

Domestic and Global Impacts of Nippon Steel's Unfairly Traded Goods

Nippon Steel has a well-established record of unfair trade, both in the United States and more broadly. The following document provides examples of antidumping orders on Nippon's products, as nations around the world confronted these unfairly traded imports.

Of particular note are U.S. Steel's facility in Fairfield, Alabama, and the AK Steel facility in Ashland, Kentucky, both of which suffered grave harm from foreign imports. Both of these facilities were capable of producing steel products for critical infrastructure and military-grade steels.

Additionally, at least eight other countries as well as the European Union instituted antidumping orders on Japanese products in the past ten years that appear to have resulted from unfairly traded imports shipped by Nippon Steel.

Taken together, these examples demonstrate Nippon Steel's alarming disregard for international trade conventions and indicate it will continue to prioritize Japanese operations at the expense of the wider market moving forward.

1. What harm have Nippon Steel's exports to the United States caused for the American steel industry and its workers?

In U.S. trade remedy investigations involving Nippon Steel, the U.S. International Trade Commission ("ITC") has found that dumped imports from Japan contributed to a significant adverse impact on American steel producers. The resulting harms included lowered production and production capacity, and also caused reductions in U.S. shipments, market share, and employment. Unfairly traded goods also limited domestic producers' financial performance.

U.S. antidumping orders involving Nippon Steel include those imposed in 2016 and 2017 after the ITC issued affirmative material injury determinations in investigations covering cold-rolled steel,¹ hot-rolled steel,² and cut-to-length plate.³ In each case, the ITC found that dumped imports from Nippon Steel and other Japanese producers contributed to material adverse impacts suffered by the relevant U.S. steel industry.⁴

Earlier this year, the ITC also announced that it would maintain antidumping orders on tin-coated steel sheet products from Japan, including those produced by Nippon.⁵

Examples of the ITC's findings include:

Cold-Rolled Steel Flat Products (2016)

- According to the ITC, "the significant volume" of imports from Japan and other countries, "which gained market share at the expense of the domestic industry through significant underselling, had a **significant impact on the domestic industry**."⁶
- "**The domestic industry's performance was impaired** during the POI (period of investigation) as it experienced **reduced sales volumes due to the subject imports**. Despite a strong 8.0 percent increase in apparent U.S. consumption in 2014, the domestic industry reported decreased commercial shipments in 2014 when the subject imports captured significant market share."⁷
- Indeed, the domestic industry's **U.S. commercial shipments declined 10.8 percent by volume, and 17.8 percent by value**, from 2013 to 2015.⁸
- Six U.S. producers reported "**line shutdowns and production curtailments**."⁹
- The domestic industry's U.S. employment "**fell by 217 workers**" from 2013 to 2015,¹⁰ and total **hours worked declined by 466,000 hours** over the same period.¹¹

Hot-Rolled Steel Flat Products (2016)

- The ITC found that low-priced, unfairly traded imports from Japan and the other subject countries took sales and market share from the domestic industry and contributed to its "**generally poor financial performance** in 2015."¹²
- From 2013 to 2015, the U.S. industry's merchant market operations deteriorated: **production declined by 11.4 percent, U.S. shipments fell by 15.6 percent, capacity utilization declined by 8.7 percentage points, and operating income fell from a profit of \$779 million to a loss of \$656 million**.¹³
- The **number of production-related workers fell by 2,506, or by 13.6 percent**, from the first quarter of 2015 to the first quarter of 2016, in part because **the U.S. industry closed or curtailed production at several plants in 2015**, including facilities in Fairfield, Alabama and Ashland, Kentucky.¹⁴

Carbon and Alloy Steel Cut-to-Length Plate (2017)

- The ITC found that imports from Japan and other countries "**had a significant impact on the domestic industry.**"¹⁵
- According to the ITC, "**Subject imports, which pervasively undersold the domestic like product in 2014, captured much of this growth in apparent U.S. consumption and gained significant market share...** In 2015, when demand collapsed, the volume and market share of subject imports remained elevated, while **the domestic industry's production, shipments, revenues, and financial performance all fell sharply...**"¹⁶
- "The **domestic industry's capacity declined** from 12.9 million short tons in 2013 to 12.5 million short tons in 2014, remained at that level in 2015, and was 9.3 million short tons in both interim 2015 and interim 2016."¹⁷
- The U.S. industry's **production declined by 13 percent** between 2013 and 2015, from 8.6 million short tons to 7.5 million short tons in 2014.¹⁸ **The U.S. industry's capacity utilization declined from 66.4 percent in 2013 to 60.3 percent in 2015, and from 64 percent in interim 2015 to 59.3 percent in interim 2016.**¹⁹
- Hours worked and wages "**declined** from 2013 to 2015, **by 3.1 percent** in both cases."²⁰
- The U.S. industry's "{g}ross profit, operating income, and net income all rose from 2013 to 2014, but then **fell sharply** in 2015."²¹
- "U.S. producers' **employment** measured by production and related workers increased by 5.3 percent from 2013 to 2014, **decreased by 4.8 percent** from 2014 to 2015, and were **8.5 percent lower** during January to September 2016 than during January to September 2015. **Hours worked by production employees and wages paid followed the same trend...**"²²
- "ArcelorMittal USA testified that as it saw demand conditions improving in early 2014, it added capacity and a second crew to one of its rolling mills in Burns Harbor, Indiana. However, it stated that as imports increased in late 2014, it **took the second crew off and continued to see downsizing in 2015**, especially in connection with the **closure of its Gary, Indiana mill**. ArcelorMittal USA also testified at the hearing that it had experienced **layoffs of about 15 percent of its workforce in its Coatesville, Pennsylvania plant, and at least one-third of the workers at the Conshohocken, Pennsylvania plant** are already receiving Trade Adjustment Assistance benefits. In addition, domestic producer SSAB testified that, although it did not enact worker layoffs directly, it **reduced employee compensation** based on production and shipments and reduced its workforce through attrition. Domestic producer Nucor testified that it operates under a "no layoff" policy, but that its **workers' salaries and bonuses were negatively impacted** during the production downturn."²³

Tin-Coated Steel Sheet Products (2024)

- U.S. production of tin mill products has been under constant attack by foreign producers, including Japan.
- On May 28, the ITC determined that revoking the existing antidumping order on tin mill products from Japan – including those produced by Nippon – would be "likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time."²⁴
- During the time that the International Trade Commission was reviewing the existing antidumping order on Japan, there were antidumping and countervailing duty petitions filed against tin mill products from China and seven other countries.²⁵
- The result of this most recent set of cases was a negative determination attributed, in part, to U.S. Steel's failure to actively participate.²⁶
- The proposed transaction would put Nippon in a position of opposing future efforts to bring cases and potentially undermine the ability to effectively adjudicate ongoing relief under existing orders. This experience in tin mill products could very well signal future attacks on U.S. production.

2. How trustworthy is Nippon Steel regarding its intentions for the U.S. market?

When trying to persuade the ITC to terminate an antidumping duty order on Hot-Rolled Steel Flat Products from Japan in 2011, Nippon Steel repeatedly claimed that revoking the order would not lead to significant increases in imports from Japan or harm the U.S. industry.²⁷ The ITC believed these claims and revoked the order.²⁸ But within a few years, dumped imports from Japan soared and again caused material injury to the U.S. industry,²⁹ forcing domestic producers to bring a new case against Nippon Steel and other Japanese producers.³⁰

Given these facts, U.S. policymakers should be extremely skeptical about any claims Nippon Steel may make regarding its plans for the U.S. market.

In five-year “sunset” reviews of antidumping (“AD”) and countervailing duty (“CVD”) orders, the ITC assesses the likelihood that revocation of the orders would result in the continuation or recurrence of material injury by reason of subject imports in the reasonably foreseeable future.³¹ The ITC’s analysis is prospective and counterfactual in nature. Consequently, foreign producers have a strong incentive to assert that they will not cause harm in the U.S. market if an order is removed.

During 2010-2011, the ITC conducted its second sunset review of the AD/CVD orders on Hot-Rolled Steel Products from Brazil, Japan, and Russia.³² In that review, Nippon Steel, either speaking for itself or jointly with other Japanese producers, repeatedly claimed that it would not harm the U.S. steel industry if the ITC revoked the AD order on Japan.³³ In contending that the ITC should revoke its AD order, Nippon Steel and other Japanese producers made the following claims:

- “[I]t is **not at all likely** that revocation of the order will lead to **any significant volumes** of hot-rolled steel imports from Japan.”³⁴
- “. . . Japanese hot-rolled steel exports **will remain focused on Asia for the foreseeable future.**”³⁵
- “The effect of revoking the antidumping duty order on hot-rolled steel from Japan **will be modest to the point of insignificance.** Japanese producers likely will continue to ship small volumes of specialty hot-rolled steel products to end users in the automotive sector. **Neither the volumes nor the prices are likely to have any significant effect on the U.S. market.**”³⁶
- “[Japanese] imports, whether considered individually or cumulated with other subject imports, are **unlikely** to contribute to a recurrence of material injury.”³⁷
- “Revocation of the antidumping duty order is **likely to have little or no impact** on the volume of shipments of hot-rolled steel from Japan to the United States.”³⁸
- “Given the divergent demand trends in Asia and the United States, **it would make no sense for Japanese Producers to divert attention and resources** from expanding their presence in Asia in order to attempt to re-enter the U.S. market in any meaningful way.”³⁹
- “. . . revocation of the order on Japan would have **no negative impact** on the domestic industry producing hot-rolled steel.”⁴⁰

- At the hearing in this review, an Executive Vice President of Nippon Steel U.S.A. testified that Nippon Steel did not expect a significant increase in its exports to the United States in the event of revocation:

Because of the investment that we have made in Asia, and as the demand grows that we see continuing in Asia, I do not expect that our strategy will change in the future.

...

If the anti-dumping order on Japan is revoked, our direct shipment from Japan would likely **continue to be limited** to special quality grades for automotive applications. We would **not expect any significant increase in our export volume** because the demand in the U.S. market for these products is rather limited. The market for commodity grade hot-rolled steel here is also not especially attractive for us.

...

So **we do not think that revocation would have much effect** on our business.⁴¹

The ITC thereafter made a negative determination in its sunset review and revoked its AD order on Japan.⁴² That determination was based in large part on a finding that, in the event of revocation, the Japanese industry would likely continue to focus on Asian markets and not export significant volumes of hot-rolled steel to the United States.⁴³

As the ITC explained, "We find that the Japanese producers' strong focus on Asian export markets is likely to continue in the reasonably foreseeable future."⁴⁴

Unfortunately, the Japanese producers' claims about their plans for the U.S. market proved false. Under the discipline of trade relief, Japan's exports of hot-rolled steel to the United States ranged between 5,009 short tons and 15,577 short tons during the 2005-2010 period.⁴⁵ However, Japan's exports of unfairly traded hot-rolled steel to the United States soared after revocation, with volumes reaching **375,383 short tons** in 2013, **537,903 short tons** in 2014 (the last full year before a new trade petition was filed), and **404,692 short tons** in 2015.⁴⁶ Domestic producers were forced to file a new trade case that included imports from Japan, and the ITC determined that imports from Japan and other countries had materially injured the U.S. industry. Given this history, U.S. policymakers should be very skeptical of claims that Nippon Steel will be a responsible player in the U.S. market.

3. Has Nippon Steel attacked markets other than the United States with unfairly traded imports?

Yes. Information from the World Trade Organization ("WTO") reveals that numerous jurisdictions outside the United States – including the European Union ("EU"), Canada, and Australia – have imposed antidumping orders on steel products made by Nippon Steel in Japan.⁴⁷

4. What is the global impact of Nippon Steel's unfairly traded goods?

Nippon Steel has a long history of sending dumped exports from Japan that injure domestic producers in the United States. In fact, twelve different U.S. antidumping duty orders are currently imposed on the company's various steel products.

But U.S. producers are not the only victims of dumped imports from Nippon Steel. The WTO maintains a database of antidumping duty orders from around the world. WTO members impose such orders when they find that imports are being sold at less than fair value and that those imports have caused or threatened material injury to domestic producers. A review of the WTO database shows that steel imports from Japan are subject to antidumping orders in multiple non-U.S. jurisdictions.

The following list is based on a review of the WTO's database for non-U.S. jurisdictions in the Group of Twenty ("G-20") countries other than China and Russia.⁴⁸ It also results from a comparison of each jurisdiction's reported antidumping orders on steel from Japan to products offered by Nippon Steel. Taking these sources together, the following orders appear to have resulted from unfairly traded imports shipped by Nippon Steel:

No.	Jurisdiction	In Force From	Product	Case No.
1	Australia	11/20/2014	Hot-rolled structural steel sections	ADC 223 AD 1
2	Australia	11/5/2014	Quenched and tempered steel plate	ADC 234 AD 2
3	Canada	10/20/2016	Certain large diameter carbon and alloy steel line pipe	AD/1408/JP
4	Canada	5/20/2014	Certain steel plate	AD/1402/JP
5	EU	10/30/2015	Grain-oriented flat-rolled products of silicon electrical steel	AD608 JP
6	India	10/19/2022	Electrogalvanized steel	6/7/2021-DGTR-2/3
7	Indonesia	3/19/2013	Cold-rolled coil/sheet	AD03-2011/JPN
8	Mexico	4/19/2019	Steel plate in sheets	10/17-JPN
9	Mexico	11/10/2000	Seamless steel tubing	09/99-JPN
10	South Korea	7/30/2004	Stainless steel bar	04-001

Countries outside the G-20 also imposed trade relief on steel imports from Japan. While this does involve a review of the reporting for every WTO member, reports from Malaysia and Thailand revealed the following examples:

11	Malaysia	9/27/2023	Cold-rolled coils of alloy and non-alloy steel of a thickness between 0.20 mm to 2.60 mm and width between 700 mm to 1300 mm	AD01/23
12	Malaysia	12/24/2019	Cold-rolled coils of iron or non-alloy steel, of width more than 1300 mm	AD01/19/JPN
13	Thailand	5/26/2003	Flat hot-rolled steel in coils and not in coils	AD2002-08
14	Thailand	3/12/2003	Flat cold-rolled stainless steel	AD2002-01

In short, the unfair trading practices of Nippon Steel have not been limited to the United States but have harmed producers in other countries as well.

Endnotes

- 1 See *Cold-Rolled Steel Flat Products from China and Japan*, Inv. Nos. 701-TA-541 and 731-TA-1284 and 1286, USITC Pub. (July 2016), Views of the Commission ("Views") at 3, 36, 40; see also *Certain Cold-Rolled Steel Flat Products From Japan and the People's Republic of China: Antidumping Duty Orders*, 81 Fed. Reg. 45,956 (Dep't Commerce July 14, 2016).
- 2 *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297, USITC Pub. 4638 (Sept. 2016) (Final) Determinations at 1, Views at 3, 47, 52; see also *Certain Hot-Rolled Steel Flat Products From Australia, Brazil, Japan, the Republic of Korea, the Netherlands, the Republic of Turkey, and the United Kingdom: Amended Final Affirmative Antidumping Determinations for Australia, the Republic of Korea, and the Republic of Turkey and Antidumping Duty Orders*, 81 Fed. Reg. 67,962 (Dep't Commerce Oct. 3, 2016).
- 3 *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan*, Inv. Nos. Nos. 701-TA-561 and 731-TA-1317-1318, 1321-1325, and 1327, USITC Pub. 4691 (May 2017) (Final), Views at 4-5 (adopting findings from the first set of final determinations in these staggered investigations – i.e., *Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South Africa, and Turkey*, Investigation Nos. 731-TA-1319, 1326, and 1328, USITC Pub. 4664 (Jan. 2017) (Final)); see also *Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, and Taiwan: Amended Final Affirmative Antidumping Determinations for France, the Federal Republic of Germany, the Republic of Korea and Taiwan, and Antidumping Duty Orders*, 82 Fed. Reg. 24,096 (Dep't Commerce May 25, 2017).
- 4 See *Cold-Rolled Steel Flat Products from China and Japan*, Inv. Nos. 701-TA-541 and 731-TA-1284 and 1286, USITC Pub. (July 2016), Views at 34-35; *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297, USITC Pub. 4638 (Sept. 2016) (Final), Views at 39-44; *Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South Africa, and Turkey*, Investigation Nos. 731-TA-1319, 1326, and 1328, USITC Pub. 4664 (Jan. 2017) (Final), Views at 42-44, adopted by *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan*, Inv. Nos. Nos. 701-TA-561 and 731-TA-1317-1318, 1321-1325, and 1327, USITC Pub. 4691 (May 2017) (Final), Views at 4-5.
- 5 *Tin- and Chromium-Coated Steel Sheet from Japan, Investigation No. 731-TA-860*, USITC Pub. 5507 (May 2024) (Fourth Review), Determination at 1; see also *Certain Tin Mill Products From Japan: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Order*, 88 Fed. Reg. 69,133 (Dep't Commerce Oct. 5, 2023) (finding that revocation of the antidumping duty order on certain tin mill products (tin mill products) from Japan would likely lead to the continuation or recurrence of dumping).
- 6 *Cold-Rolled Steel Flat Products from China and Japan*, Inv. Nos. 701-TA-541 and 731-TA-1284 and 1286, USITC Pub. (July 2016), Views at 35 (emphasis added).
- 7 *Id.*, Views at 33 (emphasis added).
- 8 *Id.* at C-4. See also *id.*, Views at 33 n.167
- 9 *Id.* at III-6 (emphasis added).
- 10 *Id.*, Views at 33 n.175 (emphasis added).
- 11 *Id.* at III-13.
- 12 *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297, USITC Pub. 4638 (Sept. 2016) (Final), Views at 43 (emphasis added).
- 13 *Id.* at C-4.
- 14 *Id.* at III-14 to III-15.
- 15 *Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South Africa, and Turkey*, Investigation Nos. 731-TA-1319, 1326, and 1328, USITC Pub. 4664 (Jan. 2017) (Final), Views at 42 (emphasis added); see also *id.*, Views at 44.
- 16 *Id.*, Views at 42 (emphasis added).
- 17 *Id.* (emphasis added).
- 18 *Id.*
- 19 *Id.*, Views at 42-43.
- 20 *Id.*, Views at 43 (emphasis added).
- 21 *Id.* (emphasis added).
- 22 *Id.* at III-14 (emphasis added).
- 23 *Id.* (emphasis added).
- 24 See *Tin- and Chromium-Coated Steel Sheet From Japan; Determination*, 89 Fed. Reg. 47,175 (Int'l Trade Comm'n May 31, 2024).
- 25 See *Tin Mill Products from Canada, China, Germany, and South Korea*, 701-TA-685 and 731-TA-1599-1601 and 1603 (Final), USITC Pub. 5492 (Feb. 2024), Views at 3.
- 26 See *Tin Mill Products from Canada, China, Germany, and South Korea*, 701-TA-685 and 731-TA-1599-1601 and 1603 (Final), USITC Pub. 5492 (Feb. 2024), Views at 51-52 ("Of particular significance is the fact that the Commission specifically requested that U.S. Steel elaborate on the reasons for its decisions to idle TMPs production at its East Chicago and Gary Works facilities, and to close its UPI mill, including any role that subject imports from Canada, China. U.S. Steel

declined to do so.”).

27 See *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808, Prehearing Brief of JFE Steel Corporation, Kobe Steel, Nippon Steel Corporation, Nisshin Steel Co., Ltd., and Sumitomo Metal Industries, Ltd. (Mar. 28, 2011) (Public Version) at 1-3, 10, 25; *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Second Review), Hearing (April 6, 2011) Tr. at 232-234 (Aoyama).

28 See *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808, USITC Pub. 4237 (June 2011) (Second Review), Views at 41.

29 See *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297, USITC Pub. 4638 (Sept. 2016) (Final) at VII-16.

30 See *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297, USITC Pub. 4638 (Sept. 2016) (Final), Views at 3.

31 See *Tin- and Chromium-Coated Steel Sheet From Japan*, Inv. No. 731-TA-860, USITC Pub. 5507 (May 2024) (Fourth Review), Views at 13-16.

32 See *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808, USITC Pub. 4237 (June 2011) (Second Review).

33 See *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808, Prehearing Brief of JFE Steel Corporation, Kobe Steel, Nippon Steel Corporation, Nisshin Steel Co., Ltd., and Sumitomo Metal Industries, Ltd. (Mar. 28, 2011) (Public Version) at 1-3, 10, 25; *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Second Review), Hearing (April 6, 2011) Tr. at 232-234 (Aoyama).

34 *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808, Prehearing Brief of JFE Steel Corporation, Kobe Steel, Nippon Steel Corporation, Nisshin Steel Co., Ltd., and Sumitomo Metal Industries, Ltd. (Mar. 28, 2011) (Public Version) at 1 (emphasis added).

35 *Id.* at 1 (emphasis added).

36 *Id.* at 2 (emphasis added).

37 *Id.* at 3 (emphasis added).

38 *Id.* (emphasis added).

39 *Id.* at 10 (emphasis added).

40 *Id.* at 25 (emphasis added).

41 *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Second Review), Hearing (April 6, 2011) Tr. at 232-234 (Aoyama) (emphasis added).

42 See *Hot-Rolled Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808, USITC Pub. 4237 (June 2011) (Second Review), Views at 41.

43 See *id.*, Views at 41; *id.* at 43.

44 *Id.* Views at 41.

45 *Id.* at C-3.

46 *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297, USITC Pub. 4638 (Sept. 2016) (Final) at VII-16. The import data specific to Japan and Nippon Steel in this case are confidential. See *id.* at C-3.

47 Information regarding antidumping measures imposed on imports of Japanese steel products can be found through the WTO Trade Remedies Data Portal, available at <https://trade-remedies.wto.org/en>.

48 See WTO Trade Remedies Data Portal, available at <https://trade-remedies.wto.org/en>.