



## DEPARTMENT OF COMMERCE

### International Trade Administration

[A-351-862]

#### Certain Corrosion-Resistant Steel Products from Brazil: Final Affirmative Determination of Sales at Less Than Fair Value

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: The U.S. Department of Commerce (Commerce) determines that imports of certain corrosion-resistant steel products (CORE) from Brazil are being, or are likely to be, sold in the United States at less than fair value (LTFV). The period of investigation is July 1, 2023, through June 30, 2024.

DATES: Applicable [Insert date of publication in the *Federal Register*].

FOR FURTHER INFORMATION CONTACT: Carter Sherwin or Nathan Araya, AD/CVD Operations, Office II, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-4260 or (202) 482-3401, respectively.

#### SUPPLEMENTARY INFORMATION:

##### Background

On April 10, 2025, Commerce published in the *Federal Register* its preliminary affirmative determination in the LTFV investigation of CORE from Brazil,<sup>1</sup> in which we also postponed the final determination until August 25, 2025, and invited interested parties to comment on the *Preliminary Determination*.<sup>2</sup> On July 17, 2025, Commerce issued a post-preliminary analysis memorandum in which we made certain changes to our differential pricing

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<sup>1</sup> See *Certain Corrosion-Resistant Steel Products from Brazil: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 90 FR 15333 (April 10, 2025) (*Preliminary Determination*), and accompanying Preliminary Decision Memorandum (PDM).

<sup>2</sup> *Id.*, 90 FR at 15333.

analysis.<sup>3</sup> We invited interested parties to comment on the changes to the differential pricing analysis.<sup>4</sup>

A summary of the events that occurred since Commerce published the *Preliminary Determination*, as well as a full discussion of the issues raised by parties for this final determination, may be found in the Issues and Decision Memorandum.<sup>5</sup> The Issues and Decision Memorandum is a public document and is on file electronically via Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS). ACCESS is available to registered users at <https://access.trade.gov>. In addition, a complete version of the Issues and Decision Memorandum can be accessed directly at <https://access.trade.gov/public/FRNoticesListLayout.aspx>.

#### Scope of the Investigation

The product covered by this investigation is CORE from Brazil. For a complete description of the scope of this investigation, *see* Appendix I.

#### Scope Comments

In the Preliminary Scope Memorandum, we set aside a period of time for parties to raise issues regarding product coverage (*i.e.*, scope) in scope-specific case briefs or other written comments.<sup>6</sup> We received scope case and rebuttal briefs from multiple interested parties. For a summary of the product coverage comments and rebuttal responses submitted to the record for this final determination, and accompanying discussion and analysis of all comments timely

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<sup>3</sup> See Memorandum, "Less-Than-Fair-Value Investigation of Certain Corrosion-Resistant Steel Products from Brazil: Post-Preliminary Analysis," dated July 17, 2025.

<sup>4</sup> See Memorandum, "Less-Than-Fair-Value Investigation of Certain Corrosion-Resistant Steel Products from Brazil: Briefing Schedule for Post-Preliminary Determination," dated July 25, 2025.

<sup>5</sup> See Memorandum, "Issues and Decision Memorandum for the Final Affirmative Determination in the Less-Than-Fair-Value Investigation of Certain Corrosion-Resistant Steel Products from Brazil," dated concurrently with, and hereby adopted by, this notice (Issues and Decision Memorandum).

<sup>6</sup> See Memorandum, "Less-Than-Fair-Value Investigations of Certain Corrosion-Resistant Steel Products from Australia, Brazil, Canada, Mexico, the Netherlands, South Africa, Taiwan, the Republic of Türkiye, the United Arab Emirates, and the Socialist Republic of Vietnam, and Countervailing Duty Investigations of Certain Corrosion-Resistant Steel Products from Brazil, Canada, Mexico, and the Socialist Republic of Vietnam: Preliminary Scope Decision Memorandum," dated April 3, 2025 (Preliminary Scope Memorandum).

received, *see* the Final Scope Memorandum.<sup>7</sup> In the Final Scope Memorandum, Commerce made no changes to the scope language as it appeared in the *Initiation Notice*.<sup>8</sup> *See* Appendix I.

### Verification

Commerce conducted verification of the information relied upon in making its final determination in this investigation, in accordance with section 782(i) of the Tariff Act of 1930, as amended (the Act). Specifically, we conducted on-site verifications of the sales and cost information submitted by CSN<sup>9</sup> and Usiminas<sup>10</sup> for use in our final determination.<sup>11</sup> We used standard verification procedures, including an examination of relevant sales and accounting records, and original source documents provided by CSN and Usiminas.

### Analysis of Comments Received

All issues raised in the case and rebuttal briefs submitted by interested parties in this investigation are addressed in the Issues and Decision Memorandum. A list of the issues addressed in the Issues and Decision Memorandum is attached to this notice at Appendix II.

### Final Determination of the Single Entity

In the *Preliminary Determination*, we found that CSN is affiliated with Prada, and Usiminas is affiliated with Unigal and Solucoes, and that each should be treated as single

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<sup>7</sup> *See* Memorandum, “Less-Than-Fair-Value Investigations of Certain Corrosion-Resistant Steel Products from Australia, Brazil, Canada, Mexico, the Netherlands, South Africa, Taiwan, the Republic of Türkiye, the United Arab Emirates, and the Socialist Republic of Vietnam, and Countervailing Duty Investigations of Certain Corrosion-Resistant Steel Products from Brazil, Canada, Mexico, and the Socialist Republic of Vietnam: Final Scope Decision Memorandum,” dated concurrently with this notice (Final Scope Memorandum).

<sup>8</sup> *See Certain Corrosion-Resistant Steel Products from Australia, Brazil, Canada, Mexico, the Netherlands, South Africa, Taiwan, Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 89 FR 80196 (October 2, 2024) (*Initiation Notice*).

<sup>9</sup> We preliminarily found that Companhia Siderurgica Nacional and Companhia Metalurgica Prada (Prada) (collectively, CSN) should be treated as a single entity. *See Preliminary Determination* PDM at 4-5; *see also* Memorandum, “Preliminary Affiliation and Collapsing Memorandum for Companhia Siderurgica Nacional,” dated April 3, 2025. No interested party commented on this finding, and we continue to find these companies should be treated as a single entity for our final determination.

<sup>10</sup> We preliminarily found that Usinas Siderurgicas de Minas Gerais S.A.; Unigal Ltda. (Unigal); and Soluções em Aço Usiminas (Solucoes) (collectively, Usiminas) should be treated as a single entity. *See Preliminary Determination* PDM at 5; *see also* Memorandum, “Preliminary Affiliation and Collapsing Memorandum for Usiminas Siderurgicas de Minas Gerais S.A.,” dated April 3, 2025. No interested party commented on this finding, and we continue to find these companies should be treated as a single entity for our final determination.

<sup>11</sup> *See* Memoranda, “Verification of the Sales Questionnaire Responses of Companhia Siderurgica Nacional,” dated June 2, 2025; “Verification of the Sales Response of Usinas Siderurgicas de Minas Gerais (Usiminas) and affiliates, Unigal Ltda. (Unigal), and Solucoes em Aço Usiminas (Solucoes),” dated June 2, 2025; “Verification of the Cost Responses of Companhia Siderurgica Nacional,” dated June 26, 2025; and “Verification of the Cost Response of Usinas Siderurgicas de Minas Gerais S.A.,” dated June 17, 2025.

entities, pursuant to 19 CFR 351.401(f).<sup>12</sup> No interested party commented on these preliminary findings. As the record contains no other information or evidence that calls into question our preliminary findings, we adopt the reasoning and findings of fact outlined in the *Preliminary Determination* with respect to this issue. Therefore, we continue to find that CSN and Prada should be treated as a single entity, and that Usiminas, Unigal, and Solucoes should be treated as a single entity, for the purpose of this proceeding.

#### Changes Since the *Preliminary Determination*

We have made certain changes to the margin calculations for CSN and Usiminas since the *Preliminary Determination*. For a discussion of these changes, *see* the Issues and Decision Memorandum.

#### All-Others Rate

Section 735(c)(5)(A) of the Act provides that Commerce shall determine an estimated all-others rate for all exporters and producers not individually examined. This rate shall be an amount equal to the weighted average of the estimated weighted-average dumping margins established for exporters and producers individually investigated, excluding any zero and *de minimis* margins, and any margins determined entirely under section 776 of the Act.

In this investigation, Commerce calculated estimated weighted-average dumping margins for CSN and Usiminas that are not zero, *de minimis*, or based entirely on facts otherwise available. Therefore, Commerce calculated the all-others rate using a weighted average of the estimated weighted-average dumping margins calculated for the examined respondents using each company's publicly-ranged values for the merchandise under consideration.<sup>13</sup>

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<sup>12</sup> *See Preliminary Determination* PDM at 5-6.

<sup>13</sup> With two respondents under examination, Commerce normally calculates: (A) a weighted-average of the estimated weighted-average dumping margins calculated for the examined respondents; (B) a simple average of the estimated weighted-average dumping margins calculated for the examined respondents; and (C) a weighted-average of the estimated weighted-average dumping margins calculated for the examined respondents using each company's publicly-ranged U.S. sales values for the merchandise under consideration. Commerce then compares (B) and (C) to (A) and selects the rate closest to (A) as the most appropriate rate for all other producers and exporters. *See, e.g., Ball Bearings and Parts Thereof from France, Germany, Italy, Japan, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews, Final Results of Changed-Circumstances Review, and Revocation of an Order in Part*, 75 FR 53661, 53662 (September 1, 2010), and accompanying Issues and Decision Memorandum at Comment 1. As complete publicly ranged sales data were available, Commerce based the all-others rate on the

## Final Determination

Commerce determines that the following estimated weighted-average dumping margins exist:

<b>Exporter/Producer</b>	<b>Weighted-Average Dumping Margin (percent)</b>	<b>Cash Deposit Rate (Adjusted for Export Subsidy Offset) (percent)</b>
Companhia Siderurgica Nacional; Companhia Metalurgica Prada	191.26	191.26 <sup>14</sup>
Usinas Siderurgicas de Minas Gerais S.A.; Unigal Ltda.; Solucoes em Aco Usiminas	25.70	21.77
All Others	161.44	157.51

### Disclosure

Commerce intends to disclose its calculations and analysis performed in connection with this final determination to interested parties within five days of any public announcement or, if there is no public announcement, within five days of the date of publication of this notice in the *Federal Register*, in accordance with 19 CFR 351.224(b).

### Continuation of Suspension of Liquidation

In accordance with section 735(c)(1)(B) of the Act, Commerce will instruct U.S. Customs and Border Protection (CBP) to continue to suspend liquidation of all entries of CORE, as described in Appendix I of this notice, which were entered, or withdrawn from warehouse, for consumption on or after April 10, 2025, the date of publication of the *Preliminary Determination* in the *Federal Register*.

Pursuant to section 735(c)(1)(B)(ii) of the Act and 19 CFR 351.210(d), upon publication of this notice, Commerce will instruct CBP to require a cash deposit for estimated antidumping duties as follows: (1) the cash deposit rate for the companies listed in the table above that

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publicly ranged sales data of the mandatory respondents. For a complete analysis of the data, see Memorandum, "Final Affirmative Determination in the Less-Than-Fair-Value Investigation of Certain Corrosion-Resistant Steel Products from Brazil: All-Others Rate Calculation Memorandum," dated concurrently with this *Federal Register* notice.

<sup>14</sup> CSN received a final net subsidy rate in the companion countervailing duty (CVD) investigation; however, none of the countervailable subsidies were export-contingent. Therefore, no CVD offset/adjustment is being made to CSN's cash deposit rate.

exported the subject merchandise will be equal to the company-specific estimated weighted-average dumping margins determined in this final determination; (2) if the exporter is not a company identified in the table above, but the producer is, then the cash deposit rate will be equal to the company-specific estimated weighted-average dumping margin established for that producer; and (3) the cash deposit rate for all other producers and exporters will be equal to the estimated weighted-average dumping margin for all other producers and exporters listed in the table above. These suspension of liquidation instructions will remain in effect until further notice.

To determine the cash deposit rate, Commerce normally adjusts the estimated weighted-average dumping margin by the amount of export subsidies countervailed in a companion CVD investigation, when CVD provisional measures are in effect. Accordingly, because Commerce made an affirmative final determination for countervailable export subsidies, Commerce has offset the estimated weighted-average dumping margin by the appropriate export subsidy rate. Any such adjusted cash deposit rate may be found in the “Final Determination” section above. However, the suspension of liquidation of provisional measures in the companion CVD case has been discontinued.<sup>15</sup> Therefore, we are not instructing CBP to collect cash deposits based on the adjusted estimated weighted-average dumping margin for export subsidies at this time. If the U.S. International Trade Commission (ITC) makes a final affirmative determination of injury due to both dumping and subsidies, then the cash deposit rate will be revised effective on the date of publication of the ITC’s final affirmative determination in the *Federal Register* to be the company-specific estimated weighted-average dumping margin adjusted for export subsidies.

#### ITC Notification

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<sup>15</sup> See *Certain Corrosion-Resistant Steel Products from Brazil: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination*, 90 FR 9228 (February 10, 2025); see also section 703(d) of the Act, which states that the provisional measures may not be in effect for more than four months, which in the companion CVD case is 120 days after the publication of the preliminary determination, or June 9, 2025 (i.e., the last day provisional measures are in effect); and CBP Message 5162402, “Discontinuation of suspension of liquidation in the countervailing duty investigation of certain corrosion-resistant steel products from Brazil (C-351-863), dated June 11, 2025.

In accordance with section 735(d) of the Act, Commerce will notify the ITC of its final affirmative determination of sales at LTFV. Because the final determination is affirmative, in accordance with section 735(b)(2) of the Act, the ITC will make its final determination as to whether the domestic industry in the United States is materially injured, or threatened with material injury, by reason of imports or sales (or the likelihood of sales) for importation of CORE from the Brazil no later than 45 days after this final determination. If the ITC determines that such injury does not exist, this proceeding will be terminated, all cash deposits posted will be refunded, and suspension of liquidation will be lifted. If the ITC determines that such injury does exist, Commerce will issue an antidumping duty order directing CBP to assess, upon further instruction by Commerce, antidumping duties on all imports of CORE from Brazil entered, or withdrawn from warehouse, for consumption on or after the effective date of the suspension of liquidation, as discussed in the “Continuation of Suspension of Liquidation” section above.

#### Administrative Protective Order (APO)

This notice serves as the only reminder to parties subject to an APO of their responsibility concerning the disposition of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3). Timely written notification of the return or destruction of APO materials or conversion to judicial protective order is hereby requested. Failure to comply with the regulations and terms of an APO is a sanctionable violation.

#### Notification to Interested Parties

This final determination and notice are issued and published pursuant to sections 735(d) and 777(i) of the Act, and 19 CFR 351.210(c).

Dated: August 25, 2025.

Abdelali Elouaradia,  
Deputy Assistant Secretary  
for Enforcement and Compliance.

## Appendix I

### Scope of the Investigation

The products covered by this investigation are certain flat-rolled steel products, either clad, plated, or coated with corrosion-resistant metals such as zinc, aluminum, or zinc-, aluminum-, nickel- or iron-based alloys, whether or not corrugated or painted, varnished, laminated, or coated with plastics or other non-metallic substances in addition to the metallic coating. The products covered include coils that have a width of 12.7 mm or greater, regardless of form of coil (*e.g.*, in successively superimposed layers, spirally oscillating, *etc.*). The products covered also include products not in coils (*e.g.*, in straight lengths) of a thickness less than 4.75 mm and a width that is 12.7 mm or greater and that measures at least 10 times the thickness. The products covered also include products not in coils (*e.g.*, in straight lengths) of a thickness of 4.75 mm or more and a width exceeding 150 mm and measuring at least twice the thickness. The products described above may be rectangular, square, circular, or other shape and include products of either rectangular or non-rectangular cross-section where such cross-section is achieved subsequent to the rolling process, *i.e.*, products which have been “worked after rolling” (*e.g.*, products which have been beveled or rounded at the edges).

For purposes of the width and thickness requirements referenced above:

- (1) Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above, and
- (2) where the width and thickness vary for a specific product (*e.g.*, the thickness of certain products with non-rectangular cross-section, the width of certain products with non-rectangular shape, *etc.*), the measurement at its greatest width or thickness applies.

Steel products included in the scope of this investigation are products in which:

- (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

Subject merchandise also includes corrosion-resistant steel that has been further processed in a third country, including but not limited to annealing, tempering, painting, varnishing, trimming, cutting, punching and/or slitting or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the in-scope corrosion resistant steel.

All products that meet the written physical description are within the scope of this investigation unless specifically excluded. The following products are outside of and/or specifically excluded from the scope of this investigation:

- Flat-rolled steel products either plated or coated with tin, lead, chromium, chromium oxides, both tin and lead (“terne plate”) or both chromium and chromium oxides (“tin free steel”), whether or not painted, varnished or coated with plastics or other non-metallic substances in addition to the metallic coating;
- Clad products in straight lengths of 4.7625 mm or more in composite thickness and of a width which exceeds 150 mm and measures at least twice the thickness;

- Certain clad stainless flat-rolled products, which are three-layered corrosion-resistant carbon steel flat-rolled products less than 4.75 mm in composite thickness that consist of a carbon steel flat-rolled product clad on both sides with stainless steel in a 20%-60%-20% ratio;

Also excluded from the scope of the antidumping duty investigations on corrosion resistant steel from Taiwan are any products covered by the existing antidumping duty order on corrosion resistant steel from Taiwan. *See Certain Corrosion-Resistant Steel Products from India, Italy, the People's Republic of China, the Republic of Korea and Taiwan: Amended Final Affirmative Antidumping Determination for India and Taiwan, and Antidumping Duty Orders*, 81 FR 48390 (July 25, 2016); *Corrosion-Resistant Steel Products from Taiwan: Notice of Third Amended Final Determination of Sales at Less Than Fair Value Pursuant to Court Decision and Partial Exclusion from Antidumping Duty Order*, 88 FR 58245 (August 25, 2023).

Also excluded from the scope of the antidumping duty investigation on corrosion-resistant steel from the United Arab Emirates and the antidumping duty and countervailing duty investigations on corrosion-resistant steel from the Socialist Republic of Vietnam are any products covered by the existing antidumping and countervailing duty orders on corrosion-resistant steel from the People's Republic of China and the Republic of Korea and the antidumping duty order on corrosion-resistant steel from Taiwan. *See Certain Corrosion-Resistant Steel Products from India, Italy, the People's Republic of China, the Republic of Korea and Taiwan: Amended Final Affirmative Antidumping Determination for India and Taiwan, and Antidumping Duty Orders*, 81 FR 48390 (July 25, 2016); *see also Certain Corrosion-Resistant Steel Products from India, Italy, Republic of Korea and the People's Republic of China: Countervailing Duty Order*, 81 FR 48387 (July 25, 2016). This exclusion does not apply to imports of corrosion-resistant steel that are entered, or withdrawn from warehouse, for consumption in the United States for which the relevant importer and exporter certifications have been completed and maintained and all other applicable certification requirements have been met such that the entry is entered into the United States as not subject to the antidumping and countervailing duty orders on corrosion-resistant steel from the People's Republic of China, the antidumping and countervailing duty orders on corrosion-resistant steel from the Republic of Korea, or the antidumping duty order on corrosion-resistant steel from Taiwan.

The products subject to the investigation are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under item numbers: 7210.30.0030, 7210.30.0060, 7210.41.0000, 7210.49.0030, 7210.49.0040, 7210.49.0045, 7210.49.0091, 7210.49.0095, 7210.61.0000, 7210.69.0000, 7210.70.6030, 7210.70.6060, 7210.70.6090, 7210.90.6000, 7210.90.9000, 7212.20.0000, 7212.30.1030, 7212.30.1090, 7212.30.3000, 7212.30.5000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7212.60.0000, 7225.91.0000, 7225.92.0000, 7226.99.0110, and 7226.99.0130.

The products subject to the investigation may also enter under the following HTSUS item numbers: 7210.90.1000, 7215.90.1000, 7215.90.3000, 7215.90.5000, 7217.20.1500, 7217.30.1530, 7217.30.1560, 7217.90.1000, 7217.90.5030, 7217.90.5060, 7217.90.5090, 7225.99.0090, 7226.99.0180, 7228.60.6000, 7228.60.8000, and 7229.90.1000. The HTSUS subheadings above are provided for convenience and customs purposes only. The written description of the scope of the investigation is dispositive.

## Appendix II

### List of Topics Discussed in the Issues and Decision Memorandum

- I. Summary
- II. Background
- III. Changes Since the *Preliminary Determination*
- IV. Discussion of the Issues

#### *CSN*

- Comment 1: Whether to Apply Partial Adverse Facts Available (AFA) to CSN's Downstream Sales
- Comment 2: Whether Commerce Should File Its Copy of Exhibit VE-9 on the Record
- Comment 3: Whether CSN's Unreconciled Costs from Its Cost Reconciliation Should be Added to Its Reported Cost of Production
- Comment 4: Whether CSN's Idle Asset Costs Have Been Double Counted
- Comment 5: Whether to Adjust CSN's General and Administrative (G&A) Expense Rate
- Comment 6: Whether to Adjust CSN's Financial Expense Rate

#### *Usiminas*

- Comment 7: Whether to Revise our Treatment of Usiminas' Downstream Sales
- Comment 8: Whether to Remove Freight Revenue and Insurance Revenue from Usiminas' Movement Expenses in the Home and U.S. Markets
- Comment 9: Whether to Account for Home Market Sales (HM) Returns
- Comment 10: Whether to Revise Usiminas' Major Input Adjustment
- Comment 11: Whether to Revise Usiminas' Financial Expense Rate

#### *Other Issues*

- Comment 12: Whether to Implement Minor Corrections Accepted at Verification
- Comment 13: Whether Zeroing Methodology Should Be Applied in This Investigation
- Comment 14: Whether to Revise the All-Others Rate Applicable to Brass-Coated Imports Subject to this Investigation

- V. Recommendation