



DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-073, C-570-074]

Common Alloy Aluminum Sheet from the People's Republic of China: Initiation of Circumvention Inquiry of the Antidumping Duty and Countervailing Duty Orders

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

SUMMARY: Based on available information, the U.S. Department of Commerce (Commerce) is self-initiating a circumvention inquiry to determine whether imports of certain aluminum composite panels (ACPs) produced in the People's Republic of China (China) by Shanghai Alumetal Decorative Material Co. (Alumetal) are circumventing the antidumping duty (AD) and countervailing duty (CVD) orders on common alloy aluminum sheet (CAAS) from China.

DATES: Applicable [INSERT DATE OF PUBLICATION IN THE *FEDERAL REGISTER*].

FOR FURTHER INFORMATION CONTACT: Samuel Frost, Office of Policy, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-8180.

SUPPLEMENTARY INFORMATION:

Background

On February 6 and 8, 2019, respectively, Commerce published the CVD and AD orders on CAAS from China.¹ On April 14, 2025, Commerce initiated a scope inquiry on certain ACPs produced by Alumetal and imported by Aluminum Line Products Company (ALPCO).² As discussed below, Commerce's decision to self-initiate this circumvention inquiry is based on information gathered in the scope inquiry on certain ACPs produced by Alumetal and imported

¹ See *Common Alloy Aluminum Sheet from the People's Republic of China: Countervailing Duty Order*, 84 FR 2157 (February 6, 2019); see also *Common Alloy Aluminum Sheet from the People's Republic of China: Antidumping Duty Order*, 84 FR 2813 (February 8, 2019) (collectively, *Orders*).

² See Memorandum, "Initiation of Scope Inquiry," dated April 14, 2025.

by ALPCO.

Scope of the *Orders*

The merchandise covered by the *Orders* is CAAS from China. For a complete description of the scope of the *Orders*, see Appendix II.

Merchandise Subject to the Circumvention Inquiry

The circumvention inquiry concerns ACPs that consist of a low-density polyethylene (LDPE) core sandwiched and permanently bonded between two aluminum sheets (each with a thickness less than or equal to 0.2 millimeters (mm)), with a cumulative panel thickness of 6.3 mm or less, but greater than 0.2 mm and manufactured from 1100 alloy, that are produced by Alumetal in China and exported to the United States.

Statutory and Regulatory Requirements to Initiate Circumvention Inquiries

Section 351.226(b) of Commerce's regulations states that if Commerce "determines from available information that an inquiry is warranted into the question of whether the elements necessary for a circumvention determination under section 781 of the Tariff Act of 1930, as amended (the Act) exist," Commerce "may initiate a circumvention inquiry and publish a notice of initiation in the *Federal Register*."

Section 781(c)(1) of the Act provides that the class or kind of merchandise subject to an AD or CVD order shall include articles that have been "altered in form or appearance in minor respects . . . whether or not included in the same tariff classification." Section 781(c)(2) of the Act provides an exception that section 781(c)(1) of the Act "shall not apply with respect to altered merchandise if the administering authority determines that it would be unnecessary to consider the altered merchandise within the scope of the {order}." When evaluating minor alterations under section 781(c) of the Act and 19 CFR 351.226(j), Commerce may consider criteria including, but not limited to: (1) overall physical characteristics of the merchandise; (2) expectations of ultimate users; (3) use of the merchandise; (4) channels of marketing; and (5) cost of any modification relative to the value of the imported products.

In accordance with 19 CFR 351.226(m)(2), for companion AD and CVD proceedings, “{Commerce} will initiate and conduct a single inquiry with respect to the product at issue for both orders only on the record of the antidumping proceeding. Further, “once {Commerce} issues a final circumvention determination on the record of the antidumping duty proceeding, {Commerce} will include on the record of the countervailing duty proceeding copies of the final circumvention determination memoranda, the final circumvention determination *Federal Register* notice, the preliminary circumvention determination memoranda, the preliminary circumvention determination *Federal Register* notice, and all relevant instructions to U.S. Customs and Border Protection {CBP}.” Accordingly, once Commerce concludes this circumvention inquiry, Commerce intends to place its final circumvention determination on the record of the companion CVD proceeding.

Available Information Supports Initiation of a Circumvention Inquiry

After analyzing record evidence in the scope inquiry on ACPs produced by Alumetal in China and imported by ALPCO, we determine initiation of these circumvention inquiries is warranted to determine whether imports of certain ACPs produced in China by Alumetal, if not found to be covered by the scope of the *Orders*, are circumventing the *Orders*. Commerce has made this determination in accordance with its analysis of the factors set forth in section 781(c) of the Act and 19 CFR 351.226(j). For a full discussion of the basis for our decision to self-initiate this circumvention inquiry, *see* the Initiation Memorandum.³ The Initiation Memorandum is a public document and is made available to the public via Enforcement and Compliance’s Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS), which is available to registered users at <https://access.trade.gov>. In addition, a complete version of the Initiation Memorandum can be accessed directly at <https://access.trade.gov/frnotices>.

³See Memorandum, “Initiation of Circumvention Inquiry on the Antidumping and Countervailing Duty Orders,” dated concurrently with, and hereby adopted by, this notice (Initiation Memorandum)

Suspension of Liquidation

Pursuant to 19 CFR 351.226(I)(1), when Commerce self-initiates a circumvention inquiry under 19 CFR 351.226(b), Commerce will notify CBP of the initiation and direct CBP to continue the suspension of liquidation of entries of products subject to the circumvention inquiry that were already subject to the suspension of liquidation, and to apply the cash deposit rate that would be applicable if the product were determined to be circumventing the order. Accordingly, Commerce will notify CBP of the initiation of the circumvention inquiry and direct CBP to continue to suspend (unliquidated) entries of the products subject to the circumvention inquiry that were already subject to the suspension of liquidation. In addition, Commerce will direct CBP to apply the cash deposit rate that would be applicable if the products were determined to be covered by the scope of the *Orders*.

Should Commerce issue preliminary or final circumvention determinations, Commerce will follow the suspension of liquidation rules under 19 CFR 351.226(I)(2)-(4). In the event Commerce issues affirmative preliminary or final circumvention determinations that the products are circumventing the *Orders*, Commerce will instruct CBP to continue the suspension of liquidation of previously suspended entries and to apply the applicable cash deposit rate. Commerce will also instruct CBP to begin the suspension of liquidation and application of cash deposits for any unliquidated entries not yet suspended, entered, or withdrawn from warehouse, for consumption, on or after the date of publication of the notice of initiation of the circumvention inquiry pursuant to paragraphs (I)(2)(ii) and (I)(3)(ii). In addition, pursuant to paragraphs (I)(2)(iii)(A) and (I)(3)(iii)(A), Commerce may instruct CBP to begin the suspension of liquidation and application of cash deposits for any unliquidated entries not yet suspended, entered, or withdrawn from warehouse, for consumption, prior to the date of initiation of the circumvention inquiry, but not for such entries prior to November 4, 2021, the effective date of

these provisions in the *Final Rule*.⁴ These rules will not affect CBP's authority to take any additional action with respect to the suspension of liquidation or related measures for these entries, as stated in 19 CFR 351.226(I)(5).

Notification to Interested Parties

In accordance with section 19 CFR 351.226(b) and 781(c) of the Act, Commerce determines that available information supports initiating a circumvention inquiry to determine whether ACPs that consist of an LDPE core sandwiched and permanently bonded between two aluminum sheets (each with a thickness less than or equal to 0.2 mm), with a cumulative panel thickness of 6.3 mm or less, but greater than 0.2 mm and manufactured from 1100 alloy, that are produced by Alumetal in China and exported to the United States, are circumventing the *Orders*. Accordingly, Commerce is notifying all interested parties of the initiation of the circumvention inquiry. In addition, we have included a description of the products that are the subject of these inquiries, and an explanation of the reasons for Commerce's decision to initiate these inquiries as provided above and in the accompanying Initiation Memorandum.

In accordance with section 781(f) of the Act and 19 CFR 351.226(e)(2), unless the circumvention inquiry is rescinded, in whole or in part, Commerce intends to issue its final determinations within 300 days from the date of publication of the notice of initiation of a circumvention inquiry in the *Federal Register*.

This notice is published in accordance with 19 CFR 351.226(b) and section 781(b) of the Act.

Date: September 24, 2026.

Scot Fullerton,
Acting Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations.

⁴ See *Regulations to Improve Administration and Enforcement of Antidumping and Countervailing Duty Laws*, 86 FR 52300, 52345 (Sept. 20, 2021) (*Final Rule*).

Appendix I

List of Topics Discussed in the Initiation Memorandum

- I. Summary
- II. Background
- III. Scope of the *Orders*
- IV. Merchandise Subject to the Circumvention Inquiry
- V. Statutory and Regulatory Framework for the Circumvention Inquiry
- VI. Statutory Analysis for the Circumvention Inquiry
- VII. Recommendation

Appendix

Scope of the *Orders*

The merchandise covered by the *Orders* is aluminum common alloy sheet (common alloy sheet) which is a flat-rolled aluminum product having a thickness of 6.3 mm or less, but greater than 0.2 mm, in coils or cut-to-length, regardless of width. Common alloy sheet within the scope of the *Orders* includes both not clad aluminum sheet, as well as multi-alloy, clad aluminum sheet. With respect to not clad aluminum sheet, common alloy sheet is manufactured from a 1XXX-, 3XXX-, or 5XXX-series alloy as designated by the Aluminum Association. With respect to multi-alloy, clad aluminum sheet, common alloy sheet is produced from a 3XXX-series core, to which cladding layers are applied to either one or both sides of the core.

Common alloy sheet may be made to ASTM specification B209-14, but can also be made to other specifications. Regardless of specification, however, all common alloy sheet meeting the scope description is included in the scope. Subject merchandise includes common alloy sheet 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 *Orders* if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of the *Orders* is aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans. Aluminum can stock is produced to gauges that range from 0.200 mm to 0.292 mm, and has an H-19, H-41, H-48, or H-391 temper. In addition, aluminum can stock has a lubricant applied to the flat surfaces of the can stock to facilitate its movement through machines used in the manufacture of beverage cans. Aluminum can stock is properly classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7606.12.3045 and 7606.12.3055.

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 for the above.

Common alloy sheet is currently classifiable under HTSUS subheadings 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. Further, merchandise that falls within the scope of the *Orders* may also be entered into the United States under HTSUS subheadings 7606.11.3030, 7606.12.3030, 7606.91.3060, 7606.91.6040, 7606.92.3060, 7606.92.6040, 7607.11.9090. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the *Orders* is dispositive.

[FR Doc. 2026-20256 Filed: 10/1/2026 8:45 am; Publication Date: 10/2/2026]