USITC Inv. Nos. 701-TA- ___, 731-TA-____
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Investigation

PUBLIC VERSION
Petitioners' Business Proprietary Information Removed from Pages 3, 23-26, 31, 33, and 35 and Exhibits I-3, I-4, I-14, I-28.

BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION

WELDED STAINLESS LINE AND PRESSURE PIPE FROM INDIA, TÜRKIYE, AND THE UNITED ARAB EMIRATES

PETITION FOR THE IMPOSITION OF ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED

VOLUME I
INFORMATION RELATING TO GENERAL ISSUES AND INJURY

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July 15, 2026

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These petitions are filed on behalf of Bristol Pipe and Tube, Inc. ("Bristol"), Felker Brothers Corporation ("Felker"), and Primus Pipe and Tube, Inc. ("Primus") (collectively, "Petitioners"), domestic producers of welded stainless line and pressure pipe ("WSLPP"). Petitioners allege that WSLPP from India, the Republic of Türkiye ("Türkiye"), and the United Arab Emirates ("UAE") is being or is likely to be sold at less than fair value within the meaning of Section 731 of the Tariff Act of 1930, as amended (the "Act"), 19 U.S.C. § 1673. Petitioners also allege that WSLPP imported from India and Türkiye is subsidized within the meaning of Section 701 of the Act, 19 U.S.C. § 1671. Petitioners further allege that these unfairly traded imports have materially injured the U.S. domestic industry producing WSLPP and threaten to cause further material injury if remedial action is not taken. These petitions contain information reasonably available to Petitioners in support of these allegations.

Separate volumes regarding the allegations of dumping by subject producers, as well as the countervailable subsidies provided to producers in India and Türkiye, are being filed simultaneously at both the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission (the "Commission"). Petitioners request that duties be imposed to offset the dumping and subsidies detailed in the specific antidumping duty ("AD") and countervailing duty ("CVD") volumes.

I. COMMON ISSUES

This section contains the information required in AD and CVD petitions by 19 C.F.R. §§ 351.202(b)(1) to 351.202(b)(9) and 207.11.

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A. Contact Information for the Petitioners (19 C.F.R. § 207.11(a); 19 C.F.R. § 351.202(b)(1))

Petitioners are domestic producers of WSLPP and therefore domestic interested parties within the meaning of 19 U.S.C. § 1677(9)(C) and 19 C.F.R. § 351.102(b)(17).[1] Petitioners' contact information is provided in **Exhibit I-1**.

B. Identity of an Industry on Whose Behalf the Petitions Are Filed (19 C.F.R. § 207.11(b)(2)(ii); 19 C.F.R. § 351.202(b)(2))

These petitions are filed on behalf of the United States industry that produces WSLPP. **Exhibit I-1** contains information relating to Petitioners and **Exhibit I-2** contains contact information for other domestic producers in the United States, to the extent reasonably available to Petitioners.

C. Information Relating to the Degree of Industry Support for the Petitions (19 C.F.R. § 351.202(b)(3))

Under Sections 702(c)(4)(A) and 732(c)(4)(A) of the Act, a petition is filed by or on behalf of the domestic industry if: (1) the domestic producers or workers who support the petition account for at least 25 percent of the total production of the domestic like product; and (2) those producers or workers account for more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for or opposition to the petition. Petitioners satisfy both requirements.

Because no source reports total domestic production of WSLPP, Petitioners have measured industry support using shipment data. As Commerce has recognized in numerous prior

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[1] Petitioners provide their confidential trade and financial data in **Exhibit I-28.**

investigations, shipments are a reasonable proxy for domestic production of steel tubular products.[2] As shown in **Exhibit I-3**, which sets forth the calculation of industry support for the petitions, Petitioners accounted for most of the industry's domestic shipments and exports in 2025.

[ ], the recognized authority on the U.S. pipe and tube market, reports that the domestic industry had [ ] short tons ("STs") of domestic shipments of welded stainless pipe and tube – a category corresponding to WSLPP – in the U.S. market in 2025.[3] Official export statistics show that the domestic industry exported 19,917 STs of WSLPP in 2025.[4] Summing domestic and export shipments, Petitioners estimate that the domestic industry as a whole produced [ ] STs of WSLPP in 2025.[5] Petitioners' production accounted for [ ] percent of this total.[6] These petitions are therefore filed by or on behalf of the domestic industry within the meaning of Sections 702(c)(4)(A) and 732(c)(4)(A) of the Act.

2 *See, e.g., Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe From the Republic of Korea and the Russian Federation: Initiation of Countervailing Duty Investigations*, 85 Fed. Reg. 47,170, 47,172 (Dep't Commerce Aug. 4, 2020) ("Because total industry production data for the domestic like product for 2019 are not reasonably available to the petitioner, and the petitioner has established that shipments are a reasonable proxy for production data, we have relied on the data provided by the petitioner for purposes of measuring industry support"); *Large Diameter Welded Pipe from Canada, Greece, India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations*, 83 Fed. Reg. 7,154, 7,157 (Dep't Commerce Feb. 20, 2018).

3 *See* [ ], excerpts attached at **Exhibit I-4**.

4 *See* Export Statistics, attached at **Exhibit I-5**.

5 The sum of domestic and export shipments is the best available proxy for production. We note that the ratio of the petitioners' production to their total shipments ranged from [ ] percent throughout the POI. See Petitioners' confidential trade and financial data in **Exhibit I-28.**

6 *See* Calculation of Industry Support for Petitions, attached at **Exhibit I-3**.

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D. Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4))

1. <u>AD/CVD Remedies</u>

The domestic industry has previously filed AD and/or CVD petitions on imports of welded stainless steel pressure pipe from China, India, Japan, Malaysia, Sweden, Thailand, and Vietnam.[7] The domestic industry has previously filed AD and/or CVD petitions on imports of welded stainless steel pipe from Japan, Korea, Sweden, and Taiwan.[8] The domestic industry has previously filed AD and/or CVD petitions on imports of large diameter welded pipe, including stainless steel pipe, from Canada, China, Greece, India, Korea, and Türkiye.[9] As of the filing of these petitions, there remain in place AD and CVD orders on welded stainless steel pressure pipe from China and India;[10] AD orders on welded stainless steel pressure pipe from Malaysia, Thailand, and Vietnam;[11] and AD orders on welded stainless steel pipe from Korea and Taiwan.[12]

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7 *See Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Third Review) and 731-TA-1210–1212 (Second Review), USITC Pub. 5624 (May 2025) at 1.2-1.4, excerpts attached at **Exhibit I-6**.

8 *See Welded Stainless Steel Pipe from South Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Fifth Review), USITC Pub. 5395 (Dec. 2022) at I-3-I-6, excerpts attached at **Exhibit I-7**.

9 *See Large Diameter Welded Pipe from China and India*, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final), USITC Pub. 4859 (Jan. 2019) at 3-4, excerpts attached at **Exhibit I-8**.

10 *Circular Welded Austenitic Stainless Pressure Pipe from the People's Republic of China: Continuation of Antidumping Duty Order and Countervailing Duty Order*, 90 Fed. Reg. 22,468 (Dep't Commerce May 28, 2025) ("*Continuation of China Orders*"); *Welded Stainless Pressure Pipe from India: Continuation of Antidumping and Countervailing Duty Orders*, 87 Fed. Reg. 29,109 (Dep't Commerce May 12, 2022) ("*Continuation of India Orders*"). The orders on China and India cover welded stainless steel pressure pipe not greater than 14 inches in outside diameter. *Id*.

11 *Welded Stainless Steel Pressure Pipe from Malaysia, Thailand, and the Socialist Republic of Vietnam: Continuation of Antidumping Duty Orders*, 90 Fed. Reg. 22,467 (Dep't Commerce May 28, 2025) ("*Continuation of Malaysia, Thailand, and Vietnam Orders*").

12 *Welded ASTM A-312 Stainless Steel Pipe from the Republic of Korea and Taiwan: Continuation of Antidumping Duty Orders*, 87 Fed. Reg. 80,154 (Dep't Commerce Dec. 29, 2022) ("*Continuation of Korea and Taiwan Orders*").

2. Other Forms of Import Relief

In 2001, the Commission conducted a safeguard investigation under Section 202 of the Trade Act of 1974 to determine whether certain steel products, including stainless steel welded pipe, were being imported into the United States in such increased quantities as to be a substantial cause of serious injury or the threat of serious injury to the domestic industries producing articles like or directly competitive with the imported articles. However, in its final determination issued in December 2001, the Commission made a negative determination with respect to stainless steel welded pipe.[13]

In March 2018, President Donald Trump exercised his authority under Section 232 of the Trade Expansion Act of 1962 to impose a tariff on certain steel imports that were found to threaten to impair U.S. national security, including WSLPP.[14] While certain country exemptions and product-specific exclusions from the payment of tariffs under the Section 232 program were granted prior to February 2025, such exemptions were terminated as of March 2025.[15]

Imports of WSLPP from China are subject to additional tariffs of 25 percent under Section 301 of the Trade Act of 1974.[16] Section 301 authorizes the Office of the United States Trade Representative ("USTR"), at the direction of the President, to take appropriate action to respond to a foreign country's unfair trade practices.[17] Additional Section 301 tariffs on Chinese imports have been in place since 2019, following an investigation by USTR into China's acts,

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13 *See Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001), Vol. I at 17-18, excerpts attached at **Exhibit I-9**.

14 *See Adjusting Imports of Steel Into the United States*, 90 Fed. Reg. 9,817 (Executive Office of the President Feb. 18, 2025).

15 *Id*. at 9,826.

16 *See Notice of Modification: China's Acts, Policies and Practices Related to Technology Transfer, Intellectual Property and Innovation***,** 89 Fed. Reg. 76,581, 76,590 (USTR Sept. 18, 2024).

17 19 U.S.C. § 2411.

policies, and practices related to technology transfer, intellectual property, and innovation and USTR's determination that these acts, policies, and practices are unreasonable or discriminatory and burden or restrict U.S. commerce.[18] The applicable rate of duty for the Section 301 tariffs on Chinese imports of WSLPP was set at 7.5 percent in 2020[19] and increased to 25 percent in 2024.[20]

E. Scope of the Investigations and a Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5))

1. Scope of Investigations

The proposed scope of these investigations is as follows:

> The merchandise covered by these petitions is circular welded austenitic stainless line and pressure pipe of any diameter. This merchandise includes, but is not limited to, merchandise meeting the American Society for Testing and Materials (''ASTM'') and American Society of Mechanical Engineers ("ASME") ASTM A–312/ASME SA312, ASTM A-358/ASME SA358, ASTM A-409/ASME SA409 or ASTM A–778 specifications, the American Petroleum Institute ("API") specification 5LC, or comparable domestic or foreign specifications.
>
> Excluded from the scope are: (1) Welded stainless mechanical tubing, meeting ASTM A–554 or comparable domestic or foreign specifications; (2) boiler, heat exchanger, superheater, refining furnace, feedwater heater, and condenser tubing, meeting ASTM A–249, ASTM A–688 or comparable domestic or foreign specifications; (3) specialized tubing, meeting ASTM A–269, ASTM A–270 or comparable domestic or foreign specifications; and (4) welded stainless tubing having a wall thickness of less than 1.65 mm.
>
> Also excluded from the scope of the antidumping duty investigation on India are any products covered by the existing antidumping duty order on welded stainless pressure pipe from India. *See Welded Stainless Pressure Pipe From India:*

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18 *Notice of Determination and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 14906 (USTR Apr. 6, 2018).

19 *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 Fed. Reg. 3,741 (USTR Jan. 22, 2020).

20 *Notice of Modification: China's Acts, Policies and Practices Related to Technology Transfer, Intellectual Property and Innovation*, 89 Fed. Reg. at 76,583.

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> *Antidumping Duty and Countervailing Duty Orders*, 81 Fed. Reg. 81,062 (Dep't Commerce Nov. 17, 2016). Also excluded from the scope of the countervailing duty investigation on India are any products covered by the existing countervailing duty order on welded stainless pressure pipe from India. *See Welded Stainless Pressure Pipe From India: Antidumping Duty and Countervailing Duty Orders*, 81 Fed. Reg. 81,062 (Dep't Commerce Nov. 17, 2016).
>
> The subject imports are normally classified in subheadings 7305.31.6010, 7306.11.0010, 7306.11.0050, 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085 of the Harmonized Tariff Schedule of the United States (''HTS''). They may also enter under HTS subheadings 7306.40.1010, 7306.40.1015, 7306.40.5042, 7306.40.5044, 7306.40.5080, and 7306.40.5090. The HTS subheadings are provided for convenience and customs purposes only; the written description of the scope of these orders is dispositive.

A copy of the proposed scope language is attached at **Exhibit I-10**. Relevant Harmonized Tariff Schedule of the United States ("HTSUS") excerpts are attached at **Exhibit I-11**.

2. Technical Characteristics and Uses

WSLPP is welded pipe of austenitic stainless steel. It is of circular cross-section, produced in relatively few standard sizes, is designed for use with standard pipe fittings, and is designated by nominal diameter and wall thickness.[21] The proposed scope includes WSLPP of any diameter.

Stainless steel is a general class of steels that contains at least 10.5 percent of chromium by weight. Chromium gives stainless steel its resistance to corrosion as well as strength at high temperatures and pressure. For these reasons, it is used in corrosive environments, under high temperature and pressure conditions, or where cleanliness and ease of maintenance are strictly required. Although there are various types of stainless steels, the product within the proposed

[21] USITC Pub. 5624 (May 2025) at 1.8-1.9, excerpts attached at **Exhibit I-6**.

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scope is made from the austenitic class of stainless steels, which has excellent corrosion resistance, very good formability, and strength as a result of cold working (changes to the shape or structure of steel, for example by rolling or drawing, without the application of heat). The subject pipe is generally made from austenitic grades 304 and 316 stainless steels. Grade 304, containing 18-20 percent chromium and 8-10.5 percent nickel, is the most widely used austenitic grade and is resistant to food-processing environments (except possibly for high-temperature conditions involving high acid or chloride contents), organic chemicals, and a wide variety of inorganic chemicals. Grade 316 contains 16-18 percent chromium, 10-14 percent nickel, and 2-3 percent molybdenum. The higher nickel and molybdenum content provides better corrosion resistance to grade 316 compared to grade 304 stainless steels.[22]

WSLPP is generally produced to conform to ASTM specifications A-312, A-358, A-409, or A-778 or to similar specifications, either foreign or domestic. Stainless line pipe may also be made to API 5LC. Copies of the relevant specifications are attached at **Exhibit I-12**. A-312 is the most common ASTM specification for stainless steel pipe. Welded A-312 pipe is designed for high-temperature, high pressure, general corrosive-resistance service, and thus must be annealed (heat treated) after welding. Major uses for welded A-312 pipe include digester lines, pharmaceutical production lines, petrochemical stock lines, automotive paint lines, and various processing lines such as those in breweries, paper mills, and general food-processing facilities. ASTM A-778 pipe is similar to ASTM A-312 pipe but does not require post-weld annealing. A-778 pipe is most often used in the pulp and paper industry and for wastewater applications, owing to its ability to withstand corrosive contact, albeit at somewhat lower levels than A-312

[22] *Id.*

pipe. A-778 pipe is also used in corn fermentation systems to produce ethanol and low-pressure fluid transfer systems.[23]

3. Production Process[24]

There are two stages in the production of WSLPP: forming the tubular shape and welding the product. Two common methods are used to form the tubular shape, namely, the continuous-mill process and the press-brake process.

The continuous-mill process, which is the principal method of producing WSLPP, begins with coils of sheet, strip, or plate. Coiled steel, of a width essentially equivalent to the outside diameter of the pipe to be produced, is set up in an uncoiler and fed into a series of paired forming rolls. As it progresses through the rolls, its cross-sectional profile is formed into a tubular shape with the butted edges ready for welding as described below.

The second method of manufacturing WSLPP is the press-brake process, a batch process in which a press gradually bends cut-to-length sheet into a cylindrical shape with the butted edges ready for welding as described below. The starting sheet is of a width essentially equivalent to the outside diameter and a length equal to the length of the piece of pipe to be produced. The press-brake process is labor-intensive and is used primarily for the production of pipes in larger diameters.

In the welding stage, the butt edges are welded together by an automatic welding machine using either the tungsten inert gas ("TIG") welding process or the laser welding process. Both methods allow welding without filler material, complete fusion of butted edges,

23 USITC Pub. 5395 (Dec. 2022) at I-11-I-12, excerpts attached at **Exhibit I-7**.

24 This description of the production process for WSLPP is taken from the Commission's final staff report in USITC Pub. 5395 at I-12-I-13, excerpts attached at **Exhibit I-7**.

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and shielding of the weld area with inert gas to prevent oxidation. In the TIG welding process, welding heat is provided by an electric arc between a tungsten electrode and the pipe edges. In the laser welding process, a laser beam is directed to the weld butt joint, forming a deep-penetration fusion weld. The laser process is capable of a higher speed of operation than is the TIG process.

For continuous welded tubular products, the pipe continues after welding through an in-line annealing furnace, then through straightening and, finally, cutting to length. Batch welded pipe is annealed in a separate operation and subsequently pickled in acid.

4. Tariff Classification

The merchandise subject to the investigations is currently classified in the HTSUS under item numbers: 7305.31.6010, 7306.11.0010, 7306.11.0050, 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085. The merchandise subject to the investigations may also enter under the following HTSUS item numbers: 7306.40.1010, 7306.40.1015, 7306.40.5042, 7306.40.5044, 7306.40.5080, and 7306.40.5090. Relevant excerpts from the HTSUS are attached at **Exhibit I-11.**

F. The Domestic Like Product Proposed by Petitioners (19 C.F.R. § 207.11(b)(2)(i))

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the domestic like product.[25] The "domestic like product" is "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation{.}"[26] In an investigation, the like product determination is a factual one made on a

25 *NEC Corp. v. United States*, 36 F. Supp. 2d 380, 382 (Ct. Int'l Trade 1998) ("*NEC*").

26 19 U.S.C. § 1677(10).

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case-by-case basis.[27] The Commission generally considers the following factors: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the product; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price.[28] No single factor is dispositive. In evaluating these factors, the Commission looks for clear dividing lines and disregards minor variations.[29]

Welded Stainless Steel Line and Pressure Pipe Constitute a Single Domestic Like Product. In its previous investigations and reviews of welded stainless steel pipe – a product category inclusive of welded stainless steel line pipe and welded stainless steel pressure pipe – the Commission defined a single domestic like product.[30] In its previous investigation of large diameter welded pipe, the Commission defined welded stainless steel pipe as a separate domestic like product, but did not define further separate like products within this category, including with respect to welded stainless steel line pipe and welded stainless steel pressure pipe.[31] Thus, in its prior investigations and reviews, the Commission has universally defined welded stainless steel line pipe and welded stainless steel pressure pipe to be within the same like product.

27 *See, e.g.*, *NEC*, 36 F. Supp. 2d at 383.

28 *Cleo, Inc. v. United States*, 501 F.3d 1291, 1295 (Fed. Cir. 2007).

29 *Id.*

30 USITC Pub. 5395 (Dec. 2022) at 7-9, excerpts attached at **Exhibit I-7**. While the Commission in its original investigations defined the like product to encompass all welded stainless steel pipe – a category broader than Commerce's scope description – and then narrowed its definition in its second five-year reviews to include only ASTM A-312 and A-778 welded stainless steel pipe, it never defined separate like products, including with respect to line and pressure pipe. *Id.*

31 USITC Pub. 4859 at 9-15, excerpts attached at **Exhibit I-8**.

The Commission should continue to do so in these investigations. Applying the Commission's six-factor tests demonstrates that there are no clear dividing lines between welded stainless steel line and pressure pipe.

Physical characteristics and uses. Welded stainless steel line and pressure pipe are made from the same raw material, austenitic stainless steel, and are produced to the same specifications, giving them identical physical characteristics. Even when they are made to different specifications, there is substantial overlap between pipe with the same diameters and wall thicknesses. Attached at **Exhibit I-13** is a table that highlights the overlap between welded stainless pipe meeting ASTM A-312 and API 5LC. It shows that for the majority of standard sizes in ASTM A-312, there is a size with the same outer diameters and wall thickness specified in API 5LC.

Their end uses likewise overlap: both are widely used in pipeline and process piping systems where corrosion resistance, cleanliness, and long service life are essential, with typical applications in refineries, petrochemical plants, chemical plants, power plants, water and desalination facilities, and offshore/onshore pipeline projects.

Manufacturing facilities, production processes, and employees. Welded stainless steel line and pressure pipe are manufactured in the same facilities by the same employees using the same production processes described above. While the Petitioners do not themselves produce welded stainless line pipe, the materials and production process are substantially the same.[32]

Chanels of distribution. Welded stainless steel line and pressure pipe are both sold to end users and distributors and thus share identical channels of distribution.

32 *See* Affidavit of Kris Podsiad, attached at **Exhibit I-14**.

Interchangeability. Line and pressure pipe produced to the same specifications are fully interchangeable: pipe meeting ASTM A-312 can be supplied and used as line or pressure pipe. As reviewed above, pipe of the same dimensions can meet specifications for both line pipe and pressure pipe.

Producer and customer perceptions. Producers and customers perceive welded stainless line and pressure pipe – which are marketed together in product brochures under the same grades – as within the same product category.[33]

Price. Based on available information, prices for welded stainless line and pressure pipe overlap.

Conclusion. Given these similarities, and consistent with prior determinations, the Commission should define a single domestic like product that consists of all WSLPP, co-extensive with the scope.

WSLPP of all Diameters Constitutes a Single Domestic Like Product. The proposed scope covers WSLPP of all diameters. Where an in-scope product exists along a continuum of sizes, the Commission consistently declines to treat gradations in size as clear dividing lines between like products. Just last year, in *Slag Pots from China* – involving a scope covering slag pots from 65 to 12,000 cubic feet in capacity – the Commission found a single domestic like product, explaining that, "where the scope covers products along a broad continuum of sizes, a lack of interchangeability between products at either end of that continuum is unsurprising, and does not demonstrate the existence of a clear line dividing them."[34] The Commission has applied the

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33 Producers market welded stainless steel pipe by grade, without differentiating between line and pressure pipe. *See*, *e.g.*, Bristol Pipe & Tube, Inc., *Stainless Steel Pipe*, <bristolpipeandtube.com/pipe-tube/stainless-steel.html> (last visited June 29, 2026), attached as **Exhibit I-15**.

34 *Slag Pots from China*, Inv. Nos. 701-TA-753 and 731-TA-1731 (Preliminary), USITC Pub. 5592 at 5-9 (Feb. 2025), excerpts attached at **Exhibit I-16**.

same principle specifically to pipe products. In *Seamless Standard, Line, and Pressure Pipe (“SSLPP”) from China*, respondents expressly urged the Commission to define SSLPP above and below 4.5 inches in outside diameter as separate like products. The Commission declined, instead defining a single domestic like product consisting of all in-scope sizes because “{a} lack of interchangeability between products at either end of a continuum is not inconsistent with a finding of a single domestic like product when the products are all part of a continuum.”[35] And in *Large Residential Washers from Korea and Mexico*, the Commission likewise found no clear lines dividing a like product existing along “a continuum of sizes.”[36]

The same analysis governs here. In-scope WSLPP is a single product manufactured along a continuum of sizes, with no diameter constituting a clear dividing line. Across every diameter, WSLPP shares the same essential physical characteristic, being circular welded pipe of austenitic stainless steel, and the same essential end uses in the applications discussed above. To the extent interchangeability between very small and very large diameter pipe is limited, that is “unsurprising, and does not demonstrate the existence of a clear line dividing them.”[37] Indeed, in *Certain Welded Stainless Steel Pipes from Korea and Taiwan*, the Commission expressly warned that distinguishing between pipe “on the basis of diameter” could “open the door to numerous inappropriate like product possibilities.”[38]

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[35] *Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from China*, Inv. Nos. 701-TA-469 and 731-TA-1168 (Final), USITC Pub. 4190 at 5-10 (Nov. 2010), attached at **Exhibit I-20**.

[36] *Large Residential Washers from Korea and Mexico*, Inv. Nos. 701-TA-488 and 731-TA-1199-1200 (Final), USITC Pub. 4378 at 5-11 (Feb. 2013), excerpts attached at **Exhibit I-21**.

[37] USITC Pub. 5592 at 9 (Feb. 2025), attached at **Exhibit I-16**.

[38] *Certain Welded Stainless Steel Pipes from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Final), USITC Pub. 2585 at 9-10, n.21 (Dec. 1992), excerpts attached at **Exhibit I-22**.

Finally, although in certain past welded stainless steel pipe proceedings the Commission has defined a single domestic like product up to 14 inches in outside diameter, the scope in those proceedings was itself bounded at 14 inches.[39] Where, as here, the scope contains no size limitation, the Commission has defined a singled domestic like product, encompassing welded stainless steel pipe of all diameters.[40]

In sum, because no clear lines divide the domestic like product – whether by diameter or between line and pressure pipe – the Commission should define a single domestic like product, WSLPP, coextensive with the scope.

G. The Names of the Subject Countries and the Name of Any Intermediate Country Through Which the Merchandise is Transshipped (19 C.F.R. § 351.202(b)(6))

The WSLPP covered by these petitions is manufactured in and exported to the United States from India, Türkiye, and the UAE. Petitioners do not have any evidence at this time indicating that the subject merchandise covered by these petitions is produced in a country other than the country from which it is exported.

H. The Names and Addresses of Each Person Believed to Sell the Merchandise at Less Than Fair Value and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(i)(A))

The names and addresses of the entities believed by Petitioners to be producing and exporting WSLPP subject to these petitions are provided in **Exhibits I-17** through **I-19**. Information reasonably available to Petitioners does not allow them to identify the proportion of total exports to the United States during the most recent 12-month period accounted for by the

[39] *See*, *e.g.*, USITC Pub. 5624 (May 2025) at 6-7, excerpts attached at **Exhibit I-6**.

[40] *See*, *e.g.*, USITC Pub. 5395 (Dec. 2022) at 6-9, excerpts attached at **Exhibit I-7**.

producers listed in these exhibits, but such information suggests that the listed companies account for the vast majority of subject exports.

I. All Factual Information Related to the Calculation of Export Price and the Constructed Export Price of the Subject Merchandise and the Normal Value of the Foreign Like Product for Market Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(B))

Volumes II through IV of these petitions contain the necessary information concerning the calculation of the export price of the subject merchandise and the normal value of the foreign like product for the subject countries that are market economy countries.

J. Factual Information Related to the Calculation of Normal Value of the Foreign Like Product in Nonmarket Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(C))

None of the countries covered by these petitions are nonmarket economies.

K. The Names and Addresses of Each Person Believed to Benefit from a Countervailable Subsidy Who Exports the Subject Merchandise to the United States and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(ii)(A))

Volume V contains a CVD petition on imports of WSLPP from India and Volume VI contains a CVD petition on imports of WSLPP from Türkiye. The names and addresses of the entities believed by Petitioners to be benefitting from countervailable subsidies and that have exported WSLPP to the United States are provided in **Exhibits I-17** (India) and **I-18** (Türkiye). Information reasonably available to Petitioners does not allow the identification of the proportion of total exports to the United States accounted for during the most recent 12-month period by the listed producers, but Petitioners believe the listed companies account for the vast majority of relevant exports.

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L. The Alleged Countervailable Subsidies and Related Factual Information (19 C.F.R. § 351.202(b)(7)(ii)(B))

Volumes V and VI of these petitions contain allegations of countervailable subsidies, as well as factual information relevant to the alleged countervailable subsidies such as the laws, regulations, and decrees under which the subsidies are bestowed, the manner in which the subsidies were paid, and Petitioners' estimation – to the extent practicable – of the value of the subsidies provided to producers and exporters of WSLPP subject to these petitions.

M. The Volume and Value of the Merchandise Imported During the Most Recent Two-Year Period (19 C.F.R. § 351.202(b)(8))

Imports of WSLPP from the subject countries have been substantial over the most recent two-year period. Petitioners estimate that by volume, subject imports were 12,928 ST in 2024 and 36,287 ST in 2025.[41] Petitioners estimate that the landed, duty-paid value of subject imports was $47.7 million in 2024 and $180.4 million in 2025.[42]

N. Contact Information for Each Entity the Petitioners Believe Imports or Is Likely to Import the Subject Merchandise (19 C.F.R. § 207.11(b)(2)(iii); 19 C.F.R. § 351.202(b)(9))

Contact information for importers of WSLPP from the subject countries known to Petitioners at this time is listed in **Exhibit I-24**. There may be a number of importers of WSLPP unknown to Petitioners at this time. Petitioners respectfully request that Commerce obtain this information from U.S. Customs and Border Protection, as Petitioners do not have access to this information.

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41 U.S. Import Data for WSLPP, attached at **Exhibit I-23**.

42 *Id*.

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O. Identification of Pricing Products (19 C.F.R. § 207.11(b)(2)(iv))

Petitioners request that the Commission collect pricing data on U.S. shipments for the following pricing products. The data should be collected in quantity (in feet) and f.o.b. value (in actual dollars) of the following WSLPP products shipped to unrelated U.S. customers during January 2023 to March 2026.

> Product 1 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 2-inch schedule 10S
>
> Product 2 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 4-inch schedule 10S
>
> Product 3 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 6-inch schedule 10S
>
> Product 4 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 14-inch schedule 10S

P. Lost Sales and Revenue (19 C.F.R. § 207.11(b)(2)(v))

Petitioners are submitting, separately, Lost Sales and Lost Revenue Allegations using the Commission's template. Petitioners expect that purchaser responses to the Commission's Lost Sales and Lost Revenue Survey, combined with other evidence developed during the investigations, will confirm significant domestic industry lost sales and revenues and other indicia of adverse price effects.

II. INJURY INFORMATION (19 C.F.R. § 351.202(B)(10))

According to the Act, a domestic industry is entitled to antidumping or countervailing duty relief if it is experiencing material injury or the threat of material injury by reason of dumped or unfairly subsidized imports. 19 U.S.C. §§ 1671, 1673. As outlined below, the domestic industry producing WSLPP in the United States is both suffering from material injury and threatened with further material injury by reason of dumped and unfairly subsidized imports of WSLPP from India, Türkiye, and the UAE.

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A. The domestic like product consists of WSLPP covered by the scope

In determining whether an industry in the United States has suffered material injury or is threatened with material injury, the Commission first defines the domestic like product, *i.e.*, "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[43] As explained in Section I.B, above, there is a single domestic like product in these investigations that consists of all WSLPP corresponding to the scope.

B. Subject imports are not negligible

Pursuant to 19 U.S.C. § 1677(24)(A)(i), imports are not considered to be negligible if they account for at least 3 percent of the volume of all such merchandise imported into the United States in the most recent twelve-month period for which data are available that precedes the filing of the petitions.[44] In this case, the most recent twelve-month period for public import data are available is June 2025 through May 2026. During that 12-month period, imports from India subject to the antidumping petition accounted for 10.12 percent of imports, imports from India subject to the countervailing duty investigation accounted for 4.25 percent of imports, imports from Turkey accounted for 9.92 percent of imports, and imports from the UAE accounted for 9.08 percent of imports.[45] Thus, imports from each of the subject countries are not negligible.

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[43] 19 U.S.C. § 1677(10).

[44] The higher negligibility threshold for CVD cases on certain developing countries does not apply in this case.

[45] *See* Negligibility Calculations, attached at **Exhibit I-26**.

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C. Subject imports should be cumulated

For the purposes of evaluating volume and price effects for a determination of material injury, the statute directs the Commission to cumulate imports from all subject countries as to which petitions were filed on the same day if such imports compete with each other and the domestic like product in the U.S. market.[46] In assessing whether subject imports compete with each other and the domestic like product, the Commission generally considers four factors: (1) the degree of fungibility between subject imports from each country and between subject imports and the domestic like product; (2) the presence of sales or offers to sell in the same geographic markets; (3) the existence of common or similar channels of distribution; and (4) whether the subject imports are simultaneously present in the U.S. market. Only a reasonable overlap of competition is required. In this case, these petitions are all being filed on the same day, and, as described in more detail below, each of the factors the Commission considers supports a finding that imports of WSLPP from all subject countries compete with each other and with the domestic like product. The Commission should therefore cumulate subject imports in its determination of material injury, and the remainder of the injury analysis in these petitions is presented on a cumulated basis.

1. Fungibility

WSLPP from India, Türkiye, and the UAE are generally substitutable with each other and with the domestic like product. WSLPP are generally produced in accordance with the same standards, whether produced domestically or imported, and the domestic like product and imports are thus highly substitutable. Additionally, as shown by the evidence of lost sales, lost revenues, and lost market share submitted with these petitions, subject imports are not merely

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[46] 19 U.S.C. § 1677(7)(G)(i).

substitutable for the domestic like product – they have, in fact, been substituted for the domestic like product. Based on these facts, the Commission should find that imports from each of the subject countries are generally fungible with each other and the domestic like product.

2. Same Geographic Markets

The record here shows that imports from the subject countries compete with imports from the other subject countries throughout the U.S. market. The import data provided at **Exhibit I-27** show that WSLPP from the subject countries entered at ports in multiple regions throughout the country during the period of investigation. Furthermore, all of those imports compete with the domestic like product, which is sold nationwide. Thus, this factor supports cumulating all of the subject imports.

3. Channels of Distribution

The Commission has previously found that both domestically-produced welded stainless pipe and subject imports are generally shipped to distributors. In addition, WSLPP from domestic producers and the subject countries are sold to the same end users. Thus, this factor supports cumulation.

4. Simultaneous Presence

Exhibit I-27 shows that imports from the subject countries have been present in every month of the period of investigation. Subject imports and the domestic like product are thus simultaneously present in the market.

*   *   *

As demonstrated above, each of the cumulation factors that the Commission normally considers shows that there is a reasonable overlap of competition between imports from each of the subject countries and the domestic like product. Accordingly, the Commission should cumulate all of the subject imports.

D. Subject imports are causing material injury to the domestic industry

In determining whether a domestic industry is experiencing present material injury by reason of unfairly traded imports, the Commission must consider: (1) the volume of subject imports; (2) the effect of imports of subject merchandise on U.S. prices for the domestic like product; and (3) the impact of subject imports on domestic producers.[47] In this case, each factor favors a finding of present material injury.

1. The volume of subject imports is significant

In assessing the volume of subject imports, the Commission must "consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[48] Imports of WSLPP from India, Türkiye, and the UAE are significant by any measure.

U.S. Imports of WSLPP from India, Türkiye, and the UAE[49]
Short Tons

Source	**2023**	**2024**	**2025**	**Jan - Mar 2025**	**Jan - Mar 2026**
India	2,763	9,190	12,942	2,628	1,695
Türkiye	61	1,096	12,628	7,988	2,767
UAE	95	2,642	10,717	1,960	2,123
Subject	2,918	12,928	36,287	12,576	6,586

By volume, subject imports were 12.4 times higher in 2025 than they were in 2023. Subject imports declined in the first quarter of 2026, but even in that one quarter exceeded total subject

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47 19 U.S.C. § 1677(7)(B).

48 19 U.S.C. § 1677(7)(C)(i).

49 *See* Import Statistics, attached at **Exhibit I-23**.

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imports in calendar year 2023. Moreover, this apparent decline likely masks an inventory overhang affecting the market in 2026 due to the massive surge from 2023 to 2025.

Subject imports are also significant relative to domestic consumption. Though demand was increasing rapidly over the period of investigation ("POI"), due in part to demand for WSLPP in the booming data center construction industry,[50] subject imports rose so quickly that they were still able to seize an increasing share of the rapidly expanding U.S. market.

Estimated WSLPP Market Share[51]
Short Tons

Source		**2023**	**2024**	**2025**	**Jan - Mar 2025**	**Jan - Mar 2026**	
Subject Imports		2,918	12,928	36,287	12,576	6,586	
Nonsubject Imports		52,505	59,018	81,317	23,065	16,740	
Total Imports		55,423	71,946	117,604	35,641	23,326	
Petitioners	[						]
Consumption	[						]
Subject %	[						]
Nonsubject %	[						]
Domestic %	[						]

From 2023 to 2025, subject imports gained [ ] percentage points of market share, the [ ] came at the expense of the domestic industry, which lost [ ] percentage points of market share. While subject imports lost some market share in the first quarter of 2026, their share remained higher than [ ]. Indeed, as overall consumption rose by a rapid [ ] percent from 2023 to 2025, domestic producers' shipments [ ], due to the swift surge in subject imports.

50 *See* Data Center Articles, attached at **Exhibit I-29**.

51 *See* Import Statistics, attached at **Exhibit I-23**. S*ee also* Petitioners' Confidential Data, attached at **Exhibit I-28**.

Thus, the volume of subject imports is significant, both absolutely and relative to consumption, and the increase in subject import volume over the period is also significant.

2. Subject imports have had significant adverse price effects

In evaluating the effect of subject imports on prices, the Commission must consider whether "there has been significant price underselling by the imported merchandise," and whether the effect of imports "otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree."[52] Subject imports of WSLPP have undersold the domestic like product, and they have also suppressed and depressed prices to a significant degree.

A comparison of Petitioners' own prices and the average unit value of subject imports shows deep and widespread underselling throughout the POI. Indeed, imports from [ ] undersold domestic producers. In addition, margins of underselling ranged as high as [ ] percent.

Underselling Analysis[53]
Average Unit Values, $/Short Ton

		2023	2024	2025	Jan - Mar 2025	Jan - Mar 2026	
Petitioners' U.S. Commercial Shipments	[						]
India		$5,137	$3,543	$4,313	$3,471	$4,696	
Turkey		$4,144	$5,782	$6,966	$7,339	$6,244	
UAE		$5,382	$3,329	$3,417	$3,234	$3,842	
India %	[						]
Turkey %	[						]
UAE %	[						]

52 19 U.S.C. § 1677(7)(c)(ii).

53 *See* Import Statistics, attached at **Exhibit I-23**. *See also* Petitioners' Confidential Data, attached at **Exhibit I-28**.

This underselling is significant, as it has caused the massive loss in market share detailed above. In addition, Petitioners' lost sales and lost revenue allegations confirm that the domestic industry has lost volume and potential volume due to competition with lower-priced subject imports.

Low-priced subject imports have also caused price depression and suppression. The average unit value of Petitioners' U.S. commercial shipments fell by [ ] percent from 2023 to 2025, even as demand was surging.[54] These data confirm that rising volumes of low-priced subject imports suppressed and depressed domestic prices to a significant degree.

In short, subject imports have undersold the domestic like product and suppressed and depressed domestic prices, resulting in significant adverse price effects.

3. <u>Subject imports have had a significant adverse impact on the domestic industry</u>

In examining the impact of subject imports on the domestic industry, the Commission is instructed to "evaluate all relevant economic factors which have a bearing on the state of the industry, in the United States."[55] These factors include, but are not limited to:

- Actual and potential declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity;
- Factors affecting domestic prices;
- Actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment;
- Actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product; and
- The magnitude of the margin of dumping.[56]

As explained in more detail below, these factors support a determination that the domestic industry has been materially injured by subject imports.

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54 *See* Petitioners' Confidential Data, attached at **Exhibit I-28**.

55 19 U.S.C. § 1677(7)(c)(iii).

56 *Id*.

From 2023 to 2025, as subject imports flooded into a growing market and seized market share, the domestic industry's production and shipments were [ ].[57] As subject imports prevented domestic producers from increasing shipments and production in line with demand, the industry's capacity utilization remained low, [ ].[58] The domestic industry was also forced to reduce employment and hours, and wages paid fell.

Widespread underselling by large and rising volumes of subject imports also harmed the industry financially. Severe price depression caused the domestic industry's net sales revenue to decline by [ ] percent from 2023 to 2025. As a result, the industry's operating income [ ]. The industry's operating income margin [ ], despite booming demand. The domestic industry's net income was also [ ] despite the rapid growth in apparent consumption.

In short, a massive surge in low-priced subject imports has thwarted the domestic industry's ability to benefit from ballooning demand over the POI. But for the increase in dumped and subsidized imports, the domestic industry would have been able to hire more workers, add shifts. and use much more of its [ ] capacity. The domestic industry should also have been able to expect to increase prices as demand surged and to improve its operating and net income as a result. Instead, imports prevented the domestic industry from increasing production, shipments, employment, revenue, and profits in line with demand. As shown in more detail below, highly substitutable imports that deeply undersell the domestic industry only threaten more injury if relief is not provided.

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57 *See* Petitioners' Confidential Data, attached at **Exhibit I-28**.

58 *See id*.

For all of these reasons, the Commission should find that the domestic industry has been materially injured, by imports of WSLPP from India, Türkiye, and the UAE.

E. Subject Imports Threaten Continued Material Injury to the Domestic Industry

The statute directs the Commission to consider several factors in assessing the threat of material injury, including: (1) existing unused subject capacity, or an imminent and substantial increase in subject capacity; (2) a significant rate of increase in the volume or market penetration of subject imports; and (3) whether subject imports are entering at prices likely to significantly depress or suppress domestic prices.[59] A threat determination "may not be made on the basis of mere conjecture or supposition."[60] None is needed here. As shown below, ample evidence confirms that subject imports threaten continued material injury to the domestic industry absent relief.

1. The Commission Should Cumulate Subject Imports for Any Threat Analysis

For threat, the Commission "may cumulatively assess the volume and price effects of imports of the subject merchandise" from all countries for which petitions were filed on the same day, if the imports compete with each other and the domestic like product.[61] Both conditions are met. The petitions concerning WSLPP from India, Türkiye, and the UAE are being filed on the same day and, as shown above, these imports compete with each other and the domestic like product. The Commission should accordingly cumulate subject imports from all three countries in any threat analysis.

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59 19 U.S.C. § 1677(7)(F)(i).

60 19 U.S.C. § 1677(7)(F)(ii).

61 19 U.S.C. § 1677(7)(H).

2. Subject Producers Have the Ability and Incentive to Target the U.S. Market

WSLPP producers in each subject country have large and growing capacity and are export oriented. Absent relief, they could flood the U.S. market. And because this market is attractive, they would have every incentive to do so. Petitioners discuss each subject WSLPP industry in turn.

India. As the Commission has recognized, India is among the world's largest producers of stainless steel tubular products,[62] and its capacity is growing. Ratnamani Metals & Tubes Limited ("Ratnamani") has 61,500 metric tons per year of stainless steel pipe and tube capacity,[63] and is expanding further.[64] Sun Mark Stainless ("Sun Mark") has 43,500 metric tons per year of dedicated welded stainless pipe and tube capacity and calls expansion its "responsibility."[65] Venus Pipes & Tubes ("Venus") expanded its welded stainless pipe and tube capacity by 15 percent in May 2025, to 27,600 metric tons per year.[66]

The Commission has also recognized that India's welded stainless steel pipe industry is export oriented.[67] That orientation is intensifying. In 2025, Ratnamani's exports made their

62 *Welded Stainless Steel Pressure Pipe from India*, Inv. Nos. 701-TA-482 and 731-TA-1064 (Review), USITC Pub. 5320 (Apr. 2022) at 17, excerpts attached at **Exhibit I-30**.

63 CRISIL Ratings, "Rating Rationale, Ratnamani Metals and Tubes Limited" (June 11, 2025) at 3, attached at **Exhibit I-31.**

64 "Ratnamani Metals & Tubes Demonstrates Resilience Amid Market Challenges, Maintains Strong Growth Outlook," *Stainless Today* (May 20, 2026) at 3, attached at **Exhibit I-32**.

65 McIntyre, Joanne, "Sun Mark Stainless: Three generations. One vision," *Stainless Steel World* (Nov. 2025) at 8-9, attached at **Exhibit I-33**.

66 Press Release, "Venus Pipes & Tubes Limited, Commencement of Operations of 3,600 MTPA of value-added Welded Tubes" (May 23, 2025), attached at **Exhibit I-34**.

67 USITC Pub. 5320 (Apr. 2022) at 17, excerpts attached at **Exhibit I-30**.

"highest ever" contribution to the company's revenues.[68] The same year, Sun Mark won the Government of India's Gold Trophy for "Highest Exports of Stainless Steel Pipes and Tubes."[69] And Venus's exports surged from 12.3 percent of revenue in 2024 to 35.3 percent in 2025, under an express strategy of "tripling exports."[70]

With large, growing, and export-oriented capacities, Indian producers have the ability to target the U.S. market with significant volumes of subject merchandise absent relief. They also have the incentive to do so. The United States is among the world's biggest WSLPP markets, importing more of the product category that includes WSLPP than any other country.[71] Import barriers in third markets, discussed below, make the United States more attractive still. None of this is lost on Indian producers, who recognize the "export opportunities"[72] and "high-potential"[73] of the large, open, and well-paying U.S. market.

Türkiye. Türkiye is Europe's largest steel pipe producer and the world's fourth largest.[74] And its capacity is growing. In January 2025, YC Inox began production at its new $80 million stainless steel pipe mill in Dilovası, Kocaeli, which will have more than 30,000 metric tons per

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68 Ratnamani Metals & Tubes Ltd., 41st Annual Report 2024-25 at 15, excerpts attached at **Exhibit I-35**.

69 McIntyre, Joanne, "Sun Mark Stainless: Three generations. One vision," *Stainless Steel World* (Nov. 2025) at 10, attached at **Exhibit I-33**.

70 Venus Pipes & Tubes Limited, Annual Report FY 2024-25 at 13 and 48, excerpts attached at **Exhibit I-36**.

71 "Tubes, pipe & hollow profiles, stainless steel, welded (HS 730640), imports by country, 2024," World Bank, World Integrated Trade Solution, attached at **Exhibit I-37**.

72 "Ratnamani Metals & Tubes Demonstrates Resilience Amid Market Challenges, Maintains Strong Growth Outlook," *Stainless Today* (May 20, 2026), attached at **Exhibit I-32**.

73 Venus Pipes & Tubes Limited, Annual Report FY 2024-25 at 47, excerpts attached at **Exhibit I-36**.

74 Turkish Steel Pipe Manufacturers' Association (CEBID), The Steel Pipe Industry of Turkey, attached at **Exhibit I-38.**

year of capacity at full build-out.[75] YC Inox is not alone. In August 2025, Erk Boru launched a second-phase expansion of its welded stainless pipe and profile operations, growing to 32 mill lines.[76]

The Turkish industry is also export oriented, describing itself as a "net exporter."[77] And its export orientation is intensifying. From 2024 to 2025, Turkish exports of the product category that includes WSLPP rose by 71.4 percent, from 7,004 to 12,003 metric tons.[78]

Turkish producers would have the incentive to direct their large, growing, and export-oriented capacities to the United States absent relief. The United States is a large market for WSLPP, as discussed, and the available data indicate that WSLPP from Türkiye commands higher prices in the United States than in other export markets.[79] Third-country trade barriers, discussed below, further increase the relative attractiveness of the U.S. market. Indeed, Turkish producer Nikel Paslanmaz has stated that European quotas and trade barriers have cut Europe's share of its exports from 80 percent to roughly 20 percent, and that it is now targeting alternative markets, including the United States.[80]

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75 "Turkey's YC Inox begins production at Dilovası stainless steel pipe plant," *SteelOrbis* (Jan. 6, 2025), attached at **Exhibit I-39**.

76 "Erk Boru Paslanmaz Çelik'ten yeni yatırım hamlesi" ("A New Investment Move from Erk Boru Paslanmaz Çelik"), *Paslanmaz Çelik Dünyası* (Aug. 21, 2025), attached at **Exhibit I-40**.

77 Turkish Steel Pipe Manufacturers' Association (CEBID), The Steel Pipe Industry of Turkey, attached at **Exhibit I-38.**

78 UN Comtrade Database, Türkiye exports of welded stainless steel tubes, pipes, and hollow profiles (HS 730640) to World, 2024 and 2025 (last accessed July 13, 2026), attached at **Exhibit I-41.**

79 AUV analysis from UN Comtrade Data (exports from Türkiye (HS 730611 and HS 730640) for 2023 by largest destination markets showing United States offers among the highest AUVs for these exports), attached at **Exhibit I-42**.

80 "Nikel Paslanmaz to expand stainless steel capacity with investments exceeding $150 million," *SteelOrbis* (May 7, 2026), attached at **Exhibit I-43**.

UAE. UAE producer Inoxium Tubi describes itself as "the biggest stainless steel pipes & tubes producing mill in the Gulf," with a capacity of 36,000 metric tons per year.[81] The Hidayath Group, another UAE producer, bills itself as "one of the industry's largest manufacturers and suppliers of stainless steel tubes, pipes, and pipe fittings," serving "more than twenty countries across five continents."[82] The UAE industry thus has the ability to ship significant volumes of subject merchandise to the United States. The U.S. market's large size, along with third-country trade barriers, would provide it with ample incentive to do so absent relief.

3. Subject Producers Have Demonstrated Their Ability to Rapidly Penetrate the U.S. Market

The statute directs the Commission to consider "a significant rate of increase of the volume or market penetration of imports of the subject merchandise" in determining whether the domestic industry is threatened with material injury.[83] Subject imports have dramatically increased both their volume and market penetration. As discussed above, from 2023 to 2025, these imports skyrocketed, and they were more than 12 times higher in 2025 than they had been in 2023. Subject imports increased their market share by [ ] percentage points from 2023 to 2025, climbing from [ ] percent of apparent U.S. consumption to [ ] percent. Subject imports have rapidly surged into the U.S. market, indicating a "likelihood of substantially increased imports" that threaten the domestic industry with additional material injury absent relief.[84]

81 "About Us," <inoxiumtubi.com>, attached at **Exhibit I-44**.

82 "Stainless Steel Pipes and Tubes," Hidayath Group, at 5, attached at **Exhibit I-45**.

83 19 U.S.C. § 1677(7)(F)(i)(III).

84 19 U.S.C. § 1677(7)(F)(i)(III).

4. Other Trade Measures Incentivize Subject Producers to Export to the U.S. Market

In assessing threat, the Commission also considers whether trade measures in third-country markets are likely to divert subject exports to the United States. On July 1, 2026, the European Union replaced its steel safeguard – which had imposed a 25 percent out-of-quota duty – with a stricter regime, Regulation (EU) 2026/1384. The new regulation cuts duty-free tariff-rate quotas by roughly 47 percent relative to safeguard levels and doubles the out-of-quota duty to 50 percent.[85] Stainless steel welded pipe is covered by the new regime.[86]

The United Kingdom acted in concert. On July 1, 2026, the UK replaced its steel safeguard with a measure that cuts overall quota volumes by 51 percent and imposes the same 50 percent out-of-quota duty. The UK measure likewise covers stainless steel welded pipe.[87]

On July 28, 2025, Brazil imposed an antidumping duty order on "seamed tubes of austenitic stainless steel" from India. The order covers HS code 730640, which includes stainless steel welded pipe, at definitive duties ranging from US $397.42 per metric ton to US $1,207.06 per metric ton. Non-individually examined Indian producers/exporters received the highest rate: US $1,207.06 per metric ton.[88]

Each of these measures heightens the relative attractiveness of the U.S. market. Absent relief, WSLPP producers in each subject country would have every incentive to divert their exports to the United States.

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85 Regulation (EU) 2026/1384 of the European Parliament and of the Council of 17 June 2026 addressing the negative trade-related effects of global overcapacity on the Union steel market, attached at **Exhibit I-46**.

86 Commission Implementing Regulation (EU) 2026/1457 of 29 June 2026, attached at **Exhibit I-47**.

87 "UK's steel trade measure from 1 July 2026," UK Department for Business and Trade, attached at **Exhibit I-48**.

88 "Measure ID 2407361," WTO Trade Remedies Data Portal, attached at **Exhibit I-49.**

5. Subject Imports Will Enter at Prices that Depress and Suppress U.S. Prices

The statute directs the Commission to consider "whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports."[89] They are. As demonstrated above, the information reasonably available to Petitioners shows pervasive underselling by subject imports from all three countries that has depressed and suppressed domestic prices. Absent relief, high volumes of low-priced subject imports will only depress and suppress domestic prices further.

6. Rising Volumes of Low-Priced Imports Will Further Injure a Vulnerable Domestic Industry

The domestic industry is vulnerable to further material injury. Petitioners' capacity utilization at the end of the period of investigation was only [   ] percent – well below sustainable levels – and the industry was deprived of the opportunity to increase production, shipments, employment, prices, and profitability as the market was booming. Absent relief, significant volumes of low-priced subject imports will force domestic producers to choose between two equally bad options: surrender sales, or defend them by cutting prices and forgoing price increases. Either would erode their output, employment, and financial performance, pushing an already vulnerable industry deeper into decline.

7. Inventories of Subject Merchandise Threaten Additional Material Injury

The statute directs the Commission to consider "inventories of the subject merchandise."[90] Data on WSLPP inventories held in the subject countries are not presently

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89 19 U.S.C. § 1677(7)(F)(i)(IV).

90 19 U.S.C. § 1677(7)(F)(i)(V).

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available to the Petitioners. But the import surge documented above supports the reasonable inference that U.S. inventories of subject WSLPP have built up, and imported product inventory overhang can depress and suppress domestic prices. This factor thus likewise supports an affirmative threat determination.

8. Subject Producers Can Shift Other Tubular Production to WSLPP

The statute directs the Commission to consider "the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products."[91] That potential exists here. Inoxium Tubi, for example, produces both "Ornamental and Industrial Tubes and Pipes" at its Umm Al Quwain mill.[92] Moreover, small-diameter WSLPP from India is outside the scope of these investigations, and the information available indicates that Indian producers can shift from producing smaller to larger diameter (and thus in-scope) WSLPP.[93] This factor further supports an affirmative threat determination.

9. Subject Imports Are Hindering the Domestic Industry's Development and Production Efforts

The statute directs the Commission to consider "the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product."[94] Dumped and subsidized subject imports have already caused the domestic industry's operating and financial

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[91] 19 U.S.C. § 1677(7)(F)(i)(VI).

[92] "About Us", <inoxiumtubi.com>, attached at **Exhibit I-44**.

[93] Venus, for example, can produce welded stainless steel pipe with outside diameters ranging from 9 mm to 1,460 mm. *See* "Venus Pipes & Tubes: On the Way to Becoming India's Largest Manufacturer of Stainless Steel Pipes and Tubes," *Stainless Steel World* (Mar. 2024), at 2, attached at **Exhibit I-50**.

[94] 19 U.S.C. § 1677(7)(F)(i)(VIII).

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performance to [   ]. Absent relief, the continuation of harm of this type by subject imports will make it difficult, if not impossible, for domestic producers to fund the development and production efforts on which their long-term viability depends.

10. Countervailable Subsidies Encourage Production and Export of WSLPP from India and Türkiye

Where a countervailable subsidy is involved, the statute directs the Commission to consider the nature of the subsidy – "particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1" of the WTO Subsidies Agreement.[95] Article 3 of the WTO Subsidies Agreement describes subsidies that are prohibited because they are contingent upon export performance or upon the use of domestic over imported goods.[96] Article 6.1 of the WTO Subsidies Agreement describes subsidies that create serious prejudice by (1) collectively exceeding 5 percent of the product's value; (2) covering an industry's operating losses; (3) covering an enterprise's operating losses, with some exceptions; or (4) directly forgiving debt.[97]

The subsidies alleged in Volumes V (India) and VI (Türkiye) include those described by Articles 3 and 6.1. For India, this includes the following subject programs:

1. Export Promotion of Capital Goods Scheme
2. Duty Drawback Scheme
3. Advance Authorization Program
4. Duty-Free Import Authorization Program
5. Remission of Duties and Taxes on Exported Products
6. Merchandise Export from India Scheme
7. Status Holder Incentive Scheme
8. Interest Equalization Scheme on Pre- and Post-Shipment Rupee Export Credit
9. Incremental Exports Incentive Scheme

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[95] 19 U.S.C. § 1677(7)(F)(i)(I).

[96] *Agreement on Subsidies and Countervailing Measures* (April 15, 1994), Marrakesh Agreement Establishing the World Trade Organization, Annex 1A, 1869 U.N.T.S. 14, at Art. 3.

[97] *Id*. at Art. 6.1

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There are also a broad array of export-contingent subsidy programs benefitting WSLPP producers in Türkiye:

Grant and Tax Programs
1. Deductions from Taxable Income for Export Revenue
2. Inward Processing Certificates (D-3 Certificates)
3. Exemption of Exchange Tax for Foreign Exchange Transactions
4. Tax Exemption for Export Loans
5. Corporate Tax Reduction for Manufacturers
6. Foreign Market Research and Market Entry Support
7. Support for the Development of International Competitiveness
8. Domestic and Foreign Fair Support Program
9. Turquality Program

Turk Eximbank Loan Programs
1. Rediscount Program
2. Pre-Shipment Export Credit Program
3. Pre-Export Credit Program
4. Export-Oriented Investment Credit Program
5. Export-Oriented Working Capital Credit Program
6. Specific Export Credit Program
7. Export Buyer's Credits
8. Export Credit Guarantees (aka Letter of Guarantee Program)

This factor strongly further supports an affirmative threat determination as to India and Türkiye.

* * *

In sum, each factor supports an affirmative threat finding. Subject import volumes are large and growing and are sold at prices that undersell the domestic like product and depress and suppress domestic prices – trends that will only continue, and worsen, absent relief. Producers in the subject countries hold ample and growing capacity to export still greater quantities, and they have every incentive to direct them here: the U.S. market for WSLPP is one of, if not the, largest in the world, and third-country trade measures have recently tightened, further closing off alternative markets. The statute requires that a threat determination rest on evidence rather than

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"mere conjecture or supposition."[98] The evidence here is conclusive. Absent relief, subject imports will continue to materially injure an already vulnerable U.S. industry.

III. CONCLUSION

Petitioners respectfully request that Commerce initiate antidumping and countervailing duty investigations on WSLPP from India, Türkiye, and the UAE, that the Commission find that the domestic industry is materially injured or threatened with injury by these imports, and that antidumping and countervailing duty orders be imposed to offset the dumping and subsidization that is found.

[98] 19 U.S.C. § 1677(7)(F)(ii).

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Table of Exhibits

Exhibit	**Title**	**BPI Requested?**
I-1	Contact Information for Petitioners	No
I-2	Contact Information for Other Domestic Producers	No
I-3	Calculation of Industry Support	Yes
I-4	[ ]	Yes
I-5	Export Statistics	No
I-6	*Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Third Review) and 731-TA-1210–1212 (Second Review), USITC Pub. 5624 (May 2025)	No
I-7	*Welded Stainless Steel Pipe from South Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Fifth Review), USITC Pub. 5395 (Dec. 2022)	No
I-8	*Large Diameter Welded Pipe from China and India*, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final), USITC Pub. 4859 (Jan. 2019)	No
I-9	*Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001)	No
I-10	Proposed Scope Language	No
I-11	HTSUS Excerpts	No
I-12	Specifications	No
I-13	ASTM A-312 and API 5LC Overlap Table	No
I-14	Affidavit of Kris Podsiad	Yes
I-15	Bristol Pipe & Tube, Inc., *Stainless Steel Pipe*	No
I-16	*Slag Pots from China*, Inv. Nos. 701-TA-753 and 731-TA-1731 (Preliminary), USITC Pub. 5592 at 5-9 (Feb. 2025)	No
I-17	Producers and Exporters of WSLPP from India	No
I-18	Producers and Exporters of WSLPP from Türkiye	No
I-19	Producers and Exporters of WSLPP from the UAE	No
I-20	*Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from China*, Inv. Nos. 701-TA-469 and 731-TA-1168 (Final), USITC Pub. 4190 at 5-10 (Nov. 2010)	No
I-21	*Large Residential Washers from Korea and Mexico*, Inv. Nos. 701-TA-488 and 731-TA-1199-1200 (Final), USITC Pub. 4378 at 5-11 (Feb. 2013)	No

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Exhibit	**Title**	**BPI Requested?**
I-22	*Certain Welded Stainless Steel Pipes from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Final), USITC Pub. 2585 at 9-10, n.21 (Dec. 1992)	No
I-23	U.S. Import Data for WSLPP	No
I-24	Contact Information for Importers	No
I-25	Exhibit Not Used	No
I-26	Negligibility Data	No
I-27	Districts and Months of Subject Imports	No
I-28	Petitioners' Confidential Trade and Financial Data	Yes
I-29	Data Center Articles	No
I-30	*Welded Stainless Steel Pressure Pipe from India*, USITC Pub. 5320 (Apr. 2022), excerpts	No
I-31	CRISIL Ratings, "Rating Rationale, Ratnamani Metals and Tubes Limited" (June 11, 2025)	No
I-32	"Ratnamani Metals & Tubes Demonstrates Resilience Amid Market Challenges, Maintains Strong Growth Outlook," *Stainless Today* (May 20, 2026)	No
I-33	McIntyre, Joanne, "Sun Mark Stainless: Three generations. One vision," *Stainless Steel World* (Nov. 2025)	No
I-34	Press Release, "Venus Pipes & Tubes Limited, Commencement of Operations of 3,600 MTPA of value-added Welded Tubes" (May 23, 2025)	No
I-35	Ratnamani Metals & Tubes Ltd., 41st Annual Report 2024-25, excerpts	No
I-36	Venus Pipes & Tubes Limited, Annual Report FY 2024-25, excerpts	No
I-37	World Bank, World Integrated Trade Solution, "Tubes, pipe & hollow profiles, stainless steel, welded (HS 730640), imports by country, 2024"	No
I-38	Turkish Steel Pipe Manufacturers' Association (CEBID), *The Steel Pipe Industry of Turkey*	No
I-39	"Turkey's YC Inox begins production at Dilovası stainless steel pipe plant," *SteelOrbis* (Jan. 6, 2025)	No
I-40	"Erk Boru Paslanmaz Çelik'ten yeni yatırım hamlesi," *Paslanmaz Çelik Dünyası* (Aug. 21, 2025)	No
I-41	UN Comtrade Database, Türkiye exports of welded stainless steel tubes, pipes, and hollow profiles (HS 730640) to World, 2024 and 2025	No

Exhibit	Title	BPI Requested?
I-42	AUV analysis from UN Comtrade Data for Türkiye exports (HS 730611 and HS 730640) by largest destination markets	No
I-43	"Nikel Paslanmaz to expand stainless steel capacity with investments exceeding $150 million," *SteelOrbis* (May 7, 2026)	No
I-44	"About Us," <inoxiumtubi.com>	No
I-45	"Stainless Steel Pipes and Tubes," Hidayath Group	No
I-46	Regulation (EU) 2026/1384 of the European Parliament and of the Council of 17 June 2026	No
I-47	Commission Implementing Regulation (EU) 2026/1457 of 29 June 2026	No
I-48	"UK's steel trade measure from 1 July 2026," UK Department for Business and Trade	No
I-49	"Measure ID 2407361," WTO Trade Remedies Data Portal	No
I-50	"Venus Pipes & Tubes: On the Way to Becoming India's Largest Manufacturer of Stainless Steel Pipes and Tubes," *Stainless Steel World* (Mar. 2024)	No