommend finding that revocation of the *Order* would likely lead to continuation or recurrence of dumping at weighted-average dumping margins up to 128.59 percent.

II. BACKGROUND

On October 1, 2020, the Department of Commerce (Commerce) published in the *Federal Register* advance notice of sunset reviews scheduled for initiation in November 2020.² On November 3, 2020, Commerce published the notice of initiation of this sunset review in the *Federal Register* pursuant to section 751(c) of the Act.³ On November 13, 16, and 18, 2020, Commerce received complete notices of intent to participate in the sunset review from domestic

¹ See *Suspension Agreement on Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China; Termination of Suspension Agreement and Notice of Antidumping Duty Order*, 68 FR 60081 (October 21, 2003) (*Order*).

² See *Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Advance Notification of Sunset Review*, 85 FR 61930 (October 1, 2020).

³ See *Initiation of Five-Year (Sunset) Reviews*, 85 FR 69585 (November 3, 2020).



interested parties⁴ within the deadline specified in 19 CFR 351.218(d)(1)(i).⁵ Domestic parties claimed interested party status, pursuant to section 771(9)(C) of the Act, as U.S. manufacturers of the domestic like product.⁶ On November 30, 2020, pursuant to 19 CFR 351.218(d)(3)(i), AMUSA, Nucor, and SSAB timely filed an adequate substantive response with Commerce.⁷ Commerce did not receive a substantive response from any respondent interested party. Accordingly, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), Commerce conducted an expedited (120-day) sunset review of the *Order*.⁸ On November 20, 2020 and December 23, 2020, Commerce notified the U.S. International Trade Commission (ITC) that it received a notice of intent to participate from domestic interested parties and did not receive an adequate substantive response from respondent interested parties, respectively.⁹

III. SCOPE OF THE *ORDER*

The product covered by the *Order* is certain cut-to-length carbon steel plate from China. Included in this description is hot-rolled iron and non-alloy steel universal mill plates (*i.e.*, flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 millimeters (mm) but not exceeding 1250 mm and of a thickness of not less than 4 mm, not in coils and without patterns in relief), of rectangular shape, neither clad, plated nor coated with metal, whether or not painted, varnished, or coated with plastics or other nonmetallic substances; and certain iron and nonalloy steel flat-rolled products not in coils, of rectangular shape, hot-rolled, neither clad, plated, nor coated with metal, whether or not painted, varnished, or coated with plastics or other nonmetallic substances, 4.75 mm or more in thickness and of a width which exceeds 150 mm and measures at least twice the thickness. Included as subject merchandise in this *Order* are flat-rolled products of nonrectangular cross-section where such cross-section is achieved subsequent to the rolling process (*i.e.*, products which have been “worked after rolling”) – for example, products which have been beveled or rounded at the edges. This merchandise is currently classified in the Harmonized Tariff Schedule of the United States

⁴ The domestic interested parties are ArcelorMittal USA LLC (AMUSA), JSW Steel (USA) Inc. (JSW), Nucor Corporation (Nucor), and SSAB Enterprises LLC (SSAB).

⁵ See SSAB’s Letter, “Notice of Intent to Participate in the Fourth Five-Year Review of the Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate from China,” dated November 13, 2020; see also AMUSA’s Letter, “Cut-to-Length Carbon Steel Plate from the People’s Republic of China– ArcelorMittal USA LLC’s Notice of Intent to Participate,” dated November 16, 2020; Nucor’s Letter, “Cut-to-Length Carbon Steel Plate from the People’s Republic of China: Notice of Intent to Participate in Review,” dated November 16, 2020; and JSW’s Letter, “Cut-to-Length Carbon Steel Plate from the People’s Republic of China: Notice of Intent to Participate in Review,” dated November 18, 2020.

⁶ *Id.* at 2.

⁷ See Domestic Interested Parties’ Letter, “Cut-to-Length Carbon Steel Plate from the People’s Republic of China; Five Year (4th Sunset) Review – Domestic Interested Parties’ Substantive Response,” dated November 30, 2020 (Substantive Response).

⁸ See *Procedures for Conducting Five-year (Sunset) Reviews of Antidumping and Countervailing Duty Orders*, 70 FR 62061 (October 28, 2005) (Commerce normally will conduct an expedited sunset review where respondent interested parties provide inadequate responses).

⁹ See Commerce’s Letter, “Sunset Reviews Initiated on November 1, 2020” dated November 20, 2020; see also Commerce’s Letter, “Sunset Reviews for November 2020,” dated December 23, 2020.

(HTSUS) under item numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000 7212.40.5000, and 7212.50.0000. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the *Order* is dispositive. Specifically excluded from the subject merchandise within the scope of the *Order* is grade X-70 steel plate.

IV. HISTORY OF THE *ORDER*

Investigation and Order

On January 12, 1998, Commerce published an amended final determination in the less-than-fair-value (LTFV) investigation of CTL plate from China with the following dumping margins:¹⁰

Exporter/Producer	Weighted-Average Percent Margin
Anshan Iron and Steel Complex (AISCO) / Angang International Trade Corporation/Sincerely Asia Ltd. (collectively, Anshan)	30.68
Baoshan Iron & Steel Corporation / Bao Steel International Trade Corporation / Bao Steel Metals Trading Corporation (collectively, Baoshan)	30.51
China Metallurgical Import & Export Liaoning Company (Liaoning) / (produced by Wuyang Iron and Steel Company)	17.33
Shanghai Pudong Iron and Steel Company (Shanghai Pudong)	38.16
Wuhan Iron & Steel Company (“Wuhan”) / International Economic and Trading Corporation / Cheerwu Trader Ltd.) (collectively, WISCO)	128.59
China-Wide Rate	128.59

Following the termination of the suspension agreement with China, Commerce published the *Order*.¹¹

¹⁰ See *Final Determination of Sales at Less than Fair Value: Certain Cut-to-Length Carbon Steel Plate from the People’s Republic of China*, 62 FR 61964 (November 20, 1997) (*Final Determination*); and *Amended Final Determination of Sales at Less Than Fair Value: Certain Cut-to-Length Carbon Steel Plate from the People’s Republic of China*, 63 FR 1821 (January 12, 1998) (*Amended Final Determination*).

¹¹ See *Order*.

Administrative, New Shipper, Changed Circumstances, or Anti-circumvention Reviews

Commerce completed seven administrative reviews of the *Order*.¹² In each of these reviews, except the 2007-2008 review, Commerce determined that the respondents with reviewable entries did not demonstrate that they were eligible for separate rate status; thus, Commerce assigned them the China-wide entity rate of 128.59 percent. In the 2007-2008 administrative review, Commerce calculated a zero percent rate for Hunan Valin Xiangtan Iron & Steel Co. (Valin Xiangtan).¹³ However, in subsequent administrative reviews, Commerce assigned the China-wide entity rate of 128.59 percent to Valin Xiangtan because it did not demonstrate that it was eligible for separate rate status.¹⁴

There have not been any completed new shipper or changed circumstances reviews.

Commerce completed two reviews in which it found circumvention of the *Order*.¹⁵

Section 129 Determination

There were no Section 129 determinations.

Scope Rulings and Duty Absorption

Commerce has not made any duty absorption findings or scope rulings with respect to the *Order*.

Sunset Reviews

In each of the prior sunset reviews, Commerce found that termination of the suspension agreement or revocation of the *Order*, as applicable, would likely lead to continuation or

¹² See *Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results and Final Partial Rescission of Antidumping Duty Administrative Review*, 71 FR 75710 (December 18, 2006); *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results of the 2007-2008 Administrative Review of the Antidumping Duty Order*, 75 FR 8301 (February 24, 2010) (2007-2008 Final Results); *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results of Antidumping Administrative Review; 2010-2011*, 77 FR 73616 (December 11, 2012); *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results and Final No Shipments Determination of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 76279 (December 17, 2013); *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results of Administrative Review; 2012-2013*, 80 FR 13522 (March 16, 2015); *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2013-2014*, 80 FR 75966 (December 7, 2015) (2013-2014 Final Results); and *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results of the 2014-2015 Antidumping Administrative Review*, 81 FR 91904 (December 19, 2016) (2014-2015 Final Results).

¹³ See 2007-2008 Final Results.

¹⁴ See 2013-2014 Final Results; see also 2014-2015 Final Results.

¹⁵ See *Affirmative Final Determination of Circumvention of the Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China*, 74 FR 40565 (August 12, 2009); see also *Affirmative Final Determination of Circumvention of the Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China*, 76 FR 50966 (August 17, 2011).

recurrence of dumping. In each of these sunset reviews, Commerce found that the magnitude of dumping likely to prevail if the suspension agreement was terminated or the *Order* was revoked, would be weighted-average dumping margins up to 128.59 percent.¹⁶ Commerce published notices continuing the suspension agreement and/or the *Order* after the first, second, and third sunset reviews.¹⁷

V. LEGAL FRAMEWORK

Section 752(c)(1)(A) and (B) of the Act provide that, in making a determination as to whether revocation of an AD order is likely to lead to continuation or recurrence of dumping, Commerce shall consider the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of U.S. imports of subject merchandise from the country subject to the order for the periods before, and after, issuance of the AD order. Commerce normally will determine that revocation of an AD order is likely to lead to continuation or recurrence of dumping where: (a) dumping continued at any level above *de minimis* after issuance of the order (however, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of zero or *de minimis* shall not, by itself, require Commerce to determine that revocation of an AD order would *not* be likely to lead to a continuation or recurrence of sales at LTFV);¹⁸ (b) U.S. imports of subject merchandise from the country subject to the order ceased after issuance of the order; or (c) dumping was eliminated after issuance of the order and U.S. import volumes of subject merchandise from the country subject to the order declined significantly.¹⁹ Alternatively, Commerce normally will determine that revocation of an AD order is not likely to lead to continuation or recurrence of dumping where dumping was eliminated after issuance of the order

¹⁶ See *Cut-to-Length Carbon Steel Plate from the People's Republic of China, the Russian Federation, and South Africa: Final Results of Expedited Sunset Review of Suspended Antidumping Duty Investigations*, 68 FR 1038 (January 8, 2003); see also *Certain Cut-To-Length Carbon Steel Plate from the People's Republic of China: Notice of Final Results of Expedited Sunset Review of Antidumping Duty Order*, 73 FR 74143 (December 5, 2008); and *Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China: Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order*, 80 FR 6051 (February 4, 2015).

¹⁷ See *Continuation of Suspended Antidumping Duty Investigations: Cut-to-Length Carbon Steel Plate from the People's Republic of China, the Russian Federation, and Ukraine*, 68 FR 54417 (September 17, 2003); see also *Continuation of Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China and Continuation of Suspended Antidumping Duty Investigations on Certain Cut-to-Length Carbon Steel Plate from the Russian Federation and Ukraine*, 74 FR 57994 (November 10, 2009); and *Continuation of Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate from the People's Republic of China and Continuation of Suspended Antidumping Duty Investigations on Certain Cut-to-Length Carbon Steel Plate from the Russian Federation and Ukraine*, 80 FR 79306 (December 21, 2015) (*2015 Continuation Notice*).

¹⁸ 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 (IDM) at Comment 1.

¹⁹ See Statement of Administrative Action Accompanying the Uruguay Round Agreements Act, H.R. Doc. 103-316, vol. 1 (1994) (SAA) at 889-90; House Report H. Rep. No. 103-826, pt. 1 (1994) (House Report) at 63-64; and Senate Report, S. Rep. No. 103-412 (1994) (Senate Report) at 52, for a description of our practice; see also *Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin*, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*).

and the volume of U.S. imports of subject merchandise from the country subject to the order remained steady or increased.²⁰

Commerce's practice is to compare post-order U.S. import volumes to U.S. import volumes during the one-year period immediately preceding initiation of the investigation, rather than comparing post-order and pre-order U.S. import volumes. Commerce follows this practice because initiation of an investigation may dampen U.S. import volumes and, thus, skew comparisons.²¹ Moreover, when analyzing U.S. import volumes for second and subsequent sunset reviews, Commerce's practice is to compare the U.S. import volume during the year preceding initiation of the underlying investigation to U.S. import volumes since issuance of the last continuation notice.²²

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act (URAA), specifically the SAA, the House Report, and the Senate Report, Commerce's likelihood determinations will be made on an order-wide, rather than a company-specific, basis.²³

Further, section 752(c)(3) of the Act requires that Commerce provide the ITC with the magnitude of the margin of dumping likely to prevail if the order is revoked. Generally, Commerce provides the ITC with the dumping margin from the final determination in the investigation because this is the only calculated dumping margin that reflects the behavior of exporters without the discipline of an order in place.²⁴ However, in certain circumstances, it may be more appropriate to provide the ITC with a more recently calculated dumping margin (*e.g.*, if dumping margins have declined over the life of an order and U.S. imports have remained steady or increased, Commerce may conclude that exporters are likely to continue dumping at the lower more recently calculated rates).²⁵

In February 2012, Commerce announced that it was modifying its practice in sunset reviews such that it would not rely on weighted-average dumping margins that were calculated using the methodology found to be World Trade Organization (WTO)-inconsistent.²⁶ In the *Final Modification for Reviews*, Commerce stated that "only in the most extraordinary circumstances"

²⁰ See SAA at 889-90; and House Report.

²¹ 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 IDM at Comment 1.

²² 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 IDM.

²³ See SAA at 879; see also House Report at 56; and Senate Report at 52.

²⁴ See SAA at 890; and *Sunset Policy Bulletin* at section II.B.1; 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 IDM at Comment 2.

²⁵ See SAA at 890-91; and *Sunset Policy Bulletin* at section II.B.2.

²⁶ 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*).

would it rely on dumping margins in sunset reviews other than those calculated and published in prior determinations.²⁷ Commerce further stated that apart from the “most extraordinary circumstances,” it did not anticipate the need to recalculate dumping margins in the vast majority of future sunset determinations and, instead 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.” Commerce noted 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.”²⁸

Below we address the comments submitted by domestic interested parties.

VI. DISCUSSION OF THE ISSUES

1. Likelihood of Continuation or Recurrence of Dumping

Domestic Interested Parties’ Comments:

- Commerce should find that if the *Order* is revoked, dumping by Chinese exporters would likely continue or recur at margins equal to, or greater than, those found in the investigation because: (i) dumping has continued at levels above *de minimis* following issuance of the *Order*; and (ii) U.S. import volumes have declined significantly since issuance of the *Order*.²⁹

Commerce’s Position:

Consistent with the legal framework laid out above and section 752(c)(1)(A) of the Act, we first considered the weighted-average dumping margins determined in the investigation. As stated above, in the investigation in this proceeding, Commerce found dumping margins up to 128.59 percent (the China-Wide dumping margin).³⁰ There has been only one administrative review of the *Order* in which Commerce calculated a *de minimis* dumping margin for a respondent and that respondent subsequently received an above *de minimis* dumping margin. Therefore, the evidence indicates that dumping has continued at above *de minimis* levels after issuance of the *Order*.

Additionally, pursuant to section 752(c)(1)(B) of the Act, we considered the volume of U.S. imports of subject merchandise from China in determining whether revocation of the *Order* is likely to lead to continuation or recurrence of dumping. As noted above, when analyzing import

²⁷ *Id.*

²⁸ *Id.*

²⁹ See Substantive Response.

³⁰ See Amended Final Determination.

volumes for second and subsequent sunset reviews, Commerce’s practice is to compare the volume of U.S. imports of subject merchandise from the country subject to the order during the year preceding initiation of the underlying investigation (*i.e.*, 1996) to U.S. import volumes of subject merchandise from the country subject to the order since issuance of the last continuation notice.³¹ Commerce issued the last continuation notice for this *Order* in December 2015.³²

Consequently, we examined U.S. import volumes of the relevant merchandise for the four calendar years following issuance of the *2015 Continuation Notice* for which a full year of import data were available at the time that the domestic interested parties filed their substantive response (*i.e.*, 2016 through 2019). The volume of U.S. imports of subject merchandise from China under the HTSUS numbers listed in the scope of the *Order* for each of these years is significantly less than the pre-initiation volume of U.S. imports of subject merchandise from China under those HTSUS numbers.³³ During these four years, the annual volume of U.S. imports of subject merchandise from China ranged from approximately 0.55 percent to 0.14 percent of the volume of U.S. imports of subject merchandise from China in the year preceding initiation of the underlying investigation (*i.e.*, 1996).³⁴

The above facts indicate that Chinese exporters may not be able to maintain pre-initiation U.S. import levels without selling subject merchandise at dumped prices.³⁵ As noted in the SAA, “declining import volumes accompanied by the continued existence of dumping margins after the issuance of an 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.”³⁶ Furthermore, according to the SAA and the House Report, “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.”³⁷ Therefore, pursuant to section 752(c)(1) of the Act, because we found lower volumes of U.S. imports of subject merchandise from China in each of the years covered by this sunset review compared to the year before initiation, accompanied by the continued existence of dumping after issuance of the *Order*, we recommend finding that dumping is likely to continue or recur if the *Order* is revoked.

Section 752(c)(2) of the Act provides that Commerce shall also consider factors other than those listed in section 752(c)(1) of the Act if “good cause is shown.” We have concluded that no such

³¹ The record contains annual import data from 1996 which account for eleven months of the year prior to initiation of the investigation on December 3, 1996.

³² See *2015 Continuation Notice*.

³³ See Substantive Response at Attachment 1 (citing U.S. Department of Commerce and USITC DataWeb, HTSUS 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000).

³⁴ *Id.*

³⁵ See, *e.g.*, *Certain Activated Carbon from the People’s Republic of China: Final Results of Expedited Sunset Review of the Antidumping Duty Order*, 77 FR 33420 (June 6, 2012), and accompanying IDM at Comment 1.

³⁶ See SAA at 889; see also House Report at 63; and Senate Report at 52.

³⁷ See SAA at 889; see also House Report at 63-64.

“good cause” exists in this case because the existence of above *de minimis* dumping margins and the decline in the volume of U.S. imports of subject merchandise from China after issuance of the *Order* satisfy the statutory test for determining the likelihood of whether dumping would continue or recur if the *Order* is revoked.

2. Magnitude of the Margin of Dumping Likely to Prevail

Domestic Interested Parties’ Comments:

- Commerce should determine that if the *Order* is revoked, dumping would continue up to the investigation rate of 128.59 percent *ad valorem*.³⁸
- This 128.59 percent rate was not calculated using zeroing.

Commerce’s Position:

Pursuant to section 752(c)(3) of the Act, Commerce shall provide the ITC with the magnitude of the margin of dumping that is likely to prevail if the AD order is revoked. Normally, Commerce will base the magnitude of the margin of dumping that is likely to prevail if an AD order is revoked, on the weighted-average dumping margins from the investigation.³⁹ Commerce’s preference is to select weighted-average dumping margins from the investigation for this purpose because they are the only calculated dumping margins that reflect the behavior of the producers and exporters without the discipline of an order or suspension agreement.⁴⁰ Under certain circumstances, however, Commerce may select a more recent dumping margin to report to the ITC. However, as explained above, in accordance with the *Final Modification for Reviews*, Commerce will not rely on weighted-average dumping margins that were calculated using the zeroing methodology found to be WTO-inconsistent.⁴¹

Accordingly, we find it appropriate to provide the ITC with the range of dumping margins from the *Amended Final Determination*, because these dumping margins best reflect the behavior of exporters without the discipline of an order. These weighted-average dumping margins range up to 128.59 percent. The 128.59 percent dumping margin, which was also assigned to the China-wide entity, was not calculated using zeroing. Thus, this dumping margin is consistent with the practice stipulated in the *Final Modification for Reviews*.

VII. FINAL RESULTS OF SUNSET REVIEW

We determine that revocation of the *Order* would likely lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail if the *Order* is revoked is the range of weighted-average dumping margins up to 128.59 percent.

³⁸ See Substantive Response.

³⁹ See SAA at 890.

⁴⁰ *Id.*

⁴¹ See *Final Modification for Reviews*, 77 FR at 8103.

VIII. RECOMMENDATION

Based on our analysis of the substantive response received, we recommend adopting the above positions. If these recommendations are accepted, we will publish these final results of this expedited sunset review in the *Federal Register* and notify the ITC of our determination.

Agree

Disagree

3/2/2021

X



Signed by: CHRISTIAN MARSH
Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance

Attachment

Quantity of Imports From China		
Year	Quantity (Short Tons)	Percent of total 1996 import volume
1996 Case Initiated 12/03/1996	301,655	
2016	1,674	0.55%
2017	373	0.12%
2018	446	0.15%
2019	428	0.14%

Source: U.S. Department of Commerce and USITC

* Consisting of imports from HTS categories 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000.