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**INTERNATIONAL TRADE &
CUSTOMS UPDATE****Imports of High-Pressure Steel Cylinders Could Face Increased Duties**

On May 11, Norris Cylinder Company filed petitions with the U.S. Department of Commerce and the International Trade Commission alleging that high-pressure steel cylinders (HPSC) from China are being sold at less than fair value in the United States and that China's government is unfairly subsidizing Chinese producers of HPSC. If Norris Cylinder succeeds, antidumping and countervailing duties will be imposed on imports of HPSC from China. Depending on how the investigations proceed, the duties could be prohibitively high. Norris Cylinder alleges the dumping margin average to be "at least 89 percent."

HPSC are classified under Harmonized Tariff Schedule number 7311.00.00. The petitions apply to chrome-alloy steel HPSC that store and secure gases at high pressure during transport, and have a water capacity of up to 450 liters and a gas capacity of 8 cubic feet to 702 cubic feet. The affected HPSC are marked with both: (i) the symbol of a U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (DOT)-approved high-pressure cylinder manufacturer; and (ii) DOT-approved marking of DOT 3A, 3AX, 3AA, 3AAX, 3B, 3E, 3HT, 3T or DOT-E. Excluded from the investigation are acetylene cylinders marked as DOT 8A or 8AL or those manufactured to UN-ISO-9809-1 and 2 specification and marked with ISO or UN symbols.

FOR MORE INFORMATION

Please contact **Matt Nicely** or **David Christy** of our **International Trade & Customs** practice group for more information.

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