US Multilateral Trade Policy Developments

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Contents

US Trade Policy

United States and Taiwan Announce Technology Trade and Investment Collaboration Framework

On December 6, the United States and Taiwan agreed to establish a new Technology Trade and Investment Collaboration (TTIC) framework, which will provide a forum for bilateral discussions aimed at strengthening and promoting investment in the semiconductor supply chain and other critical industries.[1] The US Department of Commerce's International Trade Administration and Taiwan's Ministry of Economic Affairs, Bureau of Foreign Trade will participate in the TTIC under the auspices of the American Institute in Taiwan (AIT) and the Taipei Economic and Cultural Representative Office (TECRO). The announcement of the TTIC follows other recent efforts to expand economic engagement between the US and Taiwan, such as the revival of discussions under the US-Taiwan Trade and Investment Framework Agreement, as well as the launch of a similar technology-focused dialogue between the United States and the European Union.[2]

The governments of the United States and Taiwan have provided few details on the outcomes they are seeking to achieve through the TTIC. According to the US Department of Commerce (DOC), the TTIC will "aim to develop commercial programs and explore actions to strengthen critical supply chains," and "will also support actions focused on the U.S. and Taiwan investment environment, industry trends, and new opportunities while concurrently promoting investment into the United States." In an announcement regarding the TTIC, US Secretary of Commerce Gina Raimondo emphasized the United States' interest in collaborating with Taiwan "particularly in the area of semiconductor supply chains and related eco-systems," according to DOC. Taiwan's Minister of Economic Affairs, Ms. Mei-Hua Wang, similarly emphasized the potential for cooperation on semiconductors as well as on 5G technology and electric vehicles.

As the above statements indicate, semiconductors are likely to be a focus of the United States' discussions with Taiwan under the TTIC. Though the specific objectives of the TTIC are currently unclear, the Biden administration previously has discussed several ways that it could engage with allied governments to help mitigate the current semiconductor shortage and address structural vulnerabilities in the supply chain. For example, the administration included the following recommendations in its June 2021 report on addressing risks and vulnerabilities in the semiconductor supply chain:[3]

- To address the current semiconductor shortage, the administration recommended "engaging with allies and partners to encourage increased production and a fair allocation of supplies to American firms, while discouraging hoarding," as well as conducting commercial diplomacy to encourage foreign investment in the US semiconductor industry;

- To address structural vulnerabilities in the supply chain, the administration recommended: (1) coordinating with "key supplier allies and partners" on multilateral export controls in order to limit advanced semiconductor capabilities "in countries of concern"; (2) having the Committee on Foreign Investment in the United States conduct "robust outreach" with allies and partners to share information and encourage the implementation of "robust national security-based investment screening regimes"; (3) encouraging allied and partner foundries

[1] "Secretary of Commerce Gina M. Raimondo holds introductory call with the Taiwan Minister of Economic Affairs Mei-hua Wang," US Department of Commerce, December 6, 2021, https://www.commerce.gov/news/press-releases/2021/12/secretary-commerce-gina-m-raimondo-holds-introductory-call-taiwan

[2] "United States and Taiwan Hold Dialogue on Trade and Investment Priorities," Office of the US Trade Representative, June 30, 2021, https://ustr.gov/about-us/policy-offices/press-office/press-releases/2021/june/united-states-and-taiwan-hold-dialogue-trade-and-investment-priorities. *See also* "U.S.-EU Trade and Technology Council Inaugural Joint Statement," The White House, September 29, 2021, https://www.whitehouse.gov/briefing-room/statements-releases/2021/09/29/u-s-eu-trade-and-technology-council-inaugural-joint-statement/

[3] "Building Resilient Supply Chains, Revitalizing American Manufacturing, and Fostering Broad-Based Growth," The White House, June 2021, https://www.whitehouse.gov/wp-content/uploads/2021/06/100-day-supply-chain-review-report.pdf

and materials suppliers to invest in the United States and allied and partner regions; and (4) promoting "research and development partnerships and harmonization of policies to address unfair trade practices and industrial policies[.]"

The Biden administration is currently exploring these issues in bilateral dialogues with other trading partners such as the EU. For example, under the auspices of the new US-EU Trade and Technology Council (TTC) launched in September, the two governments are seeking to "promote convergent [export] control approaches on sensitive dual-use technologies" and sharing information on best practices for investment screening, with particular focus on sensitive technologies. A dedicated "semiconductor track" within the TTC will also seek to jointly identify bottlenecks, gaps, and vulnerabilities in the semiconductor supply chain while mapping existing capacity, among other efforts. The TTIC with Taiwan may cover similar ground. However, it is too early to tell whether these bilateral dialogues or measures resulting from them will have significant commercial implications.

Secretary Raimondo and Minister Wang have indicated that they will instruct designated representatives at the bureau-level to plan and convene the first meeting of the TTIC under the auspices of AIT and TECRO "in the coming months." In the meantime, the Biden administration will continue to seek congressional approval of domestic policies to encourage investment in semiconductor manufacturing and research. Currently, the administration is urging Congress to appropriate funds to implement the CHIPS for America Act, which would provide financial assistance to firms that construct, expand, or modernize semiconductor manufacturing and research facilities in the United States. The Senate approved more than $50 billion in appropriations for the CHIPS for America Act in June as part of a broader legislative package, entitled the US Innovation and Competition Act (S.1260), but the House has not approved the legislation. The House and Senate are expected to form a conference committee early next year to negotiate a compromise version of the legislation.

Year-End Update on US Trade Legislation

Congress has concluded its legislative business for 2021 without taking action on the most significant trade proposals put forward by Members this year. Congressional Democratic leaders recently affirmed their desire to reconcile competing House and Senate versions of the US Innovation and Competition Act (USICA), which addresses US trade and economic competitiveness with China, but they have delayed their work in this area in order to prioritize President Biden's Build Back Better Act (BBBA), which itself could have important trade implications for certain sectors. Democrats had hoped to finalize the BBBA this year, but the bill has encountered major obstacles in the Senate due to policy differences within the Democratic Party, creating substantial uncertainty regarding Congress's legislative agenda for 2022. Below, we discuss the current status of the USICA and the BBBA, and the prospects for these initiatives in the new year.

Build Back Better Act (H.R. 5376)

On December 19, Senator Joe Manchin (D-WV) made a major announcement that he opposes the Build Back Better Act (BBBA) due to concerns about its fiscal impact, its effects on inflation, and certain policies included in the bill. Senator Manchin indicated that, after months of negotiation, he has been unable to reach agreement with congressional Democrats and the White House on a compromise version of the BBBA, and will not vote to proceed to consideration of the bill in the Senate. Senator Manchin's opposition effectively dooms the BBBA in its current form, as the bill cannot pass without the support of at least 50 Senators (and no Republican supports the legislation).

It remains to be seen whether the White House and congressional Democrats can develop a more modest reconciliation bill that is acceptable both to Senator Manchin and to progressive congressional Democrats (who prefer a larger, more ambitious reconciliation bill). The White House has indicated that it is open to continuing negotiations with Senator Manchin in 2022, as has the Congressional Progressive Caucus, but Senator Manchin has shown little interest in further negotiations. He has also indicated that any future reconciliation bill would need to be scaled back and significantly revised (including through Senate committee markups) in order to win his support. Given the fundamental policy differences among key Democratic stakeholders, negotiating a compromise version of the BBBA next year will be difficult, and any compromise bill is likely to be scaled back significantly from the version that passed the House of Representatives on November 19.

Electric vehicle tax credits

The stalemate over the BBBA has delayed, and may avert entirely, a major dispute between the United States and its trading partners over **electric vehicle tax credits**. As we have reported to you previously, the House-passed version of the BBBA would extend and modify an existing tax credit for purchases of "qualified plug-in electric drive motor vehicles" ("qualifying EVs"). It would so in part by providing an additional tax credit of $4,500 for qualifying EVs that satisfy "domestic assembly qualifications" (which require that "the final assembly of such vehicle occurs at a plant, factory, or other place which is located in the United States and operating under a collective bargaining agreement negotiated by an employee organization;") and providing an additional tax credit of $500 for qualifying EVs powered by US-origin battery cells. These provisions have drawn significant criticism from the United States' trading partners, who have alleged that they discriminate against imports in violation of WTO rules and US free trade agreements such as the USMCA.

Senator Manchin is the only Democratic Senator who has publicly expressed opposition to the EV tax credit scheme proposed in the BBBA. He has criticized the scheme on the ground that "[w]e shouldn't use everyone's tax dollars to pick winners and losers. If you're a capitalist economy … you let the product speak for itself." By contrast, the White House has endorsed the scheme, as have many Democratic Senators. (For example, all 14 Democratic members of the Senate Finance Committee voted for a prior version of the EV tax credit scheme in May.) However, as the pivotal vote on the BBBA, Senator Manchin's opposition is a major obstacle, and there is a strong chance that the EV tax credit scheme will be modified or removed in any compromise version of the bill.

At this stage, Senator Manchin has not clarified whether his concerns about the proposed tax credit scheme are limited to the requirement that qualifying EVs be made with union labor, or whether he also opposes the domestic content and assembly requirements. Depending on the nature of his objections, it is possible that a compromise version of the bill could remove the union labor requirement, while retaining the domestic content and assembly requirements.

Carbon border adjustment

The reconciliation instructions for the BBBA envisioned that the bill would include a **"carbon polluter import fee"** (i.e., a levy on the carbon content of imported goods similar to the EU's Carbon Border Adjustment Mechanism). However, the Build Back Better Framework unveiled by President Biden on October 28 omitted the proposed import fee, as did the BBBA legislation passed by the House on November 19, and proposed revisions to the BBBA's tax provisions published by the Senate Finance Committee on December 11. Congress has considered a variety of carbon border adjustment proposals during the debate over the BBBA, all of which have failed to garner sufficient support among congressional Democrats. These include:

- A border adjustment based on the costs incurred by domestic producers to comply with US climate-related laws and regulations (proposed by Sen. Chris Coons (D-DE) in the Fair Transition and Competition Act, S.2378);
- A per-ton tax on the carbon dioxide content of leading fossil fuels (e.g., coal, oil, natural gas) upon extraction, starting at $15 per ton and escalating over time, paired with an equivalent fee on imports (included in a Senate Finance Committee discussion document from September 2021);
- A tax per ton of carbon dioxide emissions assessed on major industrial emitters (e.g., steel, cement, chemicals), paired with an equivalent fee on imports (also included in the Senate Finance Committee discussion document); and
- A per-barrel tax on crude oil, paired with an equivalent fee on imports (also included in the Senate Finance Committee discussion document).

Each of these proposals has encountered obstacles in Congress. Some of the most significant obstacles are: (1) insufficient support for a domestic carbon price (even among Democrats) that could serve as the basis for a border adjustment; (2) concerns that a border adjustment based on domestic regulatory costs would violate WTO rules and be difficult to administer; (3) concerns that a border adjustment fee without a domestic carbon price would be ineligible for inclusion in a reconciliation bill under Senate rules; and (4) concerns that the measure would (or would be perceived to) increase consumer prices. It appears unlikely that the current Congress will include a carbon border adjustment in future iterations of the BBBA, given its omission from prior versions of the bill (and the likelihood that the BBBA will need to be scaled back further to pass the Senate.)

US Innovation and Competition Act (S.1260)

On November 17, House Speaker Nancy Pelosi (D-CA) and Senate Majority Leader Chuck Schumer (D-NY) announced that they had reached a bicameral agreement "for the House and Senate to go to conference on the United States Innovation and Competition Act," with the goal of "reconciling the two chambers' legislative proposals so that we can deliver a final piece of legislation to the President's desk as soon as possible." We understand that this process might not involve a formal conference committee, in which the House and Senate appoint select Members to negotiate a compromise text after passing competing versions of the same legislation. Instead, it is expected that Members and staff will first meet informally to try to reach agreement on a compromise bill, with substantive discussions occurring as soon as January.

Regardless of its format, the conference process is likely to be lengthy and contentious, and trade issues may be among the most difficult to reconcile. As we explain below, some key trade provisions included in the USICA face opposition in the House, and Members are seeking to include other controversial provisions in the compromise bill:

- **Section 301 tariff exclusions.** The USICA would prospectively reinstate all product exclusions that the US Trade Representative (USTR) has previously granted for products subject to the Section 301 tariffs on Chinese goods. Additionally, it would require USTR to reinstate the exclusion request process (thus allowing US entities to request new product exclusions), and would establish certain criteria for future exclusion decisions. The Biden Administration has the authority to take these actions unilaterally, but thus far has declined to do so. In October, USTR initiated a "targeted" process in which it is considering the reinstatement of certain expired exclusions that were previously extended, but this applies only to a narrow subset of products covered by the Section 301 tariffs.

  We understand that the House Democratic leadership remains opposed to the USICA's provisions concerning Section 301 exclusions, and instead insists that Congress should defer to the Biden Administration on these matters. Notably, the New Democrat Coalition (which is comprised of more than 90 moderate House Democrats) declined to take a position on the Section 301 provisions in its recent statement of priorities for the revised USICA, and has stated only that the provisions should be "carefully considered." On the other hand, the Section 301 provisions were critical in securing Republican support for the USICA in the Senate. This is likely to be one of the more challenging issues for House and Senate negotiators to resolve, particularly given the Biden Administration's apparent reluctance to broaden the Section 301 exclusion process.

- **Generalized System of Preferences (GSP).** The USICA included provisions that would reauthorize GSP through 2026 and expand its eligibility criteria to address issues such as labor rights, environmental protection, the rule of law, and gender equality in beneficiary developing countries. House Democrats have introduced a competing bill that would reauthorize GSP through 2024 and make similar changes to the eligibility criteria, though the House bill goes further in some respects. For example, the House bill would revise the existing mandatory eligibility criterion on labor, which currently prohibits a country from receiving GSP benefits if it "has not taken or is not taking steps to afford internationally recognized worker rights to workers in the country[.]" The House bill would revise this criterion so as to render a country ineligible for GSP if it "fails to effectively afford" internationally recognized worker rights to workers in the country, whereas the USICA would leave the current language in place. Though there is some disagreement among Members as to how stringent the new eligibility requirements should be, we believe these relatively minor differences can be resolved, particularly given the longstanding bipartisan support for GSP.

- **Trade remedies.** In April, Sens. Rob Portman (R-OH) and Sherrod Brown (D-OH) introduced the "Eliminating Global Market Distortions to Protect American Jobs Act" (S.1187) which aims to "strengthen U.S. trade remedy laws" in order to "challenge China's unfair trade practices." Among other changes, the bill would require that antidumping and countervailing duty investigations be expedited if they cover merchandise that was recently subject to an affirmative injury determination in another proceeding covering imports of the same merchandise from a different country. It also would establish new rules aimed at combating "market distortions" (e.g., by authorizing the US Department of Commerce to countervail "cross-border" subsidies offered to producers in the country under investigation by a government located elsewhere). On December 2, Reps. Terri Sewell (D-AL) and Bill Johnson (R-OH) introduced a companion version of S.1187 in the House, with some modifications. We expect that the proponents of this legislation will seek to include it in any compromise version of the USICA. This strategy could succeed given current congressional attitudes regarding trade enforcement and China, particularly if the trade remedies legislation is paired with trade-liberalizing provisions sought by Republicans (namely the proposed measures described above regarding GSP and Section 301).

Outlook

At this stage, it is unclear how long the stalemate over the BBBA will persist, but it is unlikely to be resolved quickly. In the meantime, the White House and congressional Democrats are likely to seek more imminently achievable legislative victories, which may result in a greater focus on the USICA in early 2022. The breadth and complexity of the USICA will mean a challenging conference process, but some officials are optimistic that the bill can be completed by the summer of 2022. Even in a best-case scenario, however, a compromise USICA bill is likely to provide relatively little in the way of trade liberalization, and may also include new trade-restrictive measures as noted above.

The trade implications of the BBBA are far less certain, given the likelihood that any future version of the bill will be substantially revised. However, as noted above, it appears unlikely that future versions of the BBBA will include a carbon border adjustment as envisioned in the reconciliation instructions. It would also be difficult for the current Congress to enact carbon border adjustment legislation outside of the reconciliation process, given the lack of Republican support for such measures. As a result, some policymakers have encouraged the Biden administration to act unilaterally to impose carbon border adjustments. For example, Senator Sheldon Whitehouse (D-RI) stated recently that he sees a "logical path" for the administration to impose carbon border adjustments under existing U.S. law, without the need for further action by Congress. This comment almost certainly refers to Section 232 of the Trade Expansion Act of 1962 (19 U.S.C. 1862), which some observers argue should be used to impose carbon border adjustments. The Biden Administration has not addressed this issue directly. However, the Administration's recent pledge to negotiate a new "Global Arrangement" with the EU, in which participants will "restrict market access" for carbon-intensive steel and aluminum imports, is an important signal that it intends to implement some form of carbon border adjustment eventually – and that it may be interested in using Section 232 to do so.

US Trade Actions

US Department of Commerce Terminates Certain "General Approved Exclusions" from Section 232 Tariff on Steel Products

On December 9, 2021, the US Department of Commerce, Bureau of Industry and Security ("BIS") issued a Federal Register notice terminating certain "General Approved Exclusions" ("GAEs") from the Section 232 tariff on imported steel products ("December 9 Rule"). GAEs allow certain steel products to enter the United States free of Section 232 tariffs and, unlike regular product exclusions, can be used by any importer. The December 9 Rule terminates 26 GAEs for steel products "to ensure only those GAEs that meet the stated criteria . . . will continue to be included as eligible GAEs." BIS has indicated that it will conduct further analysis regarding the terminated GAEs and may reinstate them, wholly or in part, at a later date. We provide an overview of the December 9 Rule below.

Background

In an Interim Final Rule dated December 14, 2020, BIS added two new supplements to 15 C.F.R. Part 705 identifying steel and aluminum articles that had been approved for importation pursuant to General Approved Exclusions ("Interim Final Rule"). These GAEs can be used by any importer and are valid indefinitely, though BIS indicated that it could, at any time, issue a notice removing, revising or adding to an existing GAE. Unlike regular product exclusions, there is no limitation on the quantity of imports that may enter pursuant to a GAE. To obtain relief from Section 232 duties on a product covered by a GAE, the importer must specify the applicable "GAE identifier" number in the Automated Commercial Environment (ACE) system.

The Interim Final Rule created 108 GAEs for steel articles and 15 GAEs for aluminum articles, which are described at the HTSUS 10-digit level and in some cases are more narrowly defined. These GAEs became effective with respect to goods entered for consumption, or withdrawn from warehouse for consumption, on or after December 29, 2020.

In the preamble to its Interim Final Rule, DOC explained that the establishment of the GAE process was intended to address "the need to create a more efficient method for approving exclusions where objections have not been received in the past for certain steel or aluminum articles."

Termination of Certain General Approved Exclusions

The December 9 Rule removes a subset of GAEs (26 GAEs for steel and 4 GAEs for aluminum) added in the Interim Final Rule "after public comments on the [Interim Final Rule] and subsequent Commerce analysis of data in the Section 232 Exclusions Portal identified these HTSUS codes as not meeting the criteria for inclusion as a GAE." According to BIS, "[t]hese cases include HTSUS codes with exclusion requests that recently received objections and/or denials in the Section 232 Exclusions Portal." BIS is removing these GAEs "to ensure that only those GAEs that meet the stated criteria from the [Interim Final Rule] will continue to be included as eligible GAEs." The list of terminated GAEs for steel products is as follows:

- GAE.3.S: 7220900060
- GAE.7.S: 7227901060
- GAE.14.S: 7215500018
- GAE.16.S: 7228501040
- GAE.23.S: 7220206010
- GAE.27.S: 7219320020
- GAE.33.S: 7304515005
- GAE.34.S: 7219330025
- GAE.35.S: 7217901000

- GAE.37.S: 7217108030
- GAE.38.S: 7212200000
- GAE.39.S: 7217204560
- GAE.52.S: 7219220040
- GAE.53.S: 7219320038
- GAE.54.S: 7219320045
- GAE.55.S: 7219350005
- GAE.56.S: 7219320036
- GAE.60.S: 7225501110
- GAE.68.S: 7302101015
- GAE.71.S: 7217304541
- GAE.75.S: 7219210005
- GAE.76.S: 7304293160
- GAE.78.S: 7216400010
- GAE.87.S: 7304293180
- GAE.92.S: 7208390015
- GAE.98.S: 7229200015

In the Preamble to the December 9 Rule, BIS stated that it "identified these GAEs based on review of its internal exclusions data in light of public comments received in response to the December 14 rule highlighting…that articles under certain HTSUS codes were included as GAEs despite previously receiving objections and/or denials in the Section 232 Exclusions Portal." BIS explained that, since publishing the Interim Final Rule on December 14, 2020, it has become aware "that exclusion requests for steel and aluminum articles specified by 29 of the GAEs removed by [the December 9 Rule] —25 steel GAEs and 4 aluminum GAEs—received objections after September 12, 2020." Accordingly, BIS "is removing these 29 GAEs to conduct further analysis with updated data from the Section 232 Exclusions Portal." Based on the results of this analysis, BIS may reissue these GAEs "in whole or part" in subsequent rules.

The December 9 Rule also removes one additional steel GAE (GAE.92.S) "as a conforming change to a recent U.S. International Trade Commission (ITC) decision," which retired HTSUS Classification 7208390015.

The December 9 Final Rule took effect on December 27, 2021.

Petitions and Investigations

US Department of Commerce Initiates Antidumping Investigations of Emulsion Styrene-Butadiene Rubber from the Czech Republic, Italy, and Russia

On December 7, 2021, the US Department of Commerce (DOC) announced the initiation of antidumping duty (AD) investigations of emulsion styrene-butadiene rubber from the Czech Republic, Italy, and Russia. DOC initiated these investigations in response to petitions filed by Lion Elastomers LLC (Port Neches, TX).

The products covered by these investigations are cold-polymerized emulsion styrene-butadiene rubber (ESB rubber). The scope of the investigations includes, but is not limited to, ESB rubber in primary forms, bales, granules, crumbs, pellets, powders, plates, sheets, strip, *etc.* ESB rubber consists of non-pigmented rubbers and oil-extended non-pigmented rubbers, both of which contain at least one percent of organic acids from the emulsion polymerization process. The products subject to these investigations are currently classifiable under subheadings 4002.19.0015 and 4002.19.0019 of the Harmonized Tariff Schedule of the United States (HTSUS). ESB rubber is described by Chemical Abstracts Services (CAS) Registry No. 9003-55-8. This CAS number also refers to other types of styrene butadiene rubber.

The dumping margins alleged in the petitions are as follows:

Country	Dumping Margin
Czech Republic	11.00 percent
Italy	28.97 percent
Russia	263.33 percent

On December 29, 2021, the US International Trade Commission (ITC) determined that there is a reasonable indication that a US industry is materially injured by reason of imports of emulsion styrene-butadiene rubber from Czechia, Italy, and Russia. As a result, the investigations will continue and DOC's preliminary determinations will be due by April 22, 2022, unless this deadline is extended. If DOC reaches affirmative final determinations that imports of the subject merchandise were sold in the United States at less than fair value, and the ITC makes affirmative final determinations of injury, DOC will impose antidumping orders.

According to DOC, imports under HTSUS subheadings 4002.19.0015 and 4002.19.0019 were valued at $7.4 million (for the Czech Republic); $6 million (for Italy); and $17.6 million (for Russia) in 2020.

US Department of Commerce Issues Affirmative Final Determinations in the Antidumping and Countervailing Duty Investigations of Pentafluoroethane (R-125) from China

On January 3, 2022, the US Department of Commerce (DOC) announced its affirmative final determinations in the antidumping duty (AD) and countervailing duty (CVD) investigations of petafluoroethane (R-125) from China. In its investigations, DOC determined that imports of the subject merchandise from China were sold in the United States at dumping margins ranging from 51.87 to 267.41 percent, and received countervailable subsidies ranging from 12.75 to 306.57 percent.

The petitioner in these investigations is Honeywell International, Inc. (Charlotte, NC). The merchandise covered by these investigations is pentafluoroethane (R-125), or its chemical equivalent, regardless of form, type or purity level. R-125 has the Chemical Abstracts Service (CAS) registry number of 354-33-6 and the chemical formula C2HF5. R-125 is also referred to as Pentafluoroethane, Genetron HFC 125, Khladon 125, Suva 125, Freon 125, and Fc-125. R-125 is classified under Harmonized Tariff Schedule of the United States (HTSUS) subheading 2903.39.2035 and 2903.39.2938. Merchandise subject to the scope may also be entered under HTSUS subheadings 2903.39.2045, 3824.78.0020, and 3824.78.0050.

The US International Trade Commission (ITC) is scheduled to issue its final injury determination by February 14, 2022. If the ITC determines that imports of the subject merchandise materially injure or threaten material injury to the domestic industry, DOC will issue antidumping and countervailing duty orders.

According to DOC, imports of R-125 from China were valued at approximately $51 million in 2019.