

June 20, 2023

Seth D. Renkema
Branch Chief, Economic Impact Analysis Branch
U.S. Customs and Border Protection
Washington, DC 20229

RE: Request for Comments on Proposed Revision to Entry Summary (Form 7501)

Dear Mr. Renkema:

Outokumpu Stainless USA, LLC (“Outokumpu”) strongly supports the proposed revision to U.S. Customs and Border Protection (“CBP”) entry summary form 7501 to add a required data field to collect information on the country of melt and pour for imported steel products.¹

Outokumpu operates a stainless steel mill in Calvert, Alabama, where it employs over 1,000 persons directly and indirectly supports the employment of thousands in the greater Mobile area. Outokumpu is the second-largest stainless steel producer in the United States, specializing in flat stainless steel products used widely in the consumer products sector. Outokumpu, like many other domestic steel producers, suffered injury from the low-priced steel imports that flooded the U.S. market prior to the institution of the section 232 tariffs. The section 232 tariffs enabled Outokumpu to recover domestic market share with fairly priced steel and operate profitably for the first time in 2021 since commencing its operations in 2012.

The United States imposed melt and pour requirements as part of the section 232 tariff-rate quota (“TRQ”) arrangements with the European Union, Japan, and the United Kingdom to ensure that only steel melted and poured in those countries benefited from the section 232 TRQs and support our allies’ sustainable steel industries.

The addition of a required field on Form 7501 for the country of melt and pour will align CBP’s data collection and reporting with the Department of Commerce’s existing reporting requirements under the Steel Import Monitoring and Analysis (“SIMA”) system. The Department of Commerce’s current steel licensing system requires applicants to provide the country of melt and pour for imported steel, but there is no way to dynamically link that information with the country of melt and pour of the actual product imported. Currently, importers provide steel certificates in the supplemental documentation accompanying the form 7501 entry summary, but CBP would have to manually review each certificate to verify that the country of melt and pour matches what was recorded on the import license. The addition of a field for country of melt and pour to Customs Form 7501 will alleviate this burden and ensure that the product imported under a steel import license matches the information reported prior to import.

As the U.S. increases its efforts to enforce its trade remedies, parties engaging in unfair trade grow increasingly adept at circumventing and evading U.S. trade law. The addition of a required data

¹ U.S. Customs and Border Protection, *Entry Summary (Form 7501)*, 88 Fed. Reg. 24203 (Apr. 19, 2023), available at <https://www.govinfo.gov/content/pkg/FR-2023-04-19/pdf/2023-08213.pdf>.

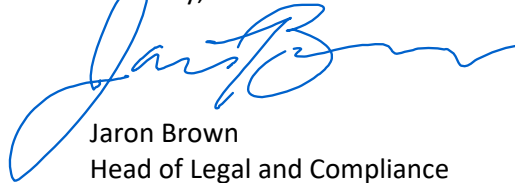
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field reporting the country of melt and pour on the entry summary form represents an important step in utilizing CBP's available technology to facilitate streamlined enforcement of the tariff rate quotas and prevent transshipment and evasion of section 232 tariffs. Critically, by adding a field for country of melt and pour to Form 7501, this information can be cross-checked automatically through the ACE system, saving the substantial administrative burden required to manually cross-check this information under the current system. Moreover, the collection of this data will help CBP and Commerce identify trade flow trends that affect the domestic industry, further supporting the agency's goal of enhancing the nation's economic prosperity through the enforcement of U.S. trade law.

Thank you for the opportunity to comment on this important revision to Form 7501 and for CBP's continuing efforts to streamline enhanced enforcement of U.S. trade laws. If you have any questions or would like additional information regarding Outokumpu's position on this issue, please feel free to contact me via telephone at (251) 501-8984 or via email at jaron.brown@outokumpu.com.

Sincerely,



Jaron Brown
Head of Legal and Compliance
Outokumpu Stainless USA, LLC