



SPECIAL REPORT: TRENDS IN 232 PRODUCT EXCLUSIONS

Trade Data through February 2020

Product Exclusion Data as of March 31, 2020

The following data are prepared using the Association's spreadsheet tracking exclusion requests, objections and final decisions. That spreadsheet is maintained on the Association's "members-only" site and can be found – [here](#)

The Full Section 232 "U.S. Aluminum Import Monitor" [here](#)

Issued: April 8, 2020

232 Product Exclusions: **Summary** (as of Mar. 31, 2020)*

	Total Requests	Objections	Granted	Denied	Pending
Number of Filings	16,718	4,158	11,004	2,437	3,277
Volume in Millions of Pounds	50,477	30,501	20,587	13,706	16,184

*There have been 204 requests (680m lbs) with potential concerns related to proper HTS Codes

Decision Status (by Count)	Filed	Granted	Denied	Pending
Objection	4,158	558	1,970	1,630
No Objection	12,560	10,446	467	1,647

	Granted	Granted Vol.	Denied	Denied Vol.	Total Vol.
Objection	22.1%	4,376	77.9%	13,488	17,864
No Objection	95.7%	16,211	4.3%	218	16,429

232 Product Exclusions: **By Product and In Total** (as of March 31, 2020)*

Product	No Decision		Granted		Denied		Total	
	# of Requests	M. Lbs	# of Requests	M. Lbs	# of Requests	M. Lbs	# of Requests	M. Lbs
7601 - Unwrought	6	12	118	1,324	157	2,129	281	3,466
7604 - Extruded Shapes/Rod & Bar	163	22	1,722	191	115	107	2,000	321
Extruded Shapes	13	17	1,233	143	31	104	1,277	264
Rods & Bars	150	5	489	48	84	4	723	57
7605 - Wire & Redraw	3	20	16	8	23	851	42	878
7606 - Sheet & Plate	1,786	15,110	4,783	16,471	1,931	3,544	8,500	35,124
Can Stock	105	6,736	197	8,635	23	645	325	16,015
Circles & Discs	0	0	160	10	36	3	196	14
Plate	84	1,509	314	1,658	318	235	716	3,402
Sheet	1,597	6,865	4,112	6,167	1,554	2,661	7,263	15,693
7607 - Foil	1,076	1,015	3,019	2,145	200	7,073	4,295	10,233
Boxed Foil	2	0	6	2	0	0	8	2
Foil (Not Backed)	1,053	990	2,957	2,087	192	7,065	4,202	10,142
Foil (Backed)	21	24	56	56	8	8	85	89
7608 - Pipe & Tube	35	1	77	19	11	2	123	22
7609 - Pipe & Tube Fittings	207	4	1,262	411	0	0	1,469	415
7616 - Castings & Forgings	1	1	7	18	0	0	8	19
Grand Total	3,277	16,184	11,004	20,587	2,437	13,706	16,718	50,477

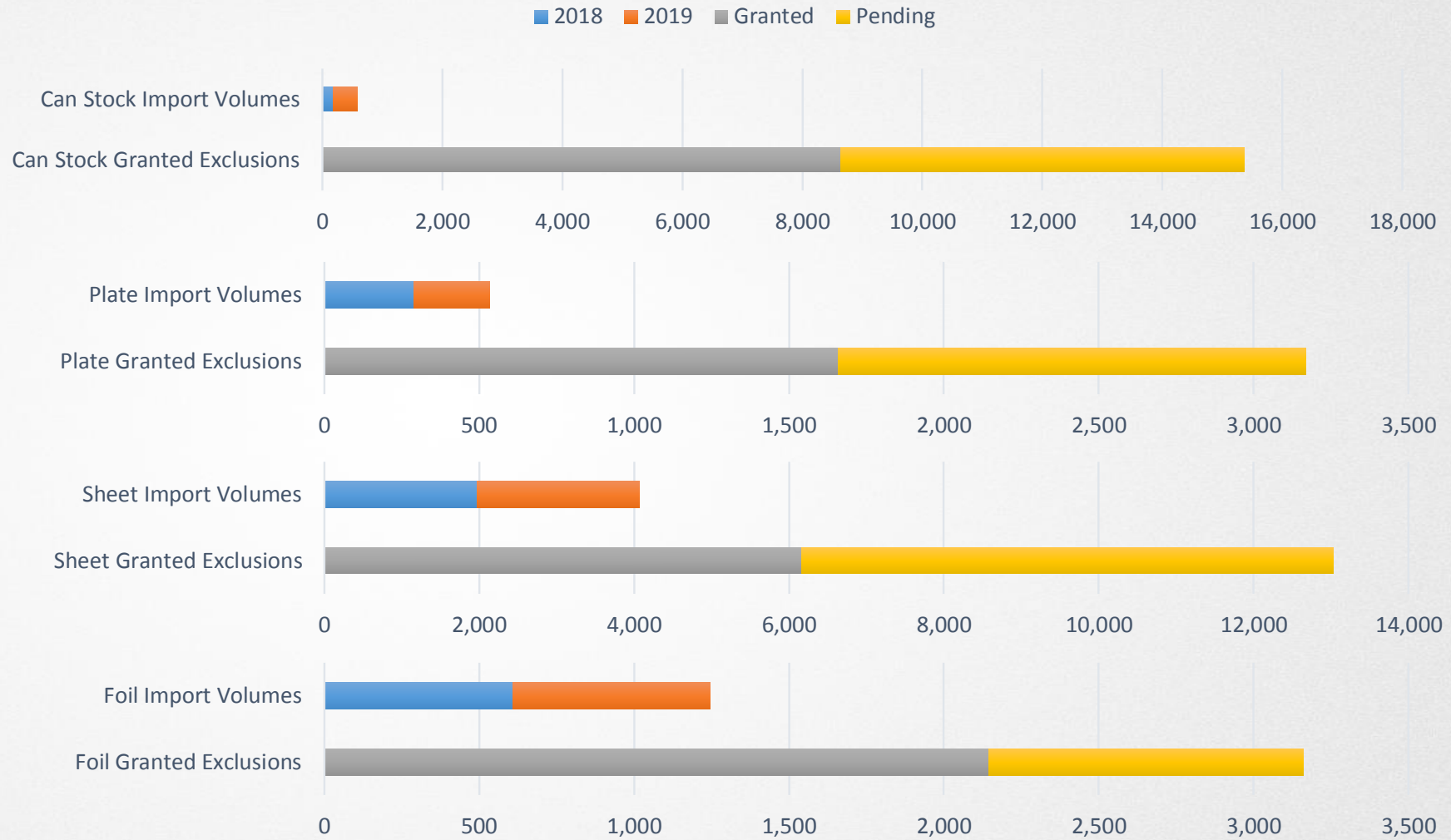
*There have been 204 requests (680m lbs) with potential concerns related to proper HTS Codes

Granted Exclusions: W/ Objections vs. Historical Imports Levels (as of Mar. 31, 2020)*

Product	Import Volume (M Lbs)			Granted Exclusions (M Lbs)				Granted W/Obj.	
	2018	2019	2020 YTD	2018	2019	2020 YTD	Total	M Lbs	% W/Obj.
7601 - Unwrought	9,199	8,384	1,342	0	1,292	32	1,324	987	74.6%
7604 - Extruded Shapes/Rod & Bar	567	479	82	13	164	14	191	1	0.7%
Extruded Shapes	504	423	73	8	123	12	143	0	0.0%
Rods & Bars	63	56	9	5	41	3	48	1	2.6%
7605 - Wire & Redraw	603	568	106	0	8	0	8	0	0.0%
7606 - Sheet & Plate	2,479	2,754	359	4,082	7,056	5,333	16,471	2,837	17.2%
Can Stock	188	403	82	567	3,315	4,753	8,635	1,530	17.7%
Circles & Discs	30	13	0	0	10	0	10	1	9.7%
Plate	289	244	32	1,429	214	15	1,658	6	0.3%
Sheet	1,971	2,093	245	2,086	3,516	565	6,167	1,300	21.1%
7607 - Foil	607	638	84	259	1,707	179	2,145	13	0.6%
Boxed Foil	0	90	10	0	2	0	2	0	0.0%
Foil (Not Backed)	480	425	56	259	1,655	172	2,087	13	0.6%
Foil (Backed)	127	122	18	0	50	6	56	0	0.0%
7608 - Pipe & Tube	50	43	6	4	15	0	19	0	0.0%
7609 - Pipe & Tube Fittings	16	17	3	0	411	1	411	0	0.0%
7616 - Castings & Forgings	41	34	4	0	18	0	18	0	0.0%
Grand Total	13,562	12,916	1,987	4,358	10,670	5,559	20,587	3,838	18.6%

Trade Data Source: U.S. Census Bureau

232 Product Exclusions: **Granted by Product** (as of Mar. 31, 2020)



Trade Data Source: U.S. Census Bureau

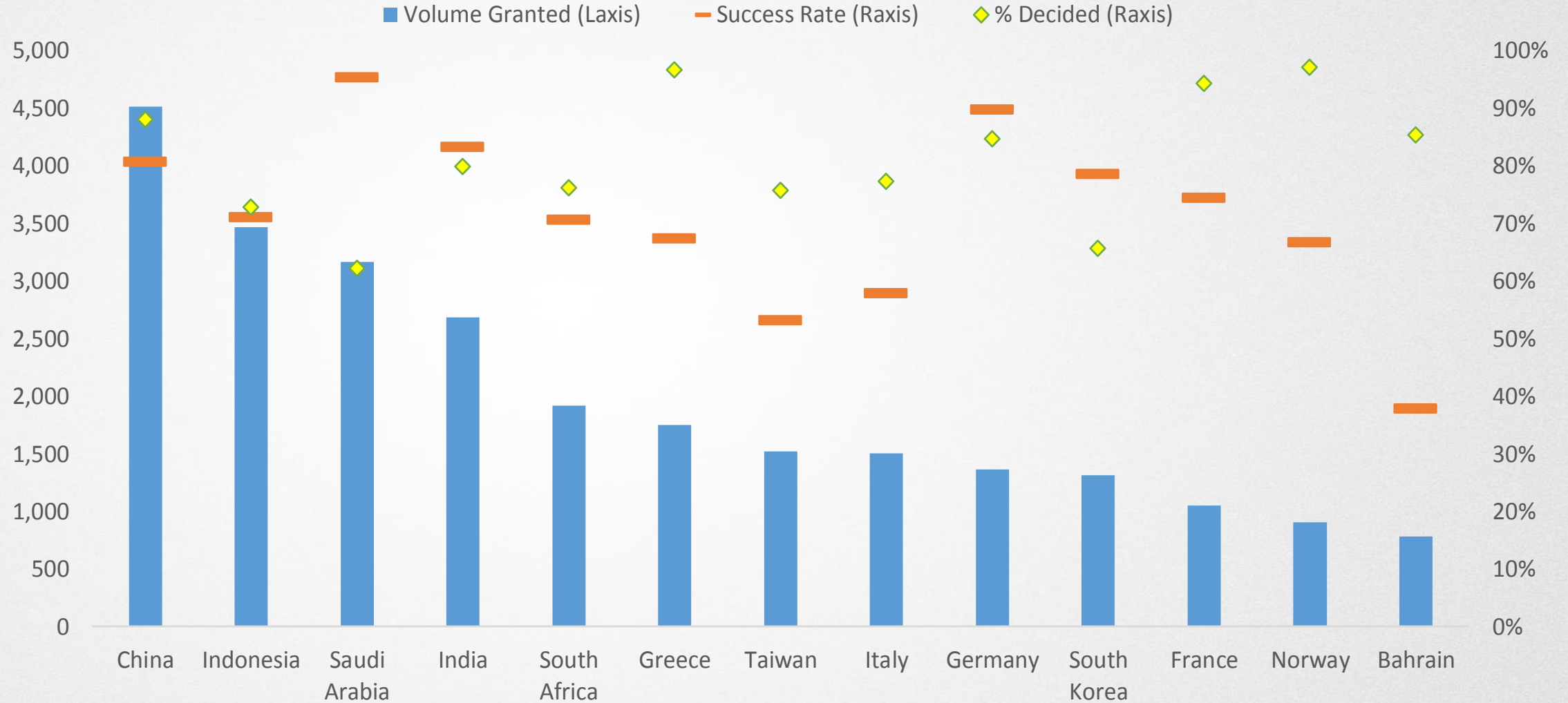
232 Product Exclusions: **Granted Year-to-Date 2020** (as of Mar. 31, 2020)

Product	2018 Imports (M Lbs)	2019 Imports YTD (M Lbs)	Granted YTD 2020 (M Lbs)			
			W/O Obj.	W/Obj.	Total	% of '19 Imp.
7601 - Unwrought	9,198.9	8,384.4	15.5	16.5	32.1	0%
7604 - Extruded Shapes/Rod & Bar	566.7	479.2	14.4	0.0	14.4	3.0%
7605 - Wire & Redraw	603.1	567.8	0.1	0.0	0.1	0.0%
7606 - Sheet & Plate	2,478.8	2,753.6	3,949.0	1,384.3	5,333.3	193.7%
<u>Can Stock</u>	188.0	403.3	3,888.5	864.2	4,752.7	1178.5%
Metal Container Corporation	--	--	3,637.2	0.0	3,637.2	--
Ball Metal Beverage Container Corp.	--	--	37.5	864.2	901.7	--
Crown Cork & Seal USA, Inc.	--	--	213.8	0.0	213.8	--
<u>Plate</u>	289.2	243.8	2.5	12.8	15.2	6.3%
<u>Sheet</u>	1,971.1	2,093.3	58.1	507.3	565.4	27.0%
Empire Resources, Inc.	--	--	0.0	221.7	221.7	--
Mandel Metals, Inc.	--	--	0.0	90.8	90.8	--
Hunter Douglas Metals, LLC	--	--	0.0	80.0	80.0	--
Midwest Metals Corporation	--	--	0.0	66.8	66.8	--
Valeo North America	--	--	0.0	15.4	15.4	--
All Others	--	--	58.1	32.6	90.7	--
7607 - Foil	607.4	637.8	178.7	0.1	178.8	28.0%
<u>Foil (Not Backed)</u>	480.3	425.3	172.4	0.1	172.5	40.6%
Bemis Company, Inc	--	--	32.0	0.0	32.0	--
ProAmpac Holdings, Inc. f.k.a. ProAmpac Interme	--	--	27.4	0.0	27.4	--
Lotte International America Corp	--	--	21.8	0.0	21.8	--
Volflex, Inc.	--	--	19.5	0.0	19.5	--
Goodman Manufacturing Company LP	--	--	15.8	0.0	15.8	--
All Others - Foil (Not Backed)	--	--	55.9	0.1	56.0	--
All Other Products	106.9	93.5	0.6	0.0	0.6	0.6%
Grand Total	13,561.8	12,916.2	4,158.4	1,400.9	5,559.3	43.0%

Trade Data Source: U.S. Census Bureau

232 Product Exclusions: Granted by Country (as of March 31, 2020)*

Granted Exclusions by Country of Origin: Volume (mlbs), Success Rate, % Decided

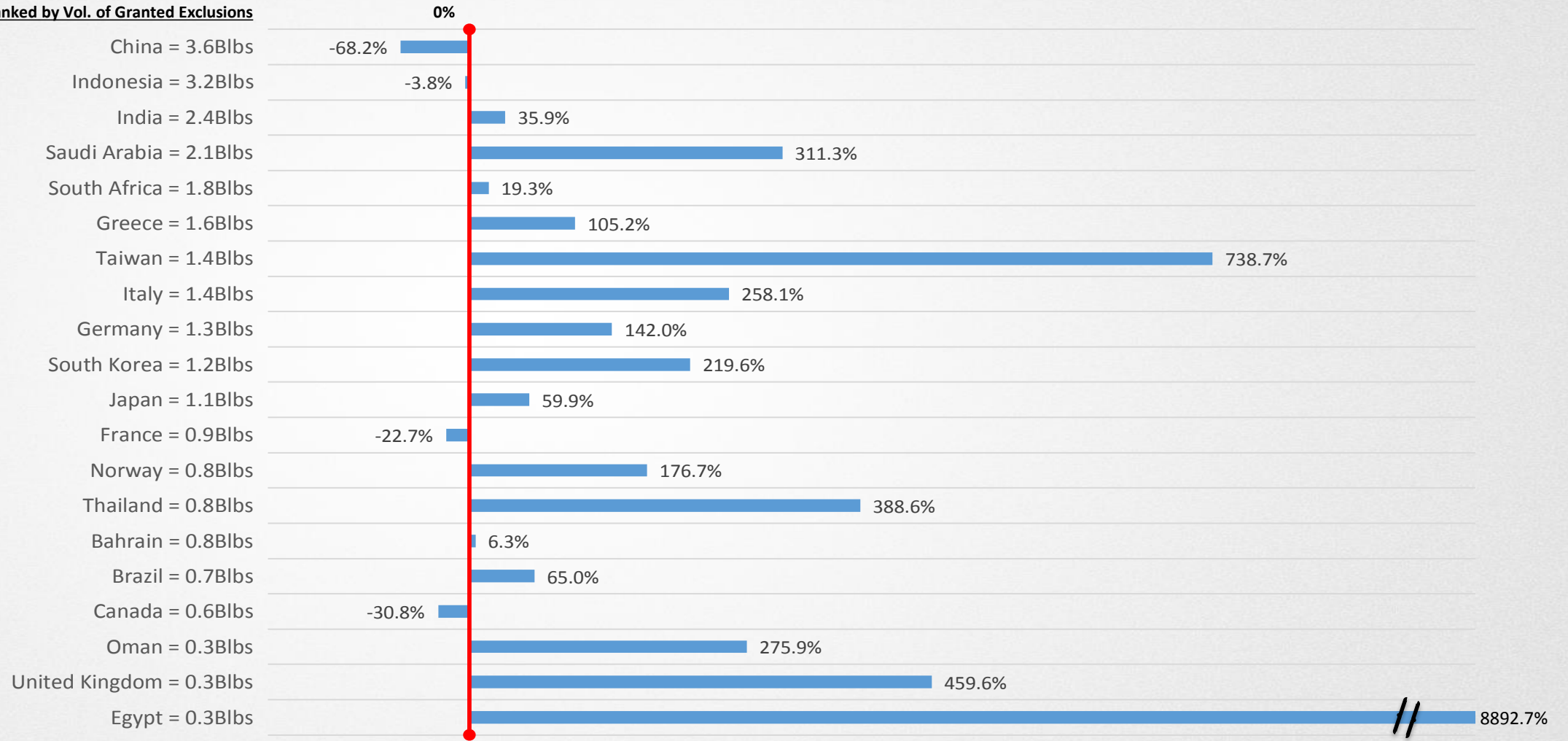


*Exclusion requests can identify multiple countries of origin. In some instances, the successful requestor is permitted to import the granted volume from any of the countries of origin identified in the request. As a result, the volumes associated with a particular country are not exact and should be considered as the maximum bound of the potential volume permitted.

Change in Imports from Countries with **Granted Exclusions** (as of March 31, 2020)*

Percent Change in Imports of Downstream Products from the Top 20 Countries with Granted Exclusions, 2019 vs. 2017

Countries Ranked by Vol. of Granted Exclusions



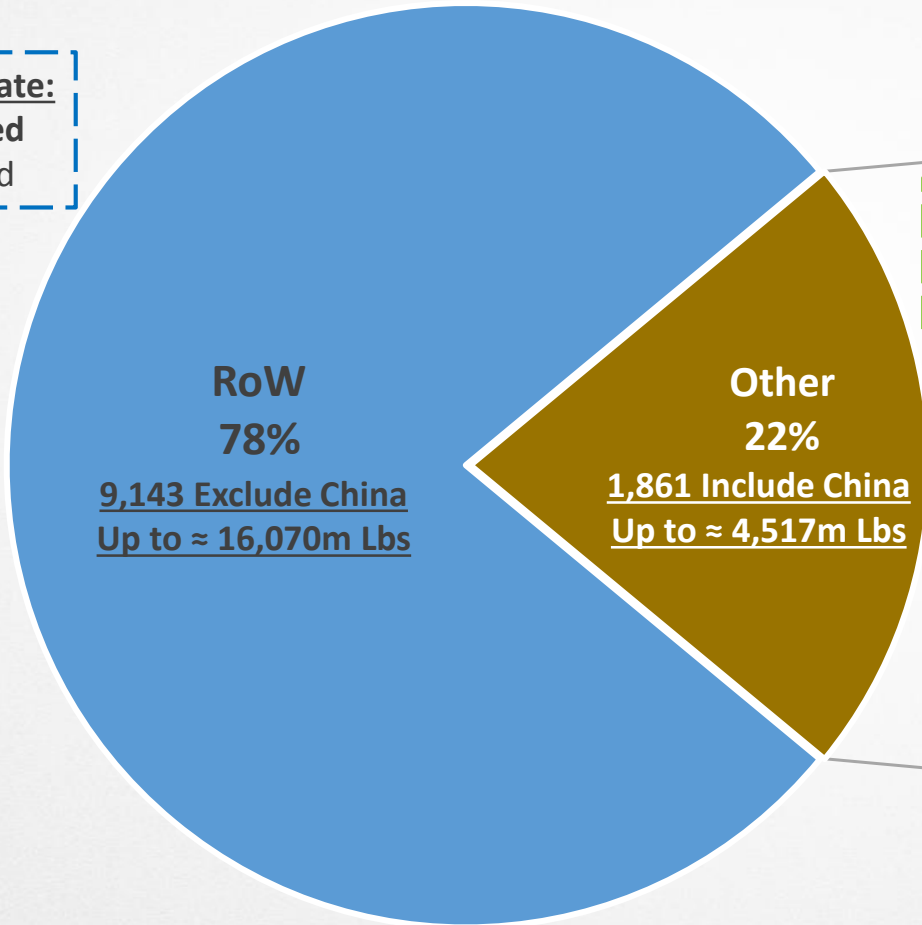
Trade Data Source: U.S. Census Bureau

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232 Product Exclusions: **Granted (China vs. RoW)**

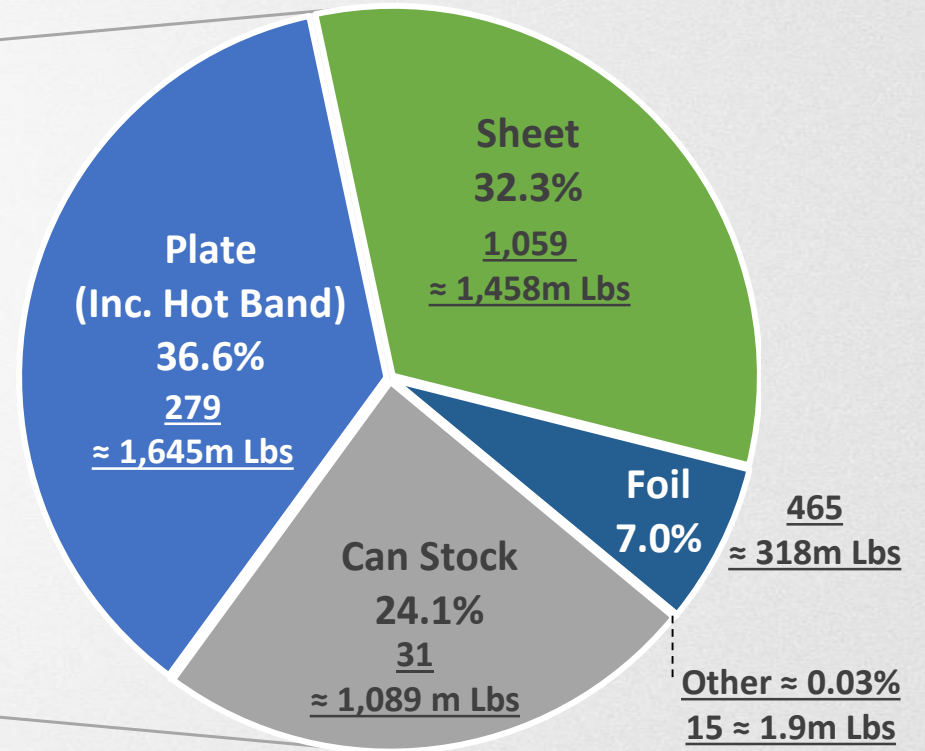
Estimated Share of Granted Product Exclusions
 China vs. Rest of the World*
 (As of March 31, 2020)

RoW Success Rate:
 82.1% Granted
 17.9% Denied



China Success Rate:
 80.7% Granted
 19.3% Denied

Of Those That Include China:



**Exclusion requests can identify multiple countries of origin. In some instances, the successful requestor is permitted to import the granted volume from any of the countries of origin identified in the request. As a result, the volumes associated with a particular country are not exact and should be considered as the maximum bound of the potential volume permitted.*

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