



A-533-823; A-834-807
A-307-820
Sunset Review
Public Document
Operations VII: JA

DATE: December 10, 2018

MEMORANDUM TO: Gary Taverman
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations
performing the non-exclusive functions and duties of the
Assistant Secretary for Enforcement and Compliance

FROM: James Maeder
Associate Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations
performing the duties of Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum: Final Results of Expedited
Third Sunset Reviews of the Antidumping Duty Orders on
Silicomanganese from India, Kazakhstan, and Venezuela

Summary

We have analyzed the substantive responses of the interested parties in the expedited third sunset reviews of the antidumping duty (AD) orders covering silicomanganese from India, Kazakhstan, and Venezuela (cumulatively, the *AD Orders*).¹ We recommend that you approve the positions as set forth in the “Discussion of Issues” section of this memorandum. Below is the complete list of the issues in this sunset review for which the Department of Commerce (Commerce) received a substantive response:

1. Likelihood of Continuation or Recurrence of Dumping
2. Magnitude of the Margins Likely to Prevail

¹ See *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Orders: Silicomanganese from India, Kazakhstan, and Venezuela*, 67 FR 36149 (May 23, 2002) (*AD Orders*).



Background

On April 2, 2002, Commerce published its final affirmative determinations of sales at less than fair value (LTFV) regarding silicomanganese from India, Kazakhstan, and Venezuela.²

On September 11, 2018, pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act), Commerce initiated the third sunset reviews of the *AD Orders* on silicomanganese from India, Kazakhstan, and Venezuela.³

On September 13, 2018, petitioner⁴ notified Commerce of its intent to participate within the 15-day period specified in 19 CFR 351.218(d)(1)(i).⁵ The petitioner claimed interested party status under section 771(9)(C) of the Act, as a producer in the United States of the domestic like product. On October 1, 2018, we received complete substantive responses for each of the three cases⁶ to the notice of initiation from the petitioner within the specified time, in accordance with 19 CFR 351.218(d)(3)(i). We received no response from respondent interested parties for any of these cases. As a result, pursuant to section 751(c)(3)(B) of the Act, and 19 CFR 351.218(e)(1)(ii)(C)(2), Commerce conducted expedited sunset reviews of these *AD Orders*.

History of the Orders

The period of investigation (POI) was April 1, 2000, through March 31, 2001, for India and Venezuela. The POI for Kazakhstan was October 1, 2000, through March 31, 2001.

On May 23, 2002, Commerce published the *Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Orders: Silicomanganese from India, Kazakhstan, and Venezuela (AD Orders)*.⁷ On July 17, 2012, Commerce published the notice of continuation of these *AD Orders*.⁸

² See *Silicomanganese from India: Notice of Final Determination of Sales at Less Than Fair Value and Final Negative Critical Circumstances Determination*, 67 FR 15531 (April 2, 2002) (*India Final Determination*); *Notice of Final Determination of Sales at Less Than Fair Value: Silicomanganese from Kazakhstan*, 67 FR 15535 (April 2, 2002) (*Kazakhstan Final Determination*); and *Notice of Final Determination of Sales at Less Than Fair Value: Silicomanganese from Venezuela*, 67 FR 15533 (April 2, 2002) (*Venezuela Final Determination*).

³ See *Initiation of Five-Year (“Sunset”) Reviews*, 83 FR 45887 (September 11, 2018) (*Initiation Notice*).

⁴ The petitioner is Eramet Marietta, Inc. (Eramet). Eramet was the petitioner in the less than fair value investigations and has participated in every active segment of these proceedings. See Substantive Response, October 1, 2018, at 5.

⁵ See the petitioner’s submission “Five-Year (“Sunset”) Reviews of Antidumping Duty Orders on Silicomanganese from India, Kazakhstan, and Venezuela: Notice of Intent to Participate” (September 13, 2018).

⁶ See the Petitioner’s Substantive Response for Silicomanganese from India, Kazakhstan, and Venezuela (Substantive Response, October 1, 2018).

⁷ See *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Orders: Silicomanganese from India, Kazakhstan, and Venezuela*, 67 FR 36149 (May 23, 2002).

⁸ See *Silicomanganese from India, Kazakhstan, and Venezuela: Continuation of Antidumping Duty Orders*, 78 FR 60846 (October 2, 2013) (*Second Continuation of the AD Orders*).

The case histories are as follows:

India

Commerce has completed two administrative reviews since the publication of the continuation of the *AD Orders* in the *Final Results of the Second Sunset Reviews*.⁹ Commerce has not conducted any new shipper reviews, changed circumstance reviews, or scope determinations since the publication of the continuation of the *AD Orders*.¹⁰

Kazakhstan

Commerce initiated an administrative review for the period May 1, 2014, through April 30, 2015, but rescinded that review based on a timely withdrawal of all review requests.¹¹ No other administrative reviews were initiated.

Commerce has not conducted any new shipper reviews, changed circumstance reviews, or scope determinations since the publication of the continuation of the *AD Orders*.¹²

Venezuela

Commerce initiated an administrative review for the period May 1, 2014, through April 30, 2015, but rescinded that review based on a timely withdrawal of all review requests.¹³ No other administrative reviews were initiated.

Commerce has not conducted any new shipper reviews, changed circumstance reviews, or scope determinations since the publication of the continuation of the *AD Orders*.¹⁴

Scope of the Orders

For purposes of these orders, the products covered are all forms, sizes and compositions of silicomanganese, except low-carbon silicomanganese, including silicomanganese briquettes, fines and slag. Silicomanganese is a ferroalloy composed principally of manganese, silicon and iron, and normally contains much smaller proportions of minor elements, such as carbon, phosphorous and sulfur. Silicomanganese is sometimes referred to as ferrosilicon manganese.

⁹ See *Silicomanganese from India: Final Results of Antidumping Duty Administrative Review; 2013-2014*, 80 FR 75660 (December 3, 2015) (2013-2014 India Admin Review); see also *Silicomanganese from India: Final Results No Shipment Determination of Antidumping Duty Administrative Review; 2014-2015*, 81 FR 56583 (August 26, 2016).

¹⁰ See *Second Continuation of the AD Orders*.

¹¹ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 80 FR 37588 (July 1, 2015); see also *Silicomanganese from Kazakhstan: Rescission of Antidumping Duty Administrative Review; 2014-2015*, 80 FR 54523 (September 10, 2015).

¹² See *Second Continuation of the AD Orders*.

¹³ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 80 FR 37588 (July 1, 2015); see also *Silicomanganese from Venezuela: Rescission of Antidumping Duty Administrative Review; 2014-2015*, 80 FR 62021 (October 15, 2015).

¹⁴ See *Second Continuation of the AD Orders*.

Silicomanganese is used primarily in steel production as a source of both silicon and manganese. Silicomanganese generally contains by weight not less than 4 percent iron, more than 30 percent manganese, more than 8 percent silicon and not more than 3 percent phosphorous. Silicomanganese is properly classifiable under subheading 7202.30.0000 of the Harmonized Tariff Schedule of the United States (HTSUS). Some silicomanganese may also be classified under HTSUS subheading 7202.99.5040.

The low-carbon silicomanganese excluded from this scope is a ferroalloy with the following chemical specifications: minimum 55 percent manganese, minimum 27 percent silicon, minimum 4 percent iron, maximum 0.10 percent phosphorus, maximum 0.10 percent carbon and maximum 0.05 percent sulfur. Low-carbon silicomanganese is used in the manufacture of stainless steel and special carbon steel grades, such as motor lamination grade steel, requiring a very low carbon content. It is sometimes referred to as ferromanganese-silicon. Low-carbon silicomanganese is classifiable under HTSUS subheading 7202.99.5040.

This scope covers all silicomanganese, regardless of its tariff classification. Although the HTSUS subheadings are provided for convenience and customs purposes, our written description of the scope remains dispositive.

Legal Framework

In accordance with section 751(c)(1) of the Act, Commerce has conducted these sunset reviews to determine whether revocation of the pertinent *AD Orders* would be likely to lead to continuation or recurrence of dumping.

Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations Commerce shall consider the weighted-average dumping margins determined in the investigation and subsequent reviews and the volume of imports of the subject merchandise for the period before and the period after the issuance of the AD Orders.

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action (SAA),¹⁵ the House Report,¹⁶ and the Senate Report,¹⁷ Commerce's determinations of likelihood will be made on an order-wide, rather than a company-specific, basis.¹⁸ As explained in the Statement of Administrative Action (SAA) accompanying the Uruguay Round Agreements Act, Commerce normally determines that revocation of an AD Order is likely to lead to continuation or recurrence of dumping when: (a) dumping continued at any level above *de minimis* after issuance of the AD Order; (b) imports of the subject merchandise ceased after issuance of the

¹⁵ See HR. Doc. 103-316, vol. 1 (1994) (SAA), reprinted in 1994 U.S.C.C.A.N. 4040 (1994).

¹⁶ See H. Rep. No. 103-826, pt. 1 (1994) (House Report), reprinted in 1994 U.S.C.C.A.N. 3773 (1994).

¹⁷ See S. Rep. No. 103-412 (1994) (Senate Report).

¹⁸ See SAA at 879; see also House Report at 56.

AD Orders; or (c) dumping was eliminated after the issuance of the *AD Orders* and import volumes for the subject merchandise declined significantly.¹⁹

Alternatively, Commerce normally will determine that revocation of an AD Order is not likely to lead to continuation or recurrence of dumping where dumping was eliminated after issuance of the *AD Order* and import volumes remained steady or increased.²⁰ In addition, as a base period of import volume comparison, it is Commerce's practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew comparison.²¹

Further, section 752(c)(3) of the Act states that Commerce shall provide to the International Trade Commission (ITC) the magnitude of the margin of dumping likely to prevail if the AD Order were revoked. Generally, Commerce selects the margin(s) from the final determination in the original investigation, as this is the only calculated rate that reflects the behavior of exporters without the discipline of an AD Order in place.²² However, Commerce may use a rate from a more recent review, if this rate may be more representative of a company's behavior in the absence of an AD Order (*e.g.*, where a company increases dumping to maintain or increase market share with an AD Order in place).²³

Finally, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of "zero or *de minimis* shall not by itself require" Commerce to determine that revocation of an AD Order would not be likely to lead to a continuation or recurrence of sales at LTFV. Our analysis of the comments submitted by the domestic interested parties follow.

In the *Final Modification for Reviews*, Commerce announced that in sunset reviews, it would comply with WTO dispute findings against "zeroing" by "not rely{ing} on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be WTO-inconsistent."²⁴ The Department also noted that "*only in the most extraordinary circumstances* will the Department rely on margins other than those calculated and published in prior determinations."²⁵ The Department further stated that, apart from the "most extraordinary circumstances," it would "limit its reliance to margins determined

¹⁹ See SAA at 889-890, H.R. Rep. No. 103-316, Vol. 1 (1994); see also *Policies Regarding the Conduct of Five-Year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders*; *Policy Bulletin* 98.3, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*); see also, *Folding Gift Boxes from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 72 FR 16765 (April 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

²⁰ See *Sunset Policy Bulletin*.

²¹ See, *e.g.*, *Stainless Steel Bar from Germany*; *Final Results of the Sunset Review of the Antidumping Duty Order*, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

²² See SAA at 890 and *Sunset Policy Bulletin* at section II.B.1. See, *e.g.*, *Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

²³ See SAA at 890-91; *Sunset Policy Bulletin* at section II.B.2.

²⁴ See *Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings*; *Final Modification*, 77 FR 8101, 8103 (February 14, 2012) (*Final Modification for Reviews*).

²⁵ *Id.* (emphasis added).

or applied during the five-year sunset period that were not determined in a manner found to be WTO-inconsistent” and that it “may also rely on past dumping margins that were not affected by the WTO-inconsistent methodology, such as dumping margins recalculated pursuant to Section 129 proceedings, dumping margins determined based on the use of total adverse facts available, and dumping margins where no offsets were denied because all comparison results were positive.”²⁶

Discussion of Issues

1. Likelihood of Continuation or Recurrence of Dumping

Silicomanganese from India

The petitioner argues that revocation of this *AD Order* would likely lead to the continuation or recurrence of sales at less than fair value.²⁷ Citing to the *Final Results Second Sunset Reviews*,²⁸ which references the pre-order (2000 and 2001) amounts of 66,686 short tons and 43,856 short tons, respectively, the petitioner compares this pre-order amount to the sunset review period (2013-2017), based on data found on USITC Dataweb, which is less than fifteen percent of the 2001 (pre-order) level.²⁹ Further, the petitioner notes that because “the HTSUS import data does not separately break out excluded low-carbon silicomanganese, the significantly decreased volumes of imports of merchandise subject to the AD Order may be even lower than the import data indicates.”³⁰

The petitioner states that “with the discipline of the antidumping duty order in place, Indian producers have been unable to make shipments of silicomanganese to the United States in commercial quantities.”³¹

The petitioner then provides a history of recent administrative reviews, where it discusses the two companies that were investigated. Nava Bharat Ventures, Ltd. (Nava Bharat)’s margin has been above *de minimis* for the entire history of the order until the 2013-2014 administrative review, based on a single sale of subject merchandise.³² According to the petitioner, within that same administrative review, Commerce found that the all-others rate should continue at 17.74 percent, *ad valorem*.³³ In the 2014-2015 administrative review, Nava Bharat and Universal Ferro and Allied Chemicals, Ltd. (Universal) had no entries of subject merchandise during the period of review.³⁴ Since the start of the AD Order, Universal’s margin has been at above *de minimis*

²⁶ *Id.*

²⁷ See Substantive Response, at 7.

²⁸ See *Silicomanganese from India, Kazakhstan, and Venezuela: Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders*, 78 FR 9034 (February 7, 2013) (*Final Results Second Sunset Reviews*).

²⁹ See Substantive Response, at 8.

³⁰ *Id.*

³¹ *Id.*

³² See Substantive Response, at 9.

³³ *Id.*

³⁴ See *Silicomanganese from India: Final Results No Shipment Determination of Antidumping Duty Administrative Review; 2014-2015*, 81 FR 56583 (August 22, 2016); see also No Shipment Inquiry for Silicomanganese from India

levels.³⁵ The petitioner concludes by stating that, based on the statutory framework and Commerce's practice, the evidence establishes that revocation would likely lead to continuation or recurrence of dumping because dumping has never ceased over the history of the *AD Order* and import volumes of subject merchandise have decreased substantially with the *AD Order* in place.³⁶

Silicomanganese from Kazakhstan

The petitioner argues that revocation of this *AD Order* would likely lead to the continuation or recurrence of sales at less than fair value at least equivalent to those found in the original investigation.³⁷ The petitioner argues that imports of silicomanganese from Kazakhstan have ceased since the imposition of the *AD Order*, and dumping margins above *de minimis* remain in place.³⁸

Silicomanganese from Venezuela

The petitioner argues that revocation of this *AD Order* would likely lead to the continuation or recurrence of sales at less than fair value at least equivalent to those found in the original investigation.³⁹ The petitioner argues that imports of silicomanganese from Venezuela have ceased since the imposition of the *AD Order*, and dumping margins above *de minimis* remain in place.⁴⁰

Commerce's Position

In the instant review, for the reasons stated below, we find that revocation of the *AD Orders* on silicomanganese from India, Kazakhstan, and Venezuela would likely result in the continuation or recurrence of dumping in the United States.

Consistent with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act (URAA), specifically the SAA,⁴¹ Commerce's determination of likelihood will be made on an *AD Order*-wide basis. In addition, Commerce normally will determine that revocation of an *AD Order* is likely to lead to continuation or recurrence of dumping where (a) dumping continued at any level above *de minimis* after the issuance of the *AD Order*, (b) imports of the subject merchandise ceased after the issuance of the *AD Order*, or (c) dumping was eliminated after the issuance of the *AD Order* and import volumes for the subject merchandise declined significantly.⁴² In addition, pursuant to section 752(c)(1)(B) of the Act, Commerce considers the volume of imports of the subject merchandise for the period

Exported by Nava Bharat Ventures Limited (July 15, 2015).

³⁵ See Substantive response at 9.

³⁶ See Substantive Response, at 8 and at Attachment 1.

³⁷ See Substantive Response, at 10.

³⁸ *Id.* at 10 and at Attachment 1.

³⁹ See Substantive Response, at 12.

⁴⁰ *Id.* at 13, and, at Attachment 1.

⁴¹ H.R. Doc. No. 103-316, vol. 1 (1994), the House Report, H. Rep. No. 103-826, pt. 1 (1994) (House Report), and the Senate Report, S. Rep. No. 103-412 (1994) (Senate Report)

⁴² See SAA at 889 – 890, House Report at 63-64, and Senate Report at 52.

before and after the issuance of the antidumping duty order.

Below is Commerce's analysis for each *AD Order*:

Silicomanganese from India

Since the publication of the *Second Continuation of the AD Orders*, Nava Bharat obtained a zero percent margin as a result of the 2013-2014 administrative review. Nava Bharat's zero percent margin was based on a single sale. Dumping margins for Universal and all-other exporters and producers remain in place. Commerce also finds that recent imports during the sunset review period (2013-2017) are significantly below the pre-order level of 60,496,07 kilograms (2000) and 39,785,507 kilograms (2001) respectively.⁴³ Specifically, imports for the sunset review period range from a low of 1,194,814 kilograms in 2016 to a high of 5,840,500 kilograms in 2017.⁴⁴ Additionally, Nava Bharat and Universal had no shipments in the 2014-2015 administrative review.⁴⁵ Thus, due to continued dumping and declining imports, Commerce determines that dumping is likely to continue or recur if this *AD order* were revoked, pursuant to section 752(c)(1) of the Act.

Silicomanganese from Kazakhstan

Since the publication of the *Second Continuation of the AD Orders*, no administrative reviews have been completed, so the dumping margin remains 247.88 percent, the rate found in the original investigation. Commerce finds that there have been no imports during the sunset review period (2013-2017).⁴⁶ Given these facts, Commerce determines that dumping is likely to continue or recur if this *AD order* were revoked, pursuant to section 752(c)(1) of the Act.

Silicomanganese from Venezuela

Since the publication of the *Second Continuation of the AD Orders*, no administrative reviews have been completed, so the dumping margin remains 24.62 percent, the rate found in the original investigation.⁴⁷ Commerce finds that there have been no imports during the sunset review period (2013-2017).⁴⁸ Given these facts, Commerce determines that dumping is likely to continue or recur if this *AD order* were revoked, pursuant to section 752(c)(1) of the Act.

2. Magnitude of the Dumping Margin Likely to Prevail

The petitioner argued that for the *AD Orders* on silicomanganese from India, Kazakhstan and Venezuela, Commerce should use the margins calculated in the LTFV investigations since those

⁴³ See Attachment 1.

⁴⁴ *Id.*

⁴⁵ See *Silicomanganese from India: Final Results of Antidumping Duty Administrative Review; 2013-2014*, 80 FR 75660 (December 3, 2015); see also No Shipment Inquiry for Silicomanganese from India Exported by Nava Bharat Ventures Limited

⁴⁶ See Attachment 1.

⁴⁷ See *Second Continuation of the AD Orders*.

⁴⁸ See Attachment 1.

are the only calculated rates that reflect the behavior of each exporter and/or producer without the discipline of an order.⁴⁹ The petitioner also argued that in the *Second Sunset Reviews*, Commerce found that the margins for India, Kazakhstan and Venezuela were all WTO-consistent and compliant with the *Final Modification for Reviews*.⁵⁰

Commerce's Position

Section 752(c)(3) of the Act provides that Commerce will provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. Commerce normally will select a dumping margin that was determined in the final determination of the LTFV investigation because that is the only calculated margin that reflects the behavior of each exporter and/or producer without the discipline of an order.⁵¹

As indicated in the “Legal Framework” section above, Commerce announced that in sunset reviews, it would comply with WTO dispute findings against “zeroing” by “not rely{ing} on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be WTO-inconsistent.”⁵² In the original investigations involving Kazakhstan and Venezuela, all final dumping margins were margins where no offsets were denied because all comparison results were positive.⁵³ As a result, Commerce’s final weighted-average dumping margins calculated in those investigations were not affected by the WTO-inconsistent methodology. These were the margins that we reported to the ITC for the *Second Expedited Sunset Reviews of the AD Orders* on Kazakhstan and Venezuela.⁵⁴ For India, we also determined during the course of the *Second Expedited Sunset Reviews of the AD Order* that zeroing did not affect the final/amended final margins for either Nava Bharat or Universal Ferro.⁵⁵

After considering the arguments put forth, and the dumping margins determined in the investigations, Commerce agrees with the petitioner that it is appropriate to report to the ITC the investigation margins for India, Kazakhstan and Venezuela because these are the only margins that reflect the behavior of manufacturers, producers, and exporters without the discipline of an order in place. Thus, Commerce will report to the ITC the margins listed in the Final Results of Review section, below.

⁴⁹ See Substantive Response at 14-16.

⁵⁰ See *Final Modification for Reviews*.

⁵¹ See SAA at 890 and the House Report at 64.

⁵² See *Final Modification for Reviews*.

⁵³ See Memorandum from Sean Carey, International Trade Compliance Analyst, Office of AD/CVD Operations 6 to the File regarding “Sunset Reviews of the Antidumping Duty Orders on Silicomanganese from India, Kazakhstan, and Venezuela: Documentation Showing Calculated Margins from the Investigations,” dated January 31, 2013.

⁵⁴ See *Final Results Second Sunset Reviews*.

⁵⁵ *Id.*

Final Results of Review

Silicomanganese from India

We determine that revocation of this *AD Order* would be likely to lead to a continuation or recurrence of dumping at a margin up to 20.53 percent.

Silicomanganese from Kazakhstan

We determine that revocation of this *AD Order* would be likely to lead to a continuation or recurrence of dumping at a margin up to 247.88 percent.

Silicomanganese from Venezuela

We determine that revocation of this *AD Order* would be likely to lead to a continuation or recurrence of dumping at a margin up to 24.62 percent.

RECOMMENDATION

Based on our analysis of the substantive comments received, we recommend adopting all the above positions. If accepted, we will publish the final results of these sunset reviews in the *Federal Register* and notify the ITC of our findings.



Agree



Disagree

12/10/2018

X



Signed by: GARY TAVERMAN

Gary Taverman
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations,
performing the non-exclusive functions and duties of the
Assistant Secretary for Enforcement and Compliance

ATTACHMENT 1

U.S. Imports for Consumption (in Kilograms)

Silicomanganese from India (A-533-825)

2013	2014	2015	2016	2017
5,218,474	4,221,000	2,909,444	1,194,814	5,840,500

Source: U.S. International Trade Commission's Dataweb

U.S. Imports for Consumption (in Kilograms)

Silicomanganese from Kazakhstan (A-834-807)

2013	2014	2015	2016	2017
0	0	0	0	0

Source: U.S. International Trade Commission's Dataweb

U.S. Imports for Consumption (in Kilograms)

Silicomanganese from Venezuela (A-307-820)

2013	2014	2015	2016	2017
0	0	0	0	0

Source: U.S. International Trade Commission's Dataweb

	<i>Silicomanganese from India, Kazakhstan and Venezuela</i>					
	U.S. Imports for Consumption (in Kilograms)					
	Country		Year 1	Year 2		
			2000	2001		
	India		60,496,097	39,785,507		
	Kazakhstan		66,396,330	32,329,130		
	Venezuela		24,100,000	1,500,000		
	Source: U.S. International Trade Commission's Dataweb					