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USITC Investigation Nos. 701-TA-512 and 731-TA-1248  
(Prelim.)  
Business Proprietary Information Released Under APO  
Deleted at Pages: 1-2, 6-28, 32-37, 39-41 and Exhibits 1-4,  
7-9 and 12  
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**BEFORE THE  
U.S. INTERNATIONAL TRADE COMMISSION**

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**CARBON AND CERTAIN ALLOY STEEL WIRE ROD FROM CHINA**

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**PETITIONERS' POSTCONFERENCE BRIEF**

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### **PETITIONERS' POST-CONFERENCE BRIEF**

This brief is submitted on behalf of ArcelorMittal USA (“AMUSA”), Charter Steel, Evraz Pueblo, Gerdau Ameristeel US, and Keystone Consolidated Industries, domestic producers of carbon and alloy steel wire rod (“CASWR”) and petitioners, along with Nucor Corporation, in these antidumping and countervailing duty investigations of imported CASWR from China.

#### **I. INTRODUCTION**

The record data in this case provide strong evidence, and more than a “reasonable indication,” that dumped and subsidized CASWR imports from China have caused material injury to the domestic industry. Even a cursory review of the charts set forth in Exhibit 1 leaves little doubt that the domestic CASWR industry has suffered material injury and that the culprit is China. Over the 2011 to 2013 period of investigation (“POI”), import volumes from China surged from minimal levels to over 600,000 tons. Exhibit (“Exh.”) 1, Chart 1, and Exh. 2. By 2013, China was the largest source of CASWR imports to the United States. As China’s market share surged from [ ] percent in 2011 to [ ] percent in 2013, the U.S. industry’s market share fell from [ ] percent to [ ] percent. Exh. 2. The rapid market inroads China attained were accomplished by undercutting U.S. prices to a substantial degree. Quarterly pricing data show significant underselling by China, particularly in 2013 as Chinese imports surged into this market. Exh. 3.

The combined effects of large and increasing volumes of lower-priced imports that undersold the domestic industry have been severely injurious to the domestic CASWR industry. While demand for CASWR grew over the POI, the domestic industry saw its production and shipments fall and its capacity utilization decline. Exh. 4. As the subject imports became increasingly aggressive in their pricing behavior, domestic producer prices fell, pulling down net

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sales values. Exh. 4. The industry's operating income over the POI was virtually [ ] and operating income as a percent of sales fell to only [ ] percent for the industry overall and to [ ] percent for sales to the merchant market. Exh. 4. Workers were laid off, work shifts were cut back, periodic shutdowns of U.S. facilities occurred, and the industry's anemic profit levels prevented U.S. producers from undertaking planned investments. See Transcript of ITC Preliminary Staff Conference conducted February 21, 2014 ("Tr.") at 12, 14-15 and 24.

No other factor explains the injury suffered here. Demand over the POI has increased, non-subject imports have declined, and prices of non-subject imports are higher than those of China. Exhs. 2 and 5. The facts here are so compelling that parties appearing in opposition to this petition at the staff conference did not even contest the injury claims by the industry or deny the volume and pricing problems caused by China. Instead, they focused on exclusion requests for certain types of CASWR and on the effects of this action on downstream consumers – neither of which is a relevant legal inquiry. See section III.D.5.

Notably, no Chinese producer appeared at the staff conference or has responded to the Commission's questionnaire to date, likely in recognition not only that this action has merit but that the data they could submit would only support petitioners' case all the more. Available information on the Chinese CASWR industry shows a massive and expanding capacity, idle capacity that could supply the U.S. market many times over, increasing third-country barriers on Chinese CASWR, and a growing export focus generally and towards the United States specifically – all of which also demonstrate an imminent threat of further material injury from China. See section IV.

## II. DOMESTIC LIKE PRODUCT AND INDUSTRY

### A. The Domestic Like Product is Co-Extensive With the Scope of the Petition and Consists of All Carbon and Certain Alloy Steel Wire Rod

The domestic like product in this case mirrors the scope of the petition and consists of all CASWR. This domestic like product definition is consistent with the statute and supported by the like product definition the Commission adopted in its earlier investigations and reviews of CASWR imports.<sup>1</sup> Section 771(10) of the Tariff Act of 1930, as amended (“the Act”), defines the 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.” 19 U.S.C. § 1677(10). In defining the like product, the Commission looks for clear dividing lines among possible like products and disregards minor variations. Hosiden Corp. v. Advanced Display Mfrs., 85 F.3d 1561 (Fed. Cir. 1996). Applying the statutory standard in the 2002 determination, the Commission found all wire rod to comprise a single continuum like product with no clear demarcations by type, grade, size or use:

As a general matter, the record demonstrates no clear demarcation between the various types of wire rod products, but rather indicates a continuum of at least 11 major categories of products ranging from low carbon wire rod such as industrial wire rod used for nails and coat hangers, to medium to high quality wire rod, such as that used for tire bead and prestressed concrete strand, to the highest-end products, including CHQ, CSPBIC, and tire cord wire rod. In cases such as the present one, where the domestically manufactured merchandise consists of a broad spectrum of similar

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<sup>1</sup> See Carbon and Certain Alloy Steel Wire Rod from Brazil, Canada, Germany, Indonesia, Mexico, Moldova, Trinidad & Tobago, Turkey and Ukraine, Inv. Nos. 701-TA-417-421 and 731-TA-953, 954, 956-959, 961 and 962 (Final), USITC Pub. 3546 at 6-12 (Oct. 2002) (“Final Determination in CASWR from Brazil et al.”); Carbon and Certain Alloy Steel Wire Rod from Brazil, Canada, Indonesia, Mexico, Moldova, Trinidad & Tobago, and Ukraine, Inv. Nos. 701-TA-417 and 731-TA-953, 954, 957-959, 961 and 962 (Review), USITC Pub. 4014 (June 2008) (“First CASWR Sunset”) at 6-8.

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products, the Commission does not consider each item of merchandise to be a separate like product that is only “like” its counterpart in the scope, but considers the continuum itself to constitute the domestic like product.

Final Determination in CASWR from Brazil et al., USITC Pub. 3546 at 7. All parties agree that this investigation covers a single domestic like product, co-extensive with the scope. See Tr. at 99 (Mr. Waite: “We accept the Commission’s previous like-product definitions and we accept the like-product definition proffered in this proceeding as well.”); 100-102 (exchange between Mr. Grace and Ms. Turner). Thus, based on the statutory standard and the Commission’s prior like product determinations on CASWR, all carbon and certain alloy steel wire rod comprises a single like product.<sup>2</sup>

The scope of this case differs from the scope of the existing CASWR orders in that it does not contain an expressed exclusion of 1080 tire cord quality and grade 1080 tire bead quality wire rod and does not reference a lower diameter range for CASWR.<sup>3</sup> These differences in scope do not change the Commission’s like product analysis. First, in the 2002 investigations, the Commission found “a single like product consisting of all wire rod, including the certain

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<sup>2</sup> See also First CASWR Sunset, USITC Pub. 4014 at 6-7; Carbon and Certain Alloy Steel Wire Rod from China, Germany, and Turkey, Inv. Nos. 731-TA-1099-1101 (Prelim.), USITC Pub. 3832 at 9-11 (Jan. 2006) (“CASWR from China, Germany, and Turkey”).

<sup>3</sup> Petitioners note that, as Ms. Turner correctly explained to Ms. Korbel and Mr. Grace at the conference, the American Wire Producers Association (“AWPA”) and Lincoln Electric’s requests to exclude certain types of CASWR from the scope of the investigations are irrelevant to the Commission’s domestic like product analysis and determination. See Tr. at 92 (Korbel), and 100 (exchange between Mr. Grace and Ms. Turner). It is the role of the Commerce Department, not the Commission, to determine the scope of the investigation. See, e.g., Certain Cold-Rolled Steel Products from Australia, India, Japan, Sweden, and Thailand, Inv. Nos. 731-TA-965, -971-972, -979, and -981 (Final), USITC Pub. 3536 (Sept. 2002) at 10, n.31; USEC, Inc. v. United States, Slip Op. 01-1421, 2002 U.S. App. LEXIS 7845 (Fed. Cir. Apr. 25, 2002) at 9. The Commission does not have authority to exclude from its determination products that are included within the scope. Sony Corp. of America v. United States, 712 F. Supp. 978, 983-85 (Ct. Int’l Trade 1989); Sandvik AB v. United States, 721 F. Supp. 1322, 1333 (CIT 1989), aff’d, 904 F.2d 46 (Fed. Cir. 1990).

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grade 1080 tire cord and the grade 1080 tire bead wire rod products that Commerce excluded from the scope of the investigations.” Final Determination in CASWR from Brazil et al., USITC Pub. 3546 at 12. Thus, inclusion of these products within the scope does not change the Commission’s like product analysis.

Second, the removal of the lower diameter limit of five millimeters does not change the like product analysis. There was no domestic or subject foreign production of hot-rolled wire rod in diameters below five millimeters at the time of the 2002 investigations. See id. at I-6 (noting that 7/32 inch (5.6 mm) wire rod, which was “the smallest cross-sectional diameter that was being hot-rolled in significant commercial quantities.”). After those investigations, Mexican wire rod producer Deacero S.A. de C.V hot-rolled CASWR in diameters below five millimeters. In 2012, Commerce found that Deacero circumvented the antidumping duty order with “wire rod with an actual diameter of 4.75 mm to 5.00 mm” that was “altered in form or appearance in such minor respects that it should be included within the scope of the order.”<sup>4</sup> Recognizing that further technical advances may permit CASWR to be commercially available in even smaller diameters, the scope language of this case removes the bottom descriptor of diameter to ensure that all diameter of CASWR are encompassed by this order.

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<sup>4</sup> Carbon and Certain Alloy Steel Wire Rod from Mexico: Affirmative Final Determination of Circumvention of the Antidumping Duty Order on Wire Rod from Mexico, 77 Fed. Reg. 59,892 (Dep’t Commerce Oct. 1, 2012). The U.S. Court of International Trade remanded the circumvention finding back to Commerce for further analysis and explanation. See Deacero S.A. de C.V. v. United States, 942 F. Supp. 2d 1321 (Ct Int’l Trade Sept. 30, 2013). On January 28, 2014, Commerce filed its Remand Determination with the Court of International Trade, reversing its affirmative determination under protest. See Final Results of Redetermination Pursuant to Court Remand: Deacero, S.A. de C.V. and Deacero USA Inc., v. United States and ArcelorMittal USA LLC, Gerdau Ameristeel U.S. Inc., Evraz Rocky Mountain Steel, and Nucor Corp., Court No. 12-00345 (Dep’t Commerce Jan. 28, 2014). The Commerce Department’s Remand Determination is subject to further review by the Court and possible further appeal.



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Accordingly, consistent with its prior determinations, the Commission should conclude that the like product in this case is coterminous with the scope language and covers all hot-rolled products of carbon steel and alloy steel, in coils, of approximately circular cross section, less than 19.00 mm in solid cross-sectional diameter not specifically excluded from the scope.<sup>5</sup>

### **B. The Domestic Industry Consists of All U.S. Producers of CASWR**

Section 771(4)(A) of the Act defines the relevant industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product consists of a major proportion of the total domestic production of the product.” 19 U.S.C. § 1677(4)(A). Based on this definition, the domestic industry consists of all U.S. producers of CASWR. There are no related party issues in this case.<sup>6</sup>

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<sup>5</sup> On February 13, 2014, petitioners clarified the scope of this investigation in two ways: (1) changed the phrase “of approximately round cross section” in the first sentence of the scope to read “of approximately circular cross section,” to harmonize the language describing the cross-sectional shape of CASWR in the petition with the terminology used in the Harmonized Tariff Schedule of the United States (“HTSUS”); and (2) added a sentence after the tariff classification description in the scope explaining that merchandise entered under HTSUS subheadings 7213.99.0090 and 7227.90.6090 may be within the scope of the investigation if it meets the physical description of subject CASWR. See Petitioners’ Feb. 13, 2014 Scope Clarification Letter at 1-3. Neither of these technical changes lead to any difference in the comparable domestic like product.

<sup>6</sup> U.S. CASWR producer [

**III. THERE IS A REASONABLE INDICATION OF MATERIAL INJURY BY REASON OF DUMPED AND SUBSIDIZED IMPORTS OF CASWR FROM CHINA**

**A. Conditions of Competition**

**1. The Domestic Industry Has More Than Ample Capacity to Supply the Domestic CASWR Market, Which Has Experienced Stable and Slightly Increasing Demand**

As discussed at the staff conference, the domestic industry has more than enough capacity to supply current and imminent demand for CASWR. See, e.g., Tr. at 20 (Nystrom). The capacity of the domestic industry to produce CASWR has been relatively stable over the POI, dipping only slightly from [ ] short tons in 2011 to [ ] short tons in 2012 and then to [ ] short tons in 2013, a total decline of only [ ] percent. See Exh. 4. Apparent domestic consumption of CASWR during the POI rose from [ ] short tons in 2011 to [ ] short tons in 2012 before retreating again slightly to [ ] short tons in 2013, for an overall increase of [ ] percent over the POI. See Exh. 2. Thus, in every year of the POI, the capacity of the domestic CASWR industry has exceeded apparent domestic consumption, as demonstrated below.

<b>Comparison of Domestic Capacity to Apparent Domestic Consumption (ADC) (short tons)</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
Domestic Capacity	[ ]	[ ]	[ ]
ADC	[ ]	[ ]	[ ]
Capacity Exceeding ADC	[ ]	[ ]	[ ]
Source: Domestic Capacity - Exh. 4; ADC – Exh. 2.			

The domestic industry has the ability to respond to any increase in demand that may occur. Nucor opened its new Darlington wire rod facility in late 2013. Tr. at 20 (Nystrom). Witnesses for AMUSA and Evraz Pueblo both testified that they could add shifts if demand warranted doing so. Tr. at 47 (Fuller) and 40 (Ashby). Gerdau Ameristeel also has an idled wire

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rod plant at Perth Amboy, New Jersey, that it could restart if domestic demand justified that additional capacity be brought back on line. Tr. at 8 (Kerkvliet).

CASWR is sold to wire drawers to be drawn into wire for use in manufacturing products drawn from wire. See CASWR from China, Germany & Turkey, USITC Pub. 3832 at II-5. A large proportion of the CASWR is used in the construction, automotive and energy industries.<sup>7</sup> Id. at II-5; Tr. at 53. Thus, demand for CASWR generally follows demand trends in those industries. Most industry observers predict continued modest but uneven growth in demand for CASWR in the imminent future. Respondents appearing at the conference did not appear to disagree. Tr. at 81. There were no reported shortages of CASWR during the POI, and the witnesses for the AWP and Lincoln Electric that testified at the conference did not allege any anticipated shortages of CASWR or boom in demand for the imminent future.

While there is no legal requirement that the domestic industry be able to supply the entire market to obtain relief from injurious unfair trade,<sup>8</sup> the substantial domestic production capacity in excess of consumption rebuts any notion that the U.S. CASWR market was short of capacity during the POI or is likely to run short of CASWR capacity in the imminent future. It also rebuts

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<sup>7</sup> In response to Ms. Preece's question regarding the percentage of wire rod designated for varying end uses (Tr. at 53), the majority of wire rod sales service the construction market (approximately [ ] percent), while roughly [ ] percent serve automotive end uses and the remaining [ ] percent are destined for energy, agricultural, consumer and industrial end uses.

<sup>8</sup> Xanthan Gum from Austria and China, Inv. Nos. 731-TA-1202-03 (Prelim.), USITC Pub. 4342 (July 2012) at 16 & n.89 (citing e.g., Softwood Lumber from Canada, Inv. Nos. 701-TA-414 and 731-TA-928 (Article 1904 NAFTA Remand) at 108, n.310 (Dec. 2003); Certain Activated Carbon from China, Inv. No. 731-TA-1103 (Prelim.), USITC Pub. 3852 (May 2006) at 19, n.134; Certain Orange Juice from Brazil, Inv. No. 731-TA-1089 (Final), USITC Pub. 3838 (Mar. 2006) at 20 n.143).

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any claim that imports of unfairly traded CASWR from China are necessary to adequately supply the domestic market.<sup>9</sup>

In addition to the macro ability of the domestic industry to supply the market, there is no indication of any existing deficit in the ability of the domestic CASWR industry to supply the various types and grades of wire rod that are used in the domestic market. The domestic industry produced significant volumes of CASWR in each of the end-use categories of wire rod identified by the Commission. See U.S. Prod. QRs at II-8. As the domestic industry witnesses testified, the industry is capable of making the vast majority of CASWR products demanded in the market, and is capable of making all of the CASWR products being imported from China into the United States. Tr. at 40 (Kerkvliet, Ashby, Nystrom), and 18 (Cannon).

The suggestion by the AWWPA witness that the domestic industry is unable to produce 1080 grade tire cord and tire bead wire rod is both incorrect and irrelevant to the Commission's analysis. Tr. at 92 (Korbel). That claim appears to be based on a misreading of the scope exclusion that was granted in the 2001 case, rather than on any evidence of what is occurring in the market today. The domestic industry can and does produce these products today. For example, [ ] domestic producers reported production of tire cord and tire bead of [ ] short tons during the POI. See U.S. Prod. QRs of [ ]

] Nor is access to unfairly traded Chinese tire cord wire rod necessary to serve

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<sup>9</sup> These facts are in contrast to the supply and demand conditions that existed during the 2006 CASWR case. In 2004, apparent domestic consumption was 7.98 million tons and U.S. producers' average capacity to produce CASWR was over 2 million tons less at 5.79 million tons. CASWR from China, Germany and Turkey, USITC Pub. 3832 at C-2 and C-3.

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the domestic market. The record shows that there are significant non-subject imports of tire cord quality wire rod from Brazil, Germany and Japan among others, while there have been only miniscule imports of tire cord or tire bead quality wire rod from China during the POI. See Exh. 6.

Lincoln Electric's claim to require complete access to unfairly-trading Chinese sources to meet its needs for welding wire rod "today, tomorrow and possibly for a very long time in the future" are similarly overstated. Tr. at 121-22. At least [ ] domestic producers reported making welding wire rod during the POI, and witnesses for both Evraz and ArcelorMittal testified that they produce such products. Tr. at 22 (Fuller) and 26 (Ashby); U.S. Prod. QRs of [ ] Indeed, Lincoln Electric's witness admitted that there are six domestic producers capable of producing approximately half of its 45 welding wire rod specifications, and that two domestic producers are currently qualified as suppliers. Tr. at 87 (DeShane); [ ] He also acknowledged significant non-subject sources of welding wire rod. Tr. at 87 (DeShane).

More importantly, Lincoln Electric has characterized imports of welding wire rod from China as "de minimis" and identified its Chinese supply of such products as only a "supplemental" source. Tr. at 88. It has not claimed that any of its imports from China are of the grades of welding wire rods that domestic producers are allegedly not capable of producing. Nor has it alleged any general shortage of welding wire rod. Finally, Lincoln Electric's witness testified that its U.S. operations have been successful and continuously more profitable every year since 2009, despite having imported only de minimis quantities of Chinese welding wire rod during the POI. Tr. at 84-85.

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In sum, the evidence of record demonstrates that: (1) the domestic CASWR industry has more than enough capacity to serve the entire domestic CASWR market currently and for the foreseeable future; (2) the domestic industry is actively engaged in producing all of the types and grade groupings of CASWR identified by the Commission; and (3) there is no type of CASWR imported from China that the domestic industry cannot make.

### 2. Price Sensitivity

In its most recent review of the CASWR industry, the Commission recognized the importance of price as a factor in CASWR sales, as reflected in purchasers' questionnaire responses:

Price plays an important role in purchasing decision for wire rod. Purchasers variously listed price most frequently as the first, second, or third most important factor in selecting a supplier. It was characterized as a "very important" purchasing factor by 38 out of 41 purchasers. No other factor was characterized as "very important" by as many purchasers.

First CASWR Sunset, USITC Pub. 4014 at 33. In this case, the record continues to indicate that the CASWR market is price sensitive. [ ] responses to questionnaires by domestic producers indicated that differences other than price are never a significant factor in sales of CASWR when competing with China. See U.S. Prod. QRs at VI-19. Representatives from the domestic industry testified at the hearing that Chinese producers are gaining sales based on their aggressively low prices and not due to any other factor. Tr. at 11 and 14. [ ] importers reported that factors other than price are only "sometimes" important in purchasing decisions involving China. Imp. QRs at III-19. Numerous purchasers acknowledged the importance of price in their buying decisions in responding to allegations of lost sales and lost revenue. See section III.C.3.

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Accordingly, record evidence continues to support the importance of price in determining sales in the CASWR market, particularly where competition with imports from China is concerned.

### 3. Captive Production

The facts of this case give rise to a captive production inquiry under the statute. By law, when the Commission finds the captive production test met, in determining market share and factors affecting the financial performance of the industry, the Commission is required to focus primarily on the merchant market for the domestic like product. 19 U.S.C. § 1677(7)(C)(iv). Domestic CASWR producers internally transfer significant production of CASWR for the production of a downstream article (various wire products) and sell significant production of the domestic like product in the merchant market as well. Based on current record data, [ ] percent of domestic CASWR shipments in 2013 were internally transferred and [ ] percent was sold in the merchant market. Exh. 7. Because this threshold requirement is met, each of the three statutory factors, as well as the effect of these captive sales on the Commission's overall analysis, is discussed below.

The first statutory criterion is that the domestic like product produced that is internally transferred for processing into the downstream article does not enter the merchant market for the domestic like product. 19 U.S.C. § 1677(7)(C)(iv)(I). As the responses to question II-13 of the U.S. producers' questionnaires indicate, this statutory factor is met, as [

] The second statutory criterion, that the domestic like product is the predominant material input in the production of the downstream article, is also met in this case. 19 U.S.C. § 1677(7)(C)(iv)(II). Responses to U.S. producer questionnaire indicate that wire rod

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costs are on average [ ] percent of the cost of the end use product (i.e., downstream wire products), and in many cases higher than that. Exh. 7.

The third statutory factor asks whether the CASWR sold in the merchant market “is not generally used in the production of that downstream article.” 19 U.S.C. § 1677(7)(C)(iv)(III). Responses to Commission questionnaires indicate that the share of U.S. producers’ captive shipments produced into the particular downstream article that competes with their customers is [ ] percent and that [ ] Exh. 7.

Accordingly, while this evidence is mixed, it cannot be said that CASWR sold in the merchant market is not generally used in the production of the downstream article.

Nonetheless, even where the statutory captive production test is not met in all respects, the Commission has considered the existence of a significant level of captive production to be a relevant “condition of competition” in its injury analysis.<sup>10</sup> As a result, the Commission has examined both the total market and the merchant market in its injury assessment. Hot-Rolled Steel Products from China, India, Indonesia, Taiwan, Thailand and Ukraine, Inv. Nos. 701-TA-405, 406, and 408 & 731-TA-899-901 and 906-908 (Second Review), USITC Pub. 4445 (2014) at 47. In this case, the Commission should similarly consider the significant level of internal transfers to comprise a relevant condition of competition and should examine both the total industry and the merchant market sector in assessing the impact of CASWR imports from China.

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<sup>10</sup> See, e.g., Uncovered Innerspring Units from South Africa and Vietnam, Inv. Nos. 731-TA-1141-1142 (Final), USITC Pub. 4051 (Dec. 2008) at 14-15 n.77. As the Commission has stated, “the extent of captive consumption may be relevant as a condition of competition, and subject imports may not affect merchant market production and captive market production in the same way.” Stainless Steel Bar from India, Italy, Japan, and Spain, USITC Pub. 2734 (Prelim.) (1994) at I-13 (citations omitted).



**B. Import Volumes and Market Shares from China Are Significant and Increasing**

Import volumes from China are significant on both an absolute basis and relative to domestic consumption. In 2013, imports from China totaled 618,818 tons and were the largest source of any country supplying CASWR to the United States, accounting for 36 percent of total imports. Exh. 5. Relative to domestic consumption, in 2013 China's import volumes accounted for a significant [ ] percent of demand. Exh. 2.

Even more noteworthy than the sizeable volume levels of imports from China is the unbelievably rapid pace at which imports from China have increased. From a level of 144 tons in 2011, imports from China surged to more than 240,000 tons in 2012 and then to almost 619,000 tons in 2013. Exh. 1 (Chart 1) and Exh. 5. This absolute volume surge led to a substantial increase in Chinese market share as well. China's market share rose from [ ] percent in 2011, to [ ] percent in 2012, and then to [ ] percent in 2013 – a double-digit growth level over the POI. Exh. 1, Chart 2; Exh. 2. While apparent domestic consumption increased somewhat over the POI, the percentage increase in Chinese wire rod imports was far greater, resulting in the sizeable market share increase. As discussed further in section III.D.1, these increasing volumes of unfairly-traded imports came at the direct expense of U.S. producers' sales, leading to a loss in U.S. industry market share over the period.

**C. Imports from China Are Significantly Undercutting and Depressing U.S. Producer Prices**

**1. There Has Been Significant Price Underselling by the Subject Imports**

Information gathered in this investigation provides compelling evidence of the significant injurious price effects of subject imports of CASWR from China. The Commission gathered quarterly pricing data from both U.S. producers and U.S. importers of CASWR from China. The

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data collected show that subject imports of CASWR from China undersold domestically-produced CASWR in [ ] quarterly pricing comparisons, or in [ ] percent of instances. See Table A below and Exh. 3. Underselling margins ranged from [ ] percent over the POI. Id.

Table A

U.S. Imports' Underselling Margins, By Year		
Year	Number of Instance	Range (%)
2011	[ ]	[ ]
2012	[ ]	[ ]
2013	[ ]	[ ]
Total	[ ]	[ ]
Source: U.S. Producers' QRs at IV-2 and U.S. Importers' QRs at III-2a; see also Exh. 3.		

Moreover, as the volume of subject imports increased over the period, direct competition with the domestic industry and instances of underselling intensified. In 2011, when subject imports were minimal, there [

]. See Table A above and Exh. 3. In 2012, when subject imports increased to nearly 242,000 short tons, there were [ ] available quarterly comparisons among the Commission's pricing products, and [ ] of those comparisons ([

) showed underselling. Id. By 2013, when subject imports more than doubled to exceed 600,000 short tons, direct competition with the domestic industry again increased. Of [ ] possible quarterly pricing comparisons in 2013, [ ] showed underselling. Id.

Not only do the price comparisons in Exhibit 3 show significant and increasing incidences of underselling by the subject imports during the POI, the data show that the margins of underselling generally increased in the latter part of the POI allowing subject imports to surge into the U.S. market. The average margins of underselling intensified over the period, increasing

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from [ ] percent in 2012 to [ ] percent in 2013 as the volume of subject imports surged.

See Exh. 3.

Underselling by the subject imports is also demonstrated by the extremely low average unit values (“AUV”) recorded by imports of Chinese CASWR compared to those of non-subject imports and the domestic industry, as shown below.

Table B

Comparison of Chinese AUV's to Domestic and Non-Subject AUVs (\$/ST)			
	2011	2012	2013
Chinese AUV	\$994.13	\$568.71	\$505.83
Domestic Unit Net Sales Value	[ ]	[ ]	[ ]
Non-Subject AUV	\$858.67	\$818.31	\$761.49
% China Below Domestic	[ ]	[ ]	[ ]
% China Below Non-Subject	(15.8%)	30.5%	33.6%
Source: Exh. 5 (Import AUVs); Exh. 4 (Unit Net Sales Values)			

As the volume of imports of CASWR from China surged in 2012 and 2013, the AUVs of Chinese CASWR were significantly below those of non-subject imports as well as below the unit net sales value of domestic shipments. See Table B and Ex. 1, Chart 3. Moreover, the amount by which Chinese AUVs were below either the average net unit values of domestic sales or the AUV of non-subject imports increased in 2012 and again in 2013. *Id.* These data show the same trends as the underselling data from the Commission’s price comparisons. The record, therefore, demonstrates that underselling by the Chinese CASWR, by whatever measure, was significant and intensified over the course of the POI as subject import volume increased.

2. **Subject Imports Have Both Suppressed and Depressed Domestic CASWR Prices Over the POI**

The evidence of record demonstrates that the significant underselling by the unfairly traded imports of Chinese CASWR has had both price depressing and suppressing effects on

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domestic producer prices. The quarterly pricing data for the pricing products identified by the Commission showed that domestic prices were generally rising in 2011 for all products, before the surge in imports of Chinese CASWR. See Exh. 3. As Chinese CASWR surged into the market in 2012, U.S. prices fell significantly over the course of the year for each pricing product. See Exh. 1, Charts 5a-5e. Id. Between the first quarter of 2012 and the fourth quarter of 2013, the domestic industry's quarterly average unit price fell for Product 1 by over [ ], for Product 2 by about [ ], for Product 3 by over [ ] for Product 4 by about [ ] and for Product 5 by over [ ]. See Exh. 3 and Exh. 1, Charts 5a-5e.

The data show that domestic producers [ ]

]

The record demonstrates that it was the unfairly low and declining prices of Chinese CASWR underselling domestic producers that caused the price depression experienced by the domestic industry over the POI. One cannot blame changing demand for falling domestic CASWR prices. Apparent domestic consumption actually rose by [ ] percent between 2011 and 2012. See Exh. 2. While apparent domestic consumption fell slightly, by [ ] percent between 2012 and 2013, it was still [ ] percent higher in 2013 than in 2011. Id. Nor can one attribute the price depression to competition with non-subject imports, given that the AUVs for non-subject imports were higher than those for subject imports and domestic CASWR, and

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between 2012 and 2013, subject imports were taking market share away from non-subject imports. See Exhs. 2, 4 and 5.

Falling raw material costs also do not explain the price declines over the POI, as a comparison of the changes in the domestic industry's COGS to its unit net sales value over the period shows.

Table C

Comparison of Unit Net Sales Value to Unit COGS (\$/ST)			
	2011	2012	2013
Unit Value of Net Sales	[ ]	[ ]	[ ]
Unit COGS	[ ]	[ ]	[ ]
Change in Unit Net Sales Value and COGS (\$/ST)			
	2011-2012	2012-2013	2011-2013
Unit Net Sales Value Change	[ ]	[ ]	[ ]
Unit COGS Change	[ ]	[ ]	[ ]
Net Operating Margin	[ ]	[ ]	[ ]
Source: Exh. 4			

As shown in Table C, while unit COGS declined over the POI, unit net sales value [ ] that unit COGS declined from 2011 to 2012. The unit net sales value again declined by more than unit COGS between 2012 and 2013. Thus, unit net sales value fell by [ ] than did unit COGS, demonstrating that falling costs alone do not explain the severe decline in U.S. prices. Instead, surging subject imports competing at prices that undersold the domestic like product in increasing frequency and intensity are the cause of the very low and declining U.S. prices.

As explained by Mr. Kerkvliet at the conference, the price that a producer is able to obtain for wire rod is not based solely on the cost of inputs, but is ultimately based on market conditions – supply, demand and the price of competing products. Tr. at 55. In this regard, as

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shown in Table D below, domestic transaction prices for wire rod fell even when scrap prices were increasing in late 2013.

Table D

U.S. Producers' 3Q13 and 4Q13 Quarterly Prices vs. Scrap Costs (\$/ST)			
	3Q2013	4Q2013	Unit Change
Product 1	[ ]	[ ]	[ ]
Product 2	[ ]	[ ]	[ ]
Product 3	[ ]	[ ]	[ ]
Product 4	[ ]	[ ]	[ ]
Product 5	[ ]	[ ]	[ ]
Average Scrap Cost	[ ]	[ ]	[ ]
Source: U.S. Prod. QRs at IV-2 (Prices); <u>American Metal Market</u> (Scrap) at Exh. 8.			

The data in Table D demonstrate that raw material prices were rising at the end of 2013, creating a need for domestic producers to raise prices. Instead, however, average transaction prices were actually falling – pushed downward by very low Chinese CASWR transaction prices that reached their lowest point of the POI in the fourth quarter of 2013. See Exh. 8.

While various industry members tried to prevent further declines in their prices by announcing price increases several times in 2013, it is apparent from the declining U.S. prices, the declining AUV of net sales for the domestic industry, and the declining operating profits of the industry over the POI that such attempts to raise prices were ineffective and insufficient to prevent the financial condition of the industry from declining further, as discussed in section III.D below.<sup>11</sup> Imposition of antidumping and countervailing duties in this case, like the cases

<sup>11</sup> When domestic price are declining more than costs over the period and fall even when raw material costs are rising, the Commission cannot credit claims made by the AWPAs witnesses that any order on imports from China would lead to “artificially inflated prices for CASWR in the United States.” Tr. at 82. The profit margins of the domestic CASWR industry are hardly indicative of “artificially inflated” prices. Exh. 4. With at least 10 current domestic producers of  
(footnote cont'd on next page)

that have been filed in numerous other countries against unfairly traded CASWR from China (see section IV.F, below), is necessary to remedy the suppression and depression of U.S. CASWR prices caused by the unfairly-traded imports of CASWR from China.

3. **Lost Sales and Statements By Purchasers Demonstrate Significant Negative Price Effects Caused By Subject Imports Underselling the Domestic Like Product**

Exhibit INJ-3 of Volume I of the petition listed numerous lost sales and lost revenue examples due to subject imports of CASWR from China that undersold the domestic industry. The Commission has now confirmed some of these lost sales. Even where purchasers did not explicitly agree with the lost sales details, they often provided other information that confirmed the pervasive underselling by Chinese CASWR, the high margins of underselling that exist and the devastating negative price effects of that underselling by subject imports.

- [ ]
- [ ]
- [ ]

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(cont'd from previous page)

CASWR and imports of fairly trade CASWR available from a number of sources, significant underutilization of existing domestic capacity, and new domestic capacity coming on line, domestic producer prices are likely to remain competitive without the need for unfairly-traded imports.

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All of these responses confirm pervasive underselling by Chinese CASWR throughout the POI at prices with which domestic producers are unable to effectively compete and demonstrate the significant negative price effects of the subject imports from China.

**D. Unfairly Traded Imports from China Have Had a Significant Injurious Impact on the U.S. Industry**

**1. Subject Imports Have Displaced U.S. Producers' Market Share**

The Chinese market share increases discussed in section III.B. above are coming at the direct expense of the domestic industry. As China's market share grew from virtually zero in 2011, to [ ] percent in 2012 and then to [ ] percent in 2013, the domestic industry's market share steadily declined. Exh. 1, Chart 9 and Exh. 2. From a market share of [ ]



percent in 2011, the domestic industry's market share dropped to [ ] percent in 2012 and then to [ ] percent in 2013 – a loss of roughly [ ] percentage points in market share. Id. The increased market share of the subject imports displaced U.S. producers' market share, resulting in the classic "X" pattern that the Commission has seen in other cases – with subject import market share increasing, while U.S. industry market share declines – as depicted in Chart 9 of Exhibit 1.

Moreover, when the commercial market is examined, the market share effect of the subject imports intensifies. Subject imports' share of the merchant market grew from zero in 2011 to [ ] percent in 2012 and then to [ ] percent in 2013, while U.S. producers' share of the commercial market fell from [ ] percent in 2011 to [ ] percent in 2012 and then to [ ] percent in 2013. Exh. 2. Thus, in the commercial market, U.S. producers lost roughly [ ] percentage points of market share as imports from China gained [ ] percentage points. Id. Whether examined on the basis of total CASWR sales or on the basis of commercial sales alone, the market share displacement U.S. producers suffered due to the increased Chinese imports is plain.

**2. Increased Chinese Import Volumes Have Caused Declines in Virtually All U.S. Trade Variables**

The increases in the volumes of imports from China have led to declines in all major U.S. industry trade variables over the POI.<sup>12</sup> Domestic production fell from [ ] tons in 2011 to [ ] in 2013, a decline of [ ] The quantity of total U.S. shipments similarly

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<sup>12</sup> The domestic industry database is very comprehensive here, with questionnaire responses filed by all members of the U.S. industry [ ]

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declined over this period, falling by roughly [ ] Notably, commercial shipments by U.S. producers declined at an even greater pace, falling by [ ] percent over the POI. [ ]

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The domestic industry's capacity also declined over the period. Exh. 4. Notwithstanding this decline, the industry's capacity utilization still fell, dropping from [ ] percent in 2011<sup>13</sup> to [ ] percent in 2013. Ex. 4 and Ex. 1, Chart 7. This capacity utilization level is anemic and leaves a huge amount of capacity idle. As Mr. Kerkvliet testified, Gerdau has an entire mill sitting idle at Perth Amboy that it is paying to maintain and that it could reopen – and hire workers back – if market conditions justified doing so.<sup>14</sup> Tr. at 8, 41. Mr. Stirnaman testified as to numerous one-week outages that occurred at Keystone in 2013, accompanied by worker layoffs, due to inability to sell rod in competition with China. Tr. at 14-15. Mr. Fuller stated that AMUSA cut back from three shifts to two shifts at the end of 2012. Tr. at 24. He further testified that AMUSA could operate as many as four shifts if the market warranted. Tr. at 47.

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<sup>13</sup> During the conference, Ms. Turner asked whether the 2011 capacity utilization level reflected an optimal or positive rate for the industry and, if not, asked the industry to identify an optimal rate for the industry. Tr. at 45, 47. As Mr. Kerkvliet stated, the 2011 capacity utilization rate was already well below what the industry would consider to be an optimal rate. The 2011 utilization rate of [ ] percent still leaves a significant percentage of the industry's capacity idle. Optimal capacity utilization for the CASWR industry is [ ] See also Tr. at 8, 14-15, 24, 40, 47. Notably, in 2002 through 2004, the industry was able to achieve a capacity utilization rate in the 80-85 percent range, [ ] First CASWR Sunset, USITC Pub. 4014 at C-4.

<sup>14</sup> In response to Ms. Preece's question (Tr. at 49), Gerdau looked further into the issue of how long it would take to reopen Perth Amboy, and reported that it would take roughly [ ] At this point, however, the question is theoretical given the significant unused capacity otherwise existing in the United States. Exh. 4.

Mr. Ashby of Evraz similarly testified that his company could increase from three to four shifts if the market permitted. Tr. at 40.

The cutbacks in U.S. production had a negative effect on workers. Employment of production and related workers fell from [ ] in 2013. Exh. 4. Those workers who retained their jobs suffered shift reductions and temporary layoffs in many instances. As Ms. Hart, testifying on behalf of the United Steelworkers, stated: “While it’s often easy to gloss over employment numbers, those numbers represent human beings and American workers, each having families and communities that rely on the continued viability of the U.S. steel wire rod industry.” Tr. at 31.

The one trade variable that the U.S. industry would like to see declining – inventory levels – is, unfortunately, increasing. Domestic inventories of wire rod rose from [ ] tons in 2011 to [ ] tons in 2013 – an increase of [ ] percent. Exh. 4. Chinese imports, which continue to increase in 2014 and are already quoting prices through June of 2014 (Tr. at 27) have limited U.S. producers’ ability to sell their product, causing inventories to rise. Thus, the trends in all trade variables examined demonstrate the problems caused by large and increasing volumes of imports from China.

**3. As Low-Priced Imports Depressed U.S. Prices, the Industry’s Net Sales and Profits Have Plummeted**

The unfairly-traded imports from China have used price, and price alone, to penetrate the U.S. market. Tr. at 11, 14. As discussed in section III.C.1 and 2 subject imports have significantly undercut U.S. producer prices during the POI, causing those prices to decline. Those price declines do not merely reflect cost declines, as respondents argued (Tr. at 107), but

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reflect price depression caused by the imports that led to severe financial erosion for domestic CASWR producers.

Over the 2011 to 2013 period, the value of the industry's net sales dropped by [ ] percent, reflecting both the volume and price declines suffered. Exh. 4. Operating profit of the industry plunged from [ ] in 2011 to [ ] in 2013 – a drop of [ ]

[ ] Id. and Ex. 1, Chart 8. The domestic industry, therefore, lost almost [ ] of its operating profits over the POI. As a percentage of net sales, the industry's operating profits fell from [ ] percent in 2011, to [ ] percent in 2012 and then to [ ] percent in 2013. Id. Low-priced imports from China pulled U.S. prices down to a greater degree than unit costs of goods sold declined, leading to the financial declines and abysmal performance the industry has experienced. Exh. 4; see also section III.C.2 supra.

When the operating income to net sales ratio for commercial shipments alone is examined, the industry's financial performance is even worse. The industry's operating income to net sales ratio in 2013 for commercial shipments alone is only [ ] percent, down from [ ] percent in 2011. Exh. 4. As discussed in section III.A.4, the Commission should consider the effects of subject imports on commercial shipments alone as a condition of competition here in recognition of the more direct effects subject imports have on such sales. The low and declining operating income figures are an indication of the financial injury low-priced imports are inflicting on U.S. producers.

The injurious effects subject imports have had on the financial results of the industry was summarized well by [ ]

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4. **The Record Data in this Case Are Significantly Different from Those Examined in the 2006 Wire Rod Case**

Mr. Corkran, the supervisory investigator, asked how the current record compares to the fact pattern that the Commission faced in the 2006 wire rod case that it determined merited a negative determination. Tr. at 75. In particular, Mr. Corkran cited record evidence from the earlier case showing: (1) subject import volume increased in only one year; (2) U.S. prices increased significantly; (3) the U.S. industry had healthy operating income in interim 2005; and (4) the foreign industry responses covered 84 percent of exports and 40 to 70 percent of respondents' production. Id. As petitioners stated at the hearing, the facts of this case are extremely different from the facts the Commission cited to support its negative 2006 decision. Tr. at 75-76.

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On the volume issue, in the 2006 case, subject import volumes increased in only one year of the prior POI and declined in every other period. CASWR from China, Germany and Turkey, USITC Pub. 3832 at 4. In this case, as Exhibit 5 shows, subject import volumes increased in every year of the POI, showing a huge surge over the period as a whole. Where price is concerned, though the facts of the earlier case showed increasing U.S. prices over the POI (USITC Pub. 3832 at 4), here U.S. prices have declined over the POI, depressed by lower-priced subject imports. Exh. 1 at Charts 5a-5e. The U.S. industry's operating income increased over the three-year period of the prior case, then declined in the interim period, whereas the U.S. industry's operating profit has declined substantially over the entire POI here. Compare USITC Pub. 3832 at C-4 with Exh. 4. The operating profit to net sales ratio for the industry in the 2006 case was 14.3 percent in the most recent full-year of 2004 and 9.2 percent in the interim 2005 period. USITC Pub. 3832 at C-4. Here, the domestic industry's operating income to net sale ratio in 2013 was only [ ] percent overall, and a meager [ ] percent for commercial sales alone. Exh. 4. Finally, as compared to the high rates of response by foreign producers in the 2006 case, no Chinese producer has submitted any data whatsoever in this case to date. These stark factual differences, as well as others,<sup>15</sup> should lead to different findings and conclusions by the Commission here.

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<sup>15</sup> In addition to the factors Mr. Corkran identified, a few other factors the Commission cited in the 2006 case to support its decision are different from the current record. In the 2006 case, the Commission emphasized that the U.S. industry lacked capacity to meet demand for wire rod and suffered shortages over the POI. CASWR from China, Germany & Turkey, USITC Pub. 3832 at 4. In contrast, U.S. producers' capacity in the current POI exceeds demand. See section III.A.1, supra. Moreover, much of that capacity is idle, and there is no evidence of shortages suffered during the current POI. See Exh. 4. In the 2006 case, the Commission also noted that non-subject imports increased to supply demand. USITC Pub. 3832 at 4. Here, non-subject imports have declined over the POI, pushed out of the U.S. market by low-priced Chinese imports as well. Exhs. 2 and 5. On threat factors, in the 2006 case, the Commission found that foreign

(footnote cont'd on next page)

**5. No Other Factors Explain the U.S. Industry Declines Over the POI**

While the Commission must ensure that subject imports, as opposed to other factors, are responsible for the injury the industry is suffering, the record here does not point to any other factor as causing the problems the industry has suffered. As shown in Exhibit 2, demand for CASWR during the POI has been stable and even up slightly. Declines in the industry's production and shipments, therefore, are not due to a decline in consumption. Indeed, during the conference, the representative for the American Wire Producers Association testified that there had even been a return of some wire production to the United States. Tr. at 81.

Nor can non-subject imports be considered a cause of the industry's injury here. The volume of non-subject imports declined on both an absolute and relative basis over the POI. Non-subject imports fell from 1,253,534 tons in 2011 to 1,089,819 tons in 2013. Exh. 2. The market share of non-subject imports dropped as well, falling from [ ] percent in 2011 to [ ] percent in 2012 and then to [ ] percent in 2013. *Id.* Subject imports from China, therefore, are taking market share from non-subject imports (although to a lesser degree) as well as taking share from domestic producers.

Non-subject imports also cannot be identified as the cause of the pricing problems the U.S. industry has suffered. As members of the domestic industry testified, China is the "price setter" in the U.S. market, meaning China is offering the lowest prices. Tr. at 69, 73. Domestic

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producers had high levels of capacity utilization and do not anticipate any significant increases in capacity in the imminent future. USITC Pub. 3832 at 5. Here, as detailed in section IV.A-C and Exhibits 9-13, Chinese producers have massive excess capacity and are continuing to increase productive capacity in the imminent future at levels that would allow China to completely displace all U.S. sales.

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producers described offers by China at levels of \$100 or more per ton below their prices. Tr. at 27. As shown in Exhibit 5, the AUVs of imports from China are well below those of other imports, reflecting the rock bottom nature of Chinese pricing. Other non-subject import sources, therefore, cannot be pointed to as the cause of the industry downturns observed here.<sup>16</sup>

No other factors have been identified by respondents to date to explain the injury the U.S. industry has suffered. Instead, respondents have merely urged that certain products be excluded from the scope of the order (Tr. at 88, 92, 99-100) and have urged the Commission to take account of the effects of antidumping and countervailing duty orders on downstream consumers. Tr. at 113-115. Respondents' requests that the Commission consider the effects of imposing antidumping and countervailing duties on downstream consumers – here, the wire producers – and exclude certain products are invalid as a matter of law.

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<sup>16</sup> In analyzing causation, the Commission recognizes that, consistent with instructions from the appellate court, it must “give full consideration, with adequate explanation, to non-attribution issues” but that it is “not . . . required to apply the replacement/benefit test that was included in Commission opinions subsequent to Bratsk.” Prestressed Concrete Steel Rail Tie Wire from China, Mexico, and Thailand, Inv. Nos. 731-TA-1207-1209 (Prelim.), USITC Pub. 4397 (2013) at 14 (citing e.g., Bratsk Aluminum Smelter v. United States, 444 F.3d 1369 (Fed. Cir. 2006) and Mittal Steel Point Lisas Ltd. v. United States, 542 F.3d 867 (Fed. Cir. 2008)). To the extent any Commissioner believes that the replacement/benefit test may continue to apply notwithstanding the Court’s indication it is not required to do so, the facts presented here do not support its application in any event. First, the numerous types of CASWR present in the U.S. market and imported from various countries are many and varied, precluding a finding that CASWR is a commodity product for purposes of the Bratsk replacement/benefit test. See Carbon and Certain Alloy Steel Wire Rod from Trinidad and Tobago, Inv. No. 731-TA-961 (Final) (Remand), USITC Pub. 3903 (2007) at 17-18. Moreover, at the staff conference in this case, respondents testified that all wire rod is not the same or interchangeable in their view. Tr. at 98. Further, even if CASWR were found to be a commodity product, the record demonstrates that non-subject imports are priced well above imports from China, preventing a conclusion that price-competitive fairly-traded imports would have replaced the Chinese imports. See section III.C.1, Table A; Exh. 5. As noted above, the lower-priced Chinese imports are displacing non-subject imports as well as domestic production.



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Ironically, the argument that the Commission should take into account effects on downstream consumers was raised by purchasers of a wire product – hangers – and rejected by the Commission in that investigation:

Numerous representatives of dry cleaners associations and proprietors of dry cleaning businesses testified at the hearing regarding the effect that the imposition of antidumping duties would have on the business operations of primarily small dry cleaning shops. Hearing Tr. at 173 (Choe), 174 (Lim), 179 (Cho), 182 (Lee), 187 (Vastola). Although we understand the concerns of the dry cleaning business community, it has long been recognized that “the antidumping law is not to be concerned with effects on U.S. purchasers,” Mitsubishi Electric Corp. v. United States, 700 F. Supp. 538, 559 (Ct. Int’l Trade 1988), aff’d, 898 F.2d 1577 (Fed. Cir. 1990). See also USX Corp. v. United States, 682 F. Supp. 60, 67 (Ct. Int’l Trade 1988) (“Congress has made a judgment that causally related injury to the domestic industry may be severe enough to justify relief from less than fair value imports even if from another viewpoint the economy could be said to be better served by providing no relief.”) (noting the statute’s focus on “injury to industry” not injury to “competition”). In this regard, the Commission has consistently declined to include “downstream” products that are outside the scope in the domestic like product because of the concern that the interests of the producers of those downstream articles are those of consumers, not producers. See e.g., Creatine Monohydrate from China, Inv. No. 731-TA-814 (Preliminary), USITC Pub. 3177 (April 1999) at 5 & n.18; Beryllium Metals and High-Beryllium Alloys from Kazakhstan, Inv. No. 731-TA-746 (Preliminary), USITC Pub. 2959 (May 1996) at 8, n.39. Further, in rejecting arguments that the Commission should, in making its determinations under the antidumping or countervailing duty laws, assess the effect of subject imports on downstream operations or industries, the Commission has emphasized that the statute directs the Commission to make its determinations based on the effects of subject imports only on the industry producing the domestic like product. See Certain Colored Synthetic Organic Oleoresinous Pigment Dispersions from India, Inv. Nos. 701-TA-436 (Preliminary) and 731-TA-1042 (Preliminary), USITC Pub. 3615 (July 2003) at 15-16 (rejecting petitioner’s “make or buy” argument).

Steel Wire Garment Hangers from China, Inv. No. 731-TA-1123 (Final), USITC Pub. 4034 (2008) at 15 n.92. The Commission's holding in the Hangers case is notable, not merely for its legal precedent but also because the Commission rejected similar arguments presented by consumers of wire products that the AWWA members themselves manufacture.<sup>17</sup> The approach adopted by the Commission in the Hangers case is a longstanding principle, recognized by both the Commission and the Courts, and warrants rejection of respondents' request here.<sup>18</sup>

Further, as discussed in section II.A, requests for product exclusions from the scope definition are not the purview of the Commission but are appropriately raised at the Commerce Department. Moreover, the domestic industry produces or is capable of producing all of the CASWR products imported from China. See section III.A.1. Accordingly, neither of the arguments respondents raised is a factor the Commission can take into account under the law, and neither has anything to do with whether subject imports have caused material injury to the domestic CASWR industry.

#### IV. THERE IS A REASONABLE INDICATION OF THREAT OF MATERIAL INJURY

In addition to the evidence strongly supporting a finding of present material injury by reason of the subject imports, there is also substantial evidence supporting a finding that the domestic CASWR industry is threatened with continued material injury. Despite sending

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<sup>17</sup> It should also be recognized that imposition of antidumping and countervailing duty orders does not prohibit imports from China; the law merely requires importers to pay remedial duties.

<sup>18</sup> Indeed, in the recent sunset review of magnesium, the Commission rejected an argument similar to that presented by the AWWA here – that falling demand for downstream products that had resulted from the orders is a relevant economic factor in a sunset review – with the Commission citing again the cases set forth above and emphasizing that the U.S. antidumping law is not to be concerned with effects on U.S. purchasers. Magnesium from China and Russia, Inv. Nos. 731-TA-1071-1072 (Review) (Feb. 2011), USITC Pub. 4214 at 30 n.175.

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questionnaires to the 48 Chinese producers and exporters of CASWR that petitioners identified in the petition,<sup>19</sup> the Commission did not receive any response from the Chinese industry.<sup>20</sup> The Chinese producers' refusal to respond is likely in recognition that their responses would not help their case. As detailed below, information petitioners have gathered demonstrates that Chinese producers have amassed CASWR production capacity at a level that is over 44 times the size of the U.S. market, unused CASWR capacity of over 12 times the size of the U.S. market, and plan to add further CASWR capacity at a level greater than twice the size of the U.S. market.

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<sup>19</sup> See Petition, Vol. I., at Exh. GEN-5; USITC Foreign Producer/Exporter Mailing List, 701-TA-512 and 731-TA-1248 (Preliminary).

<sup>20</sup> In the absence of receiving any responses to questionnaires from Chinese CASWR producers, "the Commission may employ adverse inferences about the missing information to ensure that the party does not obtain a more favorable result by failing to cooperate than if it had cooperated fully." Uruguay Round Agreements Act, Statement of Administrative Action, H.R. Doc. No. 103-316(I) at 870 (1994) ("SAA"); see also 19 U.S.C. § 1677e(b); Internal Combustion Industrial Forklift Trucks from Japan, Inv. No. 731-TA-377 (Review), USITC Pub. 3287 (Apr. 2000) at 12-13. Such adverse inferences may include selecting from any information placed on the record. See 19 U.S.C. § 1677e(b)(4). Although the use of adverse inferences is appropriate in this case, the Commission need not even make adverse inferences to find the statutory threat factors are met based on available information. See 19 U.S.C. § 1677e(a). Specifically, petitioners have provided data from multiple sources, including [ ], as well as publicly-available data on Chinese CASWR global exports and third country trade barriers to Chinese CASWR, that provide an objective and reliable basis to demonstrate threat of injury from the Chinese CASWR industry. See Exhs. 9-13.

Table E

Chinese CASWR Capacity and Unused Capacity as a Share of the U.S. Market					
2013	Chinese Production Capacity	Chinese Production	Chinese Unused Capacity	Chinese Known Capacity Expansion Plans	U.S. Apparent Domestic Consumption
Volume (1,000 short tons)	[ ]	[ ]	[ ]	[ ]	[ ]
Percentage of U.S. Market	[ ] %	[ ] %	[ ] %	[ ] %	100%

**Source:** U.S. apparent domestic consumption is taken from Exh. 2. Chinese industry CASWR production of [ ] short tons is an annualization of [ ] metric tons of CASWR production from January through November 2013, see Exh. 9 (Asian Metal), multiplied by 1.10231 (the conversion factor for converting metric to short tons). Chinese industry CASWR production capacity was calculated using the above production of [ ] tons and the Chinese steel industry's 2013 average capacity utilization of 72 percent (see Exh. 9 ("Giant steel firm grapples with toughest times in five years," [http://news.xinhuanet.com/english/china/2013-07/20/c\\_132557334.htm](http://news.xinhuanet.com/english/china/2013-07/20/c_132557334.htm))).

The massive overcapacity in the Chinese market, coupled with Chinese Government incentives to export, have led Chinese CASWR producers to increase global exports nearly three-fold over the POI. See Exh. 10. Chinese CASWR has been subject to antidumping duties in the European Union since 2009, antidumping duties in Malaysia and Thailand since 2013, and a safeguard investigation in Indonesia is currently ongoing. See Exh. 11.

During the POI, Chinese CASWR producers became increasingly focused on the U.S. market, leading to a rapid increase in CASWR exports to the United States between 2011 and 2013. See section III.B; Exh. 1, Chart 1. Moreover, Chinese CASWR has significantly undersold domestic CASWR in increasing frequency and intensity over the POI, indicating that trend is likely to continue. See section III.B. Unless remedial orders are imposed by the United

States, Chinese CASWR producers will continue to increase exports to the U.S. market, threatening the very existence of U.S. CASWR producers in the imminent future.

**A. Chinese CASWR Production Capacity is Massive**

Chinese CASWR producers have, by any measure, built up massive production capacity that threatens to overwhelm the U.S. market. In 2013, the Chinese CASWR industry produced an estimated [ ] short tons. See Table E above; Exhs. 9 and 12.<sup>21</sup> While total Chinese CASWR capacity is unavailable, the Chinese steel industry's average capacity utilization rate was 72 percent in 2013. See Exh. 9 ("Giant steel firm grapples with toughest times in five years," Xinhuanet.com, July 20, 2013). Applying a capacity utilization rate of 72 percent to reported production of [ ] tons, petitioners estimate total Chinese CASWR production capacity to be as high as [ ] tons. In contrast, U.S. consumption of CASWR in 2013 was slightly above [ ] in 2013. Exh. 2 and Exh. 1, Chart 10. Thus, total estimated 2013 capacity to produce CASWR in China was more than 44 times the size of the U.S. market.

**B. Chinese Producers Have Sizeable Unused CASWR Capacity**

Available evidence shows that the Chinese CASWR industry is severely oversupplied, and that the supply-demand gap is expanding. See Exh. 9 ("Giant steel firm grapples with toughest times in five years," Xinhuanet.com, July 20, 2013). The Chinese steel industry's capacity utilization rate in 2013 was 72 percent, leaving 28 percent rate of China's huge capacity unused. See id. ("Giant steel firm grapples with toughest times in five years," Xinhuanet.com,

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<sup>21</sup> Petitioners have located CASWR production capacity estimates for 39 Chinese producers, totaling at least [ ] short tons annually. See Exh. 12. As the much larger production figure identified above shows, however, these reporting companies account for [ ] of total Chinese capacity.

July 20, 2013). Based on estimated capacity of [ ] tons as discussed above, idle capacity in China in 2013 is estimated at roughly [ ] tons. As compared to U.S. demand of roughly [ ] tons, Chinese producers could supply the entire U.S. market twelve times over with their unused CASWR production capacity without diverting one ton of CASWR from other markets or customers See Exh. 12; Exh. 2 and Exh. 1, Chart 11.<sup>22</sup> A weak domestic market in China prevents Chinese CASWR producers from maximizing capacity utilization and forces them to increase exports. See, e.g., Exh. 9 (“Hebei Xinjin Iron and Steel Co. Ltd. launched its second wire rod production line recently,” Nov. 1, 2012 Ganglian News).

This massive volume of unused Chinese CASWR production capacity provides a strong indication of the likelihood of further substantial increases of imports of Chinese CASWR into the United States, absent relief. 19 U.S.C. § 1677(7)(F)(i)(II).

**C. Chinese Producers Have Added Substantial CASWR Capacity During the POI And Are Continuing to Add Capacity In the Imminent Future**

The available data demonstrate that the Chinese CASWR industry has been engaged in numerous capacity expansions to add to its already huge capacity and overcapacity to produce CASWR.

- In early 2011, [ ]  
[ ]
- In late 2012, Hebei Xinjin Iron & Steel began running its second wire rod mill with a capacity of about 661,386 tons per year. See Exh. 9 (“Hebei Xinjin Iron and Steel Co. Ltd. launched its second wire rod production line recently,” Nov. 1, 2012, Ganglian News); Exh. 9 [ ]  
[ ]

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<sup>22</sup> The 39 Chinese producers for which petitioners have specific data have an estimated [ ] tons of idle capacity, a level almost [ ] that of the U.S. market. Exh. 12.

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- In January 2013, Changzhi Iron and Steel (a subsidiary of Shougang Group) began production on its new 1,212,541 ton wire rod mill. See Exh. 9 (“Changzhi Steel to Start Production at New Wire Rod Project in Ja”).
- In November 2013, Shougang Qian’an Iron & Steel (another subsidiary of Shougang Group) brought on stream a new 551,155 ton wire rod mill. See Exh. 9 (“Shougang Qian’an to start up 500,000 mt/y wire rod mill”).
- [

1.

Further, at least four Chinese CASWR producers have plans to add another [ ] tons of additional capacity in the near future:

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- Xilin Iron and Steel Group has plans for 1,102,310 ton wire rod production line. See Exh. 9 (“Xilin Steel to commission 1,260 cubic meter blast furnace); Exh. 12.

These massive new and planned increases in Chinese CASWR production capacity during the POI provide a strong indication of the likelihood of further substantial increases in imports of Chinese CASWR into the United States, absent relief. See 19 U.S.C. § 1677(7)(F)(i)(II). Combining Chinese producers’ plans for additional capacity and new entrants, there will be over [ ] short tons of additional CASWR capacity in China in 2014. This additional capacity alone is more than [ ] the level of U.S. demand of [ ]

] See Exh. 2. With the Chinese CASWR market already severely oversupplied, Chinese CASWR producers must increasingly export more and more wire rod to maintain high utilization and employment levels.

**D. Chinese CASWR Exports Are Growing and Are Increasingly Focused on the U.S. Market**

Publicly-available data show that Chinese CASWR producers significantly increased their global exports over the POI, roughly doubling them from 3 million short tons in 2011 to 6 million short tons in 2012, and increased their global CASWR exports again to 8.7 million short tons in 2013. See Exh. 10. The vast majority of imported Chinese CASWR contains minimal amounts of boron (exceeding slightly 0.0008 percent by weight) to allow it nominally to be classified for customs purposes as alloy wire rod in HTSUS subheading 7227.90. See Petition, Vol. II, at Exh. PRC-6. The addition of boron permits Chinese producers to take advantage of a 9 percent VAT rebate on exports of alloy wire rod. Id. These facts, combined with the government subsidies discussed below and the huge overcapacity situation, provide a strong incentive for Chinese producers to export CASWR.



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Chinese CASWR producers are also increasingly targeting the U.S. market. From virtually no Chinese exports to the United States in 2011, the United States became the seventh top export market for Chinese CASWR producers in 2012, and then climbed to become fourth largest export destination for Chinese CASWR in 2013. See Exh. 10. This demonstrates both the interest in, and ability to, increase CASWR exports to the United States. In addition, new export barriers in third-country markets have caused and will likely continue to cause the United States to become an even more important target market for China, as discussed below in section F.

The volume of Chinese CASWR available for export to the United States, and the number of Chinese trading companies advertising such products, is staggering. A search for “steel wire rod” from “China” on [www.alibaba.com](http://www.alibaba.com), the largest marketplace for exports of Chinese steel products, identified 66,448 solicitations for sales of CASWR products offered by 1,487 suppliers. See Exh. 13. Petitioners have attached in Exhibit 13 a few examples of such offers demonstrating that Chinese CASWR producers are today actively marketing huge quantities of CASWR for export, including to the United States, at very low prices:

- Chinese CASWR producer Weifang Special Steel Group Co., Ltd. offers 4,409,240 tons of CASWR per year for export for as low as \$526 per ton.
- Tangshan Henlong Trading Co., Ltd. offers up to 551,155 tons of CASWR for export per month – or 6,013,860 tons annually – for \$363 to \$454 per ton.
- Anshan Shenglin Import & Export Trade Co., Ltd. offers up to 220,462 tons of CASWR for export per month – or 2,645,544 tons annually – for \$363 to \$635 per ton.
- Qingdao Artluck International Limited, which advertises CASWR produced by Shagang, Beitai Steel, Benxi Steel, and Rizhao Steel, offers up to 110,231 tons of CASWR for export per month – or 1,322,722 tons annually.

See id. The list goes on, with millions of tons of Chinese CASWR advertised as available for export at very low prices. Chinese CASWR producers' surging exports and increased focus on the U.S. market at low prices provide a strong indication of threat of material injury.

E. **Subject Imports Rapidly Increased their Penetration of the U.S. Market from 2011 through 2013**

The statute recognizes a significant rate of increase in subject imports or market penetration as an indication of threat of material injury. 19 U.S.C. § 1677(7)(F)(i)(III). Subject imports from China have demonstrated massive increases in absolute volume and an ability to rapidly penetrate the U.S. market has allowed it to seize an increased share of the U.S. market at the expense of U.S. producers. See section III.B and Exh. 2. A market share increase from [ ] percent in 2011 to [ ] percent in 2013, as China accomplished, is both rapid and substantial. Exh. 2.

F. **Chinese CASWR is Subject to Numerous Third-Country Barriers**

Chinese CASWR exports are subject to several third-country barriers in major export markets, causing Chinese producers to seek a new outlet for these exports. Chinese CASWR has been subject to antidumping duties in the European Union ("E.U.") since 2009. See Exh. 11. Chinese CASWR exports to the E.U. in 2007 reached 1,609,337 tons, but never exceeded 1,000 tons over the POI, after the antidumping order went into effect. See id. at L 203/7; Exh. 10. Further, two of China's top export markets, Thailand and Malaysia, imposed antidumping duties on Chinese steel wire rod in 2013. See Exh. 11. In 2013, China exported 1,770,232 short tons of carbon steel wire rod to Thailand and Malaysia, up from 721,707 short tons in 2011. See id. Finally, in January 2014, Indonesia initiated a safeguard investigation on imports of steel wire rod from many countries, including China. See Exh. 11. In 2013, China exported 672,211 tons

of carbon steel wire rod to Indonesia, up from 187,349 tons in 2011. See Exh. 10. Based on Chinese exports to Thailand, Malaysia and Indonesia, nearly 2.5 million tons Chinese CASWR exports in 2013 are now subject to third-country barriers or new cases. See Exh. 10. These exports, which represent a volume that is nearly [ ] of the U.S. market, are likely to be diverted to new markets in 2014, with the large and open U.S. market an attractive option. See Exh. 2.

Accordingly, going forward, Chinese CASWR producers are likely to increase their focus on the U.S. market, as Chinese CASWR producers will not be able to export to key target markets due to the imposition of restraints in those markets.

**G. Subsidies Bestowed on the Chinese CASWR Industry Likely Will Lead to Increased Subject Imports**

The statute states that the Commission should consider the nature of any prohibited subsidies, particularly export subsidies and subsidies contingent on the use of domestic over imported goods, and whether they are likely to cause imports of the subject merchandise to increase. See 19 U.S.C. § 1677(7)(F)(i)(I). As detailed in Section VI of Volume III of the Petition, Chinese CASWR producers are eligible for a plethora of subsidies that fell into this prohibited category, including preferential loans based on industrial policies, export performance, and the use of domestic over imported goods, as well as preferential tax programs for export-oriented enterprises. See Petition, Vol. III at 21-25 and 80-101. These subsidies violate Article 3 of the Subsidies Agreement and are likely to lead to increases in imports of Chinese CASWR into the United States.

**H. Subject Import Prices Will Further Depress and Suppress U.S. Prices Absent Relief**

Subject imports undersold U.S. producers' prices for CASWR in over [ ] percent of quarterly pricing comparisons during the POI, forcing U.S. producers to cut prices. See sections III.C and III.D. The frequency and intensity of underselling also increased significantly over the POI demonstrating that such underselling is likely to continue. See section III.C., Table A. The price depression and suppression caused by subject imports, as discussed above, are likely to continue and intensify absent relief. Moreover, the fragile condition of the domestic CASWR industry caused by the depressed pricing is evident in the industry's severe declines in production, shipments, and financial performance. See section III.D. This vulnerable condition of the domestic industry makes it highly likely that further significant volumes of low-priced imports will be devastating to the U.S. CASWR industry. The threat of injury presented by subject imports is both real and imminent.

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V. CONCLUSION

For the foregoing reasons, the Commission should find that there is a reasonable indication that dumped and subsidized CASWR imports from China have caused material injury, and threaten further material injury, to the domestic industry.

Respectfully submitted,



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KATHLEEN W. CANNON  
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GEORGETOWN ECONOMIC SERVICES, LLC


February 26, 2014

**CERTIFICATION**


CITY OF WASHINGTON                    )  
  )     ss:  
DISTRICT OF COLUMBIA                )

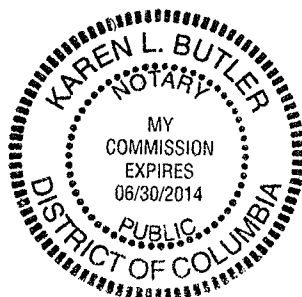
In accordance with section 201.6(b)(3)(iii) of the Commission's regulations, 19 C.F.R. § 201.6(b)(3)(iii), I, Kathleen W. Cannon, hereby certify on February 26, 2014, that information substantially identical to that for which business proprietary treatment has been requested in this document is not available to the general public.

In accordance with section 207.3(a) of the Commission's regulations, 19 C.F.R. § 207.3(a), I, Kathleen W. Cannon, hereby certify on February 26, 2014, that the information contained in this document is accurate and complete to the best of my knowledge.

  
\_\_\_\_\_  
Kathleen W. Cannon

Subscribed and sworn to before me on February 26, 2014.

  
\_\_\_\_\_  
Notary Public for the District of Columbia  
Karen L. Butler  
My Commission Expires: June 30, 2014



**PUBLIC VERSION**

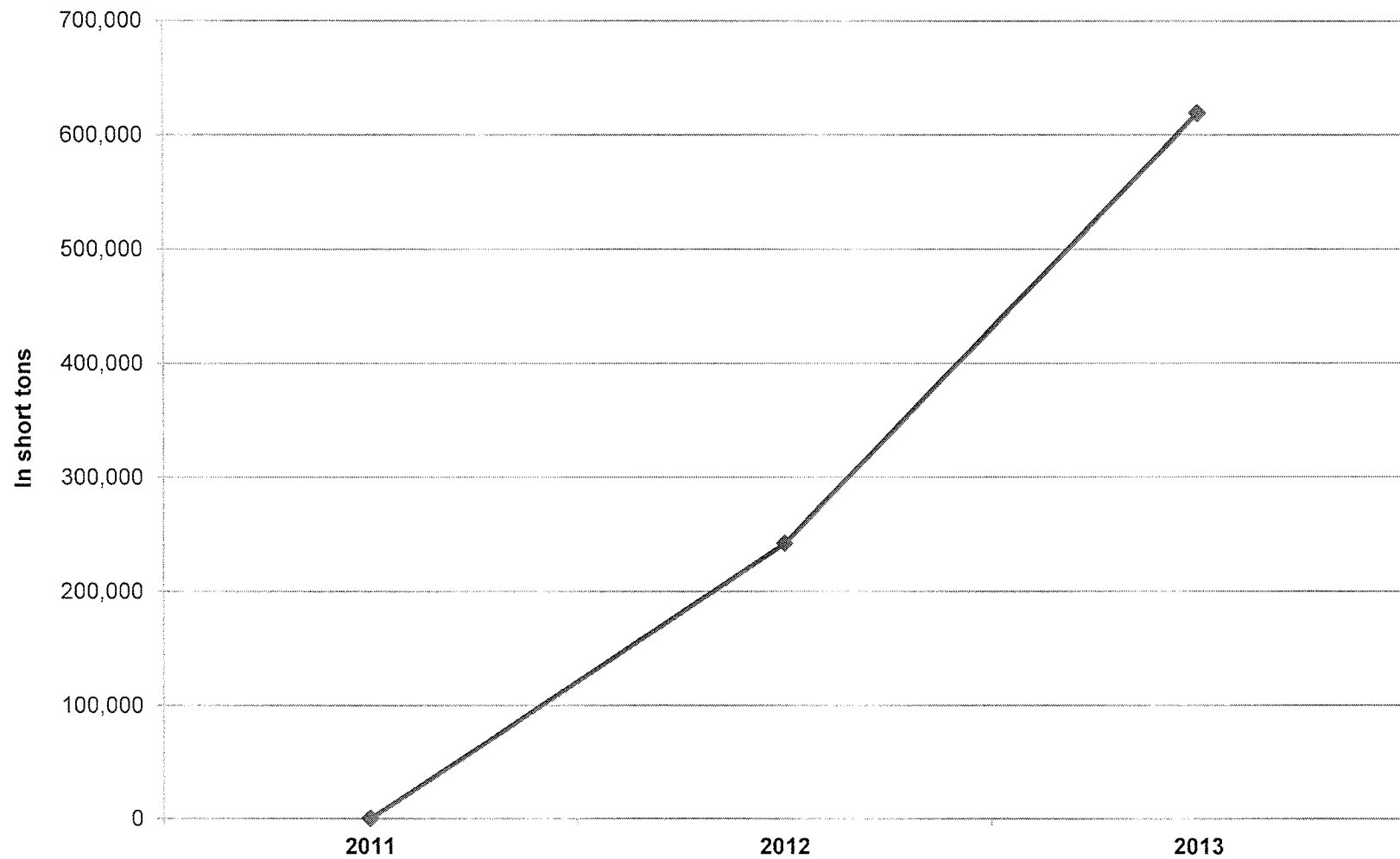
**INDEX TO EXHIBITS**

<b>Exhibit No.</b>	<b>Description</b>
1	Charts on Volume, Price and Effects of Imports on U.S. Industry
2	Total Market Shares and Commercial Market Shares
3	CASWR Underselling by Imports from China
4	U.S. CASWR Producers' Trade and Financial Data
5	U.S. Import Volumes and Values
6	Imports of Welding and Tire Cord Wire Rod
7	Captive Production Charts
8	U.S. Producers' Prices vs. Scrap Costs
9	Articles on Chinese CASWR Industry
10	Chinese Export Table (GTA Data)
11	Third Country Barriers for CASWR Exports from China
12	Summary of Chinese Producer Capacity and Supporting Documentation
13	Chinese Offers for CASWR Exports on Alibaba.com

# **EXHIBIT 1**



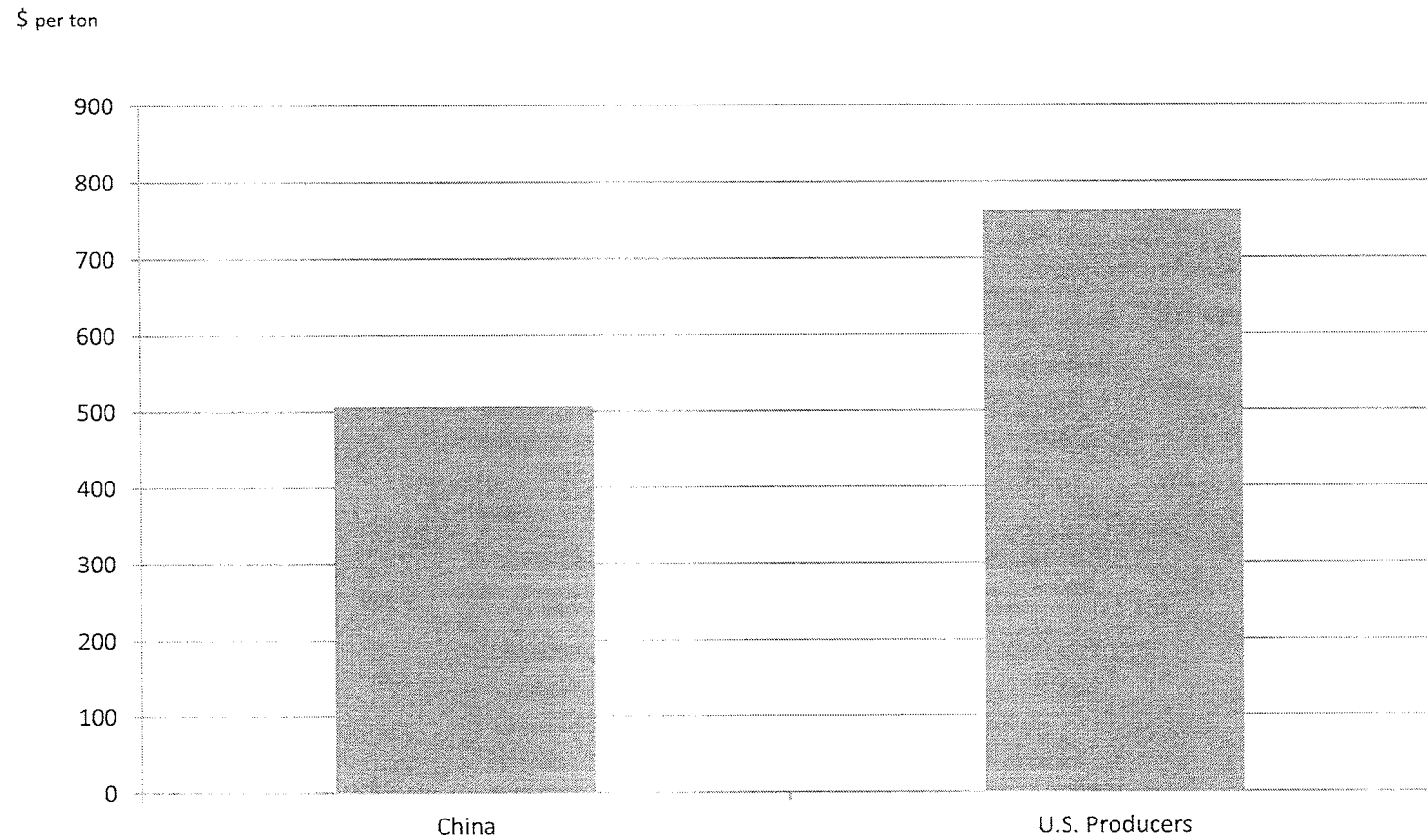
# Chart 1: CASWR Imports From China



Source: US Department of Commerce official import statistics

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PAGE OF THE EXHIBIT IS NOT  
SUSCEPTIBLE TO  
SUMMARIZATION AND  
THEREFORE IS NOT PROVIDED  
WITH THIS PUBLIC VERSION**

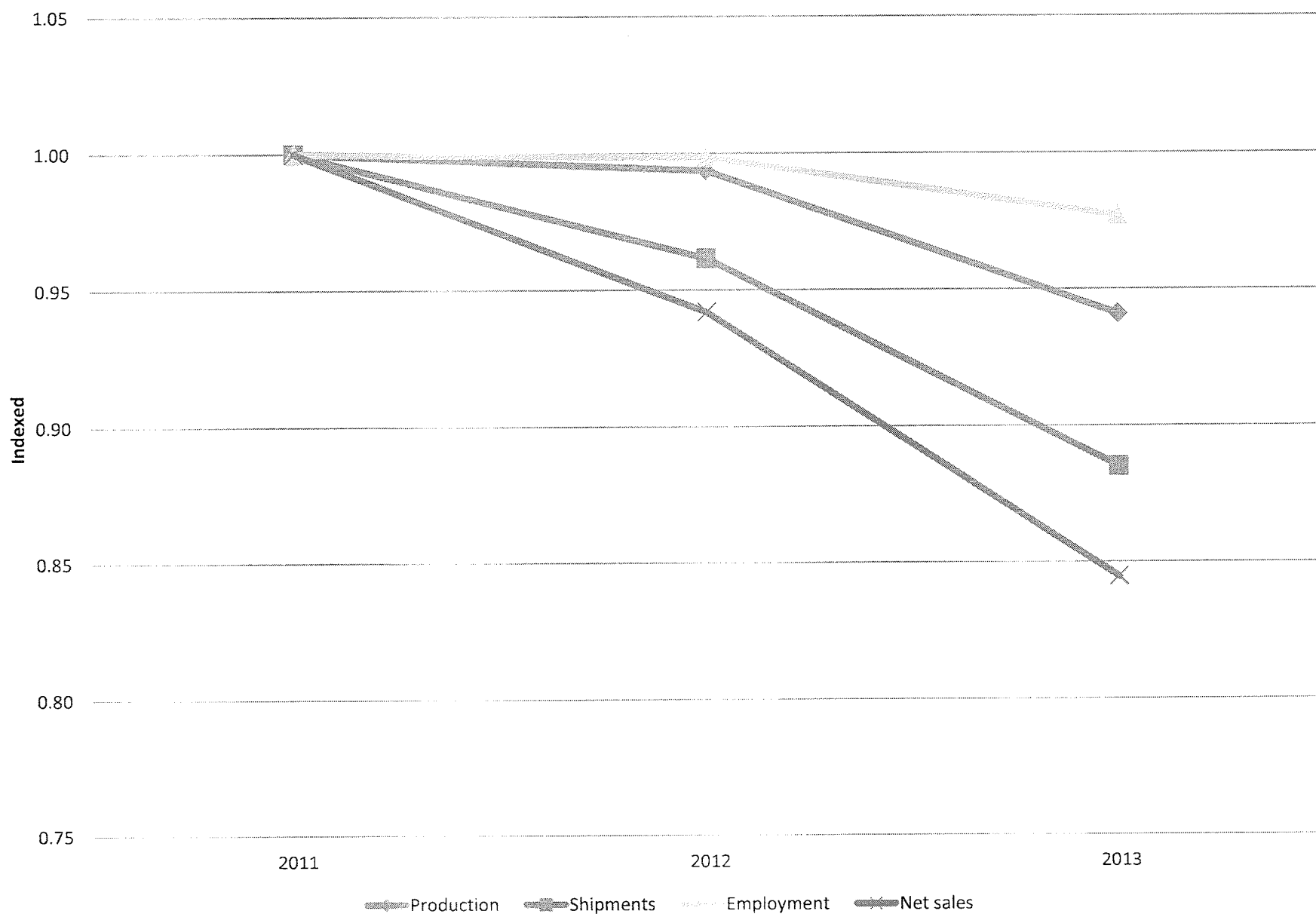
Chart 3: Comparison of Chinese AUVS with  
All Other Countries' AUVs



Source: U.S. Department of Commerce Official Import Statistics.

**CHARTS 4 AND 5 OF THIS EXHIBIT  
ARE NOT SUSCEPTIBLE TO  
SUMMARIZATION AND  
THEREFORE ARE NOT PROVIDED  
WITH THIS PUBLIC VERSION**

# Chart 6: Trends of the Domestic Industry's Trade and Financial Indicators



Source: U.S. Producers' Questionnaires

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WITH THIS PUBLIC VERSION**

# **EXHIBIT 2**

**CASWR VOLUMES AND MARKET SHARES**  
**Annual 2011 - 2013**

PUBLIC VERSION

	2011	2012	2013
Import Volume (in short tons)			
China	144	241,938	618,818
All Others	<u>1,253,534</u>	<u>1,276,956</u>	<u>1,089,819</u>
Total	1,253,678	1,518,894	1,708,637
U.S. Shipments	[		]
Apparent Domestic Consumption	[		]
Market Share of:			
Imports from China	[		]
Imports from All Others	[		]
U.S. producers	[		]

Source: U.S. Department of Commerce and ITC producers' questionnaires.



**CASWR VOLUMES AND MARKET SHARES BASED ON COMMERCIAL SHIPMENTS ONLY**  
**Annual 2011 - 2013**

PUBLIC VERSION

	2011	2012	2013
Import Volume (in short tons)			
China	144	241,938	618,818
All Others	<u>1,253,534</u>	<u>1,276,956</u>	<u>1,089,819</u>
Total	1,253,678	1,518,894	1,708,637
U.S. Commercial Shipments	[		]
Apparent Domestic Consumption	[		]
Market Share of:			
Imports from China	[		]
Imports from All Others	[		]
U.S. producers	[		]

Source: U.S. Department of Commerce and ITC producers' questionnaires.

# **EXHIBIT 3**

		CASWR UNDERSELLING BY IMPORTS FROM CHINA											
		1Q 11	2Q 11	3Q 11	4Q 11	1Q 12	2Q 12	3Q 12	4Q 12	1Q 13	2Q 13	3Q 13	4Q 13
<b>PRODUCT 1</b>													
U.S. Producers	[												]
Imports from China	[												]
Underselling/(overselling)	[												]
<b>PRODUCT 2</b>													
U.S. Producers	[												]
Imports from China	[												]
Underselling/(overselling)	[												]
<b>PRODUCT 3</b>													
U.S. Producers	[												]
Imports from China	[												]
Underselling/(overselling)	[												]
<b>PRODUCT 4</b>													
U.S. Producers	[												]
Imports from China	[												]
Underselling/(overselling)	[												]
<b>PRODUCT 5</b>													
U.S. Producers	[												]
Imports from China	[												]
Underselling/(overselling)	[												]

Source: U.S. Producers' Questionnaire at IV-2 and U.S. Importers' Questionnaire at III-2a.

# **EXHIBIT 4**

**U.S. CASWR Producers' Trade and Financial Data**  
**Annual 2011-2013**  
(Quantity in short tons, Value in \$1,000, Average Unit Values ("AUV") in \$/short tons)

<b>Trade Data:</b>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>% Change</u> <u>2011-2013</u>
Capacity	[			]
Production	[			]
Capacity Utilization	[			]
Commercial Shipments (Q)	[			]
Commercial Shipments (V)	[			]
Commercial Shipments (AUV)	[			]
Internal Consumption (Q)	[			]
Internal Consumption (V)	[			]
Internal Consumption (AUV)	[			]
Internal Transfers (Q)	[			]
Internal Transfers (V)	[			]
Internal Transfers (AUV)	[			]
U.S. Shipments (Q)	[			]
U.S. Shipments (V)	[			]
U.S. Shipments (AUV)	[			]
End-of-Period Inventories	[			]
PRWs	[			]
Hours Worked by PRWs	[			]
Wages Paid to PRWs	[			]
<b>Financial Data:</b>				
Net Sales (Q)	[			]
Net Sales (V)	[			]
Unit Net Sales Value	[			]
Unit COGS				
Gross Profit	[			]
SG&A	[			]
Operating Income	[			]
Operating Income to Net Sales Ratio	[			]
Operating Income to Net Sales Ratio (Commercial shipments only)	[			]

Source: [

]

# **EXHIBIT 5**

**U.S. Imports of Carbon and Alloy Steel Wire Rod**  
**Annual 2011 - 2013**  
**Quantity in Short Tons, Value in U.S. Dollars, AUV in \$/ton**

<b>Quantity</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
China	144	241,938	618,818
Canada	501,045	491,131	480,785
Japan	236,085	262,265	257,504
Turkey	109,574	165,820	33,182
Brazil	116,513	102,517	96,639
Germany	91,884	72,546	73,003
United Kingdom	46,323	70,107	56,395
Spain	19,574	28,743	32,725
Korea	9,868	25,575	37,567
Mexico	77,873	24,625	18,330
Netherlands	1,677	1,181	961
Italy	13,974	8,574	357
France	-	-	111
All Other	29,145	23,871	2,260
<i>Subtotal*</i>	<i>1,253,534</i>	<i>1,276,956</i>	<i>1,089,819</i>
<b>Total</b>	<b>1,253,678</b>	<b>1,518,894</b>	<b>1,708,637</b>

<b>Value</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
China	143,155	137,591,869	313,019,316
Canada	434,322,569	405,553,345	367,395,485
Japan	236,481,300	256,314,827	223,341,294
Turkey	73,003,185	107,415,401	19,033,059
Brazil	96,687,407	77,296,223	59,808,851
Germany	99,289,856	71,713,200	65,740,662
United Kingdom	35,905,467	45,463,196	32,440,689
Spain	15,885,952	20,511,896	22,555,806
Korea	9,538,803	19,947,269	24,794,575
Mexico	46,655,965	16,594,482	10,489,164
Netherlands	3,449,663	3,066,943	2,288,468
Italy	10,135,202	6,697,233	485,082
France	-	-	316,662
All Other	15,014,027	14,372,643	1,197,627
<i>Subtotal*</i>	<i>1,076,369,396</i>	<i>1,044,946,658</i>	<i>829,887,424</i>
<b>Total</b>	<b>1,076,512,551</b>	<b>1,182,538,527</b>	<b>1,142,906,740</b>

<b>AUV</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
China	994.46	568.71	505.83
Canada	866.83	825.75	764.16
Japan	1,001.68	977.31	867.33
Turkey	666.25	647.79	573.60
Brazil	829.84	753.98	618.89
Germany	1,080.60	938.52	900.53
United Kingdom	775.11	648.48	575.24
Spain	811.58	713.63	689.26
Korea	966.63	779.95	660.00
Mexico	599.13	673.88	572.25
Netherlands	2,057.24	2,596.08	2,380.71
Italy	725.27	781.10	1,357.13
France	-	-	2,845.93
All Other	515.16	602.10	529.92
<i>Subtotal*</i>	<i>858.67</i>	<i>818.31</i>	<i>761.49</i>
<b>Total</b>	<b>858.68</b>	<b>778.55</b>	<b>668.90</b>

Source: U.S. Department of Commerce

\* Subtotal includes imports from all countries except China

# **EXHIBIT 6**



**Imports of Welding Wire Rod**  
**7213.91.3020, 7227.90.6020, and 7227.20.0030**  
*(in short tons)*

China	37	278	10,550
Canada	93,778	112,940	121,581
Germany	7,735	15,907	13,834
Italy	6,537	69	269
Turkey	118	0	0
United Kingdom	20	0	13
Japan	57	356	95
Czech Republic	0	0	22
Netherlands	<u>128</u>	<u>0</u>	<u>0</u>
	108,409	129,550	146,364

**Imports of Tire Cord**  
**7213.91.3011**  
*(in short tons)*

China	3	891	37
Brazil	116,513	102,439	96,640
Canada	0	34	15
Germany	27,779	16,334	10,627
Japan	97,412	97,234	86,418
Spain	9,764	7,614	10,430
Turkey	0	192	0
United Kingdom	<u>33,099</u>	<u>25,694</u>	<u>16,831</u>
	284,480	250,431	220,999

Source: U.S. Department of Commerce import statistics.

# **EXHIBIT 7**

U.S. CASWR Shipments, by Type  
Annual 2011-2013  
(Quantity in short tons)

	2011	2012	2013
Commercial shipments	[		]
Internal consumption/company transfers	[		]
Total	[		]
Share of total commercial shipments to total shipments	[		]
Share of total internal consumption/company transfers to total shipments	[		]

Source: U.S. Producers' Questionnaires at Question II-7.

Share of 2013 Captive Shipments that Were Unusable and/or Were Used  
for Some Purpose Other Than Processing of Downstream Products  
(in short tons)

Item	Quantity
Captive Shipments that Were Unusable and/or Used for Other Purposes	[ ]
Total Captive Shipments	[ ]
Share of Shipments that Were Unusable and/or Used for Other Purposes to Total Captive Shipments	[ ]

Source: U.S. Producers' Questionnaires at Questions II-7 and II-14.

<b>Percent of Wire Rod Accounted in the Total Cost of End Use Products</b>		
<b>U.S. Producer</b>	<b>End Use Product</b>	<b>Share</b>
Average		[

Source: U.S. Producers' Questionnaires at Question IV-11(b).

Share of U.S. Producers' Captive Shipments that Are Produced into Products that Compete with the U.S. Producers' Customers

[illegible]

Source: U.S. Producers' Questionnaires at Questions II-7 and II-17(b).

# **EXHIBIT 8**

**U.S. Producers' 3Q13 and 4Q13 Quarterly Prices vs. Scrap Costs**  
 (\$ per ton)

	<u>3Q2013</u>	<u>4Q2013</u>
Product 1	[	]
Product 2	[	]
Product 3	[	]
Product 4	[	]
Product 5	[	]
Average scrap costs	[	]

Source: U.S. ITC Producers' QRs at IV-2 and [ ]



**THE REMAINDER OF THIS BUSINESS  
PROPRIETARY EXHIBIT  
IS NOT SUSCEPTIBLE TO SUMMARIZATION  
AND THEREFORE IS NOT PROVIDED  
WITH THIS PUBLIC VERSION**

# **EXHIBIT 9**



## China

### Giant steel firm grapples with toughest times in five years

English.news.cn 2013-07-20 08:13:15



By Kang Bing and Chen Jia

BEIJING, July 20 (Xinhuanet) -- China's largest iron and steel group is determined to cut output and upgrade production as it copes with the toughest market conditions since 2008, said Kong Ping, the vice-president of Hebei Iron & Steel Group Co Ltd.

The iron and steel industry is in much worse shape than it was a year ago, with more excess capacity and bleaker financial conditions, he said.

A high debt ratio is also a threat for State-owned Hebei Iron and Steel, because the central bank may keep liquidity tight in the short term, according to Kong.

"The bottom line is to ensure our capital chain doesn't break in the short term," said Kong. "In order to maintain normal production, we will try any method to control costs."

The iron and steel giant, which was created through the June 2008 merger of Handan Iron & Steel Co Ltd and Tangshan Iron & Steel Co Ltd, said revenue fell 7.83 percent in the first quarter to 26.86 billion yuan (\$4.38 billion). Net profit slid 87.82 percent to 43.8 million yuan.

Kong said there will soon be "a new round of mergers and acquisitions in the iron and steel industry".

Iron and steel supplies far outweigh demand. The industry's capacity utilization ratio is only 72 percent, said Kong. The global rule of thumb is that any industry with a capacity utilization ratio below 78 percent has excess capacity.

Ding Yue, an analyst at China International Capital Corp Ltd, said the industry's profitability in the second quarter probably worsened. Ding said losses will widen further in the third quarter, because the supply-demand gap is expanding.

Zhu Haibin, the chief China economist at JPMorgan Chase & Co, said that excess capacity and weak investment activity in the manufacturing sector contributed to the nation's first-half economic slowdown.

"Decelerating economic growth can cut enterprises' income, which is expected to increase the risks associated with corporate debt, especially for highly leveraged companies," Zhu said.

A report from the China Iron and Steel Association said that price declines for iron ore and other raw materials used by the steel industry accelerated in May. These conditions indicate weak support for steel prices.

"As excess supply is difficult to reduce and increasing international trade friction may lower exports, steel prices are likely to be at a low level this year," the CISA report said.

The United States decided on June 13 to retain anti-dumping duties on imported concrete reinforced bars from China. The US also started anti-dumping investigations into imports of Chinese-produced PC steel wire on May 14.

Separately, Australia launched anti-dumping and anti-subsidy investigations into China's exports of galvanized products; and some Southeast Asian countries also imposed restrictions on imports of Chinese steel products.

CISA said Chinese iron and steel exporters will find conditions becoming more difficult. It suggested that these manufacturers should curb production capacity and adjust their product structure.

"We will focus on the domestic market in the near future, and promote profitability that depends on improved quality. Blind pursuit of size will put more pressure on profits," Kong said.

The group plans to double annual revenue by the end of 2015 without adding any production capacity.

"The restructuring will be based on product upgrades targeting the high-end market," Kong said.

Hebei Iron and Steel's new product range includes vehicle steel plates, steel for nuclear power plants and large items for marine equipment.

"The market requires high-strength, long-life new products that resist corrosion, pushing us to improve our technology and increase the ranks of skilled employees," Kong said.

To reduce raw material costs, the group is constantly looking for opportunities to invest in overseas mines.

"We prefer equity investment when we are talking about cross-border cooperation," said Kong. "The investment proportion may not be large, but we target raw material prices to be 5 to 10 percent lower than the market level."

Overseas products should yield at least 12 percent return on equity, he added.

Hebei Iron and Steel has invested in mines in countries including Brazil, Canada, Australia and the Republic of Congo.

(Source: China Daily)

Editor: Zhu Ningzhu

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## 河北新金钢铁第二条线材产线日前投产

2012-11-01 14:40 来源: 钢联资讯 试用手机平台 资讯监督

河北新金钢铁日前第二条线材产线已经投产, 两条线设计年产量分别为50万吨和60万吨, 不过由于近期行情弱势, 产线并没有满负荷生产。

*(Translation)*

12/2/13 Hebei Xinjin Iron and Steel Co. Ltd. launched its second wire rod production line recently

**Hebei Xinjin Iron and Steel Co. Ltd. launched its second wire rod production line recently**

2012-11-01 14:40 Source: Ganglian News

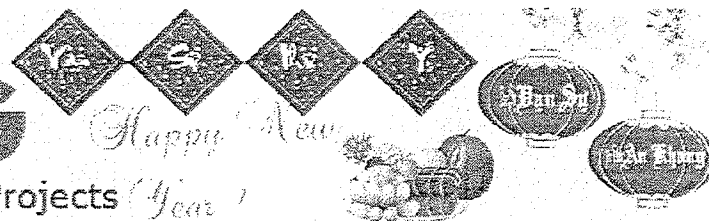
Recently, Hebei Xinjin Iron and Steel Co. Ltd. has launched its second wire rod production line; the two wire rod production lines have designed annual production capacities of 500,000 MT and 600,000 MT, respectively. However, due to the recent weak market, neither production line reaches the maximum production capacity.

Source: <http://gangpi.mysteel.com/12/1101/14/D5BF33F3C39536FA.html>

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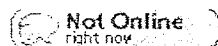
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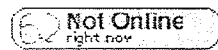
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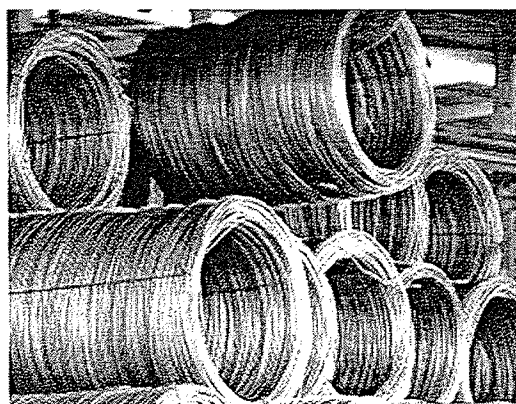
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## Shougang Qian'an to start up 500,000 mt/y wire rod mill (23/10/2013)



Shougang Qian'an Iron & Steel (Qiangang), a subsidiary of Shougang Group in northern China's Hebei province, plans to bring on stream a wire rod mill at the end of November. The mill is the relocated No. 1 wire rod mill from Shougang's old site in Beijing's Changping district.

The mill, with a capacity of about 500,000 metric tons/year, had been sourcing billets from Qiangang after Shougang closed its major steel making operation in Beijing's Shijingshan district at end-2010, according to a source with Qiangang. This line, Shougang's last longs product mill in Beijing, was shut down in March of this year for relocating to Qiangang in order to save billet transport and re-heating costs.

A company source with Shougang said the mill previously produced mainly low carbon wire rod for construction uses, medium carbon wire rod for processing and welding rod, and wire rod for tyre cord. After the relocation, the product mix would be essentially the same as before, he added.

It will be the first rod mill installed at Qiangang, which predominantly produces hot rolled coils and silicon sheets. The plant currently boasts a crude steel making capacity of about 8 million mt/y.

Li Fu

Source: steelbb.com

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兰格钢铁

Thu 2014/01/23



中文

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☐ **Xilin Steel to commission 1,260 cubic meter blast furnace**

Double-click for Auto scroll      ↗      ↖      promulgator: LangeSteel issue date: 2012-4-9 14:04:17 read: 116 times      ↗

It is reported that Heilongjiang Province-based Chinese steelmaker Xilin Iron and Steel Group 1,260 cubic meter blast furnace on which construction was completed last year will be commissioned in early April. The designed annual output capacity of the blast furnace is 1.02 million tonnes.

Xilin Steel expects its finished steel output capacity to reach 4.50 million tonnes to 5.00 million tonnes in 2012, rising to 5.50 million tonnes to 6.00 million tonnes in 2013. Meanwhile, construction work on phase two of the steelmaker's technology innovation project, valued at a cost of CNY 800 million will start in the near future.

The phase two project consists of one 1,260 cubic meter blast furnace, one 120 tonnes converter and a high speed wire rod production line with an annual output capacity of 1 million tonnes. Annual sales revenues from the completed phase two are expected to reach CNY 4.8 billion

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## Changzhi Steel to Start Production at New Wire Rod Project in Ja

Dec 25, 2012

Source: SteelOrbis

Shanxi Province based Chinese steelmaker Changzhi Iron and Steel Co a subsidiary of Shougang Group, has started to carry out trial tests at its new high speed wire rod project, as announced by Shougang Group on December 20.

Construction work on the project started in April of the current year, while production operations are expected to commence in January 2013. The designed annual output of high speed wire rod is 1.1 million tonne, with an estimated annual output value of CNY 7.5 billion (USD 1.2 billion). The wire rod products will be in a diameter range of 5.5 to 25 mm, and will include medium carbon steel, high carbon steel and cold forging steel.

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Tags: Changzhi Iron and Steel Co, steel market, metal, energy

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# **EXHIBIT 10**

**China Export Statistics**  
**HTS#: 7227.20, 7227.90, 7231.90, 7231.99**  
**Annual 2011-2013**

<b>Quantity (short tons)</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
Korea South	1,103,899	1,271,045	1,222,055
Thailand	467,374	834,360	1,112,962
Vietnam	250,941	429,744	754,193
United States	93	332,158	691,500
Indonesia	105,206	418,667	609,820
Philippines	170,533	315,040	573,993
Malaysia	187,349	367,273	492,967
Singapore	28,089	177,355	325,375
Japan	295,366	394,221	286,253
Saudi Arabia	61,795	285,356	255,849
Colombia	6,769	23,442	51,833
Total EU	731	799	49
<i>All Other</i>	476,971	1,210,658	2,322,053
<b>Total</b>	<b>3,155,114</b>	<b>6,060,118</b>	<b>8,698,901</b>

<b>Value (\$)</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
Korea South	720,840,482	737,409,948	631,677,259
Thailand	302,886,611	471,707,929	566,552,003
Vietnam	165,515,956	241,947,342	379,269,155
United States	71,248	177,979,639	340,246,613
Indonesia	70,767,443	237,232,282	316,387,704
Philippines	108,589,482	169,593,051	274,804,853
Malaysia	122,796,575	207,593,037	256,760,369
Singapore	17,542,109	97,830,227	161,009,271
Japan	192,884,170	223,976,237	145,304,204
Saudi Arabia	41,553,835	156,234,491	128,441,567
Colombia	4,440,056	12,884,526	25,916,808
Total EU	748,135	660,661	27,752
<i>All Other</i>	315,106,397	649,828,989	1,148,982,119
<b>Total</b>	<b>2,063,742,499</b>	<b>3,384,878,359</b>	<b>4,375,379,677</b>

<b>AUV (\$/short ton)</b>			
	<b>2011</b>	<b>2012</b>	<b>2013</b>
Korea South	653.00	580.16	516.90
Thailand	648.06	565.35	509.05
Vietnam	659.58	563.00	502.88
United States	767.89	535.83	492.04
Indonesia	672.66	566.64	518.82
Philippines	636.77	538.32	478.76
Malaysia	655.44	565.23	520.85
Singapore	624.52	551.61	494.84
Japan	653.03	568.15	507.61
Saudi Arabia	672.45	547.51	502.02
Colombia	655.95	549.63	500.01
Total EU	1,023.92	826.47	567.33
<i>All Other</i>	660.64	536.76	494.81
<b>Total</b>	<b>654.09</b>	<b>558.55</b>	<b>502.98</b>

Source: GTA China

# **EXHIBIT 11**

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## UPDATE 1-EU body OKs 25 pct dumping duty on China steel rods

Thu Jan 15, 2009 10:41am EST

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(Adds details, background)

By Darren Ennis

Jan 15 (Reuters) - A key European Union trade panel voted in favour on Thursday of imposing temporary antidumping duties of 25 percent on imports of Chinese-made steel wire rods, EU sources familiar with the case said.

"The vote was in favour of the duties," one source told Reuters on condition of anonymity.

European steel producers requested the additional tariffs on the rods, used among other things to reinforce tyres and concrete. They had complained that Chinese exporters enjoyed an unfair advantage because suspected subsidies in China's steel industry gave them cheap raw material.

The duties -- which are likely further to damage already brittle trade and diplomatic ties between Brussels and Beijing -- will come into force next month and remain in place for six months.

The European Commission, which oversees EU trade policy, must then decide whether to propose "definitive duties" lasting at least five years. EU trade ministers must approve any such move for it to take effect.

Trade disputes between Brussels and Beijing are on the rise since the EU's trade deficit with China has ballooned, hitting 160 billion euros (\$210 billion) last year.

In December, the EU's antidumping committee voted to adopt import duties of up to 87 percent on screws and bolts from China.

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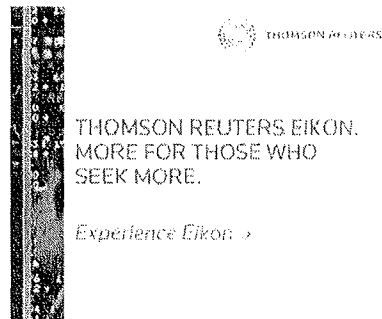
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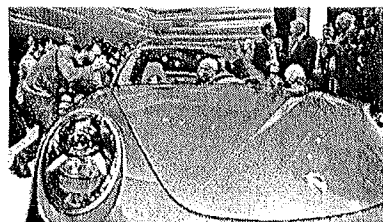
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#### Europe has bottomed out: Daimler CEO

(Acts adopted under the EC Treaty/Euratom Treaty whose publication is obligatory)

## REGULATIONS

### COUNCIL REGULATION (EC) No 703/2009

of 27 July 2009

**imposing a definitive anti-dumping duty and collecting definitively the provisional duty imposed on imports of wire rod originating in the People's Republic of China and terminating the proceeding concerning imports of wire rod originating in the Republic of Moldova and Turkey**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty establishing the European Community,

Having regard to Council Regulation (EC) No 384/96 of 22 December 1995 on protection against dumped imports from countries not members of the European Community<sup>(1)</sup> (the basic Regulation), and in particular Article 9 thereof,

Having regard to the proposal submitted by the Commission after consulting the Advisory Committee,

Whereas:

#### A. PROCEDURE

##### 1. Provisional measures

- (1) The Commission, by Regulation (EC) No 112/2009<sup>(2)</sup> (the provisional Regulation) imposed a provisional anti-dumping duty on imports of wire rod originating in the People's Republic of China (PRC) and the Republic of Moldova (RM).
- (2) It is noted that the proceeding was initiated following a complaint lodged by Eurofer (the complainant) on behalf of producers representing a major proportion, in this case more than 25 %, of the total Community production of wire rod.

##### 2. Subsequent procedure

- (3) Subsequent to the disclosure of the essential facts and considerations on the basis of which it was decided to impose provisional anti-dumping measures (provisional disclosure), several interested parties made written submissions making known their views on the provisional findings. The parties who so requested were granted an opportunity to be heard. The Commission continued to seek and verify all information it deemed necessary for its definitive findings. To this end an addi-

tional verification visit was carried out at the following company:

Producer in the Community:

— Celsa UK Holding Limited, Cardiff, United Kingdom

- (4) The Commission also continued its investigation with regard to Community interest aspects and carried out analysis of data contained in the questionnaire replies provided by some users in the Community.
- (5) It is recalled that as set out in recital (13) of the provisional Regulation the investigation of dumping and injury covered the period from 1 April 2007 to 31 March 2008 (investigation period or IP). With respect to the trends relevant for the injury assessment, the Commission analysed data covering the period from 2004 to the end of the IP (period considered).
- (6) Some interested parties argued that the choice of the year 2004 which was taken into account for the injury assessment was flawed because allegedly the year 2004 was an exceptionally good year in terms of high demand and profit margins. They therefore claimed that 2004 should be excluded from the period considered.
- (7) It should be noted that according to Article 6(1) of the basic Regulation, the investigation period should cover a period immediately prior to the initiation of the proceeding. It is recalled that the present investigation was initiated on 8 May 2008. As to the examination of trends relevant for the assessment of injury, this normally covers three or four years prior to initiation, ending in line with the dumping investigation period. In the present proceeding this practice was applied. Therefore, whether the year 2004, or any other year falling within the period considered, was exceptional or not does not seem to be relevant to the choice of this period.

<sup>(1)</sup> OJ L 56, 6.3.1996, p. 1.

<sup>(2)</sup> OJ L 38, 7.2.2009, p. 3.



- (8) All parties were informed of the essential facts and considerations on the basis of which it was intended to recommend the imposition of definitive anti-dumping measures on imports of wire rod originating in the PRC and the definitive collection of the amounts secured by way of the provisional duty, and the termination of the proceeding concerning imports of wire rod originating in the RM and Turkey. They were also granted a period within which they could make representations subsequent to this disclosure.
- (9) The oral and written comments submitted by the interested parties were considered and, where appropriate, the provisional findings were modified accordingly.

#### B. PRODUCT CONCERNED AND LIKE PRODUCT

- (10) The product concerned is bars and rods, hot-rolled, in irregularly wound coils, of iron, non-alloy steel or alloy steel other than of stainless steel originating in the PRC, the RM and Turkey (the product concerned or wire rod), normally declared within CN codes 7213 10 00, 7213 20 00, 7213 91 10, 7213 91 20, 7213 91 41, 7213 91 49, 7213 91 70, 7213 91 90, 7213 99 10, 7213 99 90, 7227 10 00, 7227 20 00, 7227 90 10, 7227 90 50 and 7227 90 95. The product concerned does not include stainless steel wire rod.
- (11) Following the provisional disclosure, one interested party claimed that wire rod falling under CN code 7213 91 90 should not be included in the definition of the product concerned because the powers of attorney issued to the complainant and its legal representative did not cover this specific product type.
- (12) In this respect it should be noted, firstly, that the complaint included the abovementioned CN code. Secondly, the product concerned is defined, at the outset of the investigation, based primarily on the basic physical, chemical and technical characteristics. The relevant CN codes under which imports of the product concerned are declared are finally determined only during the investigation, and in particular when imposing final duties. This is also clear from the text of the notice of initiation which states that the relevant CN codes are only given for information<sup>(1)</sup>. In addition, it was concluded that the wire rod declared under the above mentioned CN code does have the basic characteristics which are set out in the notice of initiation, and that it therefore does fall within the scope of the product concerned. Consequently this claim was rejected.
- (13) One exporting producer and one user alleged that a specific type of wire rod, namely 'tire cord', classified under the CN code 7213 91 20, would differ significantly from other types of wire rod with respect to the physical and technical characteristics, end uses, inter-

changeability and consumer perceptions. Consequently, they claimed that tire cord should be excluded from the scope of this investigation.

- (14) The abovementioned claim and specific arguments have been analysed in detail. Firstly, it was established that the different types of wire rod, including tire cord, included in the product definition share the same basic physical, chemical and technical characteristics, which means that they belong to the same product category.
- (15) Secondly, even if it can be argued that tire cord is a relatively more sophisticated and expensive type compared to other types of wire rod covered within the scope of the current investigation, it does not mean that tire cords imported from the PRC have characteristics which are significantly different from tire cords produced in the Community.
- (16) Furthermore the investigation showed that there were imports of tire cord from the country concerned during the period considered. Although these imports were made in limited quantities, it showed that exporting producers concerned by the current investigation had the capability to produce this type of wire rod.
- (17) Hence, based on the above facts and considerations, the exclusion of tire cord from the scope of the investigation was not considered to be warranted. The claim had therefore to be rejected.
- (18) In the absence of any other comments concerning the product concerned or the like product, recitals (13) to (14) of the provisional Regulation are hereby confirmed.

#### C. DUMPING

##### 1. Market Economy Treatment (MET)

###### 1.1. PRC

- (19) In the absence of any other comments with regard to the MET status of Chinese exporting producers, the conclusions of recitals (27) to (31) of the provisional Regulation are hereby confirmed.

###### 1.2. RM

- (20) It is recalled that the sole cooperating Moldovan exporter failed to meet any of the five MET criteria. Following the provisional disclosure, the company reiterated its previous comments on the Commission's decision not to grant it MET, which had already been analysed and addressed in the MET and provisional disclosures. The Moldovan exporter disputed the findings regarding all five MET criteria, but did not support its claims by providing any evidence in support thereof.

<sup>(1)</sup> OJ C 113, 8.5.2008, p. 20.

(21) In particular, the exporter claims that the Commission contradicts itself when considering that the so called authorities of the Transnistrian region of the RM are considered as playing the role of 'the State' when assessing criterion 1, and not so when assessing criterion 4. In this respect, it is noted that the so called authorities of the Transnistrian region of the RM are clearly in a position to interfere in the company's management. Therefore this has a direct impact in the assessment of criterion 1. On the other hand, the so called authorities of the Transnistrian region of the RM, as they are not recognised, do not ensure a legal stability and certainty as required under criterion 4. Therefore this claim had to be rejected.

(22) Regarding criterion 1, the exporter argued, in particular, that its management is composed of private persons and that no connection has been established between its top management and the so called authorities of the Transnistrian region of the RM. However, the investigation revealed that the President and other management staff of the company actively participate in the legislative bodies of the so called authorities of the Transnistrian region of the RM. Therefore this claim had to be rejected.

(23) Regarding criterion 2 the company argued, in particular, that the reserved opinion of the audit report on the company's financial statements was immaterial. However, this reserved opinion refers to the value of all fixed assets and cannot therefore be considered as immaterial. During the verification the company was not able to clarify this reserve. No additional evidence has been provided in this respect. Therefore this claim had to be rejected.

(24) Regarding criterion 3, the company repeated its argument that, following its privatisation, it was subsequently re-sold to its current holders at arm's length and therefore any previous distortions would have been eliminated. No evidence supporting this claim was however provided and the conclusion in recital (45) of the provisional Regulation is therefore confirmed.

(25) Regarding criterion 5, the company, claimed in particular that the fact that its financial statements are in US dollars, and not in the so called Transnistrian rouble currency (TMR rouble) makes the issue irrelevant. However, the fact remains that the TMR rouble is used in several of the company's daily operations, and therefore the conversion rate of the TMR rouble into other currencies is not irrelevant for assessment under this criterion. Therefore this claim had to be rejected.

(26) Therefore these claims did not change the provisional conclusions not to grant MET to the Moldovan cooperating exporting producer, and the conclusions of recitals (32) to (49) of the provisional Regulation are hereby confirmed.

## 2. Individual treatment (IT)

(27) In the absence of any comments on IT, recitals (50) to (53) of the provisional Regulation are hereby confirmed.

## 3. Normal value

### 3.1. Turkey

(28) One exporting producer pointed out that revised and verified data regarding its domestic sales had not been taken into consideration in the establishment of normal value. Another exporting producer argued that the constructed normal value had been incorrectly calculated due to a clerical error. These claims were verified and corrections were made, when appropriate.

(29) Another exporting producer argued that its export sales consisted only of a 'non-standard' type of the product concerned, whereas domestic sales were a mix of 'standard' and 'non-standard' types. It claimed that this methodology resulted in an unfair comparison and that the normal value should be calculated by comparing only the prices of 'non-standard' export and domestic sales.

(30) The investigation, however, could not demonstrate sufficient differences between 'standard' and 'non-standard' products, as claimed by the exporting producer, that would affect their comparability. Both categories fall under the product description of the like product. Additionally the investigation revealed that both types were sold by the company at the same price. Accordingly, this claim had to be disregarded.

(31) In the absence of any other comments with regard to the methodology for calculating normal value for Turkey, the provisional conclusions as outlined in recitals (54) to (63) of the provisional Regulation are hereby confirmed.

### 3.2. PRC and RM

(32) No comments were received concerning the normal value for the PRC and the RM established as described in recital (64) of the provisional Regulation. Therefore the provisional conclusions are confirmed.

#### 4. Analogue country

- (33) Turkey was provisionally chosen as analogue country for the reasons set out in recitals (65) to (74) of the provisional Regulation. Following provisional disclosure, the complainant, argued against the use of Turkey as analogue country, instead of Brazil as initially envisaged. The complainant re-stated the arguments submitted at the provisional stage (a) claiming that there is sufficient competition in the Brazilian market and (b) alleging that the subsidisation of the Turkish steel industry makes it inappropriate for establishing normal value. Moreover, the complainant argued that since the investigation has established the existence of dumping for Turkey, as per the Commission's practice it should not be used as analogue country.
- (34) It is recalled that the domestic prices in Brazil were found to be above published world prices. Also, the level of profits of the Brazilian producer in the domestic market was found to be very high compared, in particular, with the level of profit considered reasonable for the Community industry. As stated in the provisional Regulation, this is considered as an indication of the insufficient level of competition in the Brazilian market.
- (35) Regarding Turkey, there appears to be clearly more competition in the domestic market than in the case of Brazil. The fact that Turkish exporters have been found to be dumping does not necessarily mean that the normal value established for that country is not reliable.
- (36) The complainant also argued that as Turkish companies are allegedly subsidised, Turkey would not be a suitable choice as analogue country. However, no evidence was provided in support of this allegation.
- (37) In view of the above, the conclusions of recitals (65) to (74) of the provisional Regulation are confirmed, and Turkey has been used as analogue country for the purpose of this proceeding, in accordance with Article 2(7)(a) of the basic Regulation.

#### 5. Export Price

- (38) One exporting producer argued that the export price should not have been constructed as set out in recital (76) of the provisional Regulation. Having examined this claim, it was found to be warranted in particular because the functions of the company, which has its operations outside the Community, did not warrant the application of Article 2(9) of the basic Regulation.
- (39) Another exporting producer claimed that deductions for commissions made for sales through a related company were not justified. Having examined this claim, it was

found to be warranted as the related company did not perform functions similar to those of an agent. The export prices were therefore corrected accordingly.

- (40) In the absence of any other comments with regard to the methodology for establishing export prices, the provisional conclusions as outlined in recital (75) of the provisional Regulation are hereby confirmed.

#### 6. Comparison

- (41) The comparison between normal value and export price was made on an ex-works basis. For the purpose of ensuring a fair comparison between the normal value and the export price, due allowance in the form of adjustments was made for differences affecting prices and price comparability in accordance with Article 2(10) of the basic Regulation.
- (42) As described in recital (79) of the provisional Regulation allowances for differences in transport costs, freight and insurance costs, bank charges, packing costs, credit costs and commissions were granted where applicable and justified.
- (43) Several exporters disputed the calculation of adjustments for inland transport, freight costs, bank charges, credit costs and commissions and proposed alternative calculations. In view of the evidence provided in their questionnaire replies and information and evidence collected during the verification visits, most of these claims were not considered justified and the adjustments as calculated at the provisional stage were therefore maintained. However, some of the claims have been accepted, where justified, and corrections were made for the adjustments corresponding to credit costs, commissions and customs charges on export sales.

#### 7. Dumping margins

- (44) The weighted average normal value was compared with the weighted average export price as provided for in Article 2(11) and (12) of the basic Regulation.

##### 7.1. PRC

- (45) Following the corrections to the normal values in the analogue country, the definitive dumping margins for the Chinese exporting producers are as follows:

Company	Dumping margin
Valin Group	38,6 %
All others	52,3 %

## 7.2. RM

- (46) Following the imposition of provisional measures, it was considered that using all available export data for the RM would provide a more accurate picture of the dumping practised by that country. Accordingly, the country wide definitive dumping margin was calculated on the basis of the export prices of all known producers.

- (47) Following the corrections to the normal values of the analogue country, export price and adjustments as described above, the country wide definitive dumping margin for the RM was established at 16,2 %.

## 7.3. Turkish exporting producers

- (48) In light of the above, the definitive dumping margins for the Turkish exporting producers are as follows:

Company name	Dumping margin
Kroman Çelik Sanayli AS	18,8 %
Çolakoglu Metalurji AS	7,6 %
Iskenderun Demir ve Çelik AŞ	10,5 %
Habas Sinai ve Tibbi Gazlar Istihsal Endustri AS	7,1 %
İcdaş Çelik Enerji Tersane ve Ulaşım Sanayii AS	3,9 %
All others	18,8 %

## D. INJURY

## 1. Community production

- (49) In the absence of any comments concerning the Community production or cooperation by the silent producers as mentioned in recital (91) of the provisional Regulation, recitals (89) to (92) of the provisional Regulation are hereby confirmed.

## 2. Definition of the Community industry

- (50) In the absence of any comments concerning the definition of the Community industry, recital (93) of the provisional Regulation is hereby confirmed.
- (51) It is recalled that no sampling was applied for the injury analysis, since the 20 cooperating producers consisted of

four groups of companies and two independent producers. Further to the imposition of provisional measures, as mentioned in recital (3) above, an on-spot verification was carried out at the premises of one additional Community producer, in order to verify the data provided in its questionnaire reply.

## 3. Community consumption

- (52) It is recalled that the Community consumption was established on the basis of the total imports, derived from Eurostat, and the total sales on the Community market of the Community industry and of the other Community producers, including an estimate based on complaint data for the sales of the silent producers.
- (53) One interested party disputed the method used for the determination of the Community consumption, claiming that the production by the Community industry destined for captive use and captive sales should be included in the Community consumption and the injury assessment, since captive use and captive sales were in direct competition with sales on the free market, including imports.
- (54) It should be noted that as explained in recitals (119) to (143) of the provisional Regulation, the captive production of the Community industry has been analysed in the injury assessment. However, in accordance with the consistent practice of the Commission, captive use, i.e. internal transfers of the like product within the integrated Community producers for further processing, has not been included in the Community consumption figure, because these internal transfers are not in competition with sales from independent suppliers in the free market.

- (55) As regards the claim to include captive sales, i.e. the sales to related companies, in the Community consumption figure, this claim was found to be warranted, since according to the data collected during the investigation, the related companies of the Community producers were free to purchase wire rod also from other sources. In addition, the Community producers' average sales prices to related parties were found to be in line with the average sales prices to unrelated parties.

- (56) Following the verification of the data provided by one additional Community producer, as referred to in recitals (3) and (51) above, the total sales on the Community market of the Community industry were slightly revised. As a result, the Community consumption figures provided in table 1 of the provisional Regulation were adjusted as follows:

Table 1

Community consumption	2004	2005	2006	2007	IP
Tonnes	22 510 446	21 324 498	23 330 122	23 919 163	23 558 858
Index	100	95	104	106	105

Source: Eurostat, complaint data and questionnaire replies.

- (57) Overall, Community consumption expanded by 5 % over the period considered. The expansion started in 2006, after a temporary decrease of 5 % in 2005. After that, consumption recovered and increased up to 2007, followed by a slight decrease during the IP. The downturn in consumption in 2005 was mainly a result of a lower demand in the construction industry.

#### 4. Imports into the Community from the PRC, the RM and Turkey

##### 4.1. Cumulation

- (58) In order to make the definitive assessment of the conditions for cumulation of the imports from the countries concerned, the same methodology as explained in recital (99) of the provisional Regulation was applied in the light of the comments received by parties after the imposition of provisional measures. For the RM account was also taken of the fact that, as explained in recital (46) above, other Moldovan producers were exporting the product concerned to the Community.

- (59) As explained in recital (101) of the provisional Regulation, the imports from Turkey were not cumulated with the imports from the PRC and the RM since it was considered that the conditions of competition between the Turkish and other relevant operators were not similar, in particular as regards their price behaviour. Indeed, the sale prices of all cooperating exporting producers in Turkey were not below Community industry prices and were relatively high compared to other operators in the Community market.

- (60) One interested party claimed that the arguments put forward in recital (101) of the provisional Regulation were not consistent with the basic Regulation. It argued that it sufficed that the dumping margin of the Turkish imports were significantly above the *de minimis* threshold and that the volume of the imports was not negligible to cumulate those imports with other dumped imports from the RM and the PRC. It also claimed that the non-imposition of measures would lead to a surge of dumped imports from Turkey to the Community market.

- (61) It should be stressed that Article 3(4) of the basic Regulation specifically requires that the conditions of competition between the relevant operators in the Community market should be carefully examined in the context of a cumulative assessment of the imports from countries concerned by an anti-dumping investigation. In addition, the level of prices of the Turkish operators was in all cases above the non-injurious prices established according to the methodology described in recital (179) of the provisional Regulation. Hence, there was no ground to allow a cumulative assessment of Turkish imports with imports from the PRC and the RM or to impose anti-dumping measures to prevent any alleged surge of imports from that country. On this basis the claims had to be rejected.

- (62) Another interested party disputed the provisional finding that imports from the RM were cumulated with those of the PRC arguing that, contrary to imports from the PRC, the import volumes from the RM were very low and were basically not undercutting the prices of the Community industry during the IP.

- (63) Subsequent to the provisional disclosure, additional information was received concerning the Moldovan exports to the Community which resulted in revised calculations of the undercutting and injury margins for the RM as explained in more detail in recitals (71) and (107) below.

- (64) The revised calculations showed that imports from the RM did not undercut the prices of the Community industry on the Community market in the IP. Moreover, the injury margin was found to be below the *de minimis* injury threshold applied by analogy to Article 9(3) of the basic Regulation. In view of the above, it was concluded that the imports of wire rod originating in the RM should be assessed separately.

##### 4.2. Dumped imports from the PRC

- (65) It is recalled that since the consumption figures were slightly adapted as explained in recital (56) above, the market share of the imports from the PRC was revised accordingly. Hence the imports from the PRC developed as follows during the period considered.

Table 2

Total dumped imports from the PRC	2004	2005	2006	2007	IP
Volumes (tonnes)	70 816	134 176	633 631	1 459 968	1 174 556
Index	100	189	895	2 062	1 659
Market share	0,3 %	0,6 %	2,7 %	6,1 %	5,0 %
Index	100	200	863	1 940	1 585
Prices (EUR/tonne)	374	430	378	409	419
Index	100	115	101	109	112

Source: Eurostat.

(66) The dumped imports from the PRC increased significantly from around 0,07 million tonnes in 2004 to 1,1 million tonnes in the IP, i.e. by almost 17 times. These imports peaked in 2007, after which they showed a slightly declining trend in line with the evolution of Community consumption.

(67) Although the average prices of the dumped imports from the PRC increased by 12 % over the period considered, it was found that they were undercutting those of the Community industry, in particular during the IP. As a result, the market share significantly increased from 0,3 % in 2004 to 5,0 % in the IP, corresponding to a gain of 4,7 percentage points.

#### 4.3. Price undercutting

(68) The methodology described in recital (106) of the provisional Regulation to establish price undercutting is confirmed. However, following the verification visit at the premises of one Community producer as mentioned in recital (3), the average price of the Community industry was reassessed to take account of the verified data obtained from this Community producer.

(69) One party claimed that since no producer in the RM was granted MET or IT, the Commission should calculate the undercutting and the injury elimination level for the RM using Eurostat data rather than the data obtained from exporting producers in the RM.

(70) In an anti-dumping investigation and in particular for the price comparison exercise, it is the institution's practice to use the most reliable data available, which in general is the data collected and verified at the premises of the cooperating parties. In this case, price data collected at the premises of the cooperating producer in the RM was available and was used to establish the provisional price

undercutting margin for the cooperating producer in the RM. The claim to use Eurostat data is therefore rejected.

(71) It was however considered that price data available for all the imports from the RM to the Community, including imports of other Moldovan producers as mentioned in recital (46) above, should be taken into account in the calculation of the definitive undercutting margin for the RM. Hence, all price data available duly adjusted to reflect the weighted average export prices to the first independent customer, on a cif basis, was used. On this basis it was found that imports from the RM were not undercutting Community industry's prices; indeed the definitive price undercutting margin is a negative one, namely -1,2 % on average for the RM.

(72) As regards imports from the PRC, it is recalled that only one Chinese exporting producer cooperated in the investigation. Based on the same methodology and adjustments to the Community industry's data as described above and on the basis of comparable product types, an average price undercutting margin of 4,2 % was found for the sole cooperating Chinese exporter. For all other producers in the PRC, price undercutting was established as explained in recital (108) of the provisional Regulation. On this basis, an average price undercutting margin of 7,3 % was found for the Chinese imports.

#### 5. Economic situation of the Community industry

(73) Following the conclusion that imports from the RM should not be cumulated with the imports from the PRC and should be assessed separately, as described in recital (64), the examination of the impact of the dumped imports on the Community industry's economic situation, refers to the imports originating in the PRC.

- (74) As mentioned in recital (3), one additional Community producer was verified on the spot. As a result, some injury indicators were adjusted accordingly. These concern the sales volumes to the first independent customer on the Community market, average ex-works sales prices of the Community industry to unrelated customers, stock figures, profitability, cash flow, return on investment and employment.
- (75) Table 3 below shows the revised volume sold to the first independent customer on the Community market. It should be noted that, despite the revised figures, the trend is similar to the one provided in the provisional Regulation.

Table 3

	2004	2005	2006	2007	IP
Sales volume (tonnes)	7 505 684	6 738 112	7 522 435	7 548 130	7 489 831
Index	100	90	100	101	100
Market share	33,4 %	31,6 %	32,2 %	31,6 %	31,8 %
Index	100	95	97	95	95

Source: Questionnaire replies.

- (76) Following the above, the average unit sales prices of the Community industry to unrelated customers on the Community market were revised accordingly. As a result, the average sales prices for the years 2006 to the IP were marginally revised compared to the figures provided in the provisional Regulation.

Table 4

	2004	2005	2006	2007	IP
Average price (EUR/tonne)	414	409	434	468	475
Index	100	99	105	113	115

Source: Questionnaire replies.

- (77) As regards the stock figures, it should be noted that the minor revisions made in the Community industry's data for the years 2006 to IP did not change the trend analysis as provided in recital (119) of the provisional Regulation.

Table 5

	2004	2005	2006	2007	IP
Stocks (tonnes)	657 667	530 578	691 338	699 511	594 420
Index	100	81	105	106	90

Source: Questionnaire replies.

- (78) Subsequent to the provisional Regulation, also the employment figures were slightly amended for the years 2004 to IP. In the absence of any further comments received from interested parties, recitals (120) to (122) of the provisional Regulation are hereby confirmed.

Table 6

	2004	2005	2006	2007	IP
Employment — full-time equivalent (FTE)	4 216	4 029	3 920	4 195	4 310
<i>Index</i>	100	96	93	100	102
Labour cost (EUR/FTE)	41 300	43 200	45 400	45 300	44 700
<i>Index</i>	100	104	110	110	108
Productivity ( <i>Index</i> )	100	95	107	98	95

Source: Questionnaire replies.

- (79) Profitability of the Community industry was established using the same methodology as explained in recital (123) of the provisional Regulation. Subsequent to revisions made to the Community industry's data following the on-spot verification of one additional Community producer, as described in recital (3), also these figures were slightly revised. Over the period considered, the profitability of the Community industry decreased from 14,2 % in 2004 to 7,3 % in the IP. In the absence of any further comments received, recitals (124) to (126) of the provisional Regulation are hereby confirmed.

Table 7

	2004	2005	2006	2007	IP
Profitability	14,2 %	8,0 %	8,4 %	7,9 %	7,3 %
<i>Index</i>	100	56	59	55	51
Cash flow '000 euro	493 954	272 166	361 573	286 917	278 604
<i>Index</i>	100	55	73	55	56
Investments '000 euro	147 897	136 031	231 726	221 808	200 126
<i>Index</i>	100	92	157	150	135
Return on investments	68 %	49 %	50 %	46 %	47 %
<i>Index</i>	100	72	74	68	68

Source: Questionnaire replies.

### 5.1. Growth

- (80) Following the above, it can be considered that the sales volume of the Community industry stagnated between 2004 and the IP, thus preventing the Community industry from taking advantage of the expansion of the Community consumption which increased by 5 % between 2004 and the IP. As a consequence, its market share decreased by 1,6 percentage points during the same period.

### 5.2. Magnitude of the actual margin of dumping

- (81) In the absence of any other comments received, recital (128) of the provisional Regulation is hereby confirmed.



## 6. Conclusion on injury

- (82) It can be concluded that the minor revisions made to some injury indicators following the on-spot verification of one additional Community producer, as provided in tables 2 to 7 above, did not alter the conclusion made in recital (132) of the provisional Regulation.
- (83) Based on the above, it can be concluded that the Community industry suffered material injury within the meaning of Article 3(5) of the basic Regulation.

## E. CAUSALITY

### 1. Effect of the dumped imports from the PRC

- (84) It was examined whether the dumped imports of the product concerned originating in the PRC caused injury to the Community industry to a degree that can be considered material.
- (85) The investigation showed that dumped imports from the PRC increased significantly, by almost 17 times, over the period considered, increasing by 1,1 million tonnes between 2004 and the IP. This increase was particularly marked between 2006 and the IP. In terms of market share, dumped imports from the PRC increased their share of the Community market from 0,3 % in 2004 to 5,0 % in the IP. In practice this corresponded to the entire increase in the Community consumption that took place during the period considered.
- (86) During the same period, although its sales volume on the Community market remained stable, the Community industry lost market share from 33,4 % in 2004 to 31,8 % in the IP, namely 1,6 percentage points.
- (87) As regards prices, despite the fact that the prices of dumped imports increased by 12 % during the period considered in line with the increased raw material prices, they were still undercutting the prices charged by the Community industry on the Community market. Consequently, the Community industry was prevented from increasing its prices to cover the full increase in raw material prices. The profitability of the Community industry's sales on the Community market thus decreased from 14,2 % in 2004 to 7,3 % during the IP.
- (88) It is considered that the continued pressure exercised by the low-priced dumped imports from the PRC on the Community market did not allow the Community industry to adapt its sales prices to the increased cost of production. It is therefore concluded that the surge of low-priced dumped imports from the PRC had a considerable negative impact on the economic situation of the Community industry.

## 2. Effect of other factors

- (89) In the absence of any comments concerning development of demand, captive production, sales of high-end products, imports from third countries and other producers in the Community, recitals (139), (143) to (149) and (151) to (155) of the provisional Regulation are hereby confirmed.
- (90) One party claimed that the assessment of the increase in raw material prices, mentioned in recital (142) of the provisional Regulation was not correct. It argued that it is difficult to fully pass on the cost increases to the customers. Furthermore, it claimed that the negative export performance of the Community industry would explain the deterioration of the economic situation of the Community industry.
- (91) As regards the impact of the raw material prices, it is recalled that the investigation showed an increase of 25 % of the cost of production for the Community industry to produce wire rod. This should be seen in relation to an increase of only 15 % of average sales prices of the Community industry. Indeed, it can very well be difficult in some markets to be able to fully pass on the increase in costs to the customers, however, the current investigation did not show any evidence that this was the case in the wire rod market. On the contrary, the wire rod market can be considered as a commodity product sold in a transparent market where all operators are aware of the price level. Hence effective trade conditions should allow cost price increases to be reflected in the sales price of wire rod. Therefore, it is considered that the conclusion made in recital (142) is valid and therefore this claim had to be rejected.
- (92) As regards the export performance, there was indeed a declining trend in the export sales of the Community industry for reasons provided in recital (150) of the provisional Regulation. In view of the fact that the share of export sales in relation to the sales to customers within the Community is relatively low and, in addition, the sales prices of the latter were relatively lower, it is considered that the decrease in export volume can not justify the level of injury suffered. No substantiated evidence invalidating this conclusion was provided and therefore the conclusions made in recital (150) of the provisional Regulation are hereby confirmed.
- (93) In view of the above and in absence of any other comments, recitals (156) to (159) of the provisional Regulation are hereby confirmed.

## 3. Imports from Turkey

- (94) Following recitals (60) and (61) and in the absence of any further comments concerning imports from Turkey, the conclusions made in recitals (160) to (162) of the provisional Regulation are hereby confirmed.

#### 4. Imports from the RM

- (95) Further to revisions of the Community industry's data, based on the verification of the reply of one additional Community producer and taking into account all import sales originating in the RM, it was found that imports from the RM did not undercut the prices of the Community industry in the IP. Moreover, in line with recital (64) above, the comparison of the Moldovan export price with the non-injurious price of the Community industry showed a *de minimis* injury margin.
- (96) In view of the above it was concluded that there is no clear causal link between imports from the RM and the injury suffered by the Community industry.

#### F. COMMUNITY INTEREST

##### 1. Preliminary remark

- (97) In view of the above, it should be noted that only the impact of the imposition of anti-dumping duties on imports originating in the PRC has been assessed for the Community interest analysis.

##### 2. Community industry

- (98) Subsequent to the provisional Regulation, it was reassessed whether the imposition of anti-dumping measures to imports originating from PRC would be in the interest of the Community industry.
- (99) In view of the above and in the absence of any comments concerning the interest of the Community industry, recitals (164) to (167) of the provisional Regulation are confirmed.

##### 3. Importers

- (100) In the absence of any comments concerning the importers, recitals (168) and (169) of the provisional Regulation are hereby confirmed.

##### 4. Users

- (101) One interested party questioned whether all imports to the Community market from countries subject to this investigation were taken into account in the percentage provided in recital (171) of the provisional Regulation which represents the imports of wire rods by certain users. Furthermore, some interested parties argued that there would be no alternative sources available should anti-dumping measures be imposed and that this would lead to a shortage of supply.
- (102) Further to the claim on the total imports, a re-assessment has been made regarding the total imports of wire rod. Indeed, analyses showed that the actual amount of

imports of wire rod consumed by the cooperating users is higher than previously assessed at the provisional stage. As a result, the total imports of the users mentioned in recital (171) of the provisional Regulation increased by 30 %. As a result, it can be concluded that during the IP, the users mentioned in recital (171) of the provisional Regulation accounted together for around 20 % of all imports of wire rod from the PRC.

- (103) As regards the claim that there would be no alternative sources of supply in case of imposition of anti-dumping measures, the investigation showed indeed some irregularities in supplies by Community producers to certain users. However, the analysis did not show any evidence that these irregularities were on a continued basis. Moreover, it should be noted that other sources of supply, taking into account other third countries which are not subject to measures, are available. Therefore this claim was rejected.

- (104) Based on the above and in the absence of any further comments recitals (173) to (175) of the provisional Regulation are hereby confirmed.

#### 5. Conclusion on Community Interest

- (105) Based on the above, it was concluded that there are no compelling reasons against the imposition of anti-dumping duties against imports of wire rod originating in the PRC in the present case.

#### G. DEFINITIVE ANTI-DUMPING MEASURES

##### 1. Injury Elimination Level

- (106) In the absence of comments, the methodology mentioned in recital (179) of the provisional Regulation used to obtain the non-injurious prices of the Community industry was confirmed. However, the same revisions as those described in recitals (68) and (72) above were applied for the definitive assessment of the injury elimination levels. In addition, the profit margin used in the injury margin calculations was established at ex-works level in order to obtain the non-injurious prices of the Community industry at ex-works level during the IP.
- (107) Concerning the RM, in line with the contents of recital (71) above, it was considered appropriate to use price data available for all the exports from the RM to the Community, in the calculation of the definitive injury elimination level. Hence, all price data available duly adjusted to reflect the weighted average export prices to the first independent customer in the Community, on a cif basis, was used. On that basis the definitive injury elimination level for imports from the RM was found to be below the *de minimis* threshold as mentioned in recital (64) above.

(108) In view of the conclusions reached with regard to dumping, injury, causation and Community interest, definitive anti-dumping measures against imports from the PRC should be imposed in order to prevent further injury being caused to the Community industry.

(109) All parties were informed of the essential facts and considerations on the basis of which it was intended to recommend the imposition of definitive anti-dumping duties. They were also granted a period within which they could make representations subsequent to this disclosure. The comments submitted by the parties were duly considered, and, where appropriate, the findings have been modified accordingly.

## 2. Definitive measures

(110) In the light of the foregoing, it is considered that, in accordance with Article 7(2) of the basic Regulation, definitive anti-dumping duties should be imposed on imports originating in the PRC at the level of the lower of the dumping and the injury margins, in accordance with the lesser duty rule. In this case, all duty rates should accordingly be set at the level of the injury margins found. By analogy with Article 9(3) of the basic Regulation, given that the injury margin for the RM and Turkey is below a *de minimis* level, the investigation in respect of these countries should be terminated.

(111) No definitive anti-dumping duties are to be imposed on imports originating in the RM and Turkey.

(112) The proposed anti-dumping duties are the following:

Company	Injury elimination margin	Dumping margin	Anti-dumping duty rate
Valin Group (PRC)	7,9 %	38,6 %	7,9 %
PRC residual duty	24,0 %	52,3 %	24,0 %

## 3. Definitive collection of provisional duties

(113) In view of the magnitude of the dumping margins found and in the light of the level of the injury caused to the Community industry, it is considered necessary that the amounts secured by way of the provisional anti-dumping duty, imposed by the provisional Regulation should be definitively collected to the extent of the amount of the definitive duties imposed. Where the definitive duties are lower than the provisional duties, amounts provisionally secured in excess of the definitive rate of anti-dumping duties shall be released. Where the definitive duties are higher than the provisional duties, only the amounts secured at the level of the provisional duties shall be definitively collected.

## H. TERMINATION OF THE PROCEEDING

(114) In view of the findings regarding imports originating in the RM and Turkey, the proceeding with respect to these two countries should be terminated,

HAS ADOPTED THIS REGULATION:

### Article 1

1. A definitive anti-dumping duty is hereby imposed on imports of bars and rods, hot-rolled, in irregularly wound coils, of iron, non-alloy steel or alloy steel other than of stainless steel originating in the People's Republic of China, falling within CN codes 7213 10 00, 7213 20 00, 7213 91 10, 7213 91 20, 7213 91 41, 7213 91 49, 7213 91 70, 7213 91 90, 7213 99 10, 7213 99 90, 7227 10 00, 7227 20 00, 7227 90 10, 7227 90 50 and 7227 90 95.

2. The rate of the definitive anti-dumping duty applicable to the net, free-at-Community-frontier price, before duty, of the products described in paragraph 1 and produced by the companies below shall be as follows:

Country	Company	Duty	TARIC additional codes
People's Republic of China	Valin Group	7,9 %	A930
	All other companies	24,0 %	A999

3. Unless otherwise specified, the provisions in force concerning customs duties shall apply.

### Article 2

The anti-dumping proceeding concerning imports of wire rod originating in the Republic of Moldova and Turkey is hereby terminated.

### Article 3

The amounts secured by way of the provisional anti-dumping duty pursuant to Regulation (EC) No 112/2009 on imports of wire rod originating in the People's Republic of China shall be definitively collected at the rate of the definitive duty imposed pursuant to Article 1. The amounts secured in excess of the definitive rates of the anti-dumping duty shall be released. Amounts secured by way of the provisional anti-dumping duty pursuant to Commission Regulation (EC) No 112/2009 on imports of wire rod originating in the Republic of Moldova shall be released.

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*Article 4*

This Regulation shall enter into force on the day following its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 27 July 2009.

*For the Council*  
*The President*  
C. BILDT

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WORLD TRADE  
ORGANIZATION

G/ADP/N/244/EU

20 September 2013

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**Committee on Anti-Dumping Practices**

Original: English

**SEMI-ANNUAL REPORT UNDER  
ARTICLE 16.4 OF THE AGREEMENT**

EUROPEAN UNION

Reproduced herewith is the semi-annual report for the period 1 January-30 June 2013 from the **European Union**.

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## ANNEXES

DEFINITIVE ANTI-DUMPING MEASURES IN FORCE  
AS OF 30 JUNE 2013

Country/ Customs Territory	Product, investigation ID number	Measure(s)	Date of original imposition; publication reference	Date(s) of extension; publication reference(s)
Armenia	Aluminium Foil AD 534 - AR	Duties	06.10.2009 L 262, p.1	
Belarus	Welded tubes and pipes, of iron or non-alloy steel AD523BY	Duties	19.12.2008, L 343, p.1	
Bosnia and Herzegovina	Zeolite A powder AD553 BA	Duties Undertakings	14.05.2011 L 125, p. 1 14.05.2011 L 125, p. 26	
Brazil	Aluminium Foil AD 534 - BR	Duties Undertakings	06.10.2009 L 262, p.1 06.10.2009 L 262, p.50	
Canada	Biodiesel (ext.) R506 CA	Duties (ext.)	11.05.2011 L 122, p. 12	
China	Aluminium Foil AD 534 CN	Duties Undertakings	06.10.2009 L 262, p.1 06.10.2009 L 262, p. 50	
	Aluminium foil in small rolls AD582 CN	Duties	13.03.2013 OJ L 69, p. 11 [AD582]	
	Aluminium radiators AD578 CN	Duties	09.11.2012 L 310, p. 1	
	Aluminium road wheels AD541CN	Duties	28.10.2010 L 282 p. 1	
	Barium carbonate AD475CN	Duties	21.07.2005 L 189, p.15 corrected by L 181, 04.07.2006, p. 111	19.08.2011 L 214, p. 1
	Bicycles AD287CN	Duties	09.09.1993 L 228, p.1	14.07.2000 L 175, p.39 14.07.2005 L 183, p.1 06.10.2011 L 261, p.2 05.06.2013 L 153 p. 17
	Bicycle parts AD287CN AC	Duties	18.01.97 L 16, p.1	14.07.2000 L 175, p.39 28.02.2008 L 55, p.1
	Candles, tapers and the like AD528CN (AD528 CH)	Duties	14.05.2009 L 119, p. 1	
	Cargo Scanning Systems AD522 CN	Duties	16.06.2010 L 150 p.1	
	Ceramic tableware and kitchenware AD586 CN	Duties	15.05.2013, L 131 p. 1	

Country/ Customs Territory	Product, investigation ID number	Measure(s)	Date of original imposition; publication reference	Date(s) of extension; publication reference(s)
China (Cont'd)	Seamless pipes and tubes of iron and steel AD533CN	Duties	06.10.2009 L 262, p.19	
	Seamless pipes and tubes of stainless steel AD565CN	Duties	20.12.2011 L 336, p. 6	
	Silicon metal AD245CN	Duties	28.07.1990 L 198, p.57	16.12.1997 L 345, p.1 04.03.2004 L 66, p.15 29.05.2010 L 131, p.1
	Sodium cyclamate AD467CN	Duties	11.03.2004 L 72, p.1	08.06.2010 L 140, p.2
	Sodium gluconate AD544CN	Duties	28.10.2010 L 282, p. 24	
	Stainless steel fasteners and parts thereof AD482CN	Duties	19.11.2005 L 302, p. 1	07.01.2012 L 5, p. 1
	Steel ropes and cables AD384CN	Duties	17.08.1999 L 217, p.1	16.11.2005 L 299, p.1 11.05.2010 L 117, p. 1 09.02.2012 L 36, p. 1
	Sulphanilic acid AD444CN	Duties	25.07.2002 L 196, p.11	16.10.2008 L 275, p.1
	Tartaric acid AD488CN	Duties	27.01.2006 L 23, p.1	24.04.2012 L 110, p. 3
	Threaded tube or pipe cast fittings, of malleable cast iron AD585 CN	Duties	14.05.2013 L 129, p. 1	
	Trichloroisocyanuric acid AD480CN	Duties	07.10.2005 L 261, p.1	30.12.2011 L 346, p. 6
	Tube and pipe fitting, of iron or steel AD323CN	Duties	03.04.1996 L 84, p.1	06.06.2003 L 139, p.1 04.09.2009 L 233, p.1
	Tungsten carbide and fused tungsten carbide AD238CN	Duties	27.09.1990 L 264, p.7	09.04.1998 L 111, p.1 31.12.2004 L 395, p.56 24.03.2011 L 78, p. 1
	Tungsten electrodes AD502CN	Duties	13.03.2007 L 72, p.1	
	Welded tubes and pipes, of iron or non-alloy steel AD523CN	Duties	19.12.2008 L 343, p.1	
	Wire Rod AD530CN	Duties	05.08.2009 L 203, p.1	
India	Fatty alcohols and their blends AD563IN	Duties	L 293 11.11.2011 p. 1	
	Graphite electrode systems AD469IN	Duties	18.09.2004 L 295, p.10	16.12.2010 L 332, p. 17
	Oxalic acid AD568 IN	Duties	18.04.2012 L 106, p. 1	
	Sulphanilic acid AD444IN	Duties Undertakings	25.07.2002 L 196, p.11 26.01.2006 L 22, p.52	16.10.2008 L 275, p.1

# 18 Malaysia levies anti-dumping tax on steel wire rods from China, Indonesia, S. Korea

Xinhua | Agencies

Published on February 18, 2013 19:01

The Malaysian government announced on Monday it will impose anti-dumping duties on steel wire rods imports from China, China's Taiwan, Indonesia and South Korea for five years beginning February 20.


It said it will levy duties for the first time in the steel industry of 3.03 percent to 25.2 percent on products from the three countries.

The decision came after the ministry of international trade and industry completed an investigation launched in June last year into complaints by a domestic producer that steel wire rod imports from the three countries and Turkey, sold at a much lower price, were hurting the domestic industry.

China's Jiangsu Shagang International Trade Co. Ltd. and Jiangsu Yonggang Group Co. Ltd., and Indonesia's P.T. Ispat Indo are exempted from the duty.

The government freed Turkish manufacturers of anti-dumping duties after it found imports from Turkey have a dumping margin of below 2 percent.

Posted in: Asia-Pacific

Actions: E-mail | Permalink | Comments (0)  | Kick it! | DZone it! | del.icio.us



## Malaysia to impose anti-dumping duties on steel wire rods

PETALING JAYA: The Government has proposed to impose anti-dumping duties on steel wire rods from selected companies in China, Taiwan, South Korea and Indonesia, following the completion of a detailed investigation into the import of the commodity.

"The Royal Malaysian Customs will enforce the collection of the anti-dumping duties, and this measure will be effective for five years from Feb 20, 2013," according to a statement from the International Trade and Industry Ministry (Miti) said yesterday.

Imports of steel wire rods from Turkey, on the other hand, would not be slapped with any anti-dumping duties due to the dumping margin being below 2%, the ministry said.

The Government began an anti-dumping investigation on June 25, 2012, based on a petition filed by Amsteel Mills Sdn Bhd on behalf of the domestic steel wire rod industry.

The petitioner alleged that the imports of steel wire rods originating in or exported from China, Taiwan, South Korea, Indonesia and Turkey were being imported into Malaysia at a much lower price than in the domestic markets of those countries.

This, the petitioner claimed, was causing material injury to the domestic industry producing the same product in Malaysia.

According to Miti, anti-dumping duties on imports of steel wire rods from Taiwanese companies would be as follows: China Steel Corp 10.98%; Feng Hsin Iron and Steel Co Ltd 9.04%; and others 25.20%. Imports of steel wire rods from China-based companies Jiangsu Shagang International Trade Co Ltd and Jiangsu Yonggang Group Co Ltd would not be slapped with any anti-dumping duties, while imports of steel wire rods from other Chinese companies would be slapped with an anti-dumping duty of 25.20%.

Imports of steel wire rods from companies in Indonesia would also be subject to an anti-dumping duty of 25.20%, except for those sourced from PT Ispat Indo, which would not be imposed with such a levy.

Imports of steel wire rods from companies in South Korea would also be subject to an anti-dumping duty of 25.20%, except for those sourced from Posco, which would be imposed with an anti-dumping duty of 3.03%.



WORLD TRADE  
ORGANIZATION

G/ADP/N/252/MYS

23 January 2014

(14 0353)

Page: 1/6

Committee on Anti-Dumping Practices

Original: English

SEMI-ANNUAL REPORT UNDER  
ARTICLE 16.4 OF THE AGREEMENT

MALAYSIA

Reproduced herewith is the semi-annual report for the period 1 July-31 December 2013  
from **Malaysia**.

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## ANNEXES

DEFINITIVE ANTI-DUMPING MEASURES IN FORCE  
AS OF 31 DECEMBER 2013

Country/ Customs Territory	Product, investigation ID number	Measure(s)	Date of original imposition; publication reference	Date(s) of extension; publication reference(s)
Canada	Newsprint AD 01/03/CAN	Duties	27.09.2003 Gazette, P.U. (A) 370	21.03.2009 Gazette, P.U. (A) 125
China	Steel Wire Rod AD01/12/CHN	Duties	20.02.2013 Gazette, P.U. (A) 53	
	Biaxially oriented polypropylene film AD03/12/PRC	Duties	23.04.2013 Gazette, P.U. (A) 146	
	Electrolytic Tinplate AD01/13/CHN	Duties	16.11.2013 Gazette, P.U. (A) 339	
Indonesia	Newsprint AD 01/03/IDN	Duties	27.09.2003 Gazette, P.U. (A) 370	21.03.2009 Gazette, P.U. (A) 125
	Steel Wire Rod AD01/12/IDN	Duties	20.02.2013 Gazette, P.U. (A) 53	
	Biaxially oriented polypropylene film AD03/12/IDN	Duties	23.04.2013 Gazette, P.U. (A) 146	
Korea, Rep. of	Newsprint AD 01/03/KOR	Duties	27.09.2003 Gazette, P.U. (A) 370	21.03.2009 Gazette, P.U. (A) 125
	Steel Wire Rod AD01/12/KOR	Duties	20.02.2013 Gazette, P.U. (A) 53	
	Electrolytic Tinplate AD01/13/KOR	Duties	16.11.2013 Gazette, P.U. (A) 339	
Philippines	Newsprint AD01/03/PHL	Duties	27.09.2003 Gazette, P.U. (A) 370	21.03.2009 Gazette, P.U. (A) 125
Chinese Taipei	Steel Wire Rod AD01/12/TPKM	Duties	20.02.2013 Gazette, P.U. (A) 53	
	Biaxially oriented polypropylene film AD03/12/TPKM	Duties	23.04.2013 Gazette, P.U. (A) 146	
Thailand	Polyethylene Terephthalate AD 01/05/THA	Duties	23.10.2005 Gazette, P.U. (A) 414	21.04.2011 Gazette, P.U. (A) 142
	Biaxially oriented polypropylene film AD03/12/THAI	Duties	23.04.2013 Gazette, P.U. (A) 146	
United States	Newsprint AD 01/03/USA	Duties	27.09.2003 Gazette, P.U. (A) 370	21.03.2009 Gazette, P.U. (A) 125
Viet Nam	Biaxially oriented polypropylene film AD03/12/Viet Nam	Duties	23.04.2013 Gazette, P.U. (A) 146	



WORLD TRADE  
ORGANIZATION

G/ADP/N/244/THA

24 September 2013

(13-5104)

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**Committee on Anti-Dumping Practices**

Original: English

**SEMI-ANNUAL REPORT UNDER  
ARTICLE 16.4 OF THE AGREEMENT**

THAILAND

Reproduced herewith is the semi-annual report for the period 1 January-30 June 2013 from  
**Thailand.**

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Reporting Member: THAILAND<sup>1</sup>

SEMI-ANNUAL REPORT OF ANTI-DUMPING ACTIONS<sup>2</sup>

FOR THE PERIOD 1 JANUARY-30 JUNE 2013

Original Investigations

Country or customs territory	Product	Initiation	Provisional measures and preliminary determinations	Final measures		No final measures / termination	Other	Trade data (from published report(s))		Basis for normal value determination
				Definitive duty	Price undertaking			Import volume or value (units / currency); product coverage, period, if different from cols. 2 / 3	Import volume as % of apparent domestic consumption or as % of total imports	
1	2	3	4	5	6	7	8	9	10	11
China	Cold Reduced Carbon Steel in Coils and not in Coils (****) HS 7209.1500, 7209.1600, 7209.1700, 7209.1891, 7209.1899, 7209.2500, 7209.2600, 7209.2700, 7209.2810, 7209.2890, 7209.9010, 7209.9090, 7211.2310, 7211.2320, 7211.2390, 7211.2910, 7211.2920, 7211.2930, 7211.2990, 7225.5090 (AD2012-02)	17/08/12 D: 01/07/11 – 30/06/12 I: 01/01/08 – 30/06/12								
	Flat Cold Rolled Stainless Steel HS 7219.3200, 7219.3300, 7219.3400, 7219.3500, 7219.9000, 7220.2010, 7220.2090, 7220.9010, 7220.9090 (AD2012-01)	17/08/12 D: 01/07/11 – 30/06/12 I: 01/01/09 – 30/06/12								

- 2 -

G/ADP/N/244/THA

<sup>1</sup> Website address where published reports on investigations are available: [www.dft.go.th](http://www.dft.go.th)

<sup>2</sup> All terms and column headings used in this format have the meanings assigned to them in the instructions.

<sup>3</sup> For reference purposes only.

1	2	3	4	5	6	7	8	9	10	11
China (Cont'd)	High Carbon Steel Wire Rod HS 7213.9190, 7227.9000, (AD2012-05)	29/11/12 D: 01/10/11 – 30/09/12 I: 01/01/09 – 30/09/12								
	Certain Hot Dip Plated or Coated with Aluminium Zinc Alloys of Cold Rolled Steel(**) HS 7210.6110, 7210.6190 (AD2011-10)	08/07/11 D: 01/07/10 – 30/06/11 I: 01/01/08 – 30/06/11		10/01/2013 2.36– 12.820% All others: 26.22%				32,060 MT during POI	23.73% of total imports	HMP
	Painted Hot Dip Galvanized of Cold Rolled Steel and Painted Hot Dip Plated or Coated with Aluminium Zinc Alloys of Cold Rolled Steel(***) HS 7210.7010, 7210.7090 (AD2011-13)	08/07/11 D: 01/07/10 – 30/06/11 I: 01/01/08 – 30/06/11		10/01/2013 5.56– 42.88% All others: 42.88%				30,693 MT during POI	23.36% of total imports	HMP, FA
Korea, Rep. of	Certain Hot Dip Plated or Coated with Aluminium Zinc Alloys of Cold Rolled Steel(**) HS 7210.6110, 7210.6190 (AD2011-09)	08/07/11 D: 01/07/10 – 30/06/11 I: 01/01/08 – 30/06/11		10/01/2013 13.82– 16.25% All others: 22.55%				36,424 MT during POI	26.96% of total imports	HMP, CV
	Painted Hot Dip Galvanized of Cold Rolled Steel and Painted Hot Dip Plated or Coated with Aluminium Zinc Alloys of Cold Rolled Steel(***) HS 7210.7010, 7210.7090 (AD2011-12)	08/07/11 D: 01/07/10 – 30/06/11 I: 01/01/08 – 30/06/11		10/01/2013 2.51–5.95% All others: 10.25%		Termination for 1 exporter		45,830 MT during POI	34.88% of total imports	HMP
Chinese Taipei	Certain Hot Dip Plated or Coated with Aluminium Zinc Alloys of Cold Rolled Steel(**) HS 7210.6110, 7210.6190 (AD2011-08)	08/07/11 D: 01/07/10 – 30/06/11 I: 01/01/08 – 30/06/11		10/01/2013 2.59–7.12% All others: 39.12%				43,389 MT during POI	32.12% of total imports	HMP
	Painted Hot Dip Galvanized of Cold Rolled Steel and Painted Hot Dip Plated or Coated with Aluminium Zinc Alloys of Cold Rolled Steel(***) HS 7210.7010, 7210.7090 (AD2011-11)	08/07/11 D: 01/07/10 – 30/06/11 I: 01/01/08 – 30/06/11		10/01/2013 18.39– 23.55% All others: 44.77%				8,670 MT during POI	6.60% of total imports	HMP, CV
	Cold Reduced Carbon Steel in Coils and not in Coils (****) HS 7209.1500, 7209.1600, 7209.1700, 7209.1891, 7209.1899, 7209.2500, 7209.2600, 7209.2700, 7209.2810, 7209.2890, 7209.9010, 7209.9090, 7211.2310, 7211.2320, 7211.2390, 7211.2910, 7211.2920, 7211.2930, 7211.2990, 7225.5090 (AD2012-04)	17/08/12 D: 01/07/11 – 30/06/12 I: 01/01/08 – 30/06/12								

1	2	3	4	5	6	7	8	9	10	11
Viet Nam	Cold Reduced Carbon Steel in Coils and not in Coils (****) HS 7209.1500, 7209.1600, 7209.1700, 7209.1891, 7209.1899, 7209.2500, 7209.2600, 7209.2700, 7209.2810, 7209.2890, 7209.9010, 7209.9090, 7211.2310, 7211.2320, 7211.2390, 7211.2910, 7211.2920, 7211.2930, 7211.2990, 7225.5090 (AD2012-03)	17/08/12 D: 01/07/11 - 30/06/12 I: 01/01/08 - 30/06/12								

# Reviews / Other subsequent proceedings

Country or customs territory	Product	Initiation	Preliminary results / determination	Final results		Revocation of Measures	Other (e.g., procedures not affecting the duty level)	Trade Data (if available from published report(s) on proceeding)		Basis for normal value determination
				Definitive duty	Price undertaking			Import volume or value (units /currency); product coverage, period, if different from cols. 2 / 3	Import volume as % of apparent domestic consumption or as % of total imports	
	Description; HS 6-digit category covering investigated product; ID number; (*) if investigation of >1 country	Date, Type of Review or Procedure (code), Period Covered	Effective date; range of individual dumping margins; "other" rates; [range of applied rates if different, reason]	Effective date; range of individual dumping margins; "other" rates; [range of applied rates if different, reason]	Effective date; range of individual dumping margins or minimum prices; or other outcome (code)	Date Reason	Date, explanation			Codes for all bases used in proceeding
1	2	3	4	5	6	7	8	9	10	11
Nil										

## Basis for Determination Codes

HMP	Home market price.
FA	Facts Available.
TM	Third country price.
CV	Constructed value.

## Other abbreviations

(R)	A review of existing measures.
(ER)	An expiry review
(PR)	A review on scope of products under the measures
(RF)	A review for a refund of AD duty
CF	Information not provided for reasons of confidentiality
LDR	Lesser duty
EXP	Measure expired without review
P	Publication date
C	Date of commencement of duty collection
n.a.	Not available.





24 January 2014

(14-0395)

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Committee on Safeguards

Original: English

NOTIFICATION UNDER ARTICLE 12.1(A) OF THE AGREEMENT ON  
SAFEGUARDS ON INITIATION OF AN INVESTIGATION AND  
THE REASON FOR IT

INDONESIA

*(Bars and Rods, Hot-Rolled, in Irregularity Wound Coils)*

The following communication, dated 24 January 2014, is being circulated at the request of the delegation of Indonesia.

Pursuant to Article 12.1(a) of the WTO Agreement on Safeguards, the Republic of Indonesia hereby wishes to notify the Committee on Safeguards that the Indonesian Safeguards Committee (*Komite Pengamanan Perdagangan Indonesia/KPPI*), hereinafter referred as "the Investigating Authority", has initiated a safeguard investigation on the imports of bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel or of other alloy steel, under HS Codes 7213.91.10.00, 7213.91.20.00, 7213.91.90.00, 7213.99.10.00, 7213.99.20.00, 7213.99.90.00, and 7227.90.00.00.

On 23 December 2013, an application for a safeguard measures was received by the Investigating Authority from PT. Ispat Indo and PT. Krakatau Steel (Persero), Tbk., hereinafter referred as "the Applicant", against importation of bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel or of other alloy steel, under HS Codes 7213.91.10.00, 7213.91.20.00, 7213.91.90.00, 7213.99.10.00, 7213.99.20.00, 7213.99.90.00, and 7227.90.00.00. After examining the properly documented application, the Investigating Authority concluded that there was a sufficient evidence to justify the initiation of a safeguard investigation.

**1 THE DATE OF INITIATION**

The investigation initiated on 17 January 2014.

**2 SUBJECT GOOD**

- a. Bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel, other than containing indentations, ribs, grooves or other deformations produced during the rolling process, and other than other, of free cutting steel, of circular cross-section measuring less than 14 mm in diameter, of a kind used for producing soldering sticks, under HS. code 7213.91.10.00.
- b. Bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel, other than containing indentations, ribs, grooves or other deformations produced during the rolling process, and other than other, of free cutting steel, of circular cross-section measuring less than 14 mm in diameter, of a kind used for concrete reinforcement (rebars), under HS. code 7213.91.20.00.
- c. Bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel, other than containing indentations, ribs, grooves or other deformations produced during the

rolling process, and other than other, of free cutting steel, of circular cross-section measuring less than 14 mm in diameter, other than of a kind used for producing soldering sticks, other than of a kind used for concrete reinforcement (rebars), and other than containing aluminium at least 0.02% or silicon at least 0.10% or sulfur up to 0.010%, under HS. code 7213.91.90.00.

- d. Bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel, other than containing indentations, ribs, grooves or other deformations produced during the rolling process, and other than other, of free cutting steel, of circular cross-section measuring other than less than 14 mm in diameter, of a kind used for producing soldering sticks, under HS. code 7213.99.10.00.
- e. Bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel, other than containing indentations, ribs, grooves or other deformations produced during the rolling process, and other than other, of free cutting steel, of circular cross-section measuring other than less than 14 mm in diameter, of a kind used for concrete reinforcement (rebars), under HS. code 7213.99.20.00.
- f. Bars and rods, hot-rolled, in irregularity wound coils, of iron or non-alloy steel, other than containing indentations, ribs, grooves or other deformations produced during the rolling process, other than, other, of free cutting steel, of circular cross-section measuring other than less than 14 mm in diameter, other than of a kind used for producing soldering sticks, other than a kind used for concrete reinforcement (rebars), and other than containing silicon at least 0.10% or aluminium at least 0.02% or sulfur up to 0.010%, under HS. code 7213.99.90.00.
- g. Bars and rods, hot-rolled, in irregularity wound coils, of other alloy steel, other than of high speed steel and of silicon-manganese steel or of containing chrome at least 0.9%, under HS. code 7227.90.00.00.

### 3 REASONS FOR INITIATION OF INVESTIGATION PROCEDURE

The investigation was initiated following an evaluation of *prima facie* evidence provided in the application for a safeguard measure by the Applicant, which represents a major producer of the Subject Good in Indonesia.

The data submitted by the Applicant showed that there was an increased of volume of import of the subject good cause or threaten to cause serious injury to the Applicant.

The documents also showed a negative development which indicates to cause a serious injury, covering information on share of the domestic market taken by increased import, profits and losses, employment, and inventory.

### 4 FURTHER INFORMATION

All views or comments should be made in writing and submitted to the following address:

**THE INDONESIAN SAFEGUARDS COMMITTEE**  
(Komite Pengamanan Perdagangan Indonesia/KPPI)  
Jl. M.I. Ridwan Rais No.5, Building I, 5<sup>th</sup> floor, Jakarta 10110  
Telephone / Facsimile: (62-21) 385 7758  
E-mail: [kpqi@kemendag.go.id](mailto:kpqi@kemendag.go.id)

# **EXHIBIT 12**






[illegible]

Company-specific CASWR production capacity taken from attached [ ] and articles in Exh. 9.  
Chinese industry total CASWR production of [ ] short tons is an annualization of [ ] metric tons of CASWR production from January through November 2013 (see Exh. 9 (Asian Metal)), multiplied by 1.10231 (conversion from metric to short tons). Chinese industry CASWR production capacity was calculated using the above production of [ ] short tons and the Chinese steel industry's 2013 average capacity utilization of 72 percent. See Exh. 9 ("Giant steel firm grapples with toughest times in five years," [http://news.xinhuanet.com/english/china/2013-07/20/c\\_132557334.htm](http://news.xinhuanet.com/english/china/2013-07/20/c_132557334.htm) ).

**THE REMAINDER OF THIS BUSINESS  
PROPRIETARY EXHIBIT  
IS NOT SUSCEPTIBLE TO SUMMARIZATION  
AND THEREFORE IS NOT PROVIDED  
WITH THIS PUBLIC VERSION**

# **EXHIBIT 13**





ayjcy.en.alibaba.com

45# High quality carbon wire rod steel

Add to Inquiry Cart

Add to My Favorites

Share to

FOB Price:

US \$ 200 - 1,200 / Ton | [Get Latest Price](#)

Port:

Tianjin Shanghai Qingdao

Minimum Order Quantity:

20 Ton/Tons

Supply Ability:

50000 Ton/Tons per Day

Payment Terms:


L/C,T/T

Ms. Elaine yang

Offline

Contact Supplier

Start Order



See larger image

Verified Supplier | Anyang Jin Chao Yang Materials Co., Ltd.

[ Henan, China (Mainland) ]

Business Type: Trading Company

Main Markets: Domestic Market 97.21%,Western Europe 1.58%,Southeast Asia 1.21%

Comprehensive capabilities verified by TUV Rheinland

Onsite operations checked and legal status confirmed

57.1% Quick Response

Search products here

Product Showcase

Product Categories

steel plates

Steel bar

Steel pipe

Shape steel

Product Detail

Quick Details

Steel Grade: 45# High quality carbon wire rod steel

Application: Construction

Model Number: 45#

Certificate: ISO9001,CE,FPC,JIS,ASTM,TUV,PED,SGS,BSI

manufacturing technique: hot rolled

Packaging & Delivery

Packaging Details:

Delivery Detail:

Specifications

45# High quality carbon wire rod steel

1)standard: GB/T 4354 -2008

2)Diameter:5.5mm~20mm

Minisite Survey

Report Suspicious Activity

Standard: ASTM. GB

Place of Origin: Henan, China (Mainland)

Alloy Or Not: Is Alloy

Brand Name: Jigang Baogang Wugang

Brand: Jigang, Wugang, Baogang

Standard: GB/T 4354 -2008

Quality Assure: Impact Specimen Test

application: Construction

Wire Gauge: 5.5mm~20mm

Type: Copper Clad Steel Wire

Special Use: Cold Heading Steel

name: 45# High quality carbon wire rod steel

Raw Materials: High purity of steel

Diameter: 5.5mm~20mm

Service: Extended distributing service

If tonnage is less, proposing use container 20GP 5900.00 X 2340.00 X 2350.00 40GP 11800.00 X 2340.00 X 2350.00 40HQ 11800.00 X 2340.00 X 2690.00 If the goods is more,by bulk is more convenient and save money

7-30days

Stainless steel  
Steel wire rod  
Steel coil  
Ductile Iron pipe  
Ungrouped  
See All Categories

New Products

petroleum industry use  
q345r carbon ...

petroleum industry use  
q345r steel ...

petroleum industry use  
q345r steel ...

petroleum industry use  
q345r steel ...

Wire Rods Steel

Item 45# High quality carbon wire rod steel  
Standard GB/T 4354 -2008  
Diameter 5.5mm~20mm  
Surface Black painted,PE coated,Galvanized,color coated,etc  
Delivery Heat treatment facilities for hot-rolled, controlled rolling, normalizing, annealing,  
States tempering,  
quenching, normalizing plus tempering, quenching and tempering, and other  
delivery states are  
available as customers' requirement.  
Tests HIC, SSC, SPWHT, Macrostructure, detection of defects,Hardness and DWTT test  
and  
en10204/3.1 certificate are also available.  
Package Standard export seaworthy package,suit for all kinds of transport,or as required.  
Container 20ft GP:5898mm(Length)x2352mm(Width)x2393mm(High)  
Size 40ft GP:12032mm(Length)x2352mm(Width)x2393mm(High)  
40ft HC:12032mm(Length)x2352mm(Width)x2698mm(High)  
Bulk Size Any size  
Price term Ex-Work,FOB,CNF,CFR,CIF,etc  
Export to Ireland,Singapore,Indonesia,Ukraine,Saudi  
Arabia,Spain,Canada,USA,Brazil,Thailand,  
Korea,Iran,India,Egypt,Oman,Malaysia,Angola,etc  
Application Applicable to the manufacturing of low carbon steel wire and clad and galvanized  
low carbon steel wire. Construction, wire drawing, packaging, welding rod, and  
bolts, nuts, rivets  
Contact www.ayjcy.cn

Chemical composition and Mechanical performance

Brand	C	Mn	Si	P	S	Ni	Cr
45#	0.42~0.50	0.50~0.80	0.17~0.37	≤0.035	≤0.035	≤0.25	≤0.25

Minisite Survey

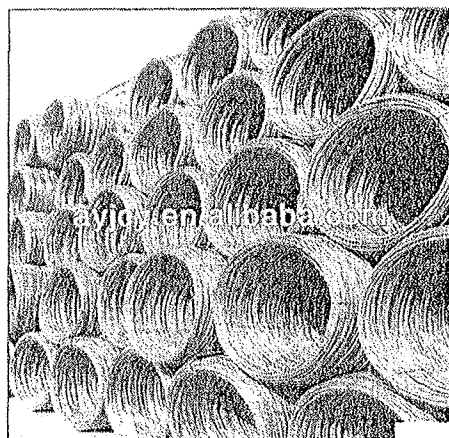
Grade	Thick mm	Yield point σs,MPa	Tensile strength σb,MPa	Elongation δ5,%	Reduction of area ψ (%)
45#	25	≥355	≥600	≥16	≥40

Process Flow

About 24 results: Steel Wire (1)

Home > Products > Minerals & Metallurgy > Steel > Steel Wire (120273)

Multi-Language Sites ▾



See larger image

## 45# wire steel coil

Add to Inquiry Cart

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Share to:

733 0

FOB Price: US \$200 - 1,200 / Ton [Get Latest Price](#)

Port: Tianjin Shanghai Qingdao

Minimum Order Quantity: 20 Ton/Tons

Supply Ability: 50000 Ton/Tons per Day

Payment Terms: L/C, T/T

Anyang Jin  
Chao Yang Materials Co., Ltd.  
[ Henan, China (Mainland) ]  
Business type: Trading Company  
Main Markets: Domestic Market 97.21%, ...

Comprehensive capabilities verified by  
TUV Rheinland

Onsite operations checked and legal  
status confirmed

I'm Away

58.4% Quick Response

Ms. Julia Liu

Contact Supplier

Start Order

Contact Details Company Profile

Product Categories

Not exactly what you want? Post a quick Buying Request!

Product Detail

Company Profile

Report Suspicious Activity

### Quick Details

Steel Grade:	45#	Standard:	AISI, ASTM, BS, DIN, GB, JIS, GB/T 435	Wire Gauge:	15-42
Place of Origin:	Henan China (Mainland)	Type:	Copper Clad Steel Wire	Application:	Construction
Alloy Or Not:	Non-alloy	Special Use:	Free Cutting Steel	Model Number:	45#
Brand Name:	Jiyuan, Angang, Baogang	name:	45# High quality carbon steel coil	Certificate:	ISO9001:CE,FPC,JIS,ASTM,TUV,PE
Brand:	Jigang, Wugang, Baogang	Raw Materials:	High purity of steel	Diameter:	5.5mm~20mm
Quality Assure:	Impact Specimen Test	Service:	Extended distributing service	manufacturing technique:	hot rolled

### Packaging & Delivery

Packaging Detail: If tonnage is less, proposing use container 20GP 5900.00 X 2340.00 X 2350.00 40GP 11800.00 X 2340.00 X 2350.00 40HQ 11800.00 X 2340.00 X 2690.00 If the goods is more, by bulk is more convenient and save money

Delivery Detail: 7-30days

### Specifications

45# High quality carbon wire rod steel

1) standard: GB/T 4354 -2008

2) Diameter 5.5mm~20mm

### 45# High quality carbon steel coil

Item	45# High quality carbon steel coil
Standard	GB/T 4354 -2008
Diameter	5.5mm~20mm
Surface	Black painted, PE coated, Galvanized, color coated, etc
Delivery States	Heat treatment facilities for hot-rolled, controlled rolling, normalizing, annealing, tempering, quenching, normalizing plus tempering, quenching and tempering, and other delivery states are available as customers' requirement.

Tests HIC, SSC, SPWHT, Macrostructure, detection of defects, Hardness and DWTT test and  
en10204/3.1 certificate are also available.

Package Standard export seaworthy package, suit for all kinds of transport, or as required.

Container 20ft GP: 5898mm (Length) x 2352mm (Width) x 2393mm (High)

Size 40ft GP: 12032mm (Length) x 2352mm (Width) x 2393mm (High)  
40ft HC: 12032mm (Length) x 2352mm (Width) x 2698mm (High)

Bulk Size Any size

Price term Ex-Work, FOB, CNF, CFR, CIF, etc

Export to Ireland, Singapore, Indonesia, Ukraine, Saudi Arabia, Spain, Canada, USA, Brazil, Thailand, Korea, Iran, India, Egypt, Oman, Malaysia, Angola, etc

Application Applicable to the manufacturing of low carbon steel wire and clad and galvanized low carbon steel wire. Construction, wire drawing, packaging, welding rod, and bolts, nuts, rivets

Contact [www.ayjcy.cn](http://www.ayjcy.cn)

#### Chemical composition and Mechanical performance

Brand	C	Mn	Si	P	S	Ni	Cr
45#	0.42~0.50	0.50~0.80	0.17~0.37	≤0.035	≤0.035	≤0.25	≤0.25

Grade	Thick mm	Yield point σs, MPa	Tensile strength σb, MPa	Elongation δs, %	reduction of area ψ (%)
45#	25	≥355	≥600	≥16	≥40

#### Process Flow

Home


Product Categories ▾

Company Profile

Advantages

Contacts

Home > Product Categories > Steel wire rod > Wire rod > coil rod for cold heading SWRCH8A alibaba cn china supplier



coil rod for cold heading SWRCH8A alibaba cn china supplier

Add to Inquiry Cart

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Share to:

FOB Price:

US \$ 200 - 1,200 / Ton | [Get Latest Price](#)

Port:

Tianjin Shanghai Qingdao

Minimum Order Quantity:

20 Ton/Tons

Supply Ability:

50000 Ton/Tons per Day

Payment Terms:

L/C,T/T

Ms. elaine yang

Offline

Contact Supplier

Start Order

See larger image

Verified Supplier | Anyang Jin Chao Yang Materials Co., Ltd.

[ Henan, China (Mainland) ]

Business Type: Trading Company

Main Markets: Domestic Market 97.21%, Western Europe 1.58%, Southeast Asia 1.21%

Comprehensive capabilities verified by TÜV Rheinland

Onsite operations checked and legal status confirmed

57.1% Quick Response

Product Detail

Quick Details

Steel Grade: coil rod for cold heading SWRCH8A

Application: Netting

Model Number: SWRCH8A

Certificate: ISO9001:CE,FPC,JIS;ASTM;TUV;PED,SG S;BSI

manufacturing technique: hot rolled

Standard: ASTM, GB, JIS

Place of Origin: Henan, China (Mainland)

Alloy Or Not: Is Alloy

Brand Name: Jigang Baogang Wugang

Brand: Jigang, Wugang, Baogang

Standard: JISG 3507-1-2005

Quality Assure: Impact Specimen Test

application: Construction

Wire Gauge: 6.5mm~20mm

Type: Copper Clad Steel Wire

Special Use: Cold Heading Steel

name: coil rod for cold heading SWRCH8A

Raw Materials: High purity of steel

Diameter: 6.5mm~20mm

Service: Extended distributing service

Packaging & Delivery

Packaging Details:

Delivery Detail:

If tonnage is less, proposaling use container 20GP 5900.00 X 2340.00 X 2350.00 40GP 11800.00 X 2340.00 X 2350.00 40HQ 11800.00 X 2340.00 X 2690.00 If the goods is more,by bulk is more convenient and save money coil rod for cold heading SWRCH8A alibaba cn china supplier

7-30days

Specifications

coil rod for cold heading SWRCH8A alibaba cn china supplier

1)standard:JISG 3507-2-2005

2)Diameter:6.5mm~20mm

Product Showcase

Product Categories

steel plates

Steel bar

Steel pipe

Shape steel

Stainless steel  
Steel wire rod  
Steel coil  
Ductile Iron pipe  
Ungrouped  
See All Categories

New Products

petroleum industry use  
q345r carbon...

petroleum industry use  
q345r steel ...

petroleum industry use  
q345r steel ...

petroleum industry use  
q345r steel ...

**coil rod for cold heading SWRCH8A alibaba cn china supplier**

Item coil rod for cold heading SWRCH8A alibaba cn china supplier

Standard JISG 3507-2-2005

Diameter 6.5mm~20mm

Surface Black painted,PE coated,Galvanized,color coated,etc

Delivery Heat treatment facilities for hot-rolled, controlled rolling, normalizing, annealing,

States tempering,

quenching, normalizing plus tempering, quenching and tempering, and other delivery states are available as customers' requirement.

Tests HIC, SSC, SPWHT, Macrostructure, detection of defects,Hardness and DWTT test

en10204/3.1 certificate are also available.

Package Standard export seaworthy package,suit for all kinds of transport,or as required.

Container 20ft GP:5898mm(Length)x2352mm(Width)x2393mm(High)

Size 40ft GP:12032mm(Length)x2352mm(Width)x2393mm(High)

40ft HC:12032mm(Length)x2352mm(Width)x2698mm(High)

Bulk Size Any size

Price term Ex-Work,FOB,CNF,CFR,CIF,etc

Export to Ireland,Singapore,Indonesia,Ukraine,Saudi Arabia,Spain,Canada,USA,Brazil,Thailand, Korea,Iran,India,Egypt,Oman,Malaysia,Angola,etc

Application Applicable to the cold heading and cold extruding products without heat processing and tempering, including the rivets, screws, bolts, nuts and other standard fasteners for cold heading, iron core of speaker, steel wires for umbrella and wheel spoke. The cold heading cannot break, thus realizing high utilization rate.

Contact [www.ayjcy.cn](http://www.ayjcy.cn)

**Chemical composition and Mechanical perf** ce

Minisite  
Survey

Grade	C	Mn	Si	P	S
SWRCH8A	≤0.10	≤0.60	≤0.10	≤0.030	≤0.035

Process Flow



## Weifang Special Steel Group Co., Ltd.

[Home](#) [Product Categories](#) [Company Profile](#) [Contacts](#)

[Home](#) > [Product Categories](#) > [Steel Wire Rod for PC Strand](#) > **Prestressing Steel wire Rod Coil price**



[See larger image](#)

### Prestressing Steel wire Rod Coil price

[Add to Inquiry Cart](#) [Add to My Favorites](#) [Share to](#)

FOB Price: US \$ 580 - 610 / Ton | [Get Latest Price](#)  
Port: QINGDAO  
Minimum Order Quantity: 100 Ton/Tons  
Supply Ability: 4000000 Ton/Tons per Year  
Payment Terms: L/C, T/T

Ms. Ada Zhang

[Offline](#)

### Contact Supplier

[Start Order](#)

Verified Supplier | Weifang  
Special Steel Group Co., Ltd.

[ Shandong, China (Mainland) ]

Business Type: Manufacturer,  
Trading Company  
Main Markets: Domestic Market  
100%

Comprehensive capabilities  
verified by Tüv Rheinland

Onsite operations checked  
and legal status confirmed

[Search products here](#)

[Product Showcase](#)

### Product Categories

[Steel Wire Rod for PC Strand](#)

[Steel Wire Rod for Steel Cord](#)

[Steel Wire Rod for Welding](#)

[Steel Wire Rod for Cold He](#)

[High Carbon Steel Wire Rod](#)

[Steel Wire Rod for Bead Wi](#)

[Welding Wire](#)

### Product Detail

#### Quick Details

Steel Grade: 30MnSi	Standard: AISI, ASTM, BS, DIN, GB, JIS	Wire Gauge: 8-12mm
Place of Origin: Shandong, China (Mainland)	Type: hot rolled	Application: Manufacturing
Model Number: 30MnSi	Alloy Or Not: Is Alloy	Special Use: Free Cutting Steel
	Brand Name: WG	

#### Packaging & Delivery

Packaging Details:	in bulk or according customer's requirement
Delivery Detail:	20 days

#### Specifications

Prestressing Steel wire price  
Grade :30MnSi  
Size: 8-12mm  
ISO and TUV certificate

### Prestressing Steel wire 30MnSi price

#### Simple introduction:

Under the standard of GB/T 24238-2009 and strict enterprise inside control standard, the main grade of the hot rolled wire coil for prestressing steel wire and steel strands is YL82B with the diameters of  $\phi 11\text{mm}$ ,  $\phi 12.5\text{mm}$ . It has become one of the competitive products with high added value of WFSTEEL, with the advantages of high quality of raw material, smelting outside stove, electromagnetic stirring, pure steel quality and strict cold and rolling control process.

#### Specification:

Grade	Dia(mm)	Standard	Chemical Composition %
-------	---------	----------	------------------------

[Mini](#)  
[Report Suspicious Activity](#) [Sun](#)

Steel Bar			C	Si	Mn	P	S	Ni	Cr	Cu	V
Ungrouped	YL77B	5.5-13mm GB/T24238-2009	0.75-0.80	0.10-0.30	0.60-0.90	≤0.025	≤0.025	≤0.10	≤0.35	≤0.20	
	YL82B		0.80-0.85	0.10-0.30	0.60-0.90	≤0.025	≤0.025	≤0.10	≤0.35	≤0.20	0.15
See All Categories											
New Products	SWRH62B	JIS G3506-1996	0.59-0.66	0.15-0.35	0.60-0.90	≤0.030	≤0.030			≤0.030	
	SWRH67B		0.64-0.71	0.15-0.35	0.60-0.90	≤0.030	≤0.030			≤0.030	
	SWRH72B		0.69-0.76	0.15-0.35	0.60-0.90	≤0.030	≤0.030			≤0.030	
	SWRH77B		0.74-0.81	0.15-0.35	0.60-0.90	≤0.030	≤0.030			≤0.030	
	SWRH82B		0.79-0.86	0.15-0.35	0.60-0.90	≤0.030	≤0.030			≤0.030	

Picture show:

steel cord wire rod  
5.5mm

guy steel wire

steel mill China

Mini  
Sun

Wire Rod Coil for  
Prestressing Steel...





Home

Product Categories

Company Profile

Contacts

Home

>

Product Categories

>

High Carbon Steel Wire Rod

>

SWRH 62B wire coil



See larger image

SWRH 62B wire coil

Add to Inquiry Cart	Add to My Favorites	Share to
FOB Price:	US \$ 580 - 620 / Metric Ton   <a href="#">Get Latest Price</a>	
Port:	QINGDAO	
Minimum Order Quantity:	60 Metric Ton/Metric Tons	
Supply Ability:	2500000 Metric Ton/Metric Tons per Year	
Payment Terms:	L/C,T/T	

Mr. Haitao Zhang

Offline

Contact Supplier

Start Order

Verified Supplier | Weifang Special Steel Group Co., Ltd.

[ Shandong, China (Mainland) ]

Business Type: Manufacturer, Trading Company

Main Markets: Domestic Market 100%

Comprehensive capabilities verified by TÜV Rheinland

Onsite operations checked and legal status confirmed

Search products here

Product Showcase

Product Categories

- Steel Wire Rod for PC Strand
- Steel Wire Rod for Steel Cord
- Steel Wire Rod for Weiding
- Steel Wire Rod for Cold Ho...
- High Carbon Steel Wire Rod
- Steel Wire Rod for Bead Wi...
- Welding Wire

Product Detail

Quick Details

Steel Grade: high carbon steel	Standard: AISI, ASTM, BS, DIN, GB, JIS	Wire Gauge: 5.5mm-13mm
Place of Origin: Shandong, China (Mainland)	Type: Drawn Wire	Application: Rope
Model Number: SWRH62B	Alloy Or Not: Non-alloy	Special Use: Cold Heading Steel
	Brand Name: WEIFANG STEEL	manufacturer: Weifang Special Steel Group Co., Ltd

Packaging & Delivery

Packaging Details:	Mill's Export Standard Packing
Delivery Detail:	Within 25 Days

Specifications

SWRH62B, SWRH72B, SWRH82B, wire rod coil.  
Weifang Special Steel Group Co., Ltd

Hot Rolled High Carbon Steel Wire Rod  
Grade SWRH62B  
Size 5.5mm-13mm  
Manufacturer Weifang Special Steel Group Co., Ltd

WEIFANG SPECIAL STEEL GROUP CO., LTD IS THE 7TH LARGEST HIGH CARBON STEEL WIRE ROD MANUFACTURER IN CHINA.

ANUAL OUTPUT: 2.5 MILLION METRIC TONS

Mini Report Suspicious Activity Sun

Steel Bar  
Ungrouped  
See All Categories

MAIN GRADE: SWRH62B SWRH67B SWRH72B SWRH77B SWRH82B  
WITH DIA: 5.5MM 6.5MM 7.0MM 8.0MM 9.0MM 11.0MM 12.5MM 13MM

New Products

Grade	Dia (mm)	Standard	Chemical Composition %								
			C	Si	Mn	P	S	Ni	Cr	Cu	V
SWRH62B	Φ5.5-13	JIS G3506-2004	0.59-0.66	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
SWRH67B			0.64-0.71	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
SWRH72B			0.69-0.76	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
SWRH77B			0.74-0.81	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
SWRH82B			0.79-0.86	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	0.15

steel cord wire rod  
5.5mm

guy steel wire

steel mill China

Wire Rod Coil for  
Prestressing Steel...

Main  
Steel



Steel Bar	MAIN GRADE: SWRH62B SWRH67B SWRH72B SWRH77B SWRH82B WITH DIA 5.5MM 6.5MM 7.0MM 8.0MM 9.0MM 11.0MM 12.5MM 13MM											
Ungrouped												
See All Categories	Grade	Dia. (mm)	Standard	Chemical Composition %								
				C	Si	Mn	P	S	Ni	Cr	Cu	V
New Products	SWRH62B			0.59-0.66	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
	SWRH67B			0.64-0.71	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
	SWRH72B	Φ5.5-13	JIS	0.69-0.76	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
	SWRH77B		G3506-2004	0.74-0.81	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	
	SWRH82B			0.79-0.86	0.15-0.35	0.60-0.90	≤0.030	≤0.030	≤0.10	≤0.35	≤0.020	0.15

steel cord wire rod  
5.5mm

guy steel wire

steel mill China


Wire Rod Coil for  
Prestressing Steel...

Mini  
Sun

Email to this supplier

From:

Enter email or Member ID.

To:  Mr. Haitao Zhang

## Tangshan Henglong Trading Co., Ltd.

[Home](#)[Product Categories](#)[Company Profile](#)[Contact Us](#)[Home](#) > [Product Categories](#) > [Wire rod](#) > [hot rolled steel wire rod coils](#)

### hot rolled steel wire rod coils

[Add to Inquiry Cart](#)[Add to My Favorites](#)[Share to:](#)

FOB Price:

US \$ 400 - 500 /Metric Ton | [Get Latest Price](#)

Port:

Tianjin

Minimum Order Quantity:

10 Metric Ton/Metric Tons

Supply Ability:

500000 Metric Ton/Metric Tons per Month

Payment Terms:

L/C,T/T

[Minisite  
Survey](#)

Ms. Aria peng

[Offline](#)[Contact Supplier](#)[Start Order](#)[See larger image](#)

Verified Supplier

Tangshan Henglong Trading Co., Ltd.

[ Hebei, China (Mainland) ]

Business Type: Trading Company

Onsite operations checked  
and legal status confirmed

59.6% Quick Response

[Search products here](#)[Product Showcase](#)

#### Product Categories

[Angle bar](#)[U-channel](#)[I beam](#)[H beam](#)[Flat bar](#)[Billet](#)

#### Product Detail

##### Quick Details

Steel Grade: Q 195--Q235

Place of Origin: Hebei, China (Mainland)

Alloy Or Not: Non-alloy

Brand Name: henglong

Standard: GB

Type: low carbon

Special Use: Free Cutting Steel

Wire Gauge: CWG

Application: Fencing

Model Number: dia 5.5-10mm

[Report Suspicious Activity](#)

##### Packaging & Delivery

Packaging Details:

Suitable for export with hooks for easy unloading of material with bundle weight

Delivery Detail:

20 days after deposit

##### Specifications

Steel Grade: Q 195--Q235

Place of Origin: Hebei, China (Mainland)

Type: low carbon

Application: Steel Wire Rod

low carbon steel wire rod

grade: Q195, SAE1008B, SAE1006B

diameter: 5.5-12mm

type: in coil, coil weight around 2 mt

2/14/14

hot rolled steel wire rod coils, View wire rod coil, henglong Product Details from Tangshan Henglong Trading Co., Ltd. on Alibaba.com

Wire rod

we Hebei yuxuan can supply the high quantity low carbon steel wire rod and low carbon steel wire rod.  
the details as follows:

Deformed steel bar

low carbon steel wire rod

Square bar

grade:Q195,SAE1008B, SAE1006B

Round bar

diameter:5.5-12mm

PPGI

type: in coil, coil weight around 2 mt

Pipe

surface: no trace, light, and smooth  
dia tolerance:  $\pm 0.3$ mm

Hot rolled steel coil/sheet

Cold rolled steel coil/sheet

Galvanized steel coil/sheet

Galvanized corrugated sheet

Chequered steel coil/sheet

Other steel products

Ungrouped

## Main Products

low carbon steel wire  
rod

5.5mm mild steel wire  
rod

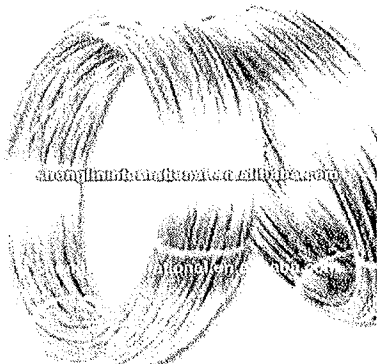
Hot Rolled wire rod

Black Annealed Wire

About 83 results: Steel Wire (67) , Steel Round Bars (4)

Home > Products > Minerals & Metallurgy > Steel > Steel Round Bars (149729)

Multi-Language Sites ▾



See larger image

### steel wire rod

Add to Inquiry Cart

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Share to:

0

FOB Price: US \$400 - 700 / Ton - Get Latest Price

Port: dalian, tianjin

Minimum Order Quantity: 20 Ton/Tons

Supply Ability: 200000 Ton/Tons per Month

Payment Terms: L/C, D/A, D/P, T/T

Shenglin Import & Export Trade Co., Ltd.

( Liaoning, China (Mainland) )

Business type: Trading Company

Onsite operations checked and legal status confirmed

36.7% Quick Response

Leave Messages

Mr. Leez Li

Contact Supplier

Start Order

Contact Details Company Profile Product Categories

Not exactly what you want? Post a quick Buying Request!

#### Product Detail

#### Company Profile

Report Suspicious Activity

#### Quick Details

Steel Grade: Q235

Place of Origin: Liaoning China (Mainland)

Alloy Or Not: Is Alloy

Standard: AISI, ASTM, BS, DIN, GB, JIS

Brand Name: Ansteel

Type: Alloy Steel Bar

Dimensions: Various size, contract us

Technique: Hot Rolled

#### Packaging & Delivery

Packaging Detail: bundle

Delivery Detail: approximately 15 days to the port

#### Specifications

email me for more details or latest inventory and catalog.

### Email me for the latest inventory

The category of our round bar is:

1. hot rolled ordinary carbon round bar

Size: 10mm-300mm

Material: Q235

2. hot rolled good-quality round bar

Size: 12mm-300mm

Material: 10#-45#, S20C, S45C

3. hot rolled low alloy round bar

Size: 12mm-300mm

Material: Q345

4. hot rolled alloy round bar

Size: 12mm-300mm

Material: 20Cr-40Cr, 20Mn-65Mn, 15CrMo-42CrMo, 20Mn2-40Mn2, 20CrNiMoA-40CrNiMoA, 38CrSi, 30CrMnSi,

20CrMnTi, 9CrSi, 9Mn2

5. hot rolled high speed alloy tool steel

Size: 12mm-300mm

Material: W18Cr4V, M42, W6, W9, 3Cr2W8V, CrWMn, Cr12MoV, Cr12, 5CrMnMo, 5CrNiMo, 9SiCr, 4CrW2Si

6. hot rolled spring steel

Size: 12mm-250mm

Material: 60Si2Mn, 65Mn, 50CrVA, 60Si2CrVA

7. hot rolled die steel, bearing steel, carbon tool steel

Size: 12mm-250mm

Material: H13, T8, T9, T10, GCr15

8. cold-drawn round bar/ square steel/ hexagonal bar/ flat bar/ angle bar

Various size

Material: carbon structural steel/ alloy steel/ free-cutting steel/ die steel/ spring steel, etc.

We design and install the mini steel mills(minimill). at the same time we sell the longproducts listed on the drawing

Wall of honors

The certificates

If you are interested in our products or want to know more,don't hesitate to contact us,we will reply with the least delay possible.

Anshan KeTong mechanical manufacturing Co.LTD and IT's branch Anshan Shenglin Import & Export Trade Company are comprehensive company involving scientific research, metallurgy production, mechanical processing, steel manufacturing and steel selling altogether.

our headoffice located in Anshan --- china's famous steel capital. the product base is located in Tiexi district with convenient transportation.

the company boasts profound technological strength and advanced producing equipment, reliable production qualification and satisfying after-sale service. The products include metallurgy equipments(rolling machine, production lines and accessories), mining equipments meanwhile the company deputed all kinds of products produced by some main steel-making factories, for example An-steel, Ba-steel, Capital-steel, Tai-steel, Tong-steel, Wu-steel etc. we also deputed to product slabs, structural sections, sticks, wires, tubes, steel railways, stainless steel and so on. the company is praised and recognized by a various client all over the world.

the company gained a high reputation. Our door is open for your visits and consultations, we hope we can make concerted efforts, get a brilliant future and win-win result.

Not exactly what you want? Post a quick Buying Request!

Send your message to this supplier

From:



Enter email or Member ID.

To: Mr. Leez Li  
Offline

Message:

Enter your inquiry details such as

- Self introduction
- Required specifications
- Inquire about price/MOQ










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	Steel FOB Price: US \$500 - 1000 / Ton Port: dalian, tianjin Min. Order: 20 Ton/Tons		tool steel FOB Price: US \$500 - 1000 / Ton Port: dalian, tianjin Min. Order: 20 Ton/Tons		Steel Bar FOB Price: US \$1250 - 8970 / Ton Port: DALIAN PORT, CHINA Min. Order: 08 Ton/Tons
	HR round bar FOB Price: US \$500 - 1000 / Ton Port: dalian, tianjin Min. Order: 20 Ton/Tons		Steel bar FOB Price: US \$125 - 789 / Ton Port: ANY PORT Min. Order: 05 Ton/Tons		High quality round bar FOB Price: US \$500 - 1000 / Ton Port: dalian, tianjin Min. Order: 20 Ton/Tons

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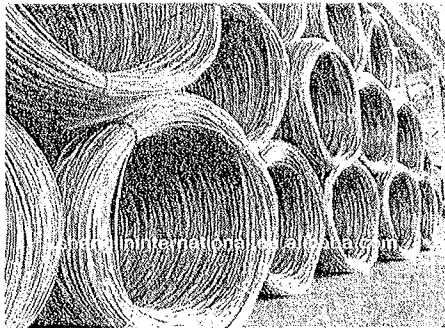
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About 83 results. Steel Wire (87) , Steel Round Bars (4)

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## high carbon steel wire rod



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FOB Price: US \$400 - 700 / Ton [Get Latest Price](#)

Port: dalian, tianjin

Minimum Order Quantity: 1 Ton/Tons

Supply Ability: 200000 Ton/Tons per Month

Payment Terms: L/C, D/A, D/P, T/T

[Shanghai Import & Export Trade Co., Ltd.](#)

[ Liaoning, China (Mainland) ]

Business type: Trading Company

Onsite operations checked and legal status confirmed

36.7% Quick Response

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Mr. Liang Li

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### Product Detail

### Company Profile

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#### Quick Details

Steel Grade: Q235

Place of Origin: Liaoning China (Mainland)

Alloy Or Not: Is Alloy

Standard: AISI,ASTM,BS,DIN,GB,JIS

Brand Name: Ansteel

Type: Alloy Steel Bar

Dimensions: Various size, contract us

Technique: Hot Rolled

#### Packaging & Delivery

Packaging Detail: bundle

Delivery Detail: approximately 15 days to the port

#### Specifications

Did the product catch your eyes? email me for more details or latest inventory and catalog.

The category of our round bar is:

1. hot rolled ordinary carbon round bar

Size: 10mm-300mm

Material: Q235

2. hot rolled good-quality round bar

Size: 12mm-300mm

Material: 10#-45#, S20C, S45C

3. hot rolled low alloy round bar

Size: 12mm-300mm

Material: Q345

4. hot rolled alloy round bar

Size: 12mm-300mm

Material: 20Cr-40Cr, 20Mn-65Mn, 15CrMo-42CrMo, 20Mn2-40Mn2, 20CrNiMoA-40CrNiMoA, 38CrSi, 30CrMnSi, 20CrMnTi, 9CrSi, 9Mn2

5. hot rolled high speed alloy tool steel

Size: 12mm-300mm

Material: W18Cr4V, M42, W6, W9, 3Cr2W8V, CrWMn, Cr12MoV, Cr12, 5CrMnMo, 5CrNiMo, 9SiCr, 4CrW2Si

6. hot rolled spring steel

Size: 12mm-250mm

Material: 60Si2Mn, 65Mn, 50CrVA, 60Si2CrVA

7. hot rolled die steel, bearing steel, carbon tool steel

Size: 12mm-250mm

Material: H13, T8, T9, T10, GCr15

8. cold-drawn round bar/ square steel/ hexagonal bar/ flat bar/ angle bar

Various size

Material: carbon structural steel/ alloy steel/ free-cutting steel/ die steel/ spring steel, etc.

We design and install the mini steel mills(minimill), at the same time we sell the longproducts listed on the drawing

Wall of horns

The certificates

If you are interested in our products or want to know more,don't hesiate to contact us,we will reply with the least delay possible.

Anshan KeTong mechanical manufacturing Co.LTD and IT's branch Anshan Shengjin Import & Export Trade Company are comprehensive company involving scientific research, metalling production, mechanical processing, steel manufacturing and steel selling altogether. our headoffice located in Anshan — china's famous steel capital. the product base is located in Tiexi district with convenient trasportation. the company boasts profound technological strength and advanced producing equipmony, reliable production qualifcatgion and satisfying after-sale service. The products include metalling equipments(rolling machine, production lines and accessories), mining equipments. meanwhile the company deputes all kinds of products produced by some main steel-making factorios, for example An-steel, Ba-steel, Capital-steel, Tai-steel, Tong-steel, Wu-steel etc. we also deputed to product slabs,s tructural sections, sticks, wires, tubes, steel-railways, stainless steel and so on. the companyis praised and recognized by a various client all over the world. the company gained a high reputation. Our door is open for your visils and consolatons, we hope we can make concerted efforts. get a brilliant future and win-win result.

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From:

Enter email or Member ID.

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Mr. Leez Li

Offline

#### Other products from this supplier

<p>high carbon steel wire rod</p> <p>FOB Price: US \$400 - 700 / Ton</p> <p>Port: dalian, tianjin</p> <p>Min. Order: 1 Ton/Tons</p>	<p>low carbon steel wire rod</p> <p>FOB Price: US \$400 - 700 / Ton</p> <p>Port: dalian, tianjin</p> <p>Min. Order: 1 Ton/Tons</p>	<p>Carbon steel Rod</p> <p>FOB Price: US \$400 - 700 / Ton</p> <p>Port: dalian, tianjin</p> <p>Min. Order: 20 Ton/Tons</p>
<p>highly drawn mild steel</p> <p>FOB Price: US \$500 - 1000 / Ton</p> <p>Port: dalian,tianjin</p> <p>Min. Order: 20 Ton/Tons</p>	<p>Steel</p> <p>FOB Price: US \$500 - 1000 / Ton</p> <p>Port: dalian,tianjin</p> <p>Min. Order: 20 Ton/Tons</p>	<p>tool steel</p> <p>FOB Price: US \$500 - 1000 / Ton</p> <p>Port: dalian,tianjin</p> <p>Min. Order: 20 Ton/Tons</p>
<p>Steel Bar</p> <p>FOB Price: US \$1250 - 8970 / Ton</p> <p>Port: DALIAN PORT,CHINA</p> <p>Min. Order: 08 Ton/Tons</p>	<p>HR round bar</p> <p>FOB Price: US \$500 - 1000 / Ton</p> <p>Port: dalian,tianjin</p> <p>Min. Order: 20 Ton/Tons</p>	<p>Steel bar</p> <p>FOB Price: US \$125 - 789 / Ton</p> <p>Port: ANY PORT</p> <p>Min. Order: 05 Ton/Tons</p>

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## high carbon steel wire rod for pc ---SWRS82B

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241 0

FOB Price:

[Get Latest Price](#)

Port:

Qingdao

Minimum Order Quantity:300 Metric Ton/Metric Tons

Supply Ability:

100000 Metric Ton/Metric Tons per Month

Payment Terms:

L/C,T/T

Address: Qingdao

Artluck International Limited

[Shandong, China (Mainland)]

Business type: Trading Company

Onsite operations checked and legal status confirmed

Supplier accepts secure e-Credit Line Open Account transactions

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Ms. Nancy Chong

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## Quick Details

Steel Grade: steel  
Place of Origin: Shandong China (Mainland)  
Alloy Or Not: Is Alloy  
Brand Name: QIS

Standard: AISI,ASTM,GB,JIS  
Type: Drawn Wire  
Special Use: Free Cutting Steel

Wire Gauge: 8.0mm  
Application: Construction  
Model Number: SWRS82B

## Packaging &amp; Delivery

Packaging Detail: export packing

Delivery Detail: after receiving L/C 30 days

## Specifications

Item: high carbon steel wire rod for pc ---SWRS82B  
Size: 8.0mm  
MOQ: 300 MT

Item: high carbon steel wire rod for pc ---SWRS82B

Size: 8.0mm

MOQ: 300 MT

Port: Qingdao Port

Payment: L/C T/T

## Chemical Compositions

Grade	C	Si	Mn	Cr	P	S	Cu
SWRS 82B	0.79~0.84	0.12~0.32	0.60~0.90	≤0.35	≤0.025	≤0.025	≤0.20

2/14/14 High Carbon Steel Wire Rod For Pc ---swrs82b - Buy High Carbon Steel Wire Rod For Pc,Steel Strand,Pc Strand Product on Alibaba.com  
SWRS 77B 0.75-0.81 0.12-0.32 0.60-0.90 ≤0.35 ≤0.025 ≤0.025 ≤0.20

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From:

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To: Ms. Nancy Cheng  
Offline

Message:

Enter your inquiry details such as:

- Self introduction
- Required specifications
- Inquire about price/MOQ

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Your message must be between 20-8000 characters

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<input type="checkbox"/>	<b>Low Carbon Steel Wire Rod</b> SAE1215-SAE1215H- SAE1215T and SAE1214B Port: Qingdao China Min. Order: 500 Metric Ton/Metric Tons	<input type="checkbox"/>	<b>High Quality High Speed Steel</b> Wire Series - Common Carbon Steel Wire Rod SAE1006-1080 Port: Qingdao, China Min. Order: 500 Metric Ton/Metric Tons	<input type="checkbox"/>	<b>high carbon steel wire rod for</b> pc---SWRS82B Port: Qingdao Min. Order: 300 Metric Ton/Metric Tons
<input type="checkbox"/>	<b>high carbon steel wire rod</b> FOB Price: US \$650 - 900 / Metric Ton Port: Qingdao,China Min. Order: 100 Metric Ton/Metric Tons	<input type="checkbox"/>	<b>carbon steel wire rods</b> FOB Price: US \$650 - 900 / Metric Ton Port: Qingdao,China Min. Order: 100 Metric Ton/Metric Tons	<input type="checkbox"/>	<b>steel carbon wire rod</b> FOB Price: US \$600 - 800 / Metric Ton Port: Qingdao,China Min. Order: 100 Metric Ton/Metric Tons
<input type="checkbox"/>	<b>carbon steel wire rod</b> FOB Price: US \$650 - 800 / Metric Ton Port: Qingdao,China Min. Order: 100 Metric Ton/Metric Tons	<input type="checkbox"/>	<b>high carbon steel wire rod</b> FOB Price: US \$650 - 1100 / Metric Ton Port: Qingdao,China Min. Order: 50 Metric Ton/Metric Tons	<input type="checkbox"/>	<b>Steel Wire Rod for steel cord</b> for radial tyre FOB Price: US \$755 - 900 / Metric Ton Port: Qingdao,China Min. Order: 100 Metric Ton/Metric Tons

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Welding Wire Rod and Deformed Steel Bar

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## Qingdao Artluck International Limited

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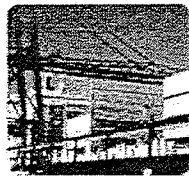
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### About Us



QINGDAO ARTLUCK INTERNATIONAL LIMITED is a professional trading company. It has been engaged in lines of export business of steel for 7 years. Now it has become a burgeoning company integrating sale, export and import into one. The company was established in Qingdao, China, with 20 employees and annual turnover of nearly RMB 1 Billion.

QINGDAO ARTLUCK INTERNATIONAL LIMITED set foot in promotion of QIS brand steel, Shagang, Xuangang, Beital steel, Benxi steel and Rizhao Steel products etc., such as high carbon steel wire rods, low carbon steel wire, steel round bars, steel rebar, welding wire rod, cold heading steel, spring flat steel and steel angel, nylon coated wire etc. There are such kinds of products as hot rolled rod, cold rolled rod, hot rolled section steel and so on with 91 grades and 129 specifications. Artluck is also dealing with **Non-ferrous Metals: copper cathodes** and **nicle** etc. export and import business in global market. Based on excellent quality, top service and favorable price, ARTLUCK products are widely applied to domestic and foreign industry and construction.

With many years of hard work and elaboration, ARTLUCK products have been exported to many countries and regions all over the world, and the company has built a friendly and long-term business relations with firms in these countries and regions, especially in America, Europe, Korea, Pakistan, Singapore, Bangladesh, India, and Southeast Asia etc.

Always adhering to the principles of "Honoring contracts" and "Keeping promises", ARTLUCK distinguishes from the competitors when it comes to its superior quality and reasonable pricing.

Since the company was founded in 2005, "Guided by the market demand, focusing on the customer service, winning with the product quality, pursuing the remarkable achievements" are our core value. Taking this management notion, we warmly welcome both domestic

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[Carbon steel wire rod](#) [Plywood](#)

[steel wire](#) [steel rebar](#)

## Contact Us

Tel:+86-532-82023576

Fax:+86-532-82023579

E-mail:

[nancy@cnartluck.com](mailto:nancy@cnartluck.com)



## Our Company

and overseas consumers to visit our company. With providing clients perfect service, QINGDAO ARTLUCK INTERNATIONAL LIMITED will sincerely cooperate with new and old friends at all circles in order to jointly create a better tomorrow.

## Company Profile

### Basic Information

Company Name: Qingdao Artluck International Limited

Established Time: 2005-09-07

Number of employees: 11-50

Main Products: exporter:steel wire rod  
exporter:free cutting steel  
supplier:Non-ferrous Metal  
exporter:welding wire rod

Legal: Nancy Cheng

Registration Number: Registration No

Authentication Information: Certifications

### Trade and Market:

Exporter: North America,Western Europe,Eastern Europe,South America,Russia,Middle East,Afrika,Oceania,Japan,Korea

Annual Sales: More than US\$200 Million

Export Proportion: 91%





Tangshan Jiayi Trading Co., Ltd.

Home

Product Categories

Company Profile

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## SAE1006 hot rolled wire iron rod

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FOB Price: US \$ 500 - 600 /Metric Ton | [Get Latest Price](#)

Minimum Order Quantity: 20 Metric Ton/Metric Tons

Supply Ability: 100,000 Metric Ton/Metric Tons per Month

Payment Terms: L/C,T/T

Minisite  
Survey  
Ms. laura chen

Offline

Contact Supplier

Start Order

Verified Supplier  
Tangshan Jiayi Trading Co., Ltd.  
[ Hebei, China (Mainland) ]

Business Type: Trading Company

Onsite operations checked  
and legal status confirmed

## Product Detail

## Quick Details

Place of Origin: Hebei, China (Mainland)

Surface Treatment: Black

Type: Loop Tie Wire

Function: Binding Wire

Wire Gauge: 1---5mm

## Packaging &amp; Delivery

Packaging Details:

suitable for sea transportation

Delivery Detail:

10--45 days after the deposit or L/C copy

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## Product Categories

Section Steel

Steel Wires

Steel Bar

Steel Plate

Steel Coils

Steel Pipe/Tube

Steel Structure

## Specifications

1.size:5.5---20

2.material:Q235,Q345,SAE1006,SAE1008

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Tangshan Jiayi Trading Co., Ltd.

Home

Product Categories ▾

Company Profile

Contacts

Home &gt; Product Categories &gt; Steel Wires &gt; Low Carbon wires &gt; SAE 1006 Wire Iron Rod

## SAE 1006 Wire Iron Rod

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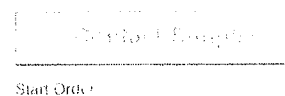
Minimum Order Quantity: 20 Metric Ton/Metric Tons

Supply Ability: 100,000 Metric Ton/Metric Tons per Month

Payment Terms: L/C, T/T

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Survey  
Ms. daisy han

Offline



Start Order



See larger image

Verified Supplier  
Tangshan Jiayi Trading Co., Ltd.  
[ Hebei, China (Mainland) ]

Business Type: Trading Company

Onsite operations checked  
and legal status confirmed

## Product Detail

## Quick Details

Place of Origin: Hebei, China (Mainland)

Surface Treatment: Black

Type: Loop Tie Wire

Function: Binding Wire

Wire Gauge: 1---5mm

## Packaging &amp; Delivery

Packaging Details:

suitable for sea transportation

Delivery Detail:

10--45 days after the deposit or L/C copy

Search products here

## Product Showcase

## Product Categories

Section Steel

Steel Wires

Steel Bar

Steel Plate

Steel Coils

Steel Pipe/Tube

Steel Structure

## Specifications

size: 5.5---20

Report Suspicious Activity

## R Tangshan Haigang Ruixiang Trading Co., Ltd.

Home Product Categories Company Profile Contacts

Home > Product Categories > Steel wire rod > mild steel wire rods

### mild steel wire rods



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FOB Price: US \$ 500 - 700 / Metric Ton | [Get Latest Price](#)

Port: tianjin

Minimum Order Quantity: 50 Metric Ton/Metric Tons

Supply Ability: 100000 Metric Ton/Metric Tons per Month

Payment Terms: L/C, T/T

Kidnapping  
Survey

Ms. Wendy Zhao

Offline

Contact Supplier

Start Order



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Verified supplier |  
Tangshan Haigang Ruixiang  
Trading Co., Ltd.

[ Hebei, China (Mainland) ]

Business Type: Trading Company

Onsite operations checked  
and legal status confirmed

33.3% Quick Response

### Product Detail

Report Suspicious Activity

#### Quick Details

Steel Grade:  
Q195/235,SAE1006B/SAE1008B/SAE1010  
B/SAE1018B,H08A, 30MnSi, 62B-82B

Standard: AISI, ASTM, GB, JIS  
Place of Origin: Hebei, China (Mainland)

Wire Gauge: 5.5-16mm

Type: Drawn Wire

Application: Construction

Alloy Or Not: Non-alloy

Special Use: Free Cutting Steel

Model Number: steel wire rod

Brand Name: RUIXIANG Steel

#### Packaging & Delivery

Search products here

Packaging Details: as your request

Product Showcase

Delivery Detail: in 20 days

### Product Categories

Steel rebar

welded steel pipe

square steel pipe

galvanized steel pipe

Steel wire rod

Angle Steel

#### Specifications

Q195/235,SAE1006B/SAE1008B/SAE1010B/SAE1018B,H08A, 30MnSi, 62B-82B steel wire rod

Grade	Chemical Composition(%)					
	C	Mn	Si	S	P	B
	0.03~0.07	≤0.32	≤0.30	≤0.045	≤0.040	>0.0008
SAE1006B	Mechanical properties					
	Yield strength(N/mm <sup>2</sup> )		Tensile strength(N/mm <sup>2</sup> )		Elongation(%)	
	250-280		350-380		≥32	

2/14/14

mild steel wire rods, View steel wire rods, RUIXIANG Steel Product Details from Tangshan Haigang Ruixiang Trading Co., Ltd. on Alibaba.com

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I Beam

Steel Channel

Nail

Screw

seamless steel pipe

steel strip

Steel Sheet

PPGI&Hot galvanized steel...

PC bar

Ungrouped

See All Categories

New Products

Grade	Chemical Composition(%)					
	C	Mn	Si	S	P	B
	0.10max	0.3~0.50	0.15max	0.050max	0.040 max	0.0008 min
SAE1008B	Mechanical properties					
	Yield strength(N/mm <sup>2</sup> )		Tensile strength(N/mm <sup>2</sup> )		Elongation(%)	
	≥195		315-430		≥30	

#### Email to this supplier

hot dipped galvanized  
iron wire

From:

Enter email or Member ID.

To:



Ms. Wendy Zhao

[Offline](#)

Message:

electric galvanized  
wire

Your message must be between 20-8000 characters

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1/4 inch galvanized  
weld wire mesh

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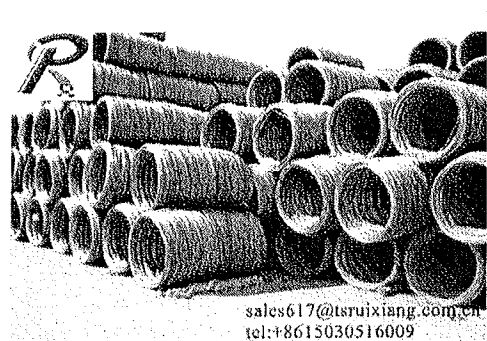
12mm HRB400  
reinforced deformed  
steel...

# R Tangshan Haigang Ruixiang Trading Co., Ltd.

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Home > Product Categories > Steel wire rod > SAE1006/SAE1008steel wire rod

## SAE1006/SAE1008steel wire rod



sales617@tsruixiang.com.cn  
tel:+8615030516009

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FOB Price: US \$ 500 - 700 / Metric Ton | [Get Latest Price](#)  
Port: tianjin  
Minimum Order Quantity: 50 Metric Ton/Metric Tons  
Supply Ability: 100000 Metric Ton/Metric Tons per Month  
Payment Terms: L/C,T/T

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Survey

Ms. Wendy Zhao

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Trading Co., Ltd.

[ Hebei, China (Mainland) ]

Business Type: Trading Company

Onsite operations checked  
and legal status confirmed

33.3% Quick Response

### Product Detail

#### Quick Details

Steel Grade:	Standard: AISI, ASTM, GB, JIS	Wire Gauge: 5.5-16mm
Q195/235,SAE1006B/SAE1008B/SAE1010 B/SAE1018B,H08A, 30MnSi, 62B-82B	Place of Origin: Hebei, China (Mainland)	Type: Drawn Wire
	Application: Construction	Alloy Or Not: Non-alloy
Special Use: Free Cutting Steel	Model Number: steel wire rod	Brand Name: RUIXIANG Steel

#### Packaging & Delivery

Packaging Details: as your request  
Delivery Detail: in 20 days

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### Product Categories

Steel rebar

welded steel pipe

square steel pipe

galvanized steel pipe

Steel wire rod

Angle Steel

### Specifications

Q195/235,SAE1006B/SAE1008B/SAE1010B/SAE1018B,H08A, 30MnSi, 62B-82B steel wire rod

Grade	Chemical Composition(%)					
	C	Mn	Si	S	P	B
	0.03~0.07	≤0.32	≤0.30	≤0.045	≤0.040	>0.0008
SAE1006B	Mechanical properties					
	Yield strength(N/mm <sup>2</sup> )		Tensile strength(N/mm <sup>2</sup> )		Elongation(%)	
	250-280		350-380		≥32	

Report Suspicious Activity

H Beam							
I Beam	Grade	Chemical Composition(%)					
Steel Channel		C	Mn	Si	S	P	B
Nail		0.10max	0.3~0.50	0.15max	0.050max	0.040 max	0.0008 min
Screw	SAE1008B	Mechanical properties					
seamless steel pipe		Yield strength(N/mm <sup>2</sup> )		Tensile strength(N/mm <sup>2</sup> )		Elongation(%)	
steel strip		≥195		315-430		≥30	
Steel Sheet							
PPGI&Hot galvanized steel...							
PC bar							
Ungrouped							
See All Categories							
New Products							


hot dipped galvanized iron wire

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 Ms. Wendy Zhao

[Offline](#)

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electric galvanized wire

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1/4 inch galvanized weld wire mesh

New Products

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# R Tangshan Haigang Ruixiang Trading Co., Ltd.

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Home > Product Categories > Steel wire rod > mild steel wire rods 5 5mm

## mild steel wire rods 5 5mm

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Supply Ability: 100000 Metric Ton/Metric Tons per Month  
Payment Terms: L/C,T/T

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Product Categories

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### Product Detail

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#### Quick Details

Steel Grade:	Standard: AISI, GB, JIS	Wire Gauge: 5.5-16mm
Q195/235,SAE1006B/SAE1008B/SAE1010B/SAE1018B,H08A, 30MnSi, 62B-82B	Place of Origin: Hebei, China (Mainland)	Type: Drawn Wire
	Application: Construction	Alloy Or Not: Non-alloy
Special Use: Free Cutting Steel	Model Number: steel wire rod	Brand Name: RUIXIANG Steel
Application: drawing,nails,construction,wire mesh		

#### Packaging & Delivery

Packaging Details: as your request  
Delivery Detail: in 20 days

#### Specifications

Q195/235,SAE1006B/SAE1008B/SAE1010B/SAE1018B,H08A, 30MnSi, 62B-82B steel wire rod

Grade	Chemical Composition(%)					
	C	Mn	Si	S	P	B
SAE1006B	0.03~0.07	≤0.32	≤0.30	≤0.045	≤0.040	>0.0008
Mechanical properties						

H Beam		Yield strength(N/mm <sup>2</sup> )	Tensile strength(N/mm <sup>2</sup> )		Elongation(%)		
I Beam		250-280	350-380		≥32		
Steel Channel	Grade	Chemical Composition(%)					
Nail		C	Mn	Si	S	P	B
Screw		0.10max	0.3~0.50	0.15max	0.050max	0.040 max	0.0008 min
seamless steel pipe	SAE1008B	Mechanical properties					
steel strip		Yield strength(N/mm <sup>2</sup> )		Tensile strength(N/mm <sup>2</sup> )		Elongation(%)	
Steel Sheet		≥195		315-430		≥30	
PPGI&Hot galvanized steel...							
PC bar							
Ungrouped							
See All Categories							

New Products

hot dipped galvanized  
iron wire

electric galvanized  
wire

1/4 inch galvanized  
weld wire mesh

12mm HRB400  
reinforced deformed  
ste...



**PUBLIC CERTIFICATE OF SERVICE**

**CARBON AND CERTAIN ALLOY STEEL WIRE ROD FROM CHINA  
USITC Investigation Nos. 701-TA-512 and 731-TA-1248 (Prel.)**

I hereby certify that on February 27, 2014, copies of the foregoing business proprietary submission were served upon the following by hand-delivery:

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