
New Trade Case on Imports of Carbon and Alloy Steel Threaded Rod from the People's Republic of China, India, Taiwan and Thailand

By Mark R. Ludwikowski, R. Kevin Williams / Feb 26, 2019

New U.S. antidumping ("AD") and/or countervailing duty ("CVD") investigations were filed on February 20, 2019 by Vulcan Steel Products Inc. ("Petitioner") against imports of carbon and alloy steel threaded rod ("CASTR") from the People's Republic of China, India, Taiwan and Thailand.

The merchandise covered by the petitions is CASTR. CASTR is used in a variety of applications, including construction to suspend electric conduit, pipes, HVAC-ductwork, sprinkler systems for fire protection, and other items. CASTR may also be used for hanging suspended ceiling and elevated conveyor belts and for joint restraint systems for underground piping. It is also used in structural tie downs, in earthquake- and hurricane-restraint systems for roofing, and as headless screws in general fastener applications or for bolting pipe joints together. The full scope of the merchandise covered is set forth below.

The petition includes AD (less than fair value) allegations against China, India, Taiwan and Thailand and CVD (unfair subsidy) allegations against China and India. The Department of Commerce and the International Trade Commission ("ITC") will next determine whether to launch AD and/or CVD duty and injury investigations, respectively, on these products. Commerce will be responsible for calculating the ultimate AD/CVD margins on the imports, while the ITC will conduct a concurrent investigation to determine if the imports are injuring the U.S. industry. If Commerce finds dumping or unfair subsidization in its preliminary determinations, currently scheduled for May 16, 2019 (CVD) and July 30, 2019 (AD), importers will be charged the calculated duties upon the products' entry in the U.S. market.

There are strict statutory deadlines associated with these proceedings and affected companies are advised to prepare as soon as possible. If this product is of interest to you, please let us know so that we can provide you with additional information as it becomes available.

The following are key facts about this trade case:

Petitioner: Vulcan Steel Products Inc.

Foreign Producers/Exporters and US Importers: Please contact us for a listing of individual companies named in the petition.

Alleged AD and CVD margins: Petitioner has alleged the following AD margins:

- China – 53.57 percent to 55.60 percent *ad valorem*
- India – 25.43 percent to 28.34 percent *ad valorem*
- Taiwan – 32.10 percent *ad valorem*
- Thailand – 20.3 percent *ad valorem*

Petitioner has alleged CVD margins for China and India above *de minimis*.

Merchandise covered by the scope of the case:

The merchandise covered by the scope of these investigations is CASTR. Steel threaded rod is certain threaded rod, bar, or studs, of carbon or alloy steel, having a solid, circular cross section of any diameter, in any straight length. Steel threaded rod is normally drawn, cold-rolled, threaded, and straightened, or it may be hot-rolled. In addition, the steel threaded rod, bar, or studs subject to these investigations are non-headed and threaded along greater than 25 percent of their total actual length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (i.e., galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

Steel threaded rod is normally produced to American Society for Testing and Materials ("ASTM") specifications ASTM A36, ASTM A193 B7/B7m, ASTM A193 B16, ASTM A307, ASTM A320 L7/L7M, ASTM A320 L43, ASTM A354 BC and BD, ASTM A449, ASTM F1554-36, ASTM F1554-55, ASTM F1554 Grade 105, American Society of Mechanical Engineers ("ASME") specification ASME B18.31.3, and American Petroleum Institute ("API") specification API 20E. All steel threaded rod meeting the physical description set forth above is covered by the scope of these investigations, whether or not produced according to a particular standard.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by cutting, chamfering, coating, or painting the threaded rod, by attaching the threaded rod to, or packaging it with, another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the threaded rod.

CASTR are also included in the scope of this investigation whether or not imported attached to, or in conjunction with, other parts and accessories such as nuts and washers. If CASTR are imported attached to, or in conjunction with, such non-subject merchandise, only the threaded rod is included in the

scope.

Excluded from the scope of these investigations are: (1) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total actual length; and (2) stainless steel threaded rod, defined as steel threaded rod containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements.

Excluded from the scope of the antidumping investigation on steel threaded rod from the People's Republic of China is any merchandise covered by the existing antidumping order on Certain Steel Threaded Rod from the People's Republic of China. *See Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order*, 74 Fed. Reg. 17,154 (Dep't Commerce Apr. 14, 2009).

Steel threaded rod is currently classifiable under subheadings 7318.15.5051, 7318.15.5056, and 7318.15.5090 of the Harmonized Tariff Schedule of the United States ("HTSUS"). Subject merchandise may also enter under subheading 7318.15.2095 and 7318.19.0000 of the HTSUS.

While the HTSUS subheadings are provided for convenience and Customs purposes, the written description of the subject merchandise is dispositive.

If you have any questions regarding the content of this alert, please contact Mark Ludwikowski (mludwikowski@clarkhill.com; 202-640-6680) or Kevin Williams (kwilliams@clarkhill.com; 312-985-5907).