



Canadian International  
Trade Tribunal

Tribunal canadien du  
commerce extérieur

CANADIAN  
INTERNATIONAL  
TRADE TRIBUNAL

# Dumping and Subsidizing

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## ORDERS AND REASONS

Expiry review RR-2021-003

Copper Pipe Fittings

*Orders and reasons issued  
Wednesday, September 14, 2022*

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IN THE MATTER OF an expiry review, pursuant to subsection 76.03(3) of the *Special Import Measures Act*, of the orders made by the Canadian International Trade Tribunal on November 28, 2016, in expiry review RR-2015-003, continuing, with amendment, its orders made on February 17, 2012, in expiry review RR-2011-001, continuing, without amendment, its findings made on February 19, 2007, in inquiry NQ-2006-002, concerning:

**COPPER PIPE FITTINGS ORIGINATING IN OR EXPORTED FROM THE  
UNITED STATES OF AMERICA, THE REPUBLIC OF KOREA AND THE  
PEOPLE'S REPUBLIC OF CHINA**

**ORDERS**

The Canadian International Trade Tribunal, pursuant to subsection 76.03(3) of the *Special Import Measures Act* (SIMA), has conducted an expiry review of the orders made on November 28, 2016, in expiry review RR-2015-003, continuing, with amendment, its orders made on February 17, 2012, in expiry review RR-2011-001, continuing, without amendment, its findings made on February 19, 2007, in inquiry NQ-2006-002, concerning the dumping of certain solder joint pressure pipe fittings and solder joint drainage, waste and vent pipe fittings, made of cast copper alloy, wrought copper alloy or wrought copper, for use in heating, plumbing, air conditioning and refrigeration applications, originating in or exported from the United States of America (United States), the Republic of Korea (South Korea) and the People's Republic of China (China), and the subsidizing of such goods originating in or exported from China.

The goods in issue are those described in the appendix, subject to the exclusion of copper-iron high-pressure alloy fittings manufactured with UNS C19400 grade copper alloy and with safe working pressure up to 1740 psi, pursuant to the Tribunal's amendment in RR-2015-003.

Pursuant to paragraph 76.03(12)(b) of SIMA, the Tribunal continues its order with respect to the dumping of the aforementioned goods originating in or exported from South Korea and China and the subsidizing of the aforementioned goods originating in or exported from China.

Pursuant to paragraph 76.03(12)(b) and subsection 76.04(1) of SIMA, the Tribunal continues its order with respect to the dumping of the aforementioned goods originating in or exported from the United States.

Randolph W. Heggart

Randolph W. Heggart  
Presiding Member

Peter Burn

Peter Burn  
Member

Frédéric Seppey

Frédéric Seppey  
Member

## APPENDIX

### Goods covered by the Tribunal's findings in inquiry NQ-2006-002, as amended by expiry review RR-2015-003

The tables in this appendix list the covered copper pipe fittings, by product category. Where an asterisk (\*) follows a specific copper pipe fitting description, it indicates that both wrought and cast copper pipe fittings are covered.

Copper pipe fittings are identified in terms of imperial measurement, i.e. inches; the metric equivalents of the imperial measurement are also covered. The term “metric equivalent” refers to those copper pipe fittings that are soft-converted equivalents of the imperial-sized copper pipe fittings and does not include fittings that are made specifically in metric dimensions. Copper pipe fittings are also identified in terms of nominal size.

Copper pipe fittings are identified in the tables in this appendix using the following abbreviated terms:

Abbreviation Chart			
WP	Wrought Pressure	FTG	Fitting End (Street End)
WD	Wrought Drainage	LT	Long Turn
CP	Cast Pressure	MJ	Mechanical Joint
CD	Cast Drainage	DE	Drop Ear
C	Copper Tube Cupped End or Sweat End	DWV	Drainage Waste, Vent
M	Male NPT Thread	TY	90° Drainage Tee
FE	Female NPT Thread	Y	45° Drainage Tee
SJ	Slip Joint End		

### Subject Copper Pipe Fittings – Female Adapters

1-1/4 CXFE CD ADAPTER*	1-1/2 FTGXFE CD ADAPTER*
1-1/2 CXFE CD ADAPTER*	1-1/2 X 1-1/4 CXFE CD ADAPTER*
3 FTGXFE CD ADAPTER*	2 CXFE CD ADAPTER*
3 CXFE CD ADAPTER*	4 CXFE CD ADAPTER*
1/2 CXFE CP ADAPTER*	1/2 X 3/8 CXFE CP ADAPTER*
1/2 X 3/4 CXFE CP ADAPTER*	3/4 CXFE CP ADAPTER*
3/4 X 1/2 CXFE CP ADAPTER*	3/4 X 1 CXFE CP ADAPTER*
3/4 X 1-1/4 CXFE CP ADAPTER*	3/4 X 1-1/2 CXFE CP ADAPTER*
1 C X FE CP ADAPTER*	1 X 1/2 CXFE CP ADAPTER*
1 X 3/4 C X FE CP ADAPTER*	1 X 1-1/4 CXFE CP ADAPTER*
1-1/4 CXFE CP ADAPTER*	1-1/4 X 1/2 CXFE CP ADAPTER*
1-1/4 X 3/4 CXFE CP ADAPTER*	1-1/4 X 1 CXFE CP ADAPTER*
3/4 X 1/2 FTGXFE CP ADAPTER*	1 FTGXFE CP ADAPTER*
1-1/2 CXFE CP ADAPTER*	1-1/2 X 3/4 CXFE CP ADAPTER*
1-1/2 X 1 CXFE CP ADAPTER*	1-1/2 X 2 CXFE CP ADAPTER*
2 CXFE CP ADAPTER*	2-1/2 C X FE CP ADAPTER*
3 CXFE CP ADAPTER*	1-1/4 CXFE WD ADAPTER*
1-1/4 X 1-1/2 CXFE WD ADAPTER*	1-1/4 FTGXFE WD ADAPTER*
1-1/2 FTGXFE WD ADAPTER*	2 FTGXFE WD ADAPTER*
1-1/2 CXFE WD ADAPTER*	1-1/2 X 1-1/4 CXFE WD ADAPTER*

1-1/2 X 2 CXFE WD ADAPTER*	3 FTGXFE WD ADAPTER*
2 C X FE WD ADAPTER*	2 X 1-1/2 CXFE WD ADAPTER*
3 C X FE WD ADAPTER*	1/4 C X FE WP ADAPTER*
3/8 C X FE WP ADAPTER*	3/8 X 1/4 CXFE WP ADAPTER*
3/8 X 1/2 CXFE WP ADAPTER*	1/2 C X FE WP ADAPTER*
1/2 X 1/4 CXFE WP ADAPTER*	1/2 X 3/8 CXFE WP ADAPTER*
1/2 X 3/4 CXFE WP ADAPTER*	1/2 X 1 CXFE WP ADAPTER*
5/8 X 1/2 CXFE WP ADAPTER*	5/8 X 3/4 CXFE WP ADAPTER*
3/4 C X FE WP ADAPTER*	3/4 X 1/2 CXFE WP ADAPTER*
3/4 X 1 CXFE WP ADAPTER*	3/4 X 1-1/4 CXFE WP ADAPTER*
3/4 X 1-1/2 CXFE WP ADAPTER*	1 C X FE WP ADAPTER*
1 X 1/2 CXFE WP ADAPTER*	1 X 3/4 CXFE WP ADAPTER*
1 X 1-1/4 CXFE WP ADAPTER*	1 X 1-1/2 CXFE WP ADAPTER*
1-1/4 C X FE WP ADAPTER*	1-1/4 C X 3/4 FE WP ADAPTER*
1-1/4 X 1 CXFE WP ADAPTER*	1-1/4 X 1-1/2 CXFE WP ADAPTER*
1-1/4 X 2 CXFE WP ADAPTER*	1/4 FTGXFE WP ADAPTER*
3/8 FTGXFE WP ADAPTER*	3/8 X 1/4 FTGXFE WP ADAPTER*
1/2 FTGXFE WP ADAPTER*	1/2 X 1/4 FTGXFE WP ADAPTER*
1/2 X 3/8 FTG X FE ADAPTER*	1/2 FTG X 3/4 FE WP ADAPTER*
3/4 FTGXFE WP ADAPTER*	3/4 FTG X 1/2 FE WP ADAPTER*
1 FTGXFE WP ADAPTER*	1 FTG X 3/4 FE WP ADAPTER*
1-1/4 FTGXFE WP ADAPTER*	1-1/2 FTGXFE WP ADAPTER*
2 FTGXFE WP ADAPTER*	1-1/2 C X FE WP ADAPTER*
2-1/2 FTGXFE WP ADAPTER*	1-1/2 C X 1 FE WP ADAPTER*
1-1/2 X 1-1/4 CXFE WP ADAPTER*	1-1/2 X 2 CXFE WP ADAPTER*
3 FTGXFE WP ADAPTER*	2 C X FE WP ADAPTER*
2 X 1 C X FE WP ADAPTER*	2 X 1-1/4 CXFE WP ADAPTER*
2 X 1-1/2 CXFE WP ADAPTER*	2-1/2 C X FE WP ADAPTER*
3 C X FE WP ADAPTER*	

**Subject Copper Pipe Fittings – Male Adapters**

1-1/4 CXM CD ADAPTER*	1-1/4X1-1/2 CXM CD ADAPTER*
1-1/2 FTGXM CD ADAPTER*	1-1/2 CXM CD ADAPTER*
1-1/2X1-1/4 CXM CD ADAPTER*	2 CXM CD ADAPTER*
2 X 1-1/2 CXM CD ADAPTER*	3 CXM CD ADAPTER*
4 CXM CD ADAPTER*	1/2 CXM CP ADAPTER*
1/2 X 3/4 CXM CP ADAPTER*	3/4 CXM CP ADAPTER*
3/4 X 1/2 CXM CP ADAPTER*	3/4 X 1-1/4 CXM CP ADAPTER*
1 CXM CP ADAPTER*	1 X 1/2 CXM CP ADAPTER*
1 X 1-1/4 CXM CP ADAPTER*	1 X 1-1/2 CXM CP ADAPTER*
1-1/4 CXM CP ADAPTER*	1-1/4 X 1/2 CXM CP ADAPTER*
1-1/4 X 1 CXM CP ADAPTER*	1-1/2 CXM CP ADAPTER*
1-1/2 X 3/4 CXM CP ADAPTER*	2 CXM CP ADAPTER*
2 X 1-1/2 C X M CP ADAPTER*	2-1/2 CXM CP ADAPTER*
3 CXM CP ADAPTER*	4 CXM CP ADAPTER*
1-1/2 M X 1-1/2 WD ADAPTER*	1-1/4 CXM WD ADAPTER*
1-1/4X1-1/2 CXM WD ADAPTER*	1-1/2 FTGXM WD ADAPTER*
2 FTGXM WD ADAPTER*	1-1/2 CXM WD ADAPTER*
1-1/2 X 1-1/4 CXM WD ADAPTER*	1-1/2 X 2 CXM WD ADAPTER*
2 CXM WD ADAPTER*	2 X 1-1/2 CXM WD ADAPTER*
3 CXM WD ADAPTER*	4 CXM WD ADAPTER*
1-1/4 CXM WD FLUSH TRAP ADAPTER*	1-1/2 CXM WD FLUSH TRAP ADAPTER*
2 CXM WD FL TRAP ADAPTER*	1-1/2 CXM WD SCULLY BUSHING*
2 CXM WD SCULLY BUSHING*	1/4 CXM WP ADAPTER*
1/4 X 3/8 CXM WP ADAPTER*	1/4 X 1/2 CXM WP ADAPTER*
3/8 CXM WP ADAPTER*	3/8 X 1/4 CXM WP ADAPTER*
3/8 X 1/2 CXM WP ADAPTER*	1/2 CXM WP ADAPTER*
1/2 X 1/4 CXM WP ADAPTER*	1/2 X 3/8 CXM WP ADAPTER*
1/2 X 3/4 CXM WP ADAPTER*	1/2 X 1 CXM WP ADAPTER*
5/8 X 1/2 CXM WP ADAPTER*	5/8 X 3/4 CXM WP ADAPTER*
3/4 CXM WP ADAPTER*	3/4 C X 3/8 WP M ADAPTER*
3/4 X 1/2 CXM WP ADAPTER*	3/4 X 1 CXM WP ADAPTER*
3/4 X 1-1/4 CXM WP ADAPTER*	3/4 X 1-1/2 CXM WP ADAPTER*
1 CXM WP ADAPTER*	1 X 1/2 CXM WP ADAPTER*
1 X 3/4 CXM WP ADAPTER*	1 X 1-1/4 CXM WP ADAPTER*
1 X 1-1/2 CXM WP ADAPTER*	1 X 2 CXM WP ADAPTER*
1-1/4 CXM WP ADAPTER*	1-1/4 X 3/4 CXM WP ADAPTER*
1-1/4 X 1 CXM WP ADAPTER*	1-1/4 X 1-1/2 CXM WP ADAPTER*
1-1/4 X 2 CXM WP ADAPTER*	1/4 FTGXM WP ADAPTER*
3/8 FTGXM WP ADAPTER*	1/2 FTGXM WP ADAPTER*
1/2 X 3/8 FTGXM WP ADAPTER*	1/2 X 3/4 FTGXM WP ADAPTER*
3/4 FTGXM WP ADAPTER*	3/4 X 1/2 FTGXM WP ADAPTER*
1 FTGXM WP ADAPTER*	1 X 3/4 FTGXM WP ADAPTER*
1-1/4 FTGXM WP ADAPTER*	1-1/2 FTGXM WP ADAPTER*
2 FTGXM WP ADAPTER*	1-1/2 CXM WP ADAPTER*
2-1/2 FTGXM WP ADAPTER*	1-1/2 X 1 CXM WP ADAPTER*
1-1/2 X 1-1/4 CXM WP ADAPTER*	1-1/2 X 2 CXM WP ADAPTER*
3 FTG X M WP ADAPTER*	2 CXM WP ADAPTER*
2 X 1-1/4 CXM WP ADAPTER*	2 X 1-1/2 CXM WP ADAPTER*
2 X 2-1/2 C X M WP ADAPTER*	2-1/2 CXM WP ADAPTER*
2-1/2 X 2 CXM WP ADAPTER*	3 CXM WP ADAPTER*
4 CXM WP ADAPTER*	1/2 X 3/4 C X HOSE WP ADAPTER*

**Subject Copper Pipe Fittings – Other Adapters**

1-1/4 X 2 CXSP CD FERRULE*	1-1/2 X 2 CXSP CD FERRULE*
1-1/2 X 3 CXSP CD FERRULE*	2 CXSP CD FERRULE*
2 X 3 CXSP CD FERRULE*	2 X 4 CXSP CD FERRULE*
3 CXSP CD FERRULE*	3 X 4 CXSP CD FERRULE*
4 CXSP CD FERRULE*	3 X 4 CXSP CD ECCENTRIC FERRULE*
1-1/4 X 2 CXMJ CD ADAPTER*	1-1/4 X 3 CXMJ CD ADAPTER*
1-1/2 X 2 CXMJ CD ADAPTER*	1-1/2 X 3 CXMJ CD ADAPTER*
1-1/2 X 4 CXMJ CD ADAPTER*	2 X 3 CXMJ CD ADAPTER*
2 X 4 CXMJ CD ADAPTER*	3 CXMJ CD ADAPTER*
3 X 4 CXMJ CD ADAPTER*	4 CXMJ CD ADAPTER*
6 C X M J CD ADAPTER*	1-1/4 FTGX SJ CD ADAPTER*
4 ACT(3S)X1-1/2C-30 CD ROOF ADAPTER*	4 ACT(3S) X 2C-30 CD ROOF ADAPTER*
4 SOIL(5A)X 1-1/2 C CD ROOF ADAPTER*	2 C X SJ CD ADAPTER*
2 C X MJ WD ADAPTER*	1-1/4 FE X SJ WD ADAPTER*
1-1/2 FE X SJ WD ADAPTER*	1-1/2 X 1-1/4 FE X SJ WD ADAPTER*
1-1/4 FTG X SJ WD ADAPTER*	1-1/2 FTG X SJ WD ADAPTER*
1-1/2 X 1-1/4 FTG X SJ ADAPTER*	1-1/4 M X SJ WD ADAPTER*
1-1/2 M X SJ WD ADAPTER*	1-1/2 X 1-1/4 M X SJ WD ADAPTER*
1-1/4 C X SJ WD ADAPTER*	1-1/4 X 1-1/2 CXSJ WD ADAPTER*
1-1/2 C X SJ WD ADAPTER*	1-1/2 X 1-1/4 CXSJ WD ADAPTER*
2 C X SJ WD ADAPTER*	1/2 CXM WP FLUSH VALVE ADAPTER*
3/4 CXM WP FLUSH VALVE ADAPTER*	

**Subject Copper Pipe Fittings – Bushings**

3 X 1-1/2 FTGXC CD BUSHING*	5 X 4 FTGXC CP BUSHING*
6 X 2 FTGXC CP BUSHING*	6 X 3 FTGXC CP BUSHING*
6 X 4 FTGXC CP BUSHING*	6 X 5 FTGXC CP BUSHING*
1 X 1/2 FTGXFE CP FLUSH BUSHING*	1-1/4 X 1 FTGXFE CP FLUSH ADAPTER*
1 1/2 FTG X 1 FE C CP FLUSH BUSHING*	1-1/2X1-1/4 FTGXC WD BUSHING*
2 X 1-1/4 FTGXC WD BUSHING*	2 X 1-1/2 FTGXC WD BUSHING*
3 X 1-1/4 FTGXC WD BUSHING*	3 X 1-1/2 FTGXC WD BUSHING*
3 X 2 FTGXC WD BUSHING*	4 X 2 FTGXC WD BUSHING*
4 X 3 FTGXC WD BUSHING*	1-1/4 CXM WD TRAP BUSHING*
1-1/2 CXM WD TRAP BUSHING*	2 CXM WD TRAP BUSHING*
3/8 X 1/8 FTGXC WP BUSHING*	3/8 X 1/4 FTGXC WP BUSHING*
1/2 X 1/4 FTGXC WP BUSHING*	1/2 X 3/8 FTGXC WP BUSHING*
5/8 X 1/4 FTGXC WP BUSHING*	5/8 X 3/8 FTGXC WP BUSHING*
5/8 X 1/2 FTGXC WP BUSHING*	3/4 X 1/4 FTGXC WP BUSHING*
3/4 X 3/8 FTGXC WP BUSHING*	3/4 X 1/2 FTGXC WP BUSHING*
3/4 X 5/8 FTGXC WP BUSHING*	1 X 3/8 FTGXC WP BUSHING*
1 X 1/2 FTGXC WP BUSHING*	1 X 5/8 FTGXC WP BUSHING*
1 X 3/4 FTGXC WP BUSHING*	1-1/4 X 1/2 FTGXC WP BUSHING*
1-1/4 X 3/4 FTGXC WP BUSHING*	1-1/4 X 1 FTGXC WP BUSHING*
1-1/2 X 1/2 FTGXC WP BUSHING*	1-1/2 X 3/4 FTGXC WP BUSHING*
1-1/2 X 1 FTGXC WP BUSHING*	1-1/2 X 1-1/4 FTGXC WP BUSHING*
2 X 1/2 FTGXC WP BUSHING*	2 X 3/4 FTGXC WP BUSHING*
2 X 1 FTGXC WP BUSHING*	2 X 1-1/4 FTGXC WP BUSHING*
2 X 1-1/2 FTGXC WP BUSHING*	2-1/2 X 1 FTGXC WP BUSHING*
2-1/2 X 1-1/4 FTGXC WP BUSHING*	2-1/2 X 1-1/2 FTGXC WP BUSHING*
2-1/2 X 2 FTGXC WP BUSHING*	3 X 1/2 FTGXC WP BUSHING*
3 X 3/4 FTGXC WP BUSHING*	3 X 1 FTGXC WP BUSHING*
3 X 1-1/4 FTGXC WP BUSHING*	3 X 1-1/2 FTGXC WP BUSHING*
3 X 2 FTGXC WP BUSHING*	3 X 2-1/2 FTGXC WP BUSHING*
3-1/2 X 2 FTGXC WP BUSHING*	3-1/2 X 2-1/2 FTGXC WP BUSHING*
3-1/2 X 3 FTGXC WP BUSHING*	4 X 1-1/4 FTGXC WP BUSHING*
4 X 1-1/2 FTGXC WP BUSHING*	4 X 2 FTGXC WP BUSHING*
4 X 2-1/2 FTGXC WP BUSHING*	4 X 3 FTGXC WP BUSHING*
4 X 3-1/2 FTGXC WP BUSHING*	1/2 X 1/4 FTGXC WP FLUSH BUSHING*
1/2 X 3/8 FTGXC WP FLUSH BUSHING*	5/8 X 3/8 FTGXC WP FLUSH BUSHING*
3/4 X 1/2 FTGXC WP FLUSH BUSHING*	1 X 1/2 FTGXC WP FLUSH BUSHING*
1 X 3/4 FTGXC WP FLUSH BUSHING*	1-1/4X3/4 FTGXC W FL BUSHING*
1-1/4 X 1 FTGXC WP FLUSH BUSHING*	1-1/2 X 1 FTGXC WP FLUSH BUSHING*
1-1/2 X 1-1/4 FTGXC WP FLUSH BUSHING*	2 X 1-1/2 FTGXC WP FLUSH BUSHING*
1 X 1/2 FE WP FLUSH BUSHING*	1-1/4 X 3/4 FE WP FLUSH BUSHING*
1-1/4 X 1 FTGXFE WP FLUSH BUSHING*	1-1/2 X 1 FTGXFE WP FLUSH BUSHING*



## Subject Copper Pipe Fittings – Couplings

3/4 CXC CP COUPLING*	1-1/4 CXC CP COUPLING*
4 CXC CP COUPLING*	5 X 3 CXC CP COUPLING*
5 X 4 CXC CP COUPLING*	6 X 2 CXC CP COUPLING*
6 X 3 CXC CP COUPLING*	6 X 4 CXC CP COUPLING*
6 X 5 CXC CP COUPLING*	1 X 1/2 CP ECCENTRIC COUPLING*
3/4 X 1/2 CXC CP ECCENTRIC COUPLING*	1-1/4 X 1/2 CP ECCENTRIC COUPLING*
1 X 3/4 CXC CP ECCENTRIC COUPLING*	1-1/2 X 1-1/4 CXC CP ECCENTRIC COUPLING*
1-1/2 X 1 CXC CP ECCENTRIC COUPLING*	2 X 1-1/2 CXC CP ECCENTRIC COUPLING*
2 X 1-1/4 CXC CP ECCENTRIC COUPLING*	3/4 CXC CP CROSSOVER COUPLING*
3 X 2 CXC CP ECCENTRIC COUPLING*	1/2 X 1 X 1/2 CXMXFE CP BOILER COUPLING
1/2C X 1M X 1/2 FE CP BOILER COUPLING	1-1/2 CXC WD COUPLING*
1-1/4 CXC WD COUPLING*	2 CXC WD COUPLING*
1-1/2X 1-1/4 CXC WD COUPLING*	2 X 1-1/2 CXC WD COUPLING*
2 X 1-1/4 CXC WD COUPLING*	3 X 1-1/4 CXC WD COUPLING*
3 CXC WD COUPLING*	3 X 2 CXC WD COUPLING*
3 X 1-1/2 CXC WD COUPLING*	4 X 1-1/2 CXC WD COUPLING*
4 CXC WD COUPLING*	4 X 3 CXC WD COUPLING*
4 X 2 CXC WD COUPLING*	4 X 3 CXC CD COUPLING*
4 X 1-1/2 CXC CD COUPLING*	1-1/4 CXC WD COUPLING NO STOP*
6 CXC WD COUPLING*	2 CXC WD COUPLING NO STOP*
1-1/2 CXC WD COUPLING NO STOP*	4 CXC WD COUPLING NO STOP*
3 CXC WD COUPLING NO STOP*	1/4 CXC WP COUPLING*
1/8 CXC WP COUPLING*	3/8 CXC WP COUPLING*
1/4 X 1/8 CXC WP COUPLING*	1/2 CXC WP COUPLING*
3/8 X 1/4 CXC WP COUPLING*	1/2 X 1/4 CXC WP COUPLING*
1/2 X 1/8 CXC WP COUPLING*	5/8 CXC WP COUPLING*
1/2 X 3/8 CXC WP COUPLING*	5/8 X 3/8 CXC WP COUPLING*
5/8 X 1/4 CXC WP COUPLING*	3/4 CXC WP COUPLING*
5/8 X 1/2 CXC WP COUPLING*	3/4 X 3/8 CXC WP COUPLING*
3/4 X 1/4 CXC WP COUPLING*	3/4 X 5/8 CXC WP COUPLING*
3/4 X 1/2 CXC WP COUPLING*	1 X 3/8 CXC WP COUPLING*
1 CXC WP COUPLING*	1 X 5/8 CXC WP COUPLING*
1 X 1/2 CXC WP COUPLING*	1-1/4 CXC WP COUPLING*
1 X 3/4 CXC WP COUPLING*	1-1/4 X 3/4 CXC WP COUPLING*
1-1/4 X 1/2 CXC WP COUPLING*	1-1/2 CXC WP COUPLING*
1-1/4 X 1 CXC WP COUPLING*	1-1/2 X 3/4 CXC WP COUPLING*
1-1/2 X 1/2 CXC WP COUPLING*	1-1/2 X 1-1/4 CXC WP COUPLING*
1-1/2 X 1 CXC WP COUPLING*	2 X 1/2 CXC WP COUPLING*
2 CXC WP COUPLING*	2 X 1 CXC WP COUPLING*
2 X 3/4 CXC WP COUPLING*	2 X 1-1/2 CXC WP COUPLING*
2 X 1-1/4 CXC WP COUPLING*	2-1/2 X 3/4 CXC WP COUPLING*
2-1/2 CXC WP COUPLING*	2-1/2 X 1-1/4 CXC WP COUPLING*
2-1/2 X 1 CXC WP COUPLING*	2-1/2 X 2 CXC WP COUPLING*
2-1/2 X 1-1/2 CXC WP COUPLING*	3 X 3/4 CXC WP COUPLING*
3 CXC WP COUPLING*	3 X 1-1/4 CXC WP COUPLING*
3 X 1 CXC WP COUPLING*	3 X 2 CXC WP COUPLING*
3 X 1-1/2 CXC WP COUPLING*	3-1/2 CXC WP COUPLING*
3 X 2-1/2 CXC WP COUPLING*	4 CXC WP COUPLING*
3-1/2 X 3 CXC WP COUPLING*	4 X 2 CXC WP COUPLING*
4 X 1-1/2 CXC WP COUPLING*	4 X 3 CXC WP COUPLING*
4 X 2-1/2 CXC WP COUPLING*	5 CXC WP COUPLING*
4 X 3-1/2 CXC WP COUPLING*	6 X 2-1/2 WP COUPLINGS*
6 CXC WP COUPLING*	1-1/4 X 1 CXC WP ECCENTRIC COUPLING*
1-1/4 X 3/4 CXC WP ECCENTRIC COUPLING*	1/4 CXC WP COUPLING NO STOP*
1/8 CXC WP COUPLING NO STOP*	1/2 CXC WP COUPLING NO STOP*
3/8 CXC WP COUPLING NO STOP*	3/4 CXC WP COUPLING NO STOP*
5/8 CXC WP COUPLING NO STOP*	1-1/4 CXC WP COUPLING NO STOP*

1 CXC WP COUPLING NO STOP*	2 CXC WP COUPLING NO STOP*
1-1/2 CXC WP COUPLING NO STOP*	3 CXC WP COUPLING NO STOP*
2-1/2 CXC WP COUPLING NO STOP*	5 CXC WP COUPLING NO STOP*
4 CXC WP COUPLING NO STOP*	1/2 X 3 CXC WP REPAIR COUPLING
6 CXC WP COUPLING NO STOP*	3/4 X 3 C X C WP REPAIR COUPLING
1/2 X 6 C X C WP REPAIR COUPLING	1/4 CXC WP RING COUPLING*
1/8 CXC WP RING COUPLING*	1/2 CXC WP RING COUPLING*
3/8 CXC WP RING COUPLING*	3/4 CXC WP RING COUPLING*
5/8 CXC WP RING COUPLING*	1-1/4 CXC WP RING COUPLING*
1 CXC WP RING COUPLING*	2 CXC WP RING COUPLING*
1-1/2 CXC WP RING COUPLING*	3 CXC WP RING COUPLING*
2-1/2 CXC WP RING COUPLING*	1/2 X 3-1/4 FTGXC WP SLIDE COUPLING
4 CXC WP RING COUPLING*	1/2 CXC WP CROSSOVER COUPLING*
3/4 X 5 FTGXC WP SLIDE COUPLING	3/4 CXC WP CROSSOVER COUPLING*

## Subject Copper Pipe Fittings – Elbows

1-1/4 CXC 11-1/4 CD ELBOW*	1-1/2 CXC 11-1/4 CD ELBOW*
2 CXC 11-1/4 CD ELBOW*	3 CXC 11-1/4 CD ELBOW*
4 C X C 11-1/4 CD ELBOW*	1-1/4 CXC 22-1/2 CD ELBOW*
1-1/2 CXC 22-1/2 CD ELBOW*	2 CXC 22-1/2 CD ELBOW*
3 CXC 22-1/2 CD ELBOW*	4 CXC 22-1/2 CD ELBOW*
3 FTGXC 45 CD ELBOW*	4 FTGXC 45 CD ELBOW*
2 CXM CD 45 ELBOW*	1-1/4 CXC 45 CD ELBOW*
1-1/2 CXC 45 CD ELBOW*	2 CXC 45 CD ELBOW*
3 CXC 45 CD ELBOW*	4 CXC 45 CD ELBOW*
1-1/4 CXC 60 CD ELBOW*	1-1/2 CXC 60 CD ELBOW*
2 CXC 60 CD ELBOW*	3 CXC 60 CD ELBOW*
1-1/4 FTGXC CD 90 ELBOW*	1-1/4 CXC CD 90 ELBOW*
2 FTGXC CD 90 ELBOW*	1-1/2 FTGXC CD 90 ELBOW*
1-1/2 X 1-1/4 CXC CD 90 ELBOW*	1-1/2 CXC CD 90 ELBOW*
4 FTGXC CD 90 ELBOW*	3 CD FTGXC 90 ELBOW*
2X 1-1/4 CXC CD 90 ELBOW*	2 CXC CD 90 ELBOW*
1-1/2 CXFE CD 90 ELBOW*	2 X 1-1/2 CXC CD 90 ELBOW*
1-1/2 CXM CD 90 ELBOW	2 CXFE CD 90 ELBOW*
3 CXC CD 90 ELBOW	2 CXM CD 90 ELBOW
1/2 C X M CP 45 ELBOW	4 CXC CD 90 ELBOW
1-1/4 C X M CP 45 ELBOW	3/4 C X M CP 45 ELBOW
6 CXC CP 45 ELBOW	4 CXC CP 45 ELBOW
1-1/4 CXC CP 90 ELBOW	1/2 C X C CP 90 ELBOW
1-1/4 X 3/4 CP 90 ELBOW	1-1/4 X 1 CP 90 ELBOW
1-1/2 X 1/2 CP 90 ELBOW	1-1/2 X 3/4 CXC CP 90 ELBOW
1-1/2 X 1 CXC CP 90 ELBOW	1/2 X 1 CXFE CP 90 ELBOW
1/2 CXFE CP 90 ELBOW	3/4 X 1/2 CXFE CP 90 ELBOW
1/2 X 3/4 CXFE CP 90 ELBOW	1 CXFE CP 90 ELBOW
3/4 CXFE CP 90 ELBOW	1 X 3/4 CXFE CP 90 ELBOW
3/4 X 1 CXFE CP 90 ELBOW	1-1/4 X 1/2 CXFE CP 90 ELBOW
1 X 1/2 C X FE CP 90 ELBOW	1-1/4 X 1 CXFE CP 90 ELBOW
1-1/4 CXFE CP 90 ELBOW	1-1/2 CXFE CP 90 ELBOW
1-1/4 X 3/4 CXFE CP 90 ELBOW	2 CXFE CP 90 ELBOW
1-1/2 X 1 C X FE CP 90 ELBOW	1/2 CXM CP 90 ELBOW
3 C X FE CP 90 ELBOW	1/2 X 3/4 CXM CP 90 ELBOW
1/2 X 3/8 CXM CP 90 ELBOW	3/4 X 1/2 CXM CP 90 ELBOW
3/4 CXM CP 90 ELBOW	1 CXM CP 90 ELBOW
3/4 C X 1 M CP 90 ELBOW	1-1/4 CXM CP P 90 ELBOW
1 X 3/4 CXM CP 90 ELBOW	1-1/2 CXM CP 90 ELBOW
1-1/4 X 1 CXM CP 90 ELBOW	1/2C X 1/8FE X 1/2C CP BASE TEE*
2 CXM CP 90 ELBOW	3/4C X 1/8FE X 3/4C CP BASE TEE*
6 CXC CP 90 ELBOW	1-1/4C X 1/8FEX 1-1/4C CP BASE TEE*
1/2C X 1/8FE X 3/4C CP BASE TEE*	1-1/4 CXFTG WD 45 ELBOW*
1C X 1/8FE X 1 C CP BASE TEE*	2 FTGXC WD 45 ELBOW*
1-1/2 FTGXC WD 45 ELBOW*	1-1/4 CXC WD 45 ELBOW*
3 C X FTG WD 45 ELBOW*	2 CXC WD 45 ELBOW*
1-1/2 CXC WD 45 ELBOW*	1-1/4 CXC WD 90 ELBOW*
3 CXC WD 45 ELBOW*	1-1/2 FTGXC WD 90 ELBOW*
1-1/4 FTGXC WD 90 ELBOW*	1-1/2 CXC WD 90 ELBOW*
2 FTGXC WD 90 ELBOW*	3 CXC WD 90 ELBOW*
2 CXC WD 90 ELBOW*	2 CXC WD 90 LT ELBOW*
1-1/2 CXC WD 90 LT ELBOW*	3/8 CXC WP 45 ELBOW*
1/4 CXC WP 45 ELBOW*	5/8 CXC WP 45 ELBOW*
1/2 CXC WP 45 ELBOW*	1 CXC WP 45 ELBOW*
3/4 CXC WP 45 ELBOW*	1/4 FTG X C WP 45 ELBOW*
1-1/4 CXC WP 45 ELBOW*	1/2 FTGXC WP 45 ELBOW*
3/8 FTGXC WP 45 ELBOW*	3/4 FTGXC WP 45 ELBOW*

5/8 FTGXC WP 45 ELBOW*	1-1/4 FTGXC WP 45 ELBOW*
1 FTGXC WP 45 ELBOW*	2 FTGXC WP 45 ELBOW*
1-1/2 FTGXC WP 45 ELBOW*	2-1/2 FTGXC WP 45 ELBOW*
1-1/2 CXC WP 45 ELBOW*	2-1/2 CXC WP 45 ELBOW*
2 CXC WP 45 ELBOW*	4 CXC WP 45 ELBOW*
3 CXC WP 45 ELBOW*	3/8 CXC WP 90 ELBOW*
1/4 CXC WP 90 ELBOW*	5/8 CXC WP 90 ELBOW*
1/2 CXC WP 90 ELBOW*	3/4 X 1/2 CXC WP 90 ELBOW*
3/4 CXC WP 90 ELBOW*	1 X 1/2 CXC WP 90 ELBOW*
1 CXC WP 90 ELBOW*	1-1/4 CXC WP 90 ELBOW*
1 X 3/4 CXC WP 90 ELBOW*	1/4 FTGXC WP 90 ELBOW*
1-1/4 X 1 CXC WP 90 ELBOW*	1/2 FTGXC WP 90 ELBOW*
3/8 FTGXC WP 90 ELBOW*	3/4 FTGXC WP 90 ELBOW*
5/8 FTGXC WP 90 ELBOW*	1-1/4 FTGXC WP 90 ELBOW*
1 FTGXC WP 90 ELBOW*	3/4 FTG X FTG WP 90 ELBOW*
1/2 FTGXFTG WP 90 ELBOW*	2 FTGXC WP 90 ELBOW*
1-1/2 FTGXC WP 90 ELBOW*	2-1/2 FTGXC WP 90 ELBOW*
1-1/2 CXC WP 90 ELBOW*	2 CXC WP 90 ELBOW*
1-1/2CX 1-1/4C WP 90 ELBOW*	3 CXC WP 90 ELBOW*
2-1/2 CXC WP 90 ELBOW*	1/2 CXC WP 90 VENT ELBOW*
4 CXC WP 90 ELBOW*	1 CXC WP 90 VENT ELBOW*
3/4 CXC WP 90 VENT ELBOW*	3/8 CXC LT WP 90 ELBOW
1/4 CXC LT WP 90 ELBOW	5/8 CXC LT WP 90 ELBOW
1/2 CXC LT WP 90 ELBOW	1 CXC LT WP 90 ELBOW
3/4 CXC LT WP 90 ELBOW	1/4 CXFTG LT WP 90 ELBOW
1-1/4 CXC LT WP 90 ELBOW	1/2 C X FTG LT WP 90 ELBOW
3/8 C X FTG LT WP 90 ELBOW	3/4 CXFTG LT WP 90 ELBOW
5/8 CXFTG LT WP 90 ELBOW	1-1/4 CXFTG LT WP 90 ELBOW
1 CXFTG LT WP 90 ELBOW	2 CXFTG LT WP 90 ELBOW
1-1/2 CXFTG LT WP 90 ELBOW	2 CXC LT WP 90 ELBOW
1-1/2 CXC LT WP 90 ELBOW	

**Subject Copper Pipe Fittings – Flanges**

3 X 4 CXC CD CLOSET FLANGE*	8 COMPANION CP FLANGE 150# SILVER BRAZED
1/2 CP COMPANION FLANGE - 125#	4 X 4 CXC CD CLOSET FLANGE*
1 CP COMPANION FLANGE - 125#	3/4 CP COMPANION FLANGE - 125#
1-1/2 CP COMPANION FLANGE - 125#	1-1/4 CP COMPANION FLANGE - 125#
2-1/2 CP COMPANION FLANGE - 125#	2 CP COMPANION FLANGE - 125#
3-1/2 CP COMPANION FLANGE #125	3 CP COMPANION FLANGE - 125#
5 CP COMPANION FLANGE - 125#	4 CP COMPANION FLANGE - 125#
8 CP COMPANION FLANGE - 125#	6 CP COMPANION FLANGE - 125#
3/4 CP COMPANION FLANGE - 150#	1/2 CP COMPANION FLANGE - 150#
1-1/4 CP COMPANION FLANGE - 150#	1 CP COMPANION FLANGE - 150#
2 CP COMPANION FLANGE - 150#	1-1/2 CP COMPANION FLANGE - 150#
3 CP COMPANION FLANGE - 150#	2-1/2 CP COMPANION FLANGE - 150#
4 X 9 CP COMPANION FLANGE - 150#	3-1/2 CP COMPANION FLANGE - 150#
6 CP COMPANION FLANGE -150#	5 CP COMPANION FLANGE - 150#
1/2 CP COMPANION FLANGE - 300#	8 CP COMPANION FLANGE - 150#
1-1/4 CP COMPANION FLANGE - 300#	1 X 5 CP COMPANION FLANGE - 300#
2 CP COMPANION FLANGE - 300#	1-1/2 X 6-1/2 CP COMPANION FLANGE-300#
3 X 8-1/4 CP COMPANION FLANGE - 300#	2-1/2 CP COMPANION FLANGE - 300#
1-1/2 CP BLIND COMPANION FLANGE	4 CP COMPANION FLANGE - 300#
3 X 7-1/2 CP BLIND COMPANION FLANGE	2 X 6 CP BLIND COMPANION FLANGE
8 COMPANION CP FLANGE 125# SILVER BRAZED	13-1/2 X 8 CP BLIND COMPANION FLANGE
3 COMPANION CP FLANGE 150# SILVER BRAZED	

## Subject Copper Pipe Fittings – Pressure Tees

1/2 X 1/2 X 1/4 CXCXFE CP TEE	1/2 CXCXFE CP TEE
1/2 X 1/2 X 3/4 CXCXFE CP TEE	1/2C X 1/2C X 3/8FE CP TEE
3/4C X 1/2C X 1/2FE CP TEE	3/4 CXCXFE CP TEE
3/4 X 3/4 X 3/8 CCFE CP TEE	3/4 X 1/2 X 3/4 CXCXFE CP TEE
3/4 X 3/4 X 1 CXCXFE CP TEE	3/4C X 3/4C X 1/2FE CP TEE
1 X 1 X 1/2 CXCXFE CP TEE	1 CXCXFE CP CP TEE
1-1/4 CXCXFE CP TEE	1 X 1 X 3/4 CXCXFE CP TEE
1-1/4 X 1-1/4 X 3/4 CCFE CP TEE	1-1/4 X 1-1/4 X 1/2 CCFE CP TEE
1-1/2 CXCXFE CP TEE	1-1/4X1-1/4X1 CCFE CP TEE
1-1/2 X 1-1/2 X 3/4 CCFE CP TEE	1-1/2X1-1/2X1/2 CCFE CP TEE
1/2 CXFEXFE CP TEE	1-1/2 X 1-1/2 X 1 CCFE CP TEE
3/4 C X FE X FE CP TEE	1/2C X 3/4FE X 1/2FE CP TEE
2 CXCXFE CP TEE	3/4 C X 3/4 FE X 1/2 FE CP TEE
2 X 2 X 3/4 CXCXFE CP TEE	2 X 2 X 1/2 CXCXFE CP TEE
1/2 CXFEXC CP TEE	2 X 2 X 1 CXCXFE CP TEE
1/2C X 3/4FE X 1/2C CP TEE	3/8 C X FE X C CP TEE
3/4 X 1/2 X 1/2 CXFEXC CP TEE	1/2C X 1/2FE X 3/4C CP TEE
3/4C X 3/4FE X 1/2C CP TEE	3/4 CXFEXC CP TEE
1C X 1/2FE X 1C CP TEE	3/4C X 1/2FE X 3/4C CP TEE
1-1/4 CXFEXC CP TEE	1 CXFEXC CP TEE
1-1/4 X 3/4 X 1-1/4 CXFEXC CP TEE	1 X 3/4 X 1 CXFEXC CP TEE
1-1/2X1/2X1-1/2 CXFEXC CP TEE	1-1/4 X 1/2 X 1-1/4 CXFEXC CP TEE
1/2 FEXFEXC CP TEE	1-1/2 C X FE X C CP TEE
3/4FE X 1/2FE X 1/2C CP TEE	1-1/2X3/4X1-1/2 CXFEXC CP TEE
3/4FE X 3/4FE X 1/2C CP TEE	3/4 FEXFEXC CP TEE
2 X 1/2 X 2 CXFEXC CP TEE	3/4FE X 1/2FE X 3/4C CP TEE
3/4 CXCXCXC CP CROSS*	2 C X FE X C CP TEE
1-1/2 CXCXCXC CP CROSSES*	2 X 3/4 X 2 CXFEXC CP TEE
3/4 CXFTGXC CP TEE*	1/2 CXCXCXC CP CROSS*
2-1/2 X 1/2 X 2-1/2 CP TEE*	1 CXCXCXC CP CROSS*
5 CXCXC CP TEE*	2 CXCXCXC CP CROSS*
6 CXCXC CP TEE*	2 X 2 X 3 CXCXC CP TEE*
1/8 CXCXC WP TEE*	2-1/2 X 1-1/2 X 1-1/2 CP TEE*
3/8 CXCXC WP TEE*	5 X 5 X 3 CXCXC CP TEE*
1/2 X 1/2 X 3/4 CXCXC WP TEE*	3/4FE X 1/8 FE X 3/4C WP BASEBOARD TEE*
3/4 X 1/2 X 1/2 CXCXC WP TEE*	1/4 CXCXC WP TEE*
3/4 X 3/4 X 1/4 CXCXC WP TEE*	1/2 CXCXC WP TEE*
3/4 X 3/4 X 1/2 CXCXC WP TEE*	3/4 CXCXC WP TEE*
1 X 1/2 X 1/2 CXCXC WP TEE*	3/4 X 1/2 X 3/4 CXCXC WP TEE*
1 X 1/2 X 1 CXCXC WP TEE*	3/4C X 3/4C X 3/8C CXCXC WP TEE*
1 X 3/4 X 3/4 CXCXC WP TEE*	1 CXCXC WP TEE*
1 X 1 X 3/8 CXCXC WP TEE*	1 X 1/2 X 3/4 CXCXC WP TEE*
1 X 1 X 3/4 CXCXC WP TEE*	1 X 3/4 X 1/2 CXCXC WP TEE*
1-1/4 X 1/2 X 1/2 CXCXC WP TEE*	1 X 3/4 X 1 CXCXC WP TEE*
1-1/4 X 1/2 X 1 CXCXC WP TEE*	1 X 1 X 1/2 CXCXC WP TEE*
1-1/4 X 3/4 X 1/2 CXCXC WP TEE*	1-1/4 CXCXC WP TEE*
1-1/4 X 3/4 X 1 CXCXC WP TEE*	1-1/4 X 1/2 X 3/4 CXCXC WP TEE*
1-1/4 X 1 X 1/2 CXCXC WP TEE*	1-1/4 X 1/2 X 1-1/4 CXCXC WP TEE*
1-1/4 X 1 X 1 CXCXC WP TEE*	1-1/4 X 3/4 X 3/4 CXCXC WP TEE*
1-1/4 X 1-1/4 X 1/2 CXCXC WP TEE*	1-1/4 X 3/4 X 1-1/4 CXCXC WP TEE*
1-1/4C X 1-1/4C X 1C CXCXC WP TEE*	1-1/4 X 1 X 3/4 CXCXC WP TEE*
1-1/2 X 1/2 X 1/2 CXCXC WP TEE*	1-1/4 X 1 X 1-1/4 CXCXC WP TEE*
1-1/2 X 1/2 X 1 CXCXC WP TEE*	1-1/4 X 1-1/4 X 3/4 CXCXC WP TEE*
1-1/2 X 1/2 X 1-1/2 CXCXC WP TEE*	1-1/2 CXCXC CXCXC WP TEE*
1-1/2 X 3/4 X 3/4 CXCXC WP TEE*	1-1/2 X 1/2 X 3/4 CXCXC WP TEE*
1-1/2 X 3/4 X 1-1/4 CXCXC WP TEE*	1-1/2 X 1/2 X 1-1/4 CXCXC WP TEE*
1-1/2 X 1 X 1/2 CXCXC WP TEE*	1-1/2 X 3/4 X 1/2 CXCXC WP TEE*

1-1/2 X 1 X 1 CXCXC WP TEE*	1-1/2 X 3/4 X 1 CXCXC WP TEE*
1-1/2 X 1 X 1-1/2 CXCXC WP TEE*	1-1/2 X 3/4 X 1-1/2 CXCXC WP TEE*
1-1/2 X 1-1/4 X 3/4 CXCXC WP TEE*	1-1/2 X 1 X 3/4 CXCXC WP TEE*
1-1/2 X 1-1/4 X 1-1/4 CXCXC WP TEE*	1-1/2 X 1 X 1-1/4 CXCXC WP TEE*
1-1/2 X 1-1/2 X 1/2 CXCXC WP TEE*	1-1/2 X 1-1/4 X 1/2 CXCXC WP TEE*
1-1/2 X 1-1/2 X 1 CXCXC WP TEE*	1-1/2 X 1-1/4 X 1 CXCXC WP TEE*
2 CXCXC CXCXC WP TEE*	1-1/2 X 1-1/4 X 1-1/2 CXCXC WP TEE*
2 X 3/4 X 2 CXCXC WP TEE*	1-1/2 X 1-1/2 X 3/4 CXCXC WP TEE*
2 X 1 X 1 CXCXC WP TEE*	1-1/2 X 1-1/2 X 1-1/4 CXCXC WP TEE*
2 X 1 X 1-1/2 CXCXC WP TEE*	2 X 1/2 X 2 CXCXC WP TEE*
2 X 1-1/4 X 1/2 CXCXC WP TEE*	2 X 1 X 3/4 CXCXC WP TEE*
2 X 1-1/4 X 1 CXCXC WP TEE*	2C X 1C X 1-1/4C CXCXC WP TEE*
2 X 1-1/4 X 1-1/2 CXCXC WP TEE*	2 X 1 X 2 CXCXC WP TEE*
2 X 1-1/2 X 1/2 CXCXC WP TEE*	2 X 1-1/4 X 3/4 CXCXC WP TEE*
2 X 1-1/2 X 1 CXCXC WP TEE*	2 X 1-1/4 X 1-1/4 CXCXC WP TEE*
2 X 1-1/2 X 1-1/2 CXCXC WP TEE*	2 X 1-1/4 X 2 CXCXC WP TEE*
2 X 2 X 1/2 CXCXC WP TEE*	2 X 1-1/2 X 3/4 CXCXC WP TEE*
2 X 2 X 1 CXCXC WP TEE*	2 X 1-1/2 X 1-1/4 CXCXC WP TEE*
2 X 2 X 1-1/2 CXCXC WP TEE*	2 X 1-1/2 X 2 CXCXC WP TEE*
2-1/2 X 1/2 X 2-1/2 CXCXC WP TEE*	2 X 2 X 3/4 CXCXC WP TEE*
2-1/2 X 3/4 X 2-1/2 CXCXC WP TEE*	2 X 2 X 1-1/4 CXCXC WP TEE*
2-1/2 X 1 X 1-1/2 CXCXC WP TEE*	2-1/2 CXCXC WP TEE*
2-1/2 X 1 X 2-1/2 CXCXC WP TEE*	2-1/2 X 3/4 X 1-1/2 CXCXC WP TEE*
2-1/2 X 1-1/4 X 1-1/2 CXCXC WP TEE*	2-1/2 X 1 X 1-1/4 CXCXC WP TEE*
2-1/2 X 1-1/4 X 2-1/2 CXCXC WP TEE*	2-1/2 X 1 X 2 CXCXC WP TEE*
2-1/2 X 1-1/2 X 1-1/4 CXCXC WP TEE*	2-1/2 X 1-1/4 X 1-1/4CXCXC WP TEE*
2-1/2 X 1-1/2 X 2 CXCXC WP TEE*	2-1/2 X 1-1/4 X 2 CXCXC WP TEE*
2-1/2 X 2 X 1/2 CXCXC WP TEE*	2-1/2 X 1-1/2 X 1 CXCXC WP TEE*
2-1/2 X 2 X 1 CXCXC WP TEE*	2-1/2 X 1-1/2 X 1-1/2 CXCXC WP TEE*
2-1/2 X 2 X 1-1/2 CXCXC WP TEE*	2-1/2 X 1-1/2 X 2-1/2 CXCXC WP TEE*
2-1/2 X 2 X 2-1/2 CXCXC WP TEE*	2-1/2 X 2 X 3/4 CXCXC WP TEE*
2-1/2 X 2-1/2 X 3/4 CXCXC WP TEE*	2-1/2 X 2 X 1-1/4 CXCXC WP TEE*
2-1/2 X 2-1/2 X 1-1/4 CXCXC WP TEE*	2-1/2 X 2 X 2 CXCXC WP TEE*
2-1/2 X 2-1/2 X 2 CXCXC WP TEE*	2-1/2 X 2-1/2 X 1/2 CXCXC WP TEE*
3 X 3/4 X 3 CXCXC WP TEE*	2-1/2 X 2-1/2 X 1 CXCXC WP TEE*
3 X 1-1/4 X 3 CXCXC WP TEE*	2-1/2 X 2-1/2 X 1-1/2 CXCXC WP TEE*
3 X 1-1/2 X 1-1/2 CXCXC WP TEE*	3 CXCXC WP TEE*
3 X 1-1/2 X 3 CXCXC WP TEE*	3 X 1 X 3 CXCXC WP TEE*
3 X 2 X 1 CXCXC WP TEE*	3 X 1-1/2 X 1-1/4 CXCXC WP TEE*
3 X 2 X 1-1/2 CXCXC WP TEE*	3 X 1-1/2 X 2-1/2 CXCXC WP TEE*
3 X 2 X 2-1/2 CXCXC WP TEE*	3 X 2 X 1/2 CXCXC WP TEE*
3 X 2-1/2 X 3/4 CXCXC WP TEE*	3 X 2 X 1-1/4 CXCXC WP TEE*
3 X 2-1/2 X 1-1/4 CXCXC WP TEE*	3 X 2 X 2 CXCXC WP TEE*
3 X 2-1/2 X 2 CXCXC WP TEE*	3 X 2 X 3 CXCXC WP TEE*
3 X 2-1/2 X 3 CXCXC WP TEE*	3 X 2-1/2 X 1 CXCXC WP TEE*
3 X 3 X 3/4 CXCXC WP TEE*	3 X 2-1/2 X 1-1/2 CXCXC WP TEE*
3 X 3 X 1-1/4 CXCXC WP TEE*	3 X 2-1/2 X 2-1/2 CXCXC WP TEE*
3 X 3 X 2 CXCXC WP TEE*	3 X 3 X 1/2 CXCXC WP TEE*
4 CXCXC WP TEE*	3 X 3 X 1 CXCXC WP TEE*
4 X 2 X 2 CXCXC WP TEE*	3 X 3 X 1-1/2 CXCXC WP TEE*
4 X 2-1/2 X 2-1/2 CXCXC WP TEE*	3 X 3 X 2-1/2 CXCXC WP TEE*
4 X 3 X 2 CXCXC WP TEE*	4 X 1-1/2 X 3 CXCXC WP TEE*
4 X 3 X 3 CXCXC WP TEE*	4 X 2 X 3 CXCXC WP TEE*
4 X 4 X 3/4 CXCXC WP TEE*	4 X 2-1/2 X 3 CXCXC WP TEE*
4 X 4 X 1-1/4 CXCXC WP TEE*	4 X 3 X 2-1/2 CXCXC WP TEE*
4 X 4 X 2 CXCXC WP TEE*	4 X 4 X 1/2 CXCXC WP TEE*
4 X 4 X 3 CXCXC WP TEE*	4 X 4 X 1 CXCXC WP TEE*
5 X 5 X 2 CXCXC WP TEE*	4 X 4 X 1-1/2 CXCXC WP TEE*
4 X 4 X 2-1/2 CXCXC WP TEE*	

**Subject Copper Pipe Fittings – Unions**

2-1/2 CXFE CP UNION*	2-1/2 CXC CP UNION*
2 CXM CP UNION*	2-1/2 C X M CP UNION*
3 CXC CP UNION*	1 CXC WP UNION*
3/4 CXC WP UNION*	1-1/2 C X C WP UNION*
1-1/4 CXC WP UNION*	3/4 C X FE WP UNION*
1/2 C X FE WP UNION*	2 CXC WP UNION*
1 C X FE WP UNION*	1-1/2 C X FE WP UNION*
1-1/4 C X FE WP UNION*	1/2 C X M WP UNION*
2 C X FE WP UNION*	1 C X M WP UNION*
3/4 C X M WP UNION*	1-1/2 C X M WP UNION*
1-1/4 C X M WP UNION*	2 C X M WP UNION*

**Subject Copper Pipe Fittings – DWV TY's**

1-1/2 CXCXC CD TY*	1-1/4 CXCXC CD TY*
1-1/2 X 1-1/4 X 1-1/2 CXCXC CD TY*	1-1/2 X 1-1/4 X 1-1/4 CXCXC CD TY*
3 FTG X C X C CD TY*	1-1/2 X 1-1/2 X 1-1/4 CXCXC CD TY*
3 X 3 X 1-1/2 FTGX CXC CD TY*	3 X 3 X 1-1/4 FTGX CXC CD TY*
2 CXCXC CD TY*	3 X 3 X 2 FTGX CXC CD TY*
2 X 1-1/4 X 1-1/2 CXCXC CD TY*	2 X 1-1/4 X 1-1/4 CXCXC CD TY*
2 X 1-1/2 X 1-1/4 CXCXC CD TY*	2 X 1-1/4 X 2 CXCXC CD TY*
2 X 1-1/2 X 2 CXCXC CD TY*	2 X 1-1/2 X 1-1/2 CXCXC CD TY*
2 X 2 X 1-1/2 CXCXC CD TY*	2 X 2 X 1-1/4 CXCXC CD TY*
2 CXCXFE CD TY	1-1/2 CXCXFE CD TY*
3 CXCXC CD TY*	2 X 1-1/2 X 1-1/2 CXCXF CD TY
3 X 2 X 1-1/2 CXCXC CD TY*	3 X 1-1/2 X 1-1/4 CXCXC CD TY*
3 X 3 X 1-1/2 CXCXC CD TY*	3 X 3 X 1-1/4 CXCXC CD TY*
4 CXCXC CD TY*	3 X 3 X 2 CXCXC CD TY*
4 X 4 X 2 CXCXC CD TY*	4 X 4 X 1-1/2 CXCXC CD TY*
2 CXCXCXC CD DOUBLE LONG TURN TY	4 X 4 X 3 CXCXC CD TY*

**Subject Copper Pipe Fittings – DWV Y's**

1-1/4 CXCXC CD 45 Y*	1-1/2CX 1-1/4CX 1-1/2C CD 45 Y*
1-1/2CX 1-1/4CX 1-1/4C CD 45 Y*	2 CXCXC 45 CD Y*
1-1/2CX 1-1/2CX 1-1/4C CD 45 Y*	2CX 1-1/4CX 1-1/2C CD 45 Y*
2CX 1-1/4CX 1-1/4C CD 45 Y*	2CX 1-1/2CX 1-1/4C CD 45 Y*
2CX 1-1/4CX 2C CD 45 Y*	2CX 1-1/2CX 2C CD 45 Y*
2CX 1-1/2CX 1-1/2C CD 45 Y*	2CX 2CX 1-1/2C CD 45 Y*
2CX 2CX 1-1/4C CD 45 Y*	3C X 2C X 2C CD 45 Y*
3 CXCXC CD 45 Y*	3CX 3CX 1-1/2C CD 45 Y*
3CX 3CX 1-1/4C CD 45 Y*	4 CXCXC CD 45 Y*
3CX 3CX 2C CD 45 Y*	4CX 4CX 3C CD 45 Y*
4CX 4CX 2C CD 45 Y*	1-1/2 CXCXCXC CD 45 DOUBLE Y



**Subject Copper Pipe Fittings – Caps and Cleanouts**

1-1/2 CXC/O CD TUBE END CLEANOUT*	3 CD CXC/O TUBE END CLEANOUT*
3 FTGXC/O CD CLEANOUT - FLUSH TYPE*	4 FTGXC/O CD CLEANOUT - FLUSH TYPE*
1-1/4 FTGXC/O CD CLEANOUT - FULL PLUG*	1-1/2 FTGXC/O CD CLEANOUT - FULL PLUG*
2 FTGXC/O CD CLEANOUT - FULL PLUG*	3 FTGXC/O CD CLEANOUT - FULL PLUG*
4 FTGXC/O CD CLEANOUT - FULL PLUG*	1-1/4 CXCO WD TUBE END CLEANOUT*
1-1/2 CXCO WD TUBE END CLEANOUT*	2 CXCO WD TUBE END CLEANOUT*
3 CXCO WD TUBE END CLEANOUT*	1-1/4 WD FLUSH FTGXCO CLEANOUT*
1-1/2 FTGXCO WD CLEANOUT-FLUSH TYPE*	1-1/2 X 1 FTGXCO WD CLEANOUT - FLUSH*
2 FTGXCO WD CLEANOUT-FLUSH TYPE*	1-1/4 FTGXCO WD CLEANOUT FULL PLUG*
1-1/2 FTGXCO WD CLEANOUT FULL PLUG*	2 FTGXCO WD CLEANOUT FULL PLUG*

Place of Hearing:	Ottawa, Ontario (file hearing)
Date of Hearing:	July 5, 2022
Tribunal Panel:	Randolph W. Heggart, Presiding Member Peter Burn, Member Frédéric Seppey, Member
Tribunal Secretariat Staff:	Kirsten Goodwin, Counsel Isaac Turner, Counsel Mark Howell, Lead Analyst Erin Stach, Analyst Andrew Wigmore, Analyst Marie-Josée Monette, Data Services Advisor Kim Gagnon-Lalonde, Acting Senior Registrar Officer Rekha Sobhee, Registrar Officer

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## STATEMENT OF REASONS

### INTRODUCTION

[1] The Canadian International Trade Tribunal has conducted an expiry review of its orders made on November 28, 2016, in expiry review RR-2015-003, continuing, with amendment, its orders made on February 17, 2012, in expiry review RR-2011-001, continuing, without amendment, its findings made on February 19, 2007, in inquiry NQ-2006-002, concerning the dumping of certain solder joint pressure pipe fittings and solder joint drainage, waste and vent pipe fittings, made of cast copper alloy, wrought copper alloy or wrought copper, for use in heating, plumbing, air conditioning and refrigeration applications (CPF), originating in or exported from the United States of America (United States), the Republic of Korea (South Korea) and the People's Republic of China (China) and the subsidizing of such goods originating in or exported from China (subject goods), excluding copper-iron high-pressure alloy fittings manufactured with UNS C19400 grade copper alloy and with safe working pressure up to 1740 psi.

[2] This expiry review is undertaken pursuant to subsection 76.03(3) of the *Special Import Measures Act* (SIMA).<sup>1</sup> The Tribunal must determine whether the expiry of the orders in expiry review RR-2015-003 (Orders) is likely to result in injury or retardation,<sup>2</sup> as defined under SIMA.<sup>3</sup> If the expiry of the Orders is likely to result in injury or retardation, the Tribunal must continue the Orders. If the expiry of the Orders is unlikely to result in injury, the Tribunal must rescind the Orders.<sup>4</sup>

### PROCEDURAL BACKGROUND

[3] The Tribunal issued its notice of expiry review on November 8, 2021.<sup>5</sup> Consequently, on November 9, 2021, the President of the Canada Border Services Agency (CBSA) initiated an investigation to determine whether the expiry of the Orders was likely to result in the continuation or resumption of dumping or subsidizing of the subject goods.

[4] On April 7, 2022, the CBSA determined that rescinding the Orders in respect of the subject goods originating in or exported from the United States, South Korea and China is likely to result in the continuation or resumption of dumping of the subject goods in Canada.<sup>6</sup> The CBSA also determined that rescinding the Order relating to subject goods originating in China is likely to result in the continuation or resumption of subsidizing.<sup>7</sup>

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<sup>1</sup> R.S.C., 1985, c. S-15. Certain SIMA provisions were amended by the *Budget Implementation Act, 2022, No. 1*, S.C. 2022, c. 10 (BIA 2022), which came into force on June 23, 2022. Pursuant to the transitional provision in section 211 of the BIA 2022, this expiry review is conducted under SIMA as it read before June 23, 2022.

<sup>2</sup> Subsection 76.03(10) of SIMA.

<sup>3</sup> Subsection 2(1) of SIMA states that “*injury* means material injury to a domestic industry” and “*retardation* means material retardation of the establishment of a domestic industry”.

<sup>4</sup> Subsection 76.03(12) of SIMA.

<sup>5</sup> Exhibit RR-2021-003-02. The Tribunal issued a revised notice of expiry review on June 24, 2022. Exhibit RR-2021-003-02.A.

<sup>6</sup> Exhibit RR-2021-003-03 at 1.

<sup>7</sup> *Ibid.*

[5] On April 8, 2022, the Tribunal notified known domestic producers and importers, as well as known foreign producers, that it would conduct an expiry review. The period of review (POR) for this expiry review is from January 1, 2019, to December 31, 2021.

[6] The Tribunal asked the domestic and foreign producers and certain importers to complete questionnaires; the Tribunal received one response to the domestic producers' questionnaire and eleven responses to the importers' questionnaire (including one from the self-identified domestic producer) but did not receive any replies to the foreign producers' questionnaire.<sup>8</sup> Tribunal staff prepared an Investigation Report based on the questionnaire replies and other information on the Tribunal's record for this proceeding. The report was placed on the record and distributed to parties.

[7] Cello Products Inc. (Cello), a domestic producer of CPF, and the United Steelworkers (USW), a trade union with members employed by Cello, filed submissions, including witness statements, supporting the continuation of the Orders. The Tribunal did not receive any submissions opposed to continuing the Orders. Cello and the USW are the sole parties to this proceeding.

[8] By letter dated June 16, 2022, the Tribunal asked the parties for their views on holding a hearing by way of written submissions (file hearing) without the presence of the parties. The parties provided their views and did not object to a file hearing. After taking the parties' views into account, the Tribunal decided to proceed with a file hearing. The Tribunal sent the file hearing procedures to the parties in a letter dated June 23, 2022. The procedures permitted the parties to file closing arguments at their discretion and reserved the Tribunal's right to request additional evidence or submissions.

[9] On June 24, 2022, the Tribunal asked Cello for additional information regarding its allocation of costs to its domestic and export sales of CPF. Cello provided the information on June 30, 2022. On July 4, 2022, Cello filed its closing arguments. The USW did not file closing arguments.

[10] The Tribunal held the file hearing on July 5, 2022.

## **PRODUCT**

### **Product definition**

[11] The product definition includes CPF as identified in the appendix to the orders above, subject to the exclusion of copper-iron high-pressure alloy fittings manufactured with UNS C19400 grade copper alloy and with safe working pressure up to 1740 psi.

### **Product information<sup>9</sup>**

[12] Solder joint CPF are used to connect copper pipes, tubes or other fittings to one another. The methods of joining copper fittings include soldering, silver brazing and epoxy or similar gluing techniques. The connections are made by fitting two pieces together and heating the ends of the tubing and fitting, as well as filling the gap between the two with melted solder, which solidifies on cooling to form a strong, leakproof connection. The fittings can also be used to connect copper

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<sup>8</sup> Exhibit RR-2021-003-05 at 5–7.

<sup>9</sup> This section is sourced from the CBSA Statement of Reasons, concerning an expiry review determination, entitled Certain Copper Pipe Fittings Originating in or Exported from the United States of America, the Republic of Korea and the People's Republic of China; Exhibit RR-2021-003-03.A at paras. 25–29.

tubing to other metal systems by use of threaded fittings. However, at least one end of a fitting is always soldered. Finally, the connection can also be made using epoxy or similar gluing methods.

[13] Solder joint copper pipe pressure fittings may be used in conveying liquids (e.g. potable water), gases and air under pressure in residential, industrial, commercial and institutional buildings. Copper pipe pressure fittings are also used in a variety of air conditioning and refrigeration applications. The types of fittings used in air conditioning applications are typically identified by reference to their outside diameters, whereas the same fittings used in non-air conditioning applications, such as plumbing and heating, are typically identified by reference to their inside or “nominal” diameters. Apart from the reference to diameter, a fitting for an air conditioning application is the same as a fitting for a non-air conditioning application.

[14] Solder joint copper pipe drainage, waste and vent (DWV) fittings are used primarily to convey waste from buildings to sewers and for venting purposes under low-pressure conditions.

[15] Female and male adapters are used to connect a copper tube to an iron pipe or a water heater. Other adapters include ferrules that are used to join a copper tube to a cast-iron pipe in older installations. Bushings are used to reduce the diameter of other fittings. Couplings are used to join tubes of either the same size or two different sizes to make longer runs through buildings. Elbows are used to change the direction of a copper tube. Flanges and unions are used to provide a connection that can be either unscrewed or unbolted for maintenance or repairs. Tees are used to allow a copper line to be split into two separate lines. There are pressure tees and drainage tees; TYs (90°) and Ys (45°). Traps are used to trap water to prevent sewer gases from coming back into a building. Cleanouts are used to provide access to drainage systems in case of blockage; and caps are removable plugs used to permit inspection and access for the purpose of clearing an obstruction.

[16] Solder joint pipe fittings manufactured in Canada and the United States are made to the standards of the American Society of Mechanical Engineers/American National Standards Institute and to the standards of the Manufacturers Standardization Society.

## LEGAL FRAMEWORK

[17] Subsection 76.03(10) of SIMA requires the Tribunal to determine whether expiry of the Orders is likely to result in injury to, or retardation of, a domestic industry.<sup>10</sup> If the Tribunal determines that injury is likely to result if the Orders expire, it must continue them with or without amendment; if it determines that no injury is likely, the Tribunal must rescind the Orders.<sup>11</sup>

[18] The Tribunal must make several findings before it analyzes the likelihood of injury. Specifically, the Tribunal must consider whether there are domestically produced goods that are “like goods” and whether there is more than one class of goods. Where there are like goods, the Tribunal must consider what constitutes the “domestic industry”. Additionally, the Tribunal must consider whether it is appropriate to assess the cumulative effect of the dumping or subsidizing of the subject goods.<sup>12</sup> The Tribunal’s findings on these matters follow below.

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<sup>10</sup> Subsection 2(1) of SIMA defines “injury” as “material injury to the domestic industry” and “retardation” as “material retardation of the *establishment* of a domestic industry” [emphasis added]. There is an established domestic industry in this review, so there is no issue regarding a likelihood of retardation.

<sup>11</sup> Subsection 76.03(12) of SIMA.

<sup>12</sup> Subsection 76.03(11) of SIMA.

## LIKE GOODS AND CLASSES OF GOODS

[19] To determine whether resumed or continued dumping or subsidizing of the subject goods is likely to cause material injury to domestic producers of like goods, the Tribunal must determine which domestically produced goods, if any, constitute like goods in relation to the subject goods. The Tribunal must also assess whether there is more than one class of goods within the subject goods and like goods.<sup>13</sup>

[20] Subsection 2(1) of SIMA defines “like goods”, in relation to any other goods, as follows:

(a) goods that are identical in all respects to the other goods, or

(b) in the absence of any goods described in paragraph (a), goods the uses and other characteristics of which closely resemble those of the other goods.

[21] In deciding the issue of like goods when the goods in issue are not identical in all respects, the Tribunal typically considers a number of factors, including the physical characteristics of the goods (e.g. composition and appearance) and market characteristics (e.g. substitutability, pricing, distribution channels, end uses and whether the goods fulfill the same customer needs).<sup>14</sup>

[22] In inquiry NQ-2006-002, the Tribunal found that, while the CPF in issue were not identical, they had similar physical and market characteristics; therefore, the domestically produced goods were like goods to the subject goods. The Tribunal also found that CPF characteristics including technical standards, composition, appearance, pricing and end use indicated a single class of goods. The Tribunal made the same findings in expiry reviews RR-2011-001 and RR-2015-003. Cello submits that there is no evidence warranting a departure from the Tribunal’s previous conclusions.

[23] There is no evidence in the present expiry review that demonstrates a change in the conditions and circumstances previously considered by the Tribunal. The Tribunal is satisfied that there is no evidence or reason that would cause it to vary from its findings in the previous inquiry and expiry reviews. Accordingly, the Tribunal finds that domestically produced CPF are like goods in relation to the subject goods and that CPF comprise a single class of goods.

## DOMESTIC INDUSTRY

[24] Subsection 2(1) of SIMA defines “domestic industry” as follows:

... the domestic producers as a whole of the like goods or those domestic producers whose collective production of the like goods constitutes a major proportion of the total domestic production of the like goods except that, where a domestic producer is related to an exporter or importer of dumped or subsidized goods, or is an importer of such goods, **domestic industry** may be interpreted as meaning the rest of those domestic producers.

<sup>13</sup> Should the Tribunal determine that there is more than one class of goods in this expiry review, it must conduct a separate injury analysis and make a decision for each class that it identifies. See *Noury Chemical Corporation and Minerals & Chemicals Ltd. v. Pennwalt of Canada Ltd. and Anti-dumping Tribunal*, [1982] 2 F.C. 283 (FC).

<sup>14</sup> See, for example, *Copper Pipe Fittings* (19 February 2007), NQ-2006-002 (CITT) [CPF 2006] at para. 48.

[25] Therefore, the Tribunal must determine whether there is a likelihood of injury to the domestic producer(s) as a whole or those domestic producers whose production represents a major proportion of the total production of like goods.

[26] Cello is the only domestic producer of CPF.<sup>15</sup> In its most recent CPF expiry review, the Tribunal found that Cello was the sole domestic producer after a second producer ceased operations in 2013.<sup>16</sup> The Tribunal sees no evidence or reason that would cause it to vary from the finding in that review, a finding which did not deviate from the Tribunal's findings in the prior expiry review and inquiry.

## CUMULATION AND CROSS-CUMULATION

[27] Subsection 76.03(11) of SIMA provides that the Tribunal must assess “the cumulative effect of the dumping or subsidizing of goods . . . that are imported into Canada from more than one country if the Tribunal is satisfied that an assessment of the cumulative effect would be appropriate taking into account the conditions of competition . . .” between the goods imported into Canada from any of the countries and the goods from any other countries or between those goods and the like goods.

[28] When examining the conditions of competition, the Tribunal typically considers a range of factors, including interchangeability of the subject goods from each country with the subject goods from the other countries or with the like goods; the presence or absence of sales of subject goods from different countries and of the like goods in the same geographic market; and common or similar distribution channels or means of transportation.<sup>17</sup> This list is not exhaustive, and no single factor is determinative.<sup>18</sup> Also, the Tribunal assesses the conditions of competition prospectively, premised on the likelihood that if a finding or order expires, subject goods from all subject countries will be present in the domestic market.<sup>19</sup>

[29] The CBSA has found that rescinding the Orders is likely to result in the continuation or resumption of dumping of the subject goods from South Korea, the United States and China. The CBSA also found that rescinding the Orders is likely to result in the continuation or resumption of imports of subsidized subject goods from China.<sup>20</sup>

[30] Cello does not argue for a particular approach to cumulation and cross-cumulation. Rather, Cello submits that it expects the Tribunal to follow its recent approach to these matters by examining the effects of dumped subject goods from the United States and South Korea cumulatively and to examine the effects of dumped and subsidized goods from China separately.

[31] The USW asks the Tribunal to cumulate the effects of dumped subject goods from the United States and South Korea together with the effects of the dumped and subsidized goods from China.

<sup>15</sup> See Cello's case brief in Exhibit RR-2021-003-A-01 at para. 7.

<sup>16</sup> *Copper Pipe Fittings* (28 November 2016), RR-2015-003 (CITT) [*CPF 2015*] at paras. 21–22.

<sup>17</sup> *CPF 2006* at para. 73; *Flat Hot-rolled Carbon and Alloy Steel Sheet and Strip* (13 May 2022), RR-2021-001 (CITT) at para. 47.

<sup>18</sup> *CPF 2006* at para. 73; *Corrosion-resistant Steel Sheet* (21 February 2019), NQ-2018-004 (CITT) at para. 45.

<sup>19</sup> *Hot-rolled Carbon Steel Plate* (9 January 2008), RR-2007-001 (CITT) at para. 48; *Carbon Steel Welded Pipe* (24 July 2001), RR-2000-002 (CITT) at 6–7; *Welded Large Diameter Carbon and Alloy Steel Line Pipe* (3 August 2022), RR-2021-002 (CITT) at para. 61.

<sup>20</sup> Exhibit RR-2021-003-03 at 1.

The USW asserts that large CPF producers in the United States and China are manipulating the market through cross-ownership which, according to the USW, the law concerning cumulation is designed to disallow. The USW argues that the only relevant consideration for the Tribunal to decide whether to cumulate and cross-cumulate is the conditions of competition between the subject goods and between the subject goods and the like goods.<sup>21</sup>

[32] In the circumstances of this review, the Tribunal will examine the cumulative effects of dumped subject goods from the United States and South Korea. The cross-cumulative effects of dumped and subsidized goods from China will be examined on their own.

[33] The Tribunal considers it appropriate to cumulate the effects of dumped subject goods from the United States and South Korea because there is no dispute that such goods are interchangeable with each other and with the like goods; compete with each other and with the like goods in the domestic market; and do not have differences in distribution channels or modes of transportation that operate so as to limit the subject goods to a market segment or geographic region. Nothing on the record suggests that these conditions of competition have changed, or are likely to change, in the near to medium future.

[34] In examining the effects of the subject goods from China separately from the effects of the subject goods from the United States and South Korea, the Tribunal considers it appropriate to cross-cumulate the effects of dumped and subsidized subject goods from China. Nothing on the record provides a basis for the Tribunal to isolate effects arising from dumping from those arising from subsidizing of the same goods from the same country. The Tribunal has consistently found that cross-cumulation is appropriate in such specific circumstances.<sup>22</sup>

[35] The Tribunal acknowledges the USW's position that the effects of imports of the subject goods from all three countries, irrespective of whether they are dumped or subsidized, should be cumulated. This approach was rejected by the majority in *Concrete Reinforcing Bar* (and similar cases).<sup>23</sup> The Tribunal finds no reason to diverge from that precedent and to follow instead the approach suggested by the USW.

## LIKELIHOOD OF INJURY ANALYSIS

[36] An expiry review is forward-looking.<sup>24</sup> It follows that evidence from the period during which an order or a finding was being enforced is relevant insofar as it bears upon the prospective analysis of whether the expiry of the order or finding is likely to result in injury.<sup>25</sup>

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<sup>21</sup> The USW cites dissenting views in certain Tribunal decisions, such as in *Carbon Steel Screws* (2 September 2020), RR-2019-002 (CITT) [*Carbon Steel Screws*].

<sup>22</sup> *Carbon Steel Welded Pipe* (28 March 2019), RR-2018-001 (CITT) at para. 29; *Concrete Reinforcing Bar* (14 October 2020), RR-2019-003 (CITT) at para. 90.

<sup>23</sup> (14 October 2020), RR-2019-003 (CITT). See also *Carbon Steel Welded Pipe* (15 October 2018), RR-2017-005 (CITT); *Carbon Steel Screws*.

<sup>24</sup> *Certain Dishwashers and Dryers* (9 May 2005), RR-2004-005 (CITT) at para. 16.

<sup>25</sup> *Copper Pipe Fittings* (17 February 2012), RR-2011-001 (CITT) at para. 56. In *Thermoelectric Containers* (9 December 2013), RR-2012-004 (CITT) [*Thermoelectric Containers*] at para. 14, the Tribunal stated that the analytical context pursuant to which an expiry review must be adjudged often includes the assessment of retrospective evidence supportive of prospective conclusions. See also *Aluminum Extrusions* (17 March 2014), RR-2013-003 (CITT) [*Aluminum Extrusions*] at para. 21.



[37] There is no presumption of injury in an expiry review; findings must be based on positive evidence. In the context of an expiry review, positive evidence includes evidence based on past facts that tend to support forward-looking conclusions.<sup>26</sup>

[38] To assess the likelihood of injury, the Tribunal typically focuses on circumstances that can reasonably be expected to exist in the near to medium term (e.g. 12 to 18 months or 12 to 24 months from the date on which the Orders could be rescinded).<sup>27</sup> Cello submitted that the Tribunal should focus on what can reasonably be foreseen over the next 12 to 18 months,<sup>28</sup> as it did in the last CPF expiry review.<sup>29</sup> Cello argued that such a time frame is appropriate because there is limited information available providing useful forecasts for CPF, and the current expiry review is being undertaken in a period of heightened post-pandemic economic uncertainty.<sup>30</sup> The Tribunal agrees with the reasoning provided by Cello and will therefore conduct its analysis looking forward to the next 12 to 18 months.

[39] Subsection 37.2(2) of the *Special Import Measures Regulations*<sup>31</sup> (Regulations) lists factors that the Tribunal may consider in assessing the likelihood of injury in cases where the CBSA has determined that expiry of an order or finding was likely to result in continued or resumed dumping or subsidizing. The factors that the Tribunal considers relevant in this expiry review are discussed below in the context of assessing the effect of the likely continued or resumed dumping of the subject goods from the United States and South Korea and the effect of the likely continued or resumed dumping and subsidizing of the subject goods from China.

### **Changes in market conditions**

[40] To assess the likely volumes and price effects of the subject goods and their impact on the domestic industry if the Orders were rescinded, the Tribunal will first consider changes in international and domestic market conditions.<sup>32</sup>

#### International market conditions

[41] As previously recognized by the Tribunal,<sup>33</sup> demand for CPF is largely driven by activity in the non-residential construction sector.<sup>34</sup> In turn, construction is affected by the state of the global economy.<sup>35</sup>

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<sup>26</sup> *Thermoelectric Containers* at para. 14; *Aluminum Extrusions* at para. 21.

<sup>27</sup> *CPF 2015* at para. 47; *Hot-rolled Carbon Steel Plate and High-strength Low-alloy Steel Plate* (31 October 2019), RR-2018-007 (CITT) at para. 42; *Hot-rolled Carbon Steel Plate and High-strength Low-alloy Steel Plate* (10 November 2020), RR-2019-004 (CITT) at para. 34.

<sup>28</sup> Exhibit RR-2021-003-A-01 at para. 12.

<sup>29</sup> *CPF 2015* at para 47.

<sup>30</sup> Cello cites *Wood Slats (Re)* (15 July 2009), RR-2008-003 (CITT) at para. 45.

<sup>31</sup> SOR/84-927.

<sup>32</sup> Paragraph 37.2(2)(j) of the Regulations.

<sup>33</sup> *CPF 2015* at para. 19; Exhibit RR-2021-003-A-03 at para. 27.

<sup>34</sup> *CPF 2015* at para. 50. See also Exhibit RR-2021-003-A-03 at para. 27.

<sup>35</sup> Exhibit RR-2021-003-A-03 at para. 27.

[42] According to the World Bank, global economic growth was relatively stable from 2017 to 2019, then contracted in 2020.<sup>36</sup> Specifically, world gross domestic product (GDP) increased by 3.4 percent in 2017, 3.3 percent in 2018, and 2.6 percent in 2019 and then decreased by 3.3 percent in 2020.<sup>37</sup> No World Bank data was available for 2021.

[43] Looking forward, general economic growth is expected to slow over the 2022/2023 period, in part due to inflationary pressures and the termination of economic support programs from the COVID-19 pandemic.<sup>38</sup> The World Bank indicates that after rebounding to an estimated 5.5 percent in 2021, global growth is expected to decelerate to 4.1 percent in 2022 and soften further to 3.2 percent in 2023.<sup>39</sup> The World Bank notes that various downside risks cloud the outlook, including the continued spread of COVID-19, continued supply strains, and continued inflation surprises.<sup>40</sup> The International Monetary Fund (IMF) makes similar global projections<sup>41</sup> and projects a slowdown in GDP for the United States, South Korea and China.<sup>42</sup>

[44] Regarding non-residential construction in the subject countries, there is evidence indicating that, in the United States, non-residential construction activity declined in 2020.<sup>43</sup> A rebound occurred in 2021.<sup>44</sup> Non-residential construction starts are forecast to increase in 2022 and 2023 (although lower spending is expected to persist in some parts of the sector).<sup>45</sup> For South Korea, there is evidence indicating that following a decrease in 2021 and part of 2022, construction output for the remainder of 2022 and in 2023 is forecast to increase modestly.<sup>46</sup> For China, there is evidence indicating that following a decrease in early 2022, GDP from construction will increase modestly over the remainder of 2022 and in 2023.<sup>47</sup>

[45] Finally, the Tribunal notes that the COMEX price of copper has increased markedly since 2019. Although the evidence indicates a slight decline in the price at the beginning of the pandemic in March 2020, the price increased between the second quarter of 2020 and the early part of 2022.<sup>48</sup>

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<sup>36</sup> Exhibit RR-2021-003-A-03 at para. 28, citing “GDP growth (annual %) – World”, The World Bank, online: <<https://data.worldbank.org/indicator/NY.GDP.MKTP.KD.ZG?end=2020&locations=1W&start=2017>>.

<sup>37</sup> *Ibid.*

<sup>38</sup> *Ibid.* at para. 29, citing the World Bank Group Flagship Report, “January 2022 - Global Economic Prospects” (Exhibit RR-2021-003-A-03 at 49).

<sup>39</sup> *Ibid.* at para. 29, at 49.

<sup>40</sup> *Ibid.* at 49, 53, 57.

<sup>41</sup> *Ibid.* at para. 30, citing “World Economic Outlook”, International Monetary Fund, April 2022 (Exhibit RR-2021-003-A-03 at 273).

<sup>42</sup> *Ibid.* at para. 30, at 313–314.

<sup>43</sup> *Ibid.* at 461.

<sup>44</sup> *Ibid.*

<sup>45</sup> *Ibid.*

<sup>46</sup> *Ibid.* at 17.

<sup>47</sup> *Ibid.* at 18–19.

<sup>48</sup> *Ibid.* at 20–21.

### Domestic market conditions

[46] The IMF projects that in Canada, real GDP will increase by 3.9 percent in 2022 and 2.8 percent in 2023, compared to 4.6 percent in 2021.<sup>49</sup>

[47] Regarding non-residential building permits in Canada, the value decreased by 17 percent in 2020 and then rebounded by 19 percent in 2021.<sup>50</sup> While Statistics Canada building permit data reflect a 60 percent increase in value in the first quarter of 2022 over the first four months of 2021,<sup>51</sup> there are no accurate forecasts for domestic non-residential construction in the coming years. Therefore, the Tribunal has no evidence establishing that the domestic demand for CPF will increase in the next 12 to 18 months.

[48] As noted previously by the Tribunal, the domestic market for CPF is relatively small and mature.<sup>52</sup> The information provided by market participants indicates that the Canadian market for CPF grew over the POR.<sup>53</sup>

[49] The total market in Canada for CPF increased by 10 percent in 2020 and by 55 percent in 2021, when measured in pieces, and increased by 8 percent in 2020 and by 38 percent in 2021, when measured in pounds.<sup>54</sup> In terms of the number of pieces within the market, this grew by 71 percent between 2019 and 2021, while it only expanded by 49 percent when measured in pounds.<sup>55</sup>

[50] During the POR, a notable change in the domestic market was the presence and increase in the volume of non-subject imports from Thailand. In a written statement, the Vice-President of Sales and Marketing for Cello, Peter Howell, indicated that Thailand has emerged as the “latest source of low-price[d] imports” and described the increase in the volume of imports from Thailand in recent years as “[a] very important Canadian market development from Cello’s perspective”.<sup>56</sup>

[51] The United States and South Korea maintained a constant but minor presence in the domestic market during the POR. Subject imports from China increased their market share between 2019 and 2021; there were corresponding losses in market share from the domestic producer and non-subject imports.<sup>57</sup>

### **Likely import volume of the subject goods if the Orders were rescinded**

[52] Paragraph 37.2(2)(a) of the Regulations directs the Tribunal to consider the likely volume of the dumped or subsidized goods if the Orders were rescinded, in particular consider whether there is likely to be a significant increase in the volume of imports of the dumped or subsidized goods, either in absolute terms or relative to the production or consumption of like goods.

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<sup>49</sup> *Ibid.* at 314.

<sup>50</sup> *Ibid.* at 481.

<sup>51</sup> *Ibid.*

<sup>52</sup> *CPF 2015* at para. 59.

<sup>53</sup> Exhibit RR-2021-003-06 (protected), Table 9.

<sup>54</sup> Exhibit RR-2021-003-05, Table 10.

<sup>55</sup> *Ibid.*

<sup>56</sup> Exhibit RR-2021-003-A-03 at para. 38.

<sup>57</sup> Exhibit RR-2021-003-06 (protected), Tables 11–12.

[53] The Tribunal's assessment of the likely volume of dumped or subsidized imports encompasses the likely performance of the foreign industry, the potential for the foreign producers to produce goods in facilities that are currently used to produce other goods, evidence of the imposition of anti-dumping and/or countervailing measures in other jurisdictions, and whether measures adopted by other jurisdictions are likely to cause a diversion of the subject goods to Canada.<sup>58</sup>

[54] Cello argued that the subject countries have excess production capacity that will lead to a significant increase in the volume of imports of subject goods if the Orders were rescinded. In the absence of replies to the questionnaire from foreign producers for the United States, Cello relied on information gathered during the last expiry review (RR-2015-003) which showed that United States producers had excess capacity that was almost 10 times the size of the Canadian market in 2021.<sup>59</sup> Cello submitted that, while the volume of imports from the United States is currently low relative to historical levels because of the Orders, proximity to the Canadian market would permit producers in the United States to increase their market share if the Orders expire. Cello further asserted that the diversion of even a small part of such excess capacity to Canada would be significant.

[55] Regarding South Korea, Cello referred to the Tribunal's finding in the last expiry review noting that a major producer in South Korea, Jungwoo, had substantial excess capacity and that South Korea was historically the most important source of imports of CPF. Peter Howell indicated that Jungwoo has previously advertised an annual production capacity of over 300 million pieces while also highlighting the company's export orientation.<sup>60</sup> Cello estimated that, even if Jungwoo were currently operating at 70 percent capacity, it would have sufficient unused capacity to supply the entire Canadian market. Cello further argued that a flat demand forecast in South Korea means that exporters will be interested in exporting to Canada if the Orders expire.

[56] Cello argued that China has "enormous" excess production capacity. As an example, Peter Howell provided the profile for a company (Hailiang) based in China that promotes itself as one of the world's largest producers of copper products, including CPF.<sup>61</sup> Peter Howell stated that there is no projected future increased demand that could absorb significant excess capacity any time soon.<sup>62</sup> Cello submitted that, if the Orders expire in such circumstances, China's excess capacity could be diverted to Canada, which would mean a significant increase in the volume of imports of subject goods. Cello further submitted that subject goods imported from China already have a foothold in the Canadian market. Peter Howell cited Hailiang as an example of a large Chinese export-orientated producer with an interest in the Canadian market.<sup>63</sup> Peter Howell explained that, following Canada's imposition of trade measures against CPF from China and Vietnam, Hailiang opened a CPF manufacturing operation in Thailand.<sup>64</sup>

[57] Cello provided evidence of construction forecasts for the United States and South Korea in 2022 and 2023. Peter Howell submitted that non-residential construction in the United States is expected to remain below 2019 levels in the next couple of years.<sup>65</sup> Peter Howell also submitted a study showing that the value of non-residential construction starts in the United States declined in

<sup>58</sup> Paragraphs 37.2(2)(a), (d), (f), (h) and (i) of the Regulations.

<sup>59</sup> Exhibit RR-2021-003-09 (protected), Table 25; Exhibit RR-2021-003-06 (protected), Table 9.

<sup>60</sup> Exhibit RR-2021-003-A-03 at para. 43.

<sup>61</sup> *Ibid.* at para. 47.

<sup>62</sup> *Ibid.* at para. 49.

<sup>63</sup> *Ibid.* at para. 48.

<sup>64</sup> *Ibid.* at paras. 38, 48.

<sup>65</sup> *Ibid.* at paras. 31–32, 461.

2019 and 2020, before rebounding in 2021. While the value of non-residential construction starts is forecast to increase in 2022, the same study maintains that “[a] great impact of the pandemic on construction is the massive reduction in nonresidential construction starts in 2020. Those lower starts reduced nonresidential construction spending in 2020, but more-so in 2021, and in some markets will extend lower spending into 2022 and 2023.”<sup>66</sup> The study submitted by Cello shows that, while non-residential construction spending (adjusted for inflation) is expected to increase through 2022 and 2023, it will remain below 2019 levels.<sup>67</sup> As of March 2022, such spending was 16 percent below the February 2020 peak.<sup>68</sup> With respect to South Korea, Peter Howell characterized the expected 3.2 percent growth in 2023 as “flat at best”.

[58] Cello submitted that some American and South Korean CPF exporters have distribution arms in Canada and/or existing commercial relationships with Canadian importers.<sup>69</sup> It argued that the combination of excess capacity, negative or flat construction forecasts, and existing long-standing relationships with Canadian importers means that, if the Orders expire, the volume of imported subject goods from the United States and South Korea will increase significantly. Peter Howell indicated that some American and South Korean exporters currently have related distribution entities physically located in Canada, stating that “Mueller Industries (‘Mueller’) is probably the largest producer of CPF in the United States and the company distributes these products in Canada through its wholly owned subsidiary, Great Lakes Copper in London, Ontario. In 2016, Mueller purchased a controlling interest in Jungwoo, which is the largest producer of CPF in South Korea and continues to export to Canada.”

[59] With respect to China, Cello submitted that the evidence forecasts that construction growth in China will only increase moderately in the near term,<sup>70</sup> making it likely that Chinese exporters of CPF will continue to rely heavily on export markets.

[60] Regarding the volume of imports from China during the POR, Cello pointed to the 108 percent increase in the volume of subject goods (measured in pounds) from China in 2021. Cello submitted that the increase in imports resulted from normal values not reflecting existing copper prices, which were between 50 and 70 percent higher than during the last period when normal values were calculated. Cello argued that the price of copper increased significantly in 2021, which meant that the normal values set in 2019 (based on a 2018 period of investigation) were too low because they did not reflect the input price increase.

[61] The USW argued that, if the Orders expire, the constraints currently preventing an increased influx of dumped subject goods from the United States and South Korea, and dumped and subsidized goods from China, into Canada would be gone. As a result, subject goods would be able to compete with low-priced non-subject goods, resulting in large volumes of CPF imports from all three subject countries. The USW also compared pre-anti-dumping/countervailing measure CPF import volumes for subject and non-subject countries in 2005–2006, using the CBSA’s statement of reasons from the

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<sup>66</sup> *Ibid.* at 461.

<sup>67</sup> *Ibid.* at 469.

<sup>68</sup> *Ibid.*

<sup>69</sup> *Ibid.* at para. 21. According to Peter Howell: (i) Elkhart Products Ltd., a major United States producer of CPF, is owned by Alberts Industries which distributes plumbing products through its Canadian subsidiary, Conbraco Industries Canada; (ii) Mueller Industries, a major United States CPF producer, distributes in Canada through its wholly owned subsidiary, Great Lakes Copper; and (iii) Mueller purchased a controlling interest in Jungwoo in 2016; the latter still exports to Canada.

<sup>70</sup> Exhibit RR-2021-003-A-03 at para. 34.

original anti-dumping investigation, against import volumes over the current POR.<sup>71</sup> The USW's main argument is that the difference in import volumes from the subject countries prior to and after the imposition of duties shows the potential for injurious importation if the Orders were rescinded. Its submissions regarding excess/large export capacity in the subject countries, and commercial realities and involvement in the Canadian CPF market, mirrored those advanced by Cello.

[62] Additionally, the USW argued that Chinese producers' propensity for source shifting means that, if the Orders expire, it is likely that at least one Thai producer (a Hailiang company) will revert to exporting to Canada from its larger production facility in China. The USW also submitted that it is well established that in commodity product industries like CPF, where there are high fixed costs, there is an incentive to maintain high production and capacity utilization levels to achieve economies of scale. The USW submitted that, accordingly, weak demand or oversupply in a foreign producer's domestic market provides a clear economic incentive for a producer to export its production.

[63] Data collected for the Tribunal's Investigation Report demonstrate that, while the subject goods from the United States and South Korea maintained a relatively small share of the Canadian market for CPF during the POR, the subject goods from China continued to be a prevalent force in the Canadian market.<sup>72</sup>

[64] Import volumes of CPF from South Korea decreased from 2,350 pounds in 2019 to 871 pounds in 2021.<sup>73</sup> Volumes of imports from the United States were 55,389 pounds in 2019, 40,878 pounds in 2020, and 64,185 pounds in 2021.<sup>74</sup> Cumulatively, the total volume of imports from South Korea and the United States measured in pounds declined by 13 percent in 2020 and increased by 30 percent in 2021, for an increase of 13 percent over the POR.<sup>75</sup>

[65] The volume of Chinese imports peaked in 2021 at 2,277,441 pounds, more than doubling from the volume in 2020. Overall, the volume of subject goods from China measured in pounds increased by 89 percent over the POR.<sup>76</sup>

[66] Measured in pounds, the ratio of imports of subject goods to domestic production (or imports relative to domestic production) increased over the POR. For the cumulated imports from the United States and South Korea, the ratio increased modestly by less than 5 percentage points, while the ratio for China increased by almost 200 percentage points.<sup>77</sup>

[67] Relative to domestic sales of domestic production, imports of subject goods measured in pounds also increased over the POR. The ratio for the cumulated imports from South Korea and the United States increased by less than 10 percentage points, while the ratio for imports from China increased by just under 350 percentage points.<sup>78</sup>

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<sup>71</sup> Exhibit RR-2021-003-B-01 at 12; the USW provided two comparative tables.

<sup>72</sup> Exhibit RR-2021-003-06 (protected), Table 9.

<sup>73</sup> Exhibit RR-2021-003-05, Table 5.

<sup>74</sup> *Ibid.*

<sup>75</sup> *Ibid.*; Exhibit RR-2021-003-06 (protected), Table 5. When measured in pieces, the cumulated volume declined in 2020 but increased in 2021, for an increase of 50 percent over the POR.

<sup>76</sup> Exhibit RR-2021-003-05, Table 5; Exhibit RR-2021-003-06 (protected), Table 5. When measured in pieces, the increase over the POR was 134 percent.

<sup>77</sup> Exhibit RR-2021-003-06 (protected), Tables 4, 5. A similar trend is observed when volume is measured in pieces.

<sup>78</sup> Exhibit RR-2021-003-06 (protected), Tables 5, 9. A similar trend is observed when volume is measured in pieces.

[68] The Tribunal previously found both significant production capacity<sup>79</sup> and significant unused capacity<sup>80</sup> in all three subject countries, especially in relation to the size of the Canadian market. According to the CBSA, the size of the United States' production capacity, which increased between 2013 and 2015 while maintaining excess capacity, is significant when compared to the small size of the Canadian market for CPF.<sup>81</sup> The CBSA further indicates that there are multiple large CPF producers in South Korea, which is again significant when compared to the small Canadian CPF market.<sup>82</sup> Finally, the CBSA states that there are a large number of CPF producers in China.<sup>83</sup> Despite limited information on production capacity and capacity utilization of individual companies, the CBSA notes indications of immense production capacity in China as compared to the relatively small Canadian market.<sup>84</sup> In the absence of evidence indicating a decrease in production or unused capacity in the subject countries, and taking into account evidence from the CBSA and Peter Howell, the Tribunal finds no reason to revise its previous finding.

[69] The fact that CPF from each subject country continued to be imported into Canada over the POR while anti-dumping and countervailing measures were in place suggests that suppliers from the subject countries have well-established distribution channels in place. This, together with the indications of significant production and excess capacity, indicates that, if the Orders expire, the producers in the subject countries would be well positioned and therefore likely to continue or increase their sales of CPF to Canada.

[70] The Tribunal continues to believe that the demand for CPF is largely driven by activity in the non-residential construction sector.<sup>85</sup> Given the construction outlooks in the subject countries, the Tribunal finds that producers of CPF would likely increase exports to Canada to increase sales and market share if the Orders were rescinded.

[71] Apparently, Canada is currently the only country that has placed trade remedy measures on CPF from the subject countries. There is no evidence of trade remedy measures on CPF from the subject countries in any other jurisdictions. While the absence of such measures in other countries means that they would not be a contributing factor to a likely increase in imports of subject goods, this does not detract from the Tribunal's finding that industry and market conditions in the subject countries would likely result in an increase in imports from all subject countries if the Orders expired.

[72] Finally, the Tribunal considers Cello's argument that outdated normal values led to increased imports of subject goods from China in 2021. The Tribunal finds that such evidence demonstrates Chinese producers' inclination to increase low-priced CPF exports to Canada if the opportunity presents itself. Consequently, the Tribunal finds that, if the Orders are rescinded, thereby completely removing the anti-dumping and countervailing duties, imports of the subject goods from China are likely to increase significantly.

[73] In summary, the Tribunal finds that, if the Orders are rescinded, there will likely be a significant increase in the volume of the dumped subject goods from the United States and South

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<sup>79</sup> Exhibit RR-2021-003-01 at para. 73.

<sup>80</sup> *Ibid.* at paras. 74, 77.

<sup>81</sup> Exhibit RR-2021-003-03.A at paras. 114–115.

<sup>82</sup> *Ibid.* at paras. 131–132.

<sup>83</sup> *Ibid.* at para. 146.

<sup>84</sup> *Ibid.* at para. 146.

<sup>85</sup> *CPF 2015* at para. 19.

Korea, both in absolute terms and relative to domestic production and domestic consumption of the like goods, in the next 12 to 18 months. The Tribunal also finds that, if the Orders are rescinded, there will likely be a significant increase in the volume of the dumped and subsidized goods from China, both in absolute terms and relative to domestic production and domestic consumption of the like goods, in the next 12 to 18 months.

### **Likely price effects of the subject goods if the Orders were rescinded**

[74] The Tribunal must consider whether, if the Orders were rescinded, the dumping or subsidizing of the subject goods would be likely to significantly undercut the prices of like goods in the domestic market, depress those prices, or suppress them (by preventing price increases that would otherwise likely occur).<sup>86</sup> In this regard, the Tribunal distinguishes the price effects of the imported subject goods from any price effects that would likely result from other factors affecting prices.

#### Price undercutting

[75] Cello submitted that, if the Orders were rescinded, the subject goods would be compelled to compete with low-priced CPF from Thailand to maintain or increase their market share. Cello argued that China and Thailand significantly undercut domestic CPF selling prices (including the prices for CPF imported from the United States and South Korea) throughout the POR. It submitted that, if the Orders expire, Chinese exporters will step up the already intense pricing pressure to capture additional market share from importers who are currently splitting their orders with exporters in non-subject countries.

[76] Regarding likely price effects of dumped CPF from the United States and South Korea on domestic selling prices if the Orders expire, Cello submitted that the limited presence of those subject goods in the Canadian market indicates that American and South Korean producers cannot compete in Canada with normal values in place, which indicates that prices of goods from those countries would fall to compete with imports from Thailand and imports of subject goods from China no longer subject to anti-dumping and countervailing duties.

[77] The USW made a general argument that, if the Orders expire, subject goods could enter the Canadian market without duties and compete with low-priced CPF from Thailand, which would result in major price undercutting and price depression.

[78] The Investigation Report shows that, while the subject goods imported from the United States and South Korea were largely priced above the domestic unit prices in Canada,<sup>87</sup> unit prices of CPF imported from China were consistently below that of the domestic industry.<sup>88</sup> In the case of subject goods imported from China, the degree of undercutting increased in each period of the POR. However, the undercutting of domestic prices was most pronounced with non-subject goods imported from Thailand.<sup>89</sup>

[79] In the absence of opposing submissions, which could have more fully informed the Tribunal's analysis, the Tribunal finds that, if the Orders are rescinded, the prices of subject goods from all three countries will likely undercut the prices of like goods as the former compete to gain

<sup>86</sup> Paragraph 37.2(2)(b) of the Regulations.

<sup>87</sup> Exhibit RR-2021-003-06 (protected), Table 23.

<sup>88</sup> *Ibid.*

<sup>89</sup> *Ibid.*



market share. In the case of South Korea and the United States, this undercutting would likely occur in an attempt to re-enter the market in a meaningful manner with the objective of increasing market share. In the case of China, where the subject goods already undercut the like goods, the Tribunal expects the degree of undercutting would likely increase as Chinese subject goods compete with lower-priced Thai CPF, with a view to continuing the growth observed in 2021.

#### Price depression

[80] Although average selling prices of like goods increased over the POR,<sup>90</sup> Peter Howell gave examples of Cello lowering its prices to compete with imports,<sup>91</sup> including several examples of negotiations and correspondence with Cello customers over the POR.<sup>92</sup> These purport to show that Cello made pricing concessions to be competitive with quotes customers received from other importers offering lower-priced CPF from China and Thailand.

[81] In one instance, Cello estimated that its competitor's pricing was substantially lower, and Cello was unable to match or improve on the low pricing to earn the sale.<sup>93</sup> Another example indicates that Cello learned that it was unsuccessful in earning a sale because the winning competitor's bid regarding imported CPF from China and Thailand offered "significant[ly] lower pricing".<sup>94</sup>

[82] While average prices for like goods do not show that price depression occurred during the POR, the Tribunal finds it reasonable to conclude that Cello faced price competition from subject (and non-subject) goods during the POR. While no specific examples of price competition from the United States and South Korea were presented in Peter Howell's evidence, the activity outlined in the sales activity reports is to be expected in a price-sensitive market for a commodity product. Further to its finding that expiry of the Orders would lead to undercutting by imports from all three subject countries, the Tribunal finds that, if the Orders were rescinded, prices of imports from the United States and South Korea, and from China, would likely lead to price depression.

#### Price suppression

[83] Cello submitted that price undercutting data indicate that, if the Orders expire, CPF from the United States and South Korea will enter the Canadian market at prices that will prevent Cello from raising its prices in line with increases in the COMEX price of copper. Cello did not refer to price suppression in its submissions on likely prices of imports from China.

[84] Likewise, the USW submitted that, if the Orders expire, subject country producers could enter the Canadian market without duties and drop their prices to compete with low-priced CPF from Thailand, which would result in price suppression.

[85] The Tribunal considers that, while there is no clear evidence of price suppression in 2020, Cello's financial results, on both a per pound and per piece basis, reveal that Cello's increase in cost

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<sup>90</sup> *Ibid.*, Tables 23, 24.

<sup>91</sup> Exhibit RR-2021-003-A-04 (protected) at 474–601.

<sup>92</sup> *Ibid.*

<sup>93</sup> *Ibid.* at 517.

<sup>94</sup> *Ibid.* at 552.

of goods sold between 2020 and 2021 outpaced its increase in net selling value.<sup>95</sup> This resulted in a decline in gross margin between 2020 and 2021. This occurred concurrently with a 108 percent increase in volume of imports from China in 2021 at prices that undercut the like goods to a larger degree than they did in 2019 and 2021.<sup>96</sup>

[86] In light of its finding that prices of subject goods from the United States and South Korea as well as prices of subject goods from China would decline if the Orders were rescinded, the Tribunal also finds that the increased competition arising from subject goods imported from the United States and South Korea, and from China, would likely prevent Cello from increasing prices to recover increased costs. Thus, the Tribunal finds price suppression likely to result if the Orders expire.

[87] The Tribunal concludes that, if the Orders were rescinded, the dumped subject goods from the United States and South Korea would be likely to significantly undercut, depress and suppress the prices of the like goods over the next 12 to 18 months. The Tribunal also concludes that, if the Orders were rescinded, the dumped and subsidized subject goods from China would be likely to significantly undercut, depress and suppress the prices of the like goods over the next 12 to 18 months.

### **Likely impact on the domestic industry if the Orders were rescinded**

[88] The Tribunal will now assess the likely impact of the above volumes and price effects of the subject goods on the domestic industry if the Orders were rescinded, taking into consideration the recent performance of the domestic industry.<sup>97</sup> In this analysis, the Tribunal distinguishes the likely impact of the subject goods from the likely impact of any other factors affecting or likely to affect the domestic industry.<sup>98</sup>

#### Recent performance of the domestic industry

[89] While the Canadian market for CPF grew over the POR,<sup>99</sup> the evidence indicates that Cello's market share declined over the same period.<sup>100</sup> Peter Howell stated that Cello did not "participate" in that growth, pointing to Cello's declining market share over the POR.<sup>101</sup> Indeed, Cello's domestic production for domestic sales decreased by 7 percent in 2020 and 11 percent in 2021,<sup>102</sup> and domestic sales from domestic production declined by 23 percent in 2020 and a further 3 percent in 2021.<sup>103</sup> Cello notes that these declines occurred despite increases in the size of the domestic market of

<sup>95</sup> Exhibit RR-2021-003-06 (protected), Table 30. Data for 2020 indicate that any increase in cost did not exceed an increase in net sales value.

<sup>96</sup> Exhibit RR-2021-003-05, Table 6; Exhibit RR-2021-003-06 (protected), Table 23.

<sup>97</sup> Subsection 37.2(2) of the Regulations.

<sup>98</sup> Paragraph 37.2(2)(k) of the Regulations.

<sup>99</sup> Exhibit RR-2021-003-05 (protected), Table 9.

<sup>100</sup> Exhibit RR-2021-003-A-03 at para. 37, citing the Tribunal's Investigation Report (Exhibit RR-2021-003-05); Exhibit RR-2021-003-05 (protected).

<sup>101</sup> Exhibit RR-2021-003-A-03 at para. 37.

<sup>102</sup> Exhibit RR-2021-003-05, Table 4. Cello's domestic production for domestic sales declined by 14 percent in 2020 and a further 9 percent in 2021, when measured in pieces.

<sup>103</sup> Exhibit RR-2021-003-05, Table 10. Cello's domestic sales from domestic production declined by 28 percent in 2020 and increased by 7 percent in 2021, when measured in pieces.

8 percent in 2020 and 38 percent in 2021.<sup>104</sup> Nothing on the record indicates that Cello's market share has increased in 2022.

[90] In terms of financial performance, according to Peter Howell, income statements (relating to domestic sales from domestic production) from the POR show that Cello was and remains in a vulnerable financial position.<sup>105</sup> Peter Howell noted that Cello's overall financial performance in recent years is even worse than in the years leading up to expiry review RR-2015-003.<sup>106</sup> Cello submitted that, while its gross margins for domestic sales improved over the POR, that "improvement" should be considered in the context of significantly better performance on export sales. There is evidence that Cello's gross margins on export sales over the POR were significantly higher than for domestic sales.<sup>107</sup> Peter Howell expressed frustration that Cello could ship CPF to the United States and make a larger margin than what is made selling the same CPF in Canada.<sup>108</sup> Cello's financial data reflected in the Investigation Report confirms that its net income from domestic sales is poor, particularly when compared to net income from export sales.<sup>109</sup> Despite an improvement in net income from domestic sales over the POR as a whole, Cello's net income in 2021 decreased as compared to 2020.

[91] Regarding employment, Peter Howell stated that declining production volumes has resulted in fewer employees, with only 18 people currently directly involved in CPF production.<sup>110</sup> Assistant to the National Director of the USW, Meg Gingrich, stated in a witness statement that not only did Cello's CPF production staff decline by 14 percent over the POR, wages and hours worked also declined.<sup>111</sup>

[92] Looking forward, although Cello seems to be headed toward recovering from the worst of the pandemic, Peter Howell did not anticipate tremendous growth.<sup>112</sup> Instead, Peter Howell expected that, at best, Cello might see a return to a 2019 level of domestic sales from domestic production.<sup>113</sup>

[93] Nothing on the record contradicts the evidence submitted by Cello and the USW, nor is there anything establishing that the witness testimony is unreliable. The Tribunal finds that, despite the possibility of some post-pandemic recovery, Cello's performance over the POR indicates that it is currently in a vulnerable position.

#### Likely impact on the domestic industry if the Orders were rescinded

[94] Cello submitted that, if the Orders are rescinded, the volume of imports of the subject goods would increase and be sold in the domestic market at low prices to compete with low-priced CPF imported from non-subject countries. According to Cello, the result would be that the market share it

<sup>104</sup> Exhibit RR-2021-003-05, Table 10. The market increased by 10 percent in 2020 and by 55 percent in 2021, when measured in pieces.

<sup>105</sup> Exhibit RR-2021-003-A-03 at para. 66; Exhibit RR-2021-003-A-04 (protected) at para. 61.

<sup>106</sup> Exhibit RR-2021-003-A-03 at para. 66.

<sup>107</sup> Exhibit RR-2021-003-A-04 (protected) at paras. 61, 63.

<sup>108</sup> *Ibid.* at para. 64.

<sup>109</sup> Exhibit RR-2021-003-06 (protected), Tables 29–32.

<sup>110</sup> *Ibid.* at para. 69.

<sup>111</sup> Exhibit RR-2021-003-B-05 at para. 23, citing Table 37 of the Tribunal's Investigation Report (Exhibit RR-2021-003-05 at 43).

<sup>112</sup> Exhibit RR-2021-003-A-03 at para. 37.

<sup>113</sup> *Ibid.*

lost and the “anemic” gross margin returns it had on domestic sales during the POR would worsen. Cello asserted that the likely increase in the volume of low-priced CPF in the domestic market would have such a detrimental impact on its financial performance that Cello would likely be unable to continue to produce CPF.

[95] Cello submitted that its future as a CPF producer hinges on its ability to maintain a certain level of production and a certain gross margin in the domestic market. If CPF from the subject countries enters the Canadian market at low prices that would result from rescinding the Orders, Cello may have to cease production altogether. To demonstrate the likely impact of low-priced CPF imports, Cello gave an example of CPF imports from Thailand in 2021, which sold at prices per pound that were significantly lower than Cello’s.<sup>114</sup> Cello also provided a hypothetical example of what its income statements for 2021 would have looked like if it had reduced its domestic selling prices closer to (but not as far as) those of the Thai imports.<sup>115</sup> The example indicates a potentially major negative impact on Cello’s financial performance.

[96] The USW submitted that, if the Orders were rescinded, there would be imports into Canada of large volumes of low-priced subject goods. According to the USW, the subject countries would be free (and choose) to compete with low-priced non-subject goods from Thailand, which would result in major price undercutting, price depression and price suppression. The USW argues that such an outcome would threaten the viability of the domestic industry with a consequent adverse effect on its workers, because Cello would be unable to compete profitably and continue producing CPF.

[97] The Tribunal has found that, if the Orders expire, subject goods from the United States and South Korea would likely enter the Canadian market in significantly increased volumes and at prices that would undercut, depress and suppress prices of the like goods. As explained below, the likely impact on the domestic industry would be negative.

[98] The Tribunal finds that, if the Orders were rescinded, a decline in the domestic industry’s output and domestic sales would be likely. Cello’s financial position leaves the business vulnerable to an increased volume of low-priced CPF imports. The evidence shows that Cello loses sales when it cannot match competitors’ offers of low-priced CPF in the domestic market. Peter Howell stated that, “[i]f Cello is forced to further reduce its Canadian selling prices we will likely reach a point where we see overall losses on total production of copper pipe fittings and, at that point, the case for keeping the plant running is hard to make.”<sup>116</sup>

[99] Similarly, the Tribunal finds that, if the Orders were rescinded, the domestic industry’s capacity utilization and return on investment would likely decline. It is undisputed that Cello has unused capacity at its plant<sup>117</sup> and has made various investments in recent years.<sup>118</sup> However, in the absence of the Orders, Cello’s ability to compete in the primarily price-based competitive domestic market would likely further deteriorate as reflected in lower sales, profits and production, all of

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<sup>114</sup> Exhibit RR-2021-003-A-06 (protected) at para. 9, citing the Tribunal’s Investigation Report (Exhibit RR-2021-003-06 (protected), Table 23).

<sup>115</sup> Exhibit RR-2021-003-A-06 (protected) at para. 9, citing Cello’s response to the Tribunal’s questionnaire (Exhibit RR-2021-003-14.01 (protected) at 9). The Tribunal notes that the data in Cello’s questionnaire align with the data in the Tribunal’s Investigation Report (Exhibit RR-2021-003-06 (protected), Table 23), subject to rounding.

<sup>116</sup> Exhibit RR-2021-003-A-03 at para. 62.

<sup>117</sup> *Ibid.* at para. 68.

<sup>118</sup> Exhibit RR-2021-003-14.01 (protected) at 10.

which would prevent Cello from utilizing more of its excess capacity and from generating a positive return on investment.

[100] The Tribunal also finds that, if the Orders were rescinded, a decline in the domestic industry's market share would be likely. Even with the Orders in place, Cello has lost market share. Low-priced imports from Thailand have contributed to that loss, which illustrates the likely impact of adding significant volumes of low-priced subject goods from the United States and South Korea.

[101] The Tribunal further finds that rescinding the Orders would likely result in a decline in Cello's profits. Although Cello can sell CPF profitably in the United States, as demonstrated by the company's gross margins achieved over the POR from United States sales, Cello's corresponding sales in Canada reflect significantly less healthy gross margins. Cello is already in a vulnerable financial position. Fewer domestic sales and decreased market share arising from rescinding the Orders would undoubtedly adversely affect Cello's profits. The Tribunal finds that rescinding the Orders would likely have a negative effect on Cello's employment levels and wages. Cello's number of employees and their wages have dropped over the POR. Lower sales, profits and production arising from the Orders expiring would put additional downward pressure on employment and wages.

[102] Finally, the Tribunal finds that rescinding the Orders would likely have a negative effect on Cello's growth. Even with the Orders in place, Cello does not foresee growth over the next 12 to 18 months that would exceed 2019 levels.

[103] The Tribunal has also found that, if the Orders expire, subject goods from China would likely enter the Canadian market in significantly increased volumes and at prices that would undercut, depress and suppress prices of the like goods. Again, Cello's financial position leaves it vulnerable to an increased volume of low-priced CPF imports from China, particularly given Chinese producers' demonstrated inclination to increase low-priced CPF exports to Canada when an opportunity to do so arises. The likely result is a decline in the domestic industry's output, domestic sales, market share and profits, which would likely further result in decreased utilization of its excess capacity, all of which would likely have an adverse impact on Cello's ability to generate a positive return on investment and on Cello's already decreasing employment levels and wages. In these circumstances, rescinding the Orders would likely have a negative effect on Cello's growth. The Tribunal therefore finds that, if the Orders expire, subject goods imported from China are likely to result in a decline in the domestic industry's output and domestic sales, capacity utilization, return on investment, domestic market share, profits, inventories, employment levels and wages, and growth.

[104] The Tribunal concludes that, if the Orders expire, Cello will likely be materially injured over the next 12 to 18 months by dumped goods from the United States and South Korea in terms of production, domestic sales, capacity utilization, domestic market share, profitability, employment, inventories, return on investment and growth. The Tribunal further concludes that, if the Orders expire, Cello will likely be materially injured by dumped and subsidized goods from China on those same terms.

## CONCLUSION

[105] Pursuant to paragraph 76.03(12)(b) of SIMA, the Tribunal continues its order with respect to the dumping of CPF originating in or exported from South Korea and China, and the subsidizing of CPF originating in or exported from China.

[106] Pursuant to paragraph 76.03(12)(b) and subsection 76.04(1) of SIMA, the Tribunal continues its order with respect to the dumping of CPF originating in or exported from the United States.

[107] The Tribunal notes that the low level of participation by foreign producers (and domestic importers) unavoidably limited the ability of the Tribunal to consider opposing views together with corresponding evidence to further assess the quality of evidence on the record. That said, the Tribunal considers that it had sufficient evidence on the record to draw logical and reasonable conclusions leading to its decision.

Randolph W. Heggart

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Randolph W. Heggart  
Presiding Member

Peter Burn

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Peter Burn  
Member

Frédéric Seppey

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Frédéric Seppey  
Member