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Ankara, 20/07/2026

Konu: ABD/Kaynaklı Boru Dampinge Karşı Önlem ve Sübvansiyona Karşı Telfi Edici
Önlem Soruőturmaları

Sayın Üyemiz,

Ticaret BakanlıĐından iletilen bir yazıda, Amerika Birleőik Devletleri'nde (ABD) yerli üreticiler tarafından ölkemizin yanı sıra Çin Halk Cumhuriyeti menőeli, ABD gümrük tarife cetveline göre 7305.31.6010, 7306.11.0010, 7306.11.0050, 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064 ve 7306.40.5085 gümrük tarife istatistik pozisyonlarında yer alan kaynaklı paslanmaz çelik hat ve basınç borusu ürünleri (welded stainless line and pressure pipe) ithalatına karşı dampinge karşı önlem ve sübvansiyona karşı telfi edici önlem soruőturmaları açılması için 14 Temmuz 2026 tarihinde ABD makamlarına yapılan başvuru ABD Ticaret Departmanı Çevrimiçi Belge Portalı'nda (ACCESS) yayımlandığı bildirilmektedir.

BilindiĐi üzere, ABD'nin ilgili mevzuatı uyarınca anti-damping ve sübvansiyon soruőturmaları iki ayrı makam tarafından yürütölmekte olup, ABD Ticaret BakanlıĐı Uluslararası Ticaret İdaresi (ITA) tarafından damping ve sübvansiyonun mevcudiyetine yönelik, Uluslararası Ticaret Komisyonu (ITC) tarafından ise mevcut damping veya sübvansiyon uygulamalarının ABD yerli üretimine zarar verip vermediĐine ilişkin ayrı soruőturmalar yürütölmektedir. Bu çerçevede, ABD'li yerli üreticiler tarafından yapılan başvuruyu müteakip 20 gün içerisinde (bu süre 40 güne kadar uzatılabilmektedir) ITA tarafından soruőturmanın açılıp açılmamasına ilişkin bir karar verilecek olup, yine başvurunun yapıldığı tarihten itibaren 45 gün içerisinde ITC tarafından yürütölmekte olan zarar soruőturmasının ön bulguları açıklanacaktır.

Bilgilerini rica ederim.

Musa DEMİR
Genel Sekreter**Ekler:**

- 1- Başvuru Dilekçesi
- 2- Başvuru Dilekçesi- Dampinge Karşı Önlem Soruőturması
- 3- Başvuru Dilekçesi- Sübvansiyon Soruőturması
- 4- Producers and Exporters of WSLPP from Türkiye

Musa Demir tarafından 5070 sayılı
kanun gereĐince güvenli elektronik
imza ile imzalanmıştır.

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Investigation

PUBLIC VERSION

Petitioners' Business Proprietary Information
Removed from Pages 3, 23-26, 31, 33, and 35
and Exhibits I-3, I-4, I-14, I-28.

**BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**WELDED STAINLESS LINE AND PRESSURE PIPE FROM INDIA,
TÜRKIYE, AND THE UNITED ARAB EMIRATES**

**PETITION FOR THE IMPOSITION
OF ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO
SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED**

**VOLUME I
INFORMATION RELATING TO GENERAL ISSUES AND INJURY**

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July 15, 2026

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These petitions are filed on behalf of Bristol Pipe and Tube, Inc. (“Bristol”), Felker Brothers Corporation (“Felker”), and Primus Pipe and Tube, Inc. (“Primus”) (collectively, “Petitioners”), domestic producers of welded stainless line and pressure pipe (“WSLPP”). Petitioners allege that WSLPP from India, the Republic of Türkiye (“Türkiye”), and the United Arab Emirates (“UAE”) is being or is likely to be sold at less than fair value within the meaning of Section 731 of the Tariff Act of 1930, as amended (the “Act”), 19 U.S.C. § 1673. Petitioners also allege that WSLPP imported from India and Türkiye is subsidized within the meaning of Section 701 of the Act, 19 U.S.C. § 1671. Petitioners further allege that these unfairly traded imports have materially injured the U.S. domestic industry producing WSLPP and threaten to cause further material injury if remedial action is not taken. These petitions contain information reasonably available to Petitioners in support of these allegations.

Separate volumes regarding the allegations of dumping by subject producers, as well as the countervailable subsidies provided to producers in India and Türkiye, are being filed simultaneously at both the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (the “Commission”). Petitioners request that duties be imposed to offset the dumping and subsidies detailed in the specific antidumping duty (“AD”) and countervailing duty (“CVD”) volumes.

I. COMMON ISSUES

This section contains the information required in AD and CVD petitions by 19 C.F.R. §§ 351.202(b)(1) to 351.202(b)(9) and 207.11.

A. Contact Information for the Petitioners (19 C.F.R. § 207.11(a); 19 C.F.R. § 351.202(b)(1))

Petitioners are domestic producers of WSLPP and therefore domestic interested parties within the meaning of 19 U.S.C. § 1677(9)(C) and 19 C.F.R. § 351.102(b)(17).¹ Petitioners' contact information is provided in **Exhibit I-1**.

B. Identity of an Industry on Whose Behalf the Petitions Are Filed (19 C.F.R. § 207.11(b)(2)(ii); 19 C.F.R. § 351.202(b)(2))

These petitions are filed on behalf of the United States industry that produces WSLPP. **Exhibit I-1** contains information relating to Petitioners and **Exhibit I-2** contains contact information for other domestic producers in the United States, to the extent reasonably available to Petitioners.

C. Information Relating to the Degree of Industry Support for the Petitions (19 C.F.R. § 351.202(b)(3))

Under Sections 702(c)(4)(A) and 732(c)(4)(A) of the Act, a petition is filed by or on behalf of the domestic industry if: (1) the domestic producers or workers who support the petition account for at least 25 percent of the total production of the domestic like product; and (2) those producers or workers account for more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for or opposition to the petition. Petitioners satisfy both requirements.

Because no source reports total domestic production of WSLPP, Petitioners have measured industry support using shipment data. As Commerce has recognized in numerous prior

¹ Petitioners provide their confidential trade and financial data in **Exhibit I-28**.

investigations, shipments are a reasonable proxy for domestic production of steel tubular products.² As shown in **Exhibit I-3**, which sets forth the calculation of industry support for the petitions, Petitioners accounted for most of the industry's domestic shipments and exports in 2025.

[], the recognized authority on the U.S. pipe and tube market, reports that the domestic industry had [] short tons ("STs") of domestic shipments of welded stainless pipe and tube – a category corresponding to WSLPP – in the U.S. market in 2025.³ Official export statistics show that the domestic industry exported 19,917 STs of WSLPP in 2025.⁴ Summing domestic and export shipments, Petitioners estimate that the domestic industry as a whole produced [] STs of WSLPP in 2025.⁵ Petitioners' production accounted for [] percent of this total.⁶ These petitions are therefore filed by or on behalf of the domestic industry within the meaning of Sections 702(c)(4)(A) and 732(c)(4)(A) of the Act.

² See, e.g., *Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe From the Republic of Korea and the Russian Federation: Initiation of Countervailing Duty Investigations*, 85 Fed. Reg. 47,170, 47,172 (Dep't Commerce Aug. 4, 2020) ("Because total industry production data for the domestic like product for 2019 are not reasonably available to the petitioner, and the petitioner has established that shipments are a reasonable proxy for production data, we have relied on the data provided by the petitioner for purposes of measuring industry support"); *Large Diameter Welded Pipe from Canada, Greece, India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations*, 83 Fed. Reg. 7,154, 7,157 (Dep't Commerce Feb. 20, 2018).

³ See [], excerpts attached at **Exhibit I-4**.

⁴ See Export Statistics, attached at **Exhibit I-5**.

⁵ The sum of domestic and export shipments is the best available proxy for production. We note that the ratio of the petitioners' production to their total shipments ranged from [] percent throughout the POI. See Petitioners' confidential trade and financial data in **Exhibit I-28**.

⁶ See Calculation of Industry Support for Petitions, attached at **Exhibit I-3**.

D. Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4))

1. AD/CVD Remedies

The domestic industry has previously filed AD and/or CVD petitions on imports of welded stainless steel pressure pipe from China, India, Japan, Malaysia, Sweden, Thailand, and Vietnam.⁷ The domestic industry has previously filed AD and/or CVD petitions on imports of welded stainless steel pipe from Japan, Korea, Sweden, and Taiwan.⁸ The domestic industry has previously filed AD and/or CVD petitions on imports of large diameter welded pipe, including stainless steel pipe, from Canada, China, Greece, India, Korea, and Türkiye.⁹ As of the filing of these petitions, there remain in place AD and CVD orders on welded stainless steel pressure pipe from China and India;¹⁰ AD orders on welded stainless steel pressure pipe from Malaysia, Thailand, and Vietnam;¹¹ and AD orders on welded stainless steel pipe from Korea and Taiwan.¹²

⁷ See *Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam*, Inv. Nos. 701-TA-454 and 731-TA-1144 (Third Review) and 731-TA-1210–1212 (Second Review), USITC Pub. 5624 (May 2025) at 1.2-1.4, excerpts attached at **Exhibit I-6**.

⁸ See *Welded Stainless Steel Pipe from South Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Fifth Review), USITC Pub. 5395 (Dec. 2022) at I-3-I-6, excerpts attached at **Exhibit I-7**.

⁹ See *Large Diameter Welded Pipe from China and India*, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final), USITC Pub. 4859 (Jan. 2019) at 3-4, excerpts attached at **Exhibit I-8**.

¹⁰ *Circular Welded Austenitic Stainless Pressure Pipe from the People's Republic of China: Continuation of Antidumping Duty Order and Countervailing Duty Order*, 90 Fed. Reg. 22,468 (Dep't Commerce May 28, 2025) ("Continuation of China Orders"); *Welded Stainless Pressure Pipe from India: Continuation of Antidumping and Countervailing Duty Orders*, 87 Fed. Reg. 29,109 (Dep't Commerce May 12, 2022) ("Continuation of India Orders"). The orders on China and India cover welded stainless steel pressure pipe not greater than 14 inches in outside diameter. *Id.*

¹¹ *Welded Stainless Steel Pressure Pipe from Malaysia, Thailand, and the Socialist Republic of Vietnam: Continuation of Antidumping Duty Orders*, 90 Fed. Reg. 22,467 (Dep't Commerce May 28, 2025) ("Continuation of Malaysia, Thailand, and Vietnam Orders").

¹² *Welded ASTM A-312 Stainless Steel Pipe from the Republic of Korea and Taiwan: Continuation of Antidumping Duty Orders*, 87 Fed. Reg. 80,154 (Dep't Commerce Dec. 29, 2022) ("Continuation of Korea and Taiwan Orders").

2. Other Forms of Import Relief

In 2001, the Commission conducted a safeguard investigation under Section 202 of the Trade Act of 1974 to determine whether certain steel products, including stainless steel welded pipe, were being imported into the United States in such increased quantities as to be a substantial cause of serious injury or the threat of serious injury to the domestic industries producing articles like or directly competitive with the imported articles. However, in its final determination issued in December 2001, the Commission made a negative determination with respect to stainless steel welded pipe.¹³

In March 2018, President Donald Trump exercised his authority under Section 232 of the Trade Expansion Act of 1962 to impose a tariff on certain steel imports that were found to threaten to impair U.S. national security, including WSLPP.¹⁴ While certain country exemptions and product-specific exclusions from the payment of tariffs under the Section 232 program were granted prior to February 2025, such exemptions were terminated as of March 2025.¹⁵

Imports of WSLPP from China are subject to additional tariffs of 25 percent under Section 301 of the Trade Act of 1974.¹⁶ Section 301 authorizes the Office of the United States Trade Representative (“USTR”), at the direction of the President, to take appropriate action to respond to a foreign country’s unfair trade practices.¹⁷ Additional Section 301 tariffs on Chinese imports have been in place since 2019, following an investigation by USTR into China’s acts,

¹³ See *Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001), Vol. I at 17-18, excerpts attached at **Exhibit I-9**.

¹⁴ See *Adjusting Imports of Steel Into the United States*, 90 Fed. Reg. 9,817 (Executive Office of the President Feb. 18, 2025).

¹⁵ *Id.* at 9,826.

¹⁶ See *Notice of Modification: China’s Acts, Policies and Practices Related to Technology Transfer, Intellectual Property and Innovation*, 89 Fed. Reg. 76,581, 76,590 (USTR Sept. 18, 2024).

¹⁷ 19 U.S.C. § 2411.

policies, and practices related to technology transfer, intellectual property, and innovation and USTR's determination that these acts, policies, and practices are unreasonable or discriminatory and burden or restrict U.S. commerce.¹⁸ The applicable rate of duty for the Section 301 tariffs on Chinese imports of WSLPP was set at 7.5 percent in 2020¹⁹ and increased to 25 percent in 2024.²⁰

E. Scope of the Investigations and a Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5))

1. Scope of Investigations

The proposed scope of these investigations is as follows:

The merchandise covered by these petitions is circular welded austenitic stainless line and pressure pipe of any diameter. This merchandise includes, but is not limited to, merchandise meeting the American Society for Testing and Materials ("ASTM") and American Society of Mechanical Engineers ("ASME") ASTM A-312/ASME SA312, ASTM A-358/ASME SA358, ASTM A-409/ASME SA409 or ASTM A-778 specifications, the American Petroleum Institute ("API") specification 5LC, or comparable domestic or foreign specifications.

Excluded from the scope are: (1) Welded stainless mechanical tubing, meeting ASTM A-554 or comparable domestic or foreign specifications; (2) boiler, heat exchanger, superheater, refining furnace, feedwater heater, and condenser tubing, meeting ASTM A-249, ASTM A-688 or comparable domestic or foreign specifications; (3) specialized tubing, meeting ASTM A-269, ASTM A-270 or comparable domestic or foreign specifications; and (4) welded stainless tubing having a wall thickness of less than 1.65 mm.

Also excluded from the scope of the antidumping duty investigation on India are any products covered by the existing antidumping duty order on welded stainless pressure pipe from India. *See Welded Stainless Pressure Pipe From India:*

¹⁸ *Notice of Determination and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 14906 (USTR Apr. 6, 2018).

¹⁹ *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 Fed. Reg. 3,741 (USTR Jan. 22, 2020).

²⁰ *Notice of Modification: China's Acts, Policies and Practices Related to Technology Transfer, Intellectual Property and Innovation*, 89 Fed. Reg. at 76,583.

Antidumping Duty and Countervailing Duty Orders, 81 Fed. Reg. 81,062 (Dep’t Commerce Nov. 17, 2016). Also excluded from the scope of the countervailing duty investigation on India are any products covered by the existing countervailing duty order on welded stainless pressure pipe from India. *See Welded Stainless Pressure Pipe From India: Antidumping Duty and Countervailing Duty Orders*, 81 Fed. Reg. 81,062 (Dep’t Commerce Nov. 17, 2016).

The subject imports are normally classified in subheadings 7305.31.6010, 7306.11.0010, 7306.11.0050, 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085 of the Harmonized Tariff Schedule of the United States (“HTS”). They may also enter under HTS subheadings 7306.40.1010, 7306.40.1015, 7306.40.5042, 7306.40.5044, 7306.40.5080, and 7306.40.5090. The HTS subheadings are provided for convenience and customs purposes only; the written description of the scope of these orders is dispositive.

A copy of the proposed scope language is attached at **Exhibit I-10**. Relevant Harmonized Tariff Schedule of the United States (“HTSUS”) excerpts are attached at **Exhibit I-11**.

2. Technical Characteristics and Uses

WSLPP is welded pipe of austenitic stainless steel. It is of circular cross-section, produced in relatively few standard sizes, is designed for use with standard pipe fittings, and is designated by nominal diameter and wall thickness.²¹ The proposed scope includes WSLPP of any diameter.

Stainless steel is a general class of steels that contains at least 10.5 percent of chromium by weight. Chromium gives stainless steel its resistance to corrosion as well as strength at high temperatures and pressure. For these reasons, it is used in corrosive environments, under high temperature and pressure conditions, or where cleanliness and ease of maintenance are strictly required. Although there are various types of stainless steels, the product within the proposed

²¹ USITC Pub. 5624 (May 2025) at 1.8-1.9, excerpts attached at **Exhibit I-6**.

scope is made from the austenitic class of stainless steels, which has excellent corrosion resistance, very good formability, and strength as a result of cold working (changes to the shape or structure of steel, for example by rolling or drawing, without the application of heat). The subject pipe is generally made from austenitic grades 304 and 316 stainless steels. Grade 304, containing 18-20 percent chromium and 8-10.5 percent nickel, is the most widely used austenitic grade and is resistant to food-processing environments (except possibly for high-temperature conditions involving high acid or chloride contents), organic chemicals, and a wide variety of inorganic chemicals. Grade 316 contains 16-18 percent chromium, 10-14 percent nickel, and 2-3 percent molybdenum. The higher nickel and molybdenum content provides better corrosion resistance to grade 316 compared to grade 304 stainless steels.²²

WSLPP is generally produced to conform to ASTM specifications A-312, A-358, A-409, or A-778 or to similar specifications, either foreign or domestic. Stainless line pipe may also be made to API 5LC. Copies of the relevant specifications are attached at **Exhibit I-12**. A-312 is the most common ASTM specification for stainless steel pipe. Welded A-312 pipe is designed for high-temperature, high pressure, general corrosive-resistance service, and thus must be annealed (heat treated) after welding. Major uses for welded A-312 pipe include digester lines, pharmaceutical production lines, petrochemical stock lines, automotive paint lines, and various processing lines such as those in breweries, paper mills, and general food-processing facilities. ASTM A-778 pipe is similar to ASTM A-312 pipe but does not require post-weld annealing. A-778 pipe is most often used in the pulp and paper industry and for wastewater applications, owing to its ability to withstand corrosive contact, albeit at somewhat lower levels than A-312

²² *Id.*

pipe. A-778 pipe is also used in corn fermentation systems to produce ethanol and low-pressure fluid transfer systems.²³

3. Production Process²⁴

There are two stages in the production of WSLPP: forming the tubular shape and welding the product. Two common methods are used to form the tubular shape, namely, the continuous-mill process and the press-brake process.

The continuous-mill process, which is the principal method of producing WSLPP, begins with coils of sheet, strip, or plate. Coiled steel, of a width essentially equivalent to the outside diameter of the pipe to be produced, is set up in an uncoiler and fed into a series of paired forming rolls. As it progresses through the rolls, its cross-sectional profile is formed into a tubular shape with the butted edges ready for welding as described below.

The second method of manufacturing WSLPP is the press-brake process, a batch process in which a press gradually bends cut-to-length sheet into a cylindrical shape with the butted edges ready for welding as described below. The starting sheet is of a width essentially equivalent to the outside diameter and a length equal to the length of the piece of pipe to be produced. The press-brake process is labor-intensive and is used primarily for the production of pipes in larger diameters.

In the welding stage, the butt edges are welded together by an automatic welding machine using either the tungsten inert gas (“TIG”) welding process or the laser welding process. Both methods allow welding without filler material, complete fusion of butted edges,

²³ USITC Pub. 5395 (Dec. 2022) at I-11-I-12, excerpts attached at **Exhibit I-7**.

²⁴ This description of the production process for WSLPP is taken from the Commission’s final staff report in USITC Pub. 5395 at I-12-I-13, excerpts attached at **Exhibit I-7**.

and shielding of the weld area with inert gas to prevent oxidation. In the TIG welding process, welding heat is provided by an electric arc between a tungsten electrode and the pipe edges. In the laser welding process, a laser beam is directed to the weld butt joint, forming a deep-penetration fusion weld. The laser process is capable of a higher speed of operation than is the TIG process.

For continuous welded tubular products, the pipe continues after welding through an in-line annealing furnace, then through straightening and, finally, cutting to length. Batch welded pipe is annealed in a separate operation and subsequently pickled in acid.

4. Tariff Classification

The merchandise subject to the investigations is currently classified in the HTSUS under item numbers: 7305.31.6010, 7306.11.0010, 7306.11.0050, 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, and 7306.40.5085. The merchandise subject to the investigations may also enter under the following HTSUS item numbers: 7306.40.1010, 7306.40.1015, 7306.40.5042, 7306.40.5044, 7306.40.5080, and 7306.40.5090. Relevant excerpts from the HTSUS are attached at **Exhibit I-11**.

F. The Domestic Like Product Proposed by Petitioners (19 C.F.R. § 207.11(b)(2)(i))

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the domestic like product.²⁵ The “domestic like product” is “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation{.}”²⁶ In an investigation, the like product determination is a factual one made on a

²⁵ *NEC Corp. v. United States*, 36 F. Supp. 2d 380, 382 (Ct. Int’l Trade 1998) (“*NEC*”).

²⁶ 19 U.S.C. § 1677(10).

case-by-case basis.²⁷ The Commission generally considers the following factors: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the product; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price.²⁸ No single factor is dispositive. In evaluating these factors, the Commission looks for clear dividing lines and disregards minor variations.²⁹

Welded Stainless Steel Line and Pressure Pipe Constitute a Single Domestic Like Product. In its previous investigations and reviews of welded stainless steel pipe – a product category inclusive of welded stainless steel line pipe and welded stainless steel pressure pipe – the Commission defined a single domestic like product.³⁰ In its previous investigation of large diameter welded pipe, the Commission defined welded stainless steel pipe as a separate domestic like product, but did not define further separate like products within this category, including with respect to welded stainless steel line pipe and welded stainless steel pressure pipe.³¹ Thus, in its prior investigations and reviews, the Commission has universally defined welded stainless steel line pipe and welded stainless steel pressure pipe to be within the same like product.

²⁷ See, e.g., *NEC*, 36 F. Supp. 2d at 383.

²⁸ *Cleo, Inc. v. United States*, 501 F.3d 1291, 1295 (Fed. Cir. 2007).

²⁹ *Id.*

³⁰ USITC Pub. 5395 (Dec. 2022) at 7-9, excerpts attached at **Exhibit I-7**. While the Commission in its original investigations defined the like product to encompass all welded stainless steel pipe – a category broader than Commerce’s scope description – and then narrowed its definition in its second five-year reviews to include only ASTM A-312 and A-778 welded stainless steel pipe, it never defined separate like products, including with respect to line and pressure pipe. *Id.*

³¹ USITC Pub. 4859 at 9-15, excerpts attached at **Exhibit I-8**.

The Commission should continue to do so in these investigations. Applying the Commission's six-factor tests demonstrates that there are no clear dividing lines between welded stainless steel line and pressure pipe.

Physical characteristics and uses. Welded stainless steel line and pressure pipe are made from the same raw material, austenitic stainless steel, and are produced to the same specifications, giving them identical physical characteristics. Even when they are made to different specifications, there is substantial overlap between pipe with the same diameters and wall thicknesses. Attached at **Exhibit I-13** is a table that highlights the overlap between welded stainless pipe meeting ASTM A-312 and API 5LC. It shows that for the majority of standard sizes in ASTM A-312, there is a size with the same outer diameters and wall thickness specified in API 5LC.

Their end uses likewise overlap: both are widely used in pipeline and process piping systems where corrosion resistance, cleanliness, and long service life are essential, with typical applications in refineries, petrochemical plants, chemical plants, power plants, water and desalination facilities, and offshore/onshore pipeline projects.

Manufacturing facilities, production processes, and employees. Welded stainless steel line and pressure pipe are manufactured in the same facilities by the same employees using the same production processes described above. While the Petitioners do not themselves produce welded stainless line pipe, the materials and production process are substantially the same.³²

Channels of distribution. Welded stainless steel line and pressure pipe are both sold to end users and distributors and thus share identical channels of distribution.

³² See Affidavit of Kris Podsiad, attached at **Exhibit I-14**.

Interchangeability. Line and pressure pipe produced to the same specifications are fully interchangeable: pipe meeting ASTM A-312 can be supplied and used as line or pressure pipe. As reviewed above, pipe of the same dimensions can meet specifications for both line pipe and pressure pipe.

Producer and customer perceptions. Producers and customers perceive welded stainless line and pressure pipe – which are marketed together in product brochures under the same grades – as within the same product category.³³

Price. Based on available information, prices for welded stainless line and pressure pipe overlap.

Conclusion. Given these similarities, and consistent with prior determinations, the Commission should define a single domestic like product that consists of all WSLPP, co-extensive with the scope.

WSLPP of all Diameters Constitutes a Single Domestic Like Product. The proposed scope covers WSLPP of all diameters. Where an in-scope product exists along a continuum of sizes, the Commission consistently declines to treat gradations in size as clear dividing lines between like products. Just last year, in *Slag Pots from China* – involving a scope covering slag pots from 65 to 12,000 cubic feet in capacity – the Commission found a single domestic like product, explaining that, “where the scope covers products along a broad continuum of sizes, a lack of interchangeability between products at either end of that continuum is unsurprising, and does not demonstrate the existence of a clear line dividing them.”³⁴ The Commission has applied the

³³ Producers market welded stainless steel pipe by grade, without differentiating between line and pressure pipe. See, e.g., Bristol Pipe & Tube, Inc., *Stainless Steel Pipe*, <bristolpipeandtube.com/pipe-tube/stainless-steel.html> (last visited June 29, 2026), attached as **Exhibit I-15**.

³⁴ *Slag Pots from China*, Inv. Nos. 701-TA-753 and 731-TA-1731 (Preliminary), USITC Pub. 5592 at 5-9 (Feb. 2025), excerpts attached at **Exhibit I-16**.

same principle specifically to pipe products. In *Seamless Standard, Line, and Pressure Pipe (“SSLPP”) from China*, respondents expressly urged the Commission to define SSLPP above and below 4.5 inches in outside diameter as separate like products. The Commission declined, instead defining a single domestic like product consisting of all in-scope sizes because “{a} lack of interchangeability between products at either end of a continuum is not inconsistent with a finding of a single domestic like product when the products are all part of a continuum.”³⁵ And in *Large Residential Washers from Korea and Mexico*, the Commission likewise found no clear lines dividing a like product existing along “a continuum of sizes.”³⁶

The same analysis governs here. In-scope WSLPP is a single product manufactured along a continuum of sizes, with no diameter constituting a clear dividing line. Across every diameter, WSLPP shares the same essential physical characteristic, being circular welded pipe of austenitic stainless steel, and the same essential end uses in the applications discussed above. To the extent interchangeability between very small and very large diameter pipe is limited, that is “unsurprising, and does not demonstrate the existence of a clear line dividing them.”³⁷ Indeed, in *Certain Welded Stainless Steel Pipes from Korea and Taiwan*, the Commission expressly warned that distinguishing between pipe “on the basis of diameter” could “open the door to numerous inappropriate like product possibilities.”³⁸

³⁵ *Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from China*, Inv. Nos. 701-TA-469 and 731-TA-1168 (Final), USITC Pub. 4190 at 5-10 (Nov. 2010), attached at **Exhibit I-20**.

³⁶ *Large Residential Washers from Korea and Mexico*, Inv. Nos. 701-TA-488 and 731-TA-1199-1200 (Final), USITC Pub. 4378 at 5-11 (Feb. 2013), excerpts attached at **Exhibit I-21**.

³⁷ USITC Pub. 5592 at 9 (Feb. 2025), attached at **Exhibit I-16**.

³⁸ *Certain Welded Stainless Steel Pipes from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Final), USITC Pub. 2585 at 9-10, n.21 (Dec. 1992), excerpts attached at **Exhibit I-22**.

Finally, although in certain past welded stainless steel pipe proceedings the Commission has defined a single domestic like product up to 14 inches in outside diameter, the scope in those proceedings was itself bounded at 14 inches.³⁹ Where, as here, the scope contains no size limitation, the Commission has defined a singled domestic like product, encompassing welded stainless steel pipe of all diameters.⁴⁰

In sum, because no clear lines divide the domestic like product – whether by diameter or between line and pressure pipe – the Commission should define a single domestic like product, WSLPP, coextensive with the scope.

G. The Names of the Subject Countries and the Name of Any Intermediate Country Through Which the Merchandise is Transshipped (19 C.F.R. § 351.202(b)(6))

The WSLPP covered by these petitions is manufactured in and exported to the United States from India, Türkiye, and the UAE. Petitioners do not have any evidence at this time indicating that the subject merchandise covered by these petitions is produced in a country other than the country from which it is exported.

H. The Names and Addresses of Each Person Believed to Sell the Merchandise at Less Than Fair Value and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(i)(A))

The names and addresses of the entities believed by Petitioners to be producing and exporting WSLPP subject to these petitions are provided in **Exhibits I-17** through **I-19**. Information reasonably available to Petitioners does not allow them to identify the proportion of total exports to the United States during the most recent 12-month period accounted for by the

³⁹ See, e.g., USITC Pub. 5624 (May 2025) at 6-7, excerpts attached at **Exhibit I-6**.

⁴⁰ See, e.g., USITC Pub. 5395 (Dec. 2022) at 6-9, excerpts attached at **Exhibit I-7**.

producers listed in these exhibits, but such information suggests that the listed companies account for the vast majority of subject exports.

I. All Factual Information Related to the Calculation of Export Price and the Constructed Export Price of the Subject Merchandise and the Normal Value of the Foreign Like Product for Market Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(B))

Volumes II through IV of these petitions contain the necessary information concerning the calculation of the export price of the subject merchandise and the normal value of the foreign like product for the subject countries that are market economy countries.

J. Factual Information Related to the Calculation of Normal Value of the Foreign Like Product in Nonmarket Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(C))

None of the countries covered by these petitions are nonmarket economies.

K. The Names and Addresses of Each Person Believed to Benefit from a Countervailable Subsidy Who Exports the Subject Merchandise to the United States and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(ii)(A))

Volume V contains a CVD petition on imports of WSLPP from India and Volume VI contains a CVD petition on imports of WSLPP from Türkiye. The names and addresses of the entities believed by Petitioners to be benefitting from countervailable subsidies and that have exported WSLPP to the United States are provided in **Exhibits I-17** (India) and **I-18** (Türkiye). Information reasonably available to Petitioners does not allow the identification of the proportion of total exports to the United States accounted for during the most recent 12-month period by the listed producers, but Petitioners believe the listed companies account for the vast majority of relevant exports.

L. The Alleged Countervailable Subsidies and Related Factual Information (19 C.F.R. § 351.202(b)(7)(ii)(B))

Volumes V and VI of these petitions contain allegations of countervailable subsidies, as well as factual information relevant to the alleged countervailable subsidies such as the laws, regulations, and decrees under which the subsidies are bestowed, the manner in which the subsidies were paid, and Petitioners' estimation – to the extent practicable – of the value of the subsidies provided to producers and exporters of WSLPP subject to these petitions.

M. The Volume and Value of the Merchandise Imported During the Most Recent Two-Year Period (19 C.F.R. § 351.202(b)(8))

Imports of WSLPP from the subject countries have been substantial over the most recent two-year period. Petitioners estimate that by volume, subject imports were 12,928 ST in 2024 and 36,287 ST in 2025.⁴¹ Petitioners estimate that the landed, duty-paid value of subject imports was \$47.7 million in 2024 and \$180.4 million in 2025.⁴²

N. Contact Information for Each Entity the Petitioners Believe Imports or Is Likely to Import the Subject Merchandise (19 C.F.R. § 207.11(b)(2)(iii); 19 C.F.R. § 351.202(b)(9))

Contact information for importers of WSLPP from the subject countries known to Petitioners at this time is listed in **Exhibit I-24**. There may be a number of importers of WSLPP unknown to Petitioners at this time. Petitioners respectfully request that Commerce obtain this information from U.S. Customs and Border Protection, as Petitioners do not have access to this information.

⁴¹ U.S. Import Data for WSLPP, attached at **Exhibit I-23**.

⁴² *Id.*

O. Identification of Pricing Products (19 C.F.R. § 207.11(b)(2)(iv))

Petitioners request that the Commission collect pricing data on U.S. shipments for the following pricing products. The data should be collected in quantity (in feet) and f.o.b. value (in actual dollars) of the following WSLPP products shipped to unrelated U.S. customers during January 2023 to March 2026.

Product 1 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 2-inch schedule 10S

Product 2 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 4-inch schedule 10S

Product 3 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 6-inch schedule 10S

Product 4 – ASTM A-312 or API 5LC, welded, grade AISI 304/304L pipe, 14-inch schedule 10S

P. Lost Sales and Revenue (19 C.F.R. § 207.11(b)(2)(v))

Petitioners are submitting, separately, Lost Sales and Lost Revenue Allegations using the Commission's template. Petitioners expect that purchaser responses to the Commission's Lost Sales and Lost Revenue Survey, combined with other evidence developed during the investigations, will confirm significant domestic industry lost sales and revenues and other indicia of adverse price effects.

II. INJURY INFORMATION (19 C.F.R. § 351.202(B)(10))

According to the Act, a domestic industry is entitled to antidumping or countervailing duty relief if it is experiencing material injury or the threat of material injury by reason of dumped or unfairly subsidized imports. 19 U.S.C. §§ 1671, 1673. As outlined below, the domestic industry producing WSLPP in the United States is both suffering from material injury and threatened with further material injury by reason of dumped and unfairly subsidized imports of WSLPP from India, Türkiye, and the UAE.

A. The domestic like product consists of WSLPP covered by the scope

In determining whether an industry in the United States has suffered material injury or is threatened with material injury, the Commission first defines the domestic like product, *i.e.*, “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”⁴³ As explained in Section I.B, above, there is a single domestic like product in these investigations that consists of all WSLPP corresponding to the scope.

B. Subject imports are not negligible

Pursuant to 19 U.S.C. § 1677(24)(A)(i), imports are not considered to be negligible if they account for at least 3 percent of the volume of all such merchandise imported into the United States in the most recent twelve-month period for which data are available that precedes the filing of the petitions.⁴⁴ In this case, the most recent twelve-month period for public import data are available is June 2025 through May 2026. During that 12-month period, imports from India subject to the antidumping petition accounted for 10.12 percent of imports, imports from India subject to the countervailing duty investigation accounted for 4.25 percent of imports, imports from Turkey accounted for 9.92 percent of imports, and imports from the UAE accounted for 9.08 percent of imports.⁴⁵ Thus, imports from each of the subject countries are not negligible.

⁴³ 19 U.S.C. § 1677(10).

⁴⁴ The higher negligibility threshold for CVD cases on certain developing countries does not apply in this case.

⁴⁵ See Negligibility Calculations, attached at **Exhibit I-26**.

C. Subject imports should be cumulated

For the purposes of evaluating volume and price effects for a determination of material injury, the statute directs the Commission to cumulate imports from all subject countries as to which petitions were filed on the same day if such imports compete with each other and the domestic like product in the U.S. market.⁴⁶ In assessing whether subject imports compete with each other and the domestic like product, the Commission generally considers four factors: (1) the degree of fungibility between subject imports from each country and between subject imports and the domestic like product; (2) the presence of sales or offers to sell in the same geographic markets; (3) the existence of common or similar channels of distribution; and (4) whether the subject imports are simultaneously present in the U.S. market. Only a reasonable overlap of competition is required. In this case, these petitions are all being filed on the same day, and, as described in more detail below, each of the factors the Commission considers supports a finding that imports of WSLPP from all subject countries compete with each other and with the domestic like product. The Commission should therefore cumulate subject imports in its determination of material injury, and the remainder of the injury analysis in these petitions is presented on a cumulated basis.

1. Fungibility

WSLPP from India, Türkiye, and the UAE are generally substitutable with each other and with the domestic like product. WSLPP are generally produced in accordance with the same standards, whether produced domestically or imported, and the domestic like product and imports are thus highly substitutable. Additionally, as shown by the evidence of lost sales, lost revenues, and lost market share submitted with these petitions, subject imports are not merely

⁴⁶ 19 U.S.C. § 1677(7)(G)(i).

substitutable for the domestic like product – they have, in fact, been substituted for the domestic like product. Based on these facts, the Commission should find that imports from each of the subject countries are generally fungible with each other and the domestic like product.

2. Same Geographic Markets

The record here shows that imports from the subject countries compete with imports from the other subject countries throughout the U.S. market. The import data provided at **Exhibit I-27** show that WSLPP from the subject countries entered at ports in multiple regions throughout the country during the period of investigation. Furthermore, all of those imports compete with the domestic like product, which is sold nationwide. Thus, this factor supports cumulating all of the subject imports.

3. Channels of Distribution

The Commission has previously found that both domestically-produced welded stainless pipe and subject imports are generally shipped to distributors. In addition, WSLPP from domestic producers and the subject countries are sold to the same end users. Thus, this factor supports cumulation.

4. Simultaneous Presence

Exhibit I-27 shows that imports from the subject countries have been present in every month of the period of investigation. Subject imports and the domestic like product are thus simultaneously present in the market.

* * *

As demonstrated above, each of the cumulation factors that the Commission normally considers shows that there is a reasonable overlap of competition between imports from each of

the subject countries and the domestic like product. Accordingly, the Commission should cumulate all of the subject imports.

D. Subject imports are causing material injury to the domestic industry

In determining whether a domestic industry is experiencing present material injury by reason of unfairly traded imports, the Commission must consider: (1) the volume of subject imports; (2) the effect of imports of subject merchandise on U.S. prices for the domestic like product; and (3) the impact of subject imports on domestic producers.⁴⁷ In this case, each factor favors a finding of present material injury.

1. The volume of subject imports is significant

In assessing the volume of subject imports, the Commission must “consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”⁴⁸ Imports of WSLPP from India, Türkiye, and the UAE are significant by any measure.

U.S. Imports of WSLPP from India, Türkiye, and the UAE⁴⁹ Short Tons

Source	2023	2024	2025	Jan - Mar 2025	Jan - Mar 2026
India	2,763	9,190	12,942	2,628	1,695
Türkiye	61	1,096	12,628	7,988	2,767
UAE	95	2,642	10,717	1,960	2,123
Subject	2,918	12,928	36,287	12,576	6,586

By volume, subject imports were 12.4 times higher in 2025 than they were in 2023. Subject imports declined in the first quarter of 2026, but even in that one quarter exceeded total subject

⁴⁷ 19 U.S.C. § 1677(7)(B).

⁴⁸ 19 U.S.C. § 1677(7)(C)(i).

⁴⁹ See Import Statistics, attached at **Exhibit I-23**.

imports in calendar year 2023. Moreover, this apparent decline likely masks an inventory overhang affecting the market in 2026 due to the massive surge from 2023 to 2025.

Subject imports are also significant relative to domestic consumption. Though demand was increasing rapidly over the period of investigation (“POI”), due in part to demand for WSLPP in the booming data center construction industry,⁵⁰ subject imports rose so quickly that they were still able to seize an increasing share of the rapidly expanding U.S. market.

Estimated WSLPP Market Share⁵¹
Short Tons

Source		2023	2024	2025	Jan - Mar 2025	Jan - Mar 2026	
Subject Imports		2,918	12,928	36,287	12,576	6,586	
Nonsubject Imports		52,505	59,018	81,317	23,065	16,740	
Total Imports		55,423	71,946	117,604	35,641	23,326	
Petitioners	[						]
Consumption	[						]
Subject %	[						]
Nonsubject %	[						]
Domestic %	[						]

From 2023 to 2025, subject imports gained [] percentage points of market share, the [] came at the expense of the domestic industry, which lost [] percentage points of market share. While subject imports lost some market share in the first quarter of 2026, their share remained higher than []. Indeed, as overall consumption rose by a rapid [] percent from 2023 to 2025, domestic producers’ shipments [], due to the swift surge in subject imports.

⁵⁰ See Data Center Articles, attached at **Exhibit I-29**.

⁵¹ See Import Statistics, attached at **Exhibit I-23**. See also Petitioners’ Confidential Data, attached at **Exhibit I-28**.

Thus, the volume of subject imports is significant, both absolutely and relative to consumption, and the increase in subject import volume over the period is also significant.

2. Subject imports have had significant adverse price effects

In evaluating the effect of subject imports on prices, the Commission must consider whether “there has been significant price underselling by the imported merchandise,” and whether the effect of imports “otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.”⁵² Subject imports of WSLPP have undersold the domestic like product, and they have also suppressed and depressed prices to a significant degree.

A comparison of Petitioners’ own prices and the average unit value of subject imports shows deep and widespread underselling throughout the POI. Indeed, imports from [] undersold domestic producers. In addition, margins of underselling ranged as high as [] percent.

Underselling Analysis⁵³
Average Unit Values, \$/Short Ton

		2023	2024	2025	Jan - Mar 2025	Jan - Mar 2026	
Petitioners’ U.S. Commercial Shipments	[						]
India		\$5,137	\$3,543	\$4,313	\$3,471	\$4,696	
Turkey		\$4,144	\$5,782	\$6,966	\$7,339	\$6,244	
UAE		\$5,382	\$3,329	\$3,417	\$3,234	\$3,842	
India %	[						]
Turkey %	[						]
UAE %	[						]

⁵² 19 U.S.C. § 1677(7)(c)(ii).

⁵³ See Import Statistics, attached at **Exhibit I-23**. See also Petitioners’ Confidential Data, attached at **Exhibit I-28**.

This underselling is significant, as it has caused the massive loss in market share detailed above. In addition, Petitioners' lost sales and lost revenue allegations confirm that the domestic industry has lost volume and potential volume due to competition with lower-priced subject imports.

Low-priced subject imports have also caused price depression and suppression. The average unit value of Petitioners' U.S. commercial shipments fell by [] percent from 2023 to 2025, even as demand was surging.⁵⁴ These data confirm that rising volumes of low-priced subject imports suppressed and depressed domestic prices to a significant degree.

In short, subject imports have undersold the domestic like product and suppressed and depressed domestic prices, resulting in significant adverse price effects.

3. Subject imports have had a significant adverse impact on the domestic industry

In examining the impact of subject imports on the domestic industry, the Commission is instructed to "evaluate all relevant economic factors which have a bearing on the state of the industry, in the United States."⁵⁵ These factors include, but are not limited to:

- Actual and potential declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity;
- Factors affecting domestic prices;
- Actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment;
- Actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product; and
- The magnitude of the margin of dumping.⁵⁶

As explained in more detail below, these factors support a determination that the domestic industry has been materially injured by subject imports.

⁵⁴ See Petitioners' Confidential Data, attached at **Exhibit I-28**.

⁵⁵ 19 U.S.C. § 1677(7)(c)(iii).

⁵⁶ *Id.*

From 2023 to 2025, as subject imports flooded into a growing market and seized market share, the domestic industry's production and shipments were [].⁵⁷ As subject imports prevented domestic producers from increasing shipments and production in line with demand, the industry's capacity utilization remained low, [].⁵⁸ The domestic industry was also forced to reduce employment and hours, and wages paid fell.

Widespread underselling by large and rising volumes of subject imports also harmed the industry financially. Severe price depression caused the domestic industry's net sales revenue to decline by [] percent from 2023 to 2025. As a result, the industry's operating income []. The industry's operating income margin [], despite booming demand. The domestic industry's net income was also [] despite the rapid growth in apparent consumption.

In short, a massive surge in low-priced subject imports has thwarted the domestic industry's ability to benefit from ballooning demand over the POI. But for the increase in dumped and subsidized imports, the domestic industry would have been able to hire more workers, add shifts, and use much more of its [] capacity. The domestic industry should also have been able to expect to increase prices as demand surged and to improve its operating and net income as a result. Instead, imports prevented the domestic industry from increasing production, shipments, employment, revenue, and profits in line with demand. As shown in more detail below, highly substitutable imports that deeply undersell the domestic industry only threaten more injury if relief is not provided.

⁵⁷ See Petitioners' Confidential Data, attached at **Exhibit I-28**.

⁵⁸ See *id.*

For all of these reasons, the Commission should find that the domestic industry has been materially injured, by imports of WSLPP from India, Türkiye, and the UAE.

E. Subject Imports Threaten Continued Material Injury to the Domestic Industry

The statute directs the Commission to consider several factors in assessing the threat of material injury, including: (1) existing unused subject capacity, or an imminent and substantial increase in subject capacity; (2) a significant rate of increase in the volume or market penetration of subject imports; and (3) whether subject imports are entering at prices likely to significantly depress or suppress domestic prices.⁵⁹ A threat determination “may not be made on the basis of mere conjecture or supposition.”⁶⁰ None is needed here. As shown below, ample evidence confirms that subject imports threaten continued material injury to the domestic industry absent relief.

1. The Commission Should Cumulate Subject Imports for Any Threat Analysis

For threat, the Commission “may cumulatively assess the volume and price effects of imports of the subject merchandise” from all countries for which petitions were filed on the same day, if the imports compete with each other and the domestic like product.⁶¹ Both conditions are met. The petitions concerning WSLPP from India, Türkiye, and the UAE are being filed on the same day and, as shown above, these imports compete with each other and the domestic like product. The Commission should accordingly cumulate subject imports from all three countries in any threat analysis.

⁵⁹ 19 U.S.C. § 1677(7)(F)(i).

⁶⁰ 19 U.S.C. § 1677(7)(F)(ii).

⁶¹ 19 U.S.C. § 1677(7)(H).

2. Subject Producers Have the Ability and Incentive to Target the U.S. Market

WSLPP producers in each subject country have large and growing capacity and are export oriented. Absent relief, they could flood the U.S. market. And because this market is attractive, they would have every incentive to do so. Petitioners discuss each subject WSLPP industry in turn.

India. As the Commission has recognized, India is among the world’s largest producers of stainless steel tubular products,⁶² and its capacity is growing. Ratnamani Metals & Tubes Limited (“Ratnamani”) has 61,500 metric tons per year of stainless steel pipe and tube capacity,⁶³ and is expanding further.⁶⁴ Sun Mark Stainless (“Sun Mark”) has 43,500 metric tons per year of dedicated welded stainless pipe and tube capacity and calls expansion its “responsibility.”⁶⁵ Venus Pipes & Tubes (“Venus”) expanded its welded stainless pipe and tube capacity by 15 percent in May 2025, to 27,600 metric tons per year.⁶⁶

The Commission has also recognized that India’s welded stainless steel pipe industry is export oriented.⁶⁷ That orientation is intensifying. In 2025, Ratnamani’s exports made their

⁶² *Welded Stainless Steel Pressure Pipe from India*, Inv. Nos. 701-TA-482 and 731-TA-1064 (Review), USITC Pub. 5320 (Apr. 2022) at 17, excerpts attached at **Exhibit I-30**.

⁶³ CRISIL Ratings, “Rating Rationale, Ratnamani Metals and Tubes Limited” (June 11, 2025) at 3, attached at **Exhibit I-31**.

⁶⁴ “Ratnamani Metals & Tubes Demonstrates Resilience Amid Market Challenges, Maintains Strong Growth Outlook,” *Stainless Today* (May 20, 2026) at 3, attached at **Exhibit I-32**.

⁶⁵ McIntyre, Joanne, “Sun Mark Stainless: Three generations. One vision,” *Stainless Steel World* (Nov. 2025) at 8-9, attached at **Exhibit I-33**.

⁶⁶ Press Release, “Venus Pipes & Tubes Limited, Commencement of Operations of 3,600 MTPA of value-added Welded Tubes” (May 23, 2025), attached at **Exhibit I-34**.

⁶⁷ USITC Pub. 5320 (Apr. 2022) at 17, excerpts attached at **Exhibit I-30**.

“highest ever” contribution to the company’s revenues.⁶⁸ The same year, Sun Mark won the Government of India’s Gold Trophy for “Highest Exports of Stainless Steel Pipes and Tubes.”⁶⁹ And Venus’s exports surged from 12.3 percent of revenue in 2024 to 35.3 percent in 2025, under an express strategy of “tripling exports.”⁷⁰

With large, growing, and export-oriented capacities, Indian producers have the ability to target the U.S. market with significant volumes of subject merchandise absent relief. They also have the incentive to do so. The United States is among the world’s biggest WSLPP markets, importing more of the product category that includes WSLPP than any other country.⁷¹ Import barriers in third markets, discussed below, make the United States more attractive still. None of this is lost on Indian producers, who recognize the “export opportunities”⁷² and “high-potential”⁷³ of the large, open, and well-paying U.S. market.

Türkiye. Türkiye is Europe’s largest steel pipe producer and the world’s fourth largest.⁷⁴ And its capacity is growing. In January 2025, YC Inox began production at its new \$80 million stainless steel pipe mill in Dilovası, Kocaeli, which will have more than 30,000 metric tons per

⁶⁸ Ratnamani Metals & Tubes Ltd., 41st Annual Report 2024-25 at 15, excerpts attached at **Exhibit I-35**.

⁶⁹ McIntyre, Joanne, “Sun Mark Stainless: Three generations. One vision,” *Stainless Steel World* (Nov. 2025) at 10, attached at **Exhibit I-33**.

⁷⁰ Venus Pipes & Tubes Limited, Annual Report FY 2024-25 at 13 and 48, excerpts attached at **Exhibit I-36**.

⁷¹ “Tubes, pipe & hollow profiles, stainless steel, welded (HS 730640), imports by country, 2024,” World Bank, World Integrated Trade Solution, attached at **Exhibit I-37**.

⁷² “Ratnamani Metals & Tubes Demonstrates Resilience Amid Market Challenges, Maintains Strong Growth Outlook,” *Stainless Today* (May 20, 2026), attached at **Exhibit I-32**.

⁷³ Venus Pipes & Tubes Limited, Annual Report FY 2024-25 at 47, excerpts attached at **Exhibit I-36**.

⁷⁴ Turkish Steel Pipe Manufacturers’ Association (CEBID), The Steel Pipe Industry of Turkey, attached at **Exhibit I-38**.

year of capacity at full build-out.⁷⁵ YC Inox is not alone. In August 2025, Erk Boru launched a second-phase expansion of its welded stainless pipe and profile operations, growing to 32 mill lines.⁷⁶

The Turkish industry is also export oriented, describing itself as a “net exporter.”⁷⁷ And its export orientation is intensifying. From 2024 to 2025, Turkish exports of the product category that includes WSLPP rose by 71.4 percent, from 7,004 to 12,003 metric tons.⁷⁸

Turkish producers would have the incentive to direct their large, growing, and export-oriented capacities to the United States absent relief. The United States is a large market for WSLPP, as discussed, and the available data indicate that WSLPP from Türkiye commands higher prices in the United States than in other export markets.⁷⁹ Third-country trade barriers, discussed below, further increase the relative attractiveness of the U.S. market. Indeed, Turkish producer Nikel Paslanmaz has stated that European quotas and trade barriers have cut Europe’s share of its exports from 80 percent to roughly 20 percent, and that it is now targeting alternative markets, including the United States.⁸⁰

⁷⁵ “Turkey’s YC Inox begins production at Dilovası stainless steel pipe plant,” *SteelOrbis* (Jan. 6, 2025), attached at **Exhibit I-39**.

⁷⁶ “Erk Boru Paslanmaz Çelik’ten yeni yatırım hamlesi” (“A New Investment Move from Erk Boru Paslanmaz Çelik”), *Paslanmaz Çelik Dünyası* (Aug. 21, 2025), attached at **Exhibit I-40**.

⁷⁷ Turkish Steel Pipe Manufacturers’ Association (CEBID), The Steel Pipe Industry of Turkey, attached at **Exhibit I-38**.

⁷⁸ UN Comtrade Database, Türkiye exports of welded stainless steel tubes, pipes, and hollow profiles (HS 730640) to World, 2024 and 2025 (last accessed July 13, 2026), attached at **Exhibit I-41**.

⁷⁹ AUV analysis from UN Comtrade Data (exports from Türkiye (HS 730611 and HS 730640) for 2023 by largest destination markets showing United States offers among the highest AUVs for these exports), attached at **Exhibit I-42**.

⁸⁰ “Nikel Paslanmaz to expand stainless steel capacity with investments exceeding \$150 million,” *SteelOrbis* (May 7, 2026), attached at **Exhibit I-43**.

UAE. UAE producer Inoxium Tubi describes itself as “the biggest stainless steel pipes & tubes producing mill in the Gulf,” with a capacity of 36,000 metric tons per year.⁸¹ The Hidayath Group, another UAE producer, bills itself as “one of the industry’s largest manufacturers and suppliers of stainless steel tubes, pipes, and pipe fittings,” serving “more than twenty countries across five continents.”⁸² The UAE industry thus has the ability to ship significant volumes of subject merchandise to the United States. The U.S. market’s large size, along with third-country trade barriers, would provide it with ample incentive to do so absent relief.

3. Subject Producers Have Demonstrated Their Ability to Rapidly Penetrate the U.S. Market

The statute directs the Commission to consider “a significant rate of increase of the volume or market penetration of imports of the subject merchandise” in determining whether the domestic industry is threatened with material injury.⁸³ Subject imports have dramatically increased both their volume and market penetration. As discussed above, from 2023 to 2025, these imports skyrocketed, and they were more than 12 times higher in 2025 than they had been in 2023. Subject imports increased their market share by [] percentage points from 2023 to 2025, climbing from [] percent of apparent U.S. consumption to [] percent. Subject imports have rapidly surged into the U.S. market, indicating a “likelihood of substantially increased imports” that threaten the domestic industry with additional material injury absent relief.⁸⁴

⁸¹ “About Us,” <inoxiumtubi.com>, attached at **Exhibit I-44**.

⁸² “Stainless Steel Pipes and Tubes,” Hidayath Group, at 5, attached at **Exhibit I-45**.

⁸³ 19 U.S.C. § 1677(7)(F)(i)(III).

⁸⁴ 19 U.S.C. § 1677(7)(F)(i)(III).

4. Other Trade Measures Incentivize Subject Producers to Export to the U.S. Market

In assessing threat, the Commission also considers whether trade measures in third-country markets are likely to divert subject exports to the United States. On July 1, 2026, the European Union replaced its steel safeguard – which had imposed a 25 percent out-of-quota duty – with a stricter regime, Regulation (EU) 2026/1384. The new regulation cuts duty-free tariff-rate quotas by roughly 47 percent relative to safeguard levels and doubles the out-of-quota duty to 50 percent.⁸⁵ Stainless steel welded pipe is covered by the new regime.⁸⁶

The United Kingdom acted in concert. On July 1, 2026, the UK replaced its steel safeguard with a measure that cuts overall quota volumes by 51 percent and imposes the same 50 percent out-of-quota duty. The UK measure likewise covers stainless steel welded pipe.⁸⁷

On July 28, 2025, Brazil imposed an antidumping duty order on “seamed tubes of austenitic stainless steel” from India. The order covers HS code 730640, which includes stainless steel welded pipe, at definitive duties ranging from US \$397.42 per metric ton to US \$1,207.06 per metric ton. Non-individually examined Indian producers/exporters received the highest rate: US \$1,207.06 per metric ton.⁸⁸

Each of these measures heightens the relative attractiveness of the U.S. market. Absent relief, WSLPP producers in each subject country would have every incentive to divert their exports to the United States.

⁸⁵ Regulation (EU) 2026/1384 of the European Parliament and of the Council of 17 June 2026 addressing the negative trade-related effects of global overcapacity on the Union steel market, attached at **Exhibit I-46**.

⁸⁶ Commission Implementing Regulation (EU) 2026/1457 of 29 June 2026, attached at **Exhibit I-47**.

⁸⁷ “UK’s steel trade measure from 1 July 2026,” UK Department for Business and Trade, attached at **Exhibit I-48**.

⁸⁸ “Measure ID 2407361,” WTO Trade Remedies Data Portal, attached at **Exhibit I-49**.

5. Subject Imports Will Enter at Prices that Depress and Suppress U.S. Prices

The statute directs the Commission to consider “whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports.”⁸⁹ They are. As demonstrated above, the information reasonably available to Petitioners shows pervasive underselling by subject imports from all three countries that has depressed and suppressed domestic prices. Absent relief, high volumes of low-priced subject imports will only depress and suppress domestic prices further.

6. Rising Volumes of Low-Priced Imports Will Further Injure a Vulnerable Domestic Industry

The domestic industry is vulnerable to further material injury. Petitioners’ capacity utilization at the end of the period of investigation was only [] percent – well below sustainable levels – and the industry was deprived of the opportunity to increase production, shipments, employment, prices, and profitability as the market was booming. Absent relief, significant volumes of low-priced subject imports will force domestic producers to choose between two equally bad options: surrender sales, or defend them by cutting prices and forgoing price increases. Either would erode their output, employment, and financial performance, pushing an already vulnerable industry deeper into decline.

7. Inventories of Subject Merchandise Threaten Additional Material Injury

The statute directs the Commission to consider “inventories of the subject merchandise.”⁹⁰ Data on WSLPP inventories held in the subject countries are not presently

⁸⁹ 19 U.S.C. § 1677(7)(F)(i)(IV).

⁹⁰ 19 U.S.C. § 1677(7)(F)(i)(V).

available to the Petitioners. But the import surge documented above supports the reasonable inference that U.S. inventories of subject WSLPP have built up, and imported product inventory overhang can depress and suppress domestic prices. This factor thus likewise supports an affirmative threat determination.

8. Subject Producers Can Shift Other Tubular Production to WSLPP

The statute directs the Commission to consider “the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.”⁹¹ That potential exists here. Inoxium Tubi, for example, produces both “Ornamental and Industrial Tubes and Pipes” at its Umm Al Quwain mill.⁹² Moreover, small-diameter WSLPP from India is outside the scope of these investigations, and the information available indicates that Indian producers can shift from producing smaller to larger diameter (and thus in-scope) WSLPP.⁹³ This factor further supports an affirmative threat determination.

9. Subject Imports Are Hindering the Domestic Industry’s Development and Production Efforts

The statute directs the Commission to consider “the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product.”⁹⁴ Dumped and subsidized subject imports have already caused the domestic industry’s operating and financial

⁹¹ 19 U.S.C. § 1677(7)(F)(i)(VI).

⁹² “About Us”, <inoxiumtubi.com>, attached at **Exhibit I-44**.

⁹³ Venus, for example, can produce welded stainless steel pipe with outside diameters ranging from 9 mm to 1,460 mm. *See* “Venus Pipes & Tubes: On the Way to Becoming India’s Largest Manufacturer of Stainless Steel Pipes and Tubes,” *Stainless Steel World* (Mar. 2024), at 2, attached at **Exhibit I-50**.

⁹⁴ 19 U.S.C. § 1677(7)(F)(i)(VIII).

performance to []. Absent relief, the continuation of harm of this type by subject imports will make it difficult, if not impossible, for domestic producers to fund the development and production efforts on which their long-term viability depends.

10. Countervailable Subsidies Encourage Production and Export of WSLPP from India and Türkiye

Where a countervailable subsidy is involved, the statute directs the Commission to consider the nature of the subsidy – “particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1” of the WTO Subsidies Agreement.⁹⁵ Article 3 of the WTO Subsidies Agreement describes subsidies that are prohibited because they are contingent upon export performance or upon the use of domestic over imported goods.⁹⁶ Article 6.1 of the WTO Subsidies Agreement describes subsidies that create serious prejudice by (1) collectively exceeding 5 percent of the product’s value; (2) covering an industry’s operating losses; (3) covering an enterprise’s operating losses, with some exceptions; or (4) directly forgiving debt.⁹⁷

The subsidies alleged in Volumes V (India) and VI (Türkiye) include those described by Articles 3 and 6.1. For India, this includes the following subject programs:

1. Export Promotion of Capital Goods Scheme
2. Duty Drawback Scheme
3. Advance Authorization Program
4. Duty-Free Import Authorization Program
5. Remission of Duties and Taxes on Exported Products
6. Merchandise Export from India Scheme
7. Status Holder Incentive Scheme
8. Interest Equalization Scheme on Pre- and Post-Shipment Rupee Export Credit
9. Incremental Exports Incentive Scheme

⁹⁵ 19 U.S.C. § 1677(7)(F)(i)(I).

⁹⁶ *Agreement on Subsidies and Countervailing Measures* (April 15, 1994), Marrakesh Agreement Establishing the World Trade Organization, Annex 1A, 1869 U.N.T.S. 14, at Art. 3.

⁹⁷ *Id.* at Art. 6.1

There are also a broad array of export-contingent subsidy programs benefitting WSLPP producers in Türkiye:

Grant and Tax Programs

1. Deductions from Taxable Income for Export Revenue
2. Inward Processing Certificates (D-3 Certificates)
3. Exemption of Exchange Tax for Foreign Exchange Transactions
4. Tax Exemption for Export Loans
5. Corporate Tax Reduction for Manufacturers
6. Foreign Market Research and Market Entry Support
7. Support for the Development of International Competitiveness
8. Domestic and Foreign Fair Support Program
9. Turquality Program

Turk Eximbank Loan Programs

1. Rediscount Program
2. Pre-Shipment Export Credit Program
3. Pre-Export Credit Program
4. Export-Oriented Investment Credit Program
5. Export-Oriented Working Capital Credit Program
6. Specific Export Credit Program
7. Export Buyer's Credits
8. Export Credit Guarantees (aka Letter of Guarantee Program)

This factor strongly further supports an affirmative threat determination as to India and Türkiye.

* * *

In sum, each factor supports an affirmative threat finding. Subject import volumes are large and growing and are sold at prices that undersell the domestic like product and depress and suppress domestic prices – trends that will only continue, and worsen, absent relief. Producers in the subject countries hold ample and growing capacity to export still greater quantities, and they have every incentive to direct them here: the U.S. market for WSLPP is one of, if not the, largest in the world, and third-country trade measures have recently tightened, further closing off alternative markets. The statute requires that a threat determination rest on evidence rather than

“mere conjecture or supposition.”⁹⁸ The evidence here is conclusive. Absent relief, subject imports will continue to materially injure an already vulnerable U.S. industry.

III. CONCLUSION

Petitioners respectfully request that Commerce initiate antidumping and countervailing duty investigations on WSLPP from India, Türkiye, and the UAE, that the Commission find that the domestic industry is materially injured or threatened with injury by these imports, and that antidumping and countervailing duty orders be imposed to offset the dumping and subsidization that is found.

⁹⁸ 19 U.S.C. § 1677(7)(F)(ii).

Table of Exhibits

Exhibit	Title	BPI Requested?
I-1	Contact Information for Petitioners	No
I-2	Contact Information for Other Domestic Producers	No
I-3	Calculation of Industry Support	Yes
I-4	[]	Yes
I-5	Export Statistics	No
I-6	<i>Welded Stainless Steel Pressure Pipe from China, Malaysia, Thailand, and Vietnam</i> , Inv. Nos. 701-TA-454 and 731-TA-1144 (Third Review) and 731-TA-1210–1212 (Second Review), USITC Pub. 5624 (May 2025)	No
I-7	<i>Welded Stainless Steel Pipe from South Korea and Taiwan</i> , Inv. Nos. 731-TA-540-541 (Fifth Review), USITC Pub. 5395 (Dec. 2022)	No
I-8	<i>Large Diameter Welded Pipe from China and India</i> , Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final), USITC Pub. 4859 (Jan. 2019)	No
I-9	<i>Steel</i> , Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001)	No
I-10	Proposed Scope Language	No
I-11	HTSUS Excerpts	No
I-12	Specifications	No
I-13	ASTM A-312 and API 5LC Overlap Table	No
I-14	Affidavit of Kris Podsiad	Yes
I-15	Bristol Pipe & Tube, Inc., <i>Stainless Steel Pipe</i>	No
I-16	<i>Slag Pots from China</i> , Inv. Nos. 701-TA-753 and 731-TA-1731 (Preliminary), USITC Pub. 5592 at 5-9 (Feb. 2025)	No
I-17	Producers and Exporters of WSLPP from India	No
I-18	Producers and Exporters of WSLPP from Türkiye	No
I-19	Producers and Exporters of WSLPP from the UAE	No
I-20	<i>Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from China</i> , Inv. Nos. 701-TA-469 and 731-TA-1168 (Final), USITC Pub. 4190 at 5-10 (Nov. 2010)	No
I-21	<i>Large Residential Washers from Korea and Mexico</i> , Inv. Nos. 701-TA-488 and 731-TA-1199-1200 (Final), USITC Pub. 4378 at 5-11 (Feb. 2013)	No

Exhibit	Title	BPI Requested?
I-22	<i>Certain Welded Stainless Steel Pipes from the Republic of Korea and Taiwan</i> , Inv. Nos. 731-TA-540-541 (Final), USITC Pub. 2585 at 9-10, n.21 (Dec. 1992)	No
I-23	U.S. Import Data for WSLPP	No
I-24	Contact Information for Importers	No
I-25	Exhibit Not Used	No
I-26	Negligibility Data	No
I-27	Districts and Months of Subject Imports	No
I-28	Petitioners' Confidential Trade and Financial Data	Yes
I-29	Data Center Articles	No
I-30	<i>Welded Stainless Steel Pressure Pipe from India</i> , USITC Pub. 5320 (Apr. 2022), excerpts	No
I-31	CRISIL Ratings, "Rating Rationale, Ratnamani Metals and Tubes Limited" (June 11, 2025)	No
I-32	"Ratnamani Metals & Tubes Demonstrates Resilience Amid Market Challenges, Maintains Strong Growth Outlook," <i>Stainless Today</i> (May 20, 2026)	No
I-33	McIntyre, Joanne, "Sun Mark Stainless: Three generations. One vision," <i>Stainless Steel World</i> (Nov. 2025)	No
I-34	Press Release, "Venus Pipes & Tubes Limited, Commencement of Operations of 3,600 MTPA of value-added Welded Tubes" (May 23, 2025)	No
I-35	Ratnamani Metals & Tubes Ltd., 41st Annual Report 2024-25, excerpts	No
I-36	Venus Pipes & Tubes Limited, Annual Report FY 2024-25, excerpts	No
I-37	World Bank, World Integrated Trade Solution, "Tubes, pipe & hollow profiles, stainless steel, welded (HS 730640), imports by country, 2024"	No
I-38	Turkish Steel Pipe Manufacturers' Association (CEBID), <i>The Steel Pipe Industry of Turkey</i>	No
I-39	"Turkey's YC Inox begins production at Dilovası stainless steel pipe plant," <i>SteelOrbis</i> (Jan. 6, 2025)	No
I-40	"Erk Boru Paslanmaz Çelik'ten yeni yatırım hamlesi," <i>Paslanmaz Çelik Dünyası</i> (Aug. 21, 2025)	No
I-41	UN Comtrade Database, Türkiye exports of welded stainless steel tubes, pipes, and hollow profiles (HS 730640) to World, 2024 and 2025	No

Exhibit	Title	BPI Requested?
I-42	AUV analysis from UN Comtrade Data for Türkiye exports (HS 730611 and HS 730640) by largest destination markets	No
I-43	“Nikel Paslanmaz to expand stainless steel capacity with investments exceeding \$150 million,” <i>SteelOrbis</i> (May 7, 2026)	No
I-44	“About Us,” <inoxiumtubi.com>	No
I-45	“Stainless Steel Pipes and Tubes,” Hidayath Group	No
I-46	Regulation (EU) 2026/1384 of the European Parliament and of the Council of 17 June 2026	No
I-47	Commission Implementing Regulation (EU) 2026/1457 of 29 June 2026	No
I-48	“UK’s steel trade measure from 1 July 2026,” UK Department for Business and Trade	No
I-49	“Measure ID 2407361,” WTO Trade Remedies Data Portal	No
I-50	“Venus Pipes & Tubes: On the Way to Becoming India’s Largest Manufacturer of Stainless Steel Pipes and Tubes,” <i>Stainless Steel World</i> (Mar. 2024)	No

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Total Pages: 200
Investigation

PUBLIC VERSION

Petitioners' Business Proprietary Information
Removed from Pages 6-8, the Table of Exhibits,
and Exhibits III-8–III-14 and III-22.

**BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**WELDED STAINLESS LINE AND PRESSURE PIPE FROM INDIA,
TÜRKIYE, AND THE UNITED ARAB EMIRATES**

**PETITION FOR THE IMPOSITION
OF ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO
SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED**

**VOLUME III
INFORMATION RELATING TO TÜRKIYE – DUMPING**

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July 15, 2026

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I. INTRODUCTION

This petition is filed on behalf of Bristol Pipe and Tube Inc., Felker Brothers Corporation, and Primus Pipe and Tube Inc. (collectively, “Petitioners”). As demonstrated below, producers and exporters from the Republic of Türkiye (“Türkiye”) sold, or offered for sale, welded stainless line and pressure pipe (“WSLPP”) in the United States at less than fair value. Petitioners demonstrate that WSLPP imported from Türkiye is being sold or offered for sale at less than fair value by comparing the U.S. price with the normal value for such merchandise in accordance with the statute and the regulations and practice of the U.S. Department of Commerce (“Commerce”). Petitioners ultimately calculate dumping margins for the subject merchandise based on such comparisons.

Petitioners use export price as the basis for U.S. price because information regarding sales of WSLPP by Turkish producers and/or exporters through affiliated parties in the United States is not reasonably available to Petitioners. Petitioners were unable to obtain any suitable quotations or offers for the sale of WSLPP from Türkiye. Therefore, as the best information available, Petitioners use official U.S. import statistics to determine U.S. price. Petitioners adjust U.S. price to account for movement expenses and other expenses in Türkiye incident to exporting the merchandise to the United States.

Petitioners use constructed value as the basis for normal value because Petitioners were unable to obtain suitable offers for the sale of WSLPP in Türkiye. Petitioners calculate constructed value by applying the usage rates of a U.S. producer to the unit factor costs in the Turkish home market for each production input used to manufacture the products in question. In

accordance with Section 773(e) of the Tariff Act of 1930, as amended (the “Act”),¹ Petitioners also include manufacturing overhead expenses, selling, general and administrative (“SG&A”) expenses, interest expenses, and profit in the constructed value calculation.

Finally, Petitioners calculate dumping margins for the subject merchandise based on comparisons of the ex-factory export prices to the constructed values. As established below, Commerce should initiate an investigation into sales of WSLPP from Türkiye at less than fair value and should impose antidumping duties in an amount equal to the amount by which the normal value exceeds the U.S. price.

II. UNITED STATES PRICE

A. Sales Price

Petitioners were unable to obtain specific prices or offers for the sale of WSLPP from Türkiye within the United States. As the best information available, Petitioners use official import statistics downloaded from the U.S. Census Bureau’s USA Trade Online database to calculate an average unit value (“AUV”) per metric ton (“MT”) for WSLPP imported from Türkiye under the relevant subheadings of the Harmonized Tariff Schedule of the United States (“HTSUS”) during the period of investigation (“POI”).² **Exhibit III-1** provides the official import statistics for imports of WSLPP into the United States from Türkiye. The AUVs used as the basis for U.S. price are for HTS subheadings (*i.e.*, 7306.11.0050 and 7306.40.5040) representing a significant volume of imports from Türkiye during the POI and correspond to the products for which normal value was calculated. In particular, the imports under the HTSUS 7306.11.0050 (“Other tubes, pipes and hollow profiles (for example, open seamed or welded,

¹ See 19 U.S.C. § 1677b(e).

² The POI is from July 1, 2025 to June 30, 2026.

riveted or similarly closed), of iron or steel: Line pipe of a kind used for oil or gas pipelines: Welded, of stainless steel, With an outside diameter exceeding 114.3 mm”) represent over 90 percent of the volume from Türkiye. The use of AUVs calculated using official import data as the basis for export price is consistent with Commerce’s practice.³

B. Foreign Inland Freight and Brokerage and Handling

To compute ex-factory U.S. prices, Petitioners make adjustments for foreign inland freight and brokerage and handling. Petitioners calculate foreign inland freight based on the distance between Borusan Birleşik Boru Fabrikaları Sanayi ve Ticaret Anonim Şirketi (“Borusan Boru”), a Turkish producer of WSLPP, and the nearest port of export in Türkiye. The materials included in **Exhibit III-2** show that Borusan Boru produces an identical or comparable product, and **Exhibit III-3** contains the estimated distance from Borusan Boru’s plant in Gemlik, Türkiye, to the nearest port. Petitioners derive the per unit freight expense in Türkiye from the World Bank’s *Doing Business 2020: Economy Profile – Turkey* (“*Doing Business Turkey 2020*”), which is included as **Exhibit III-4**. To compute brokerage and handling expenses in Türkiye, Petitioners use the data from *Doing Business in Turkey 2020* for the cost of export border compliance and documentary compliance. Petitioners adjust foreign inland freight and brokerage and handling costs for inflation using data from International Monetary Fund (“IMF”) Statistics.⁴

³ See, e.g., *Certain Oil Country Tubular Goods from Austria, Taiwan, and the United Arab Emirates: Initiation of Less-Than-Fair-Value Investigations*, 91 Fed. Reg. 22,806, 22,808 (Dep’t Commerce Apr. 28, 2026); *Unwrought Palladium from the Russian Federation: Initiation of Less-Than-Fair-Value Investigation*, 90 Fed. Reg. 41,032, 41,035 (Dep’t Commerce Aug. 22, 2025); *Certain Corrosion-Resistant Steel Products from Australia, Brazil, Canada, Mexico, the Netherlands, South Africa, Taiwan, the Republic of Türkiye, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 89 Fed. Reg. 80,196, 80,200 (Dep’t Commerce Oct. 2, 2024).

⁴ See Türkiye Consumer Price Index at **Exhibit III-5**. Petitioners note that Producer Price Index (“PPI”) data for Türkiye is not reasonably available for the period of investigation. Accordingly, Petitioners use Consumer Price Index (“CPI”) data to inflate non-contemporaneous data for the

The resulting calculations of foreign inland freight and brokerage and handling in Türkiye, as adjusted for inflation, are shown in **Exhibit III-6**.

C. Calculation of Ex-Factory U.S. Price

Petitioners subtract the calculated expenses for foreign inland freight and foreign brokerage and handling from the U.S. import AUVs to arrive at ex-factory U.S. prices. The calculations of the ex-factory U.S. prices are provided in **Exhibit III-7**.

III. NORMAL VALUE

A. Home Market and Third Country Prices

Petitioners were able to obtain one home market price quote for products in the home market. However, Petitioners have not relied on that quote for normal value because the quoted products are not sufficiently comparable to the U.S. product used for export price. Suitable publicly available third-country pricing information is also unavailable. Accordingly, Petitioners rely on constructed value to estimate normal value.

B. Constructed Value

To calculate the constructed value of WSLPP from Türkiye, Petitioners use Commerce's standard methodology in accordance with Section 773(e) of the Act.⁵ Petitioners do not have access to Turkish producers' factors of production or usage rates for those factors of production (*i.e.*, the quantities of raw materials consumed, the number of hours of labor required, and the amount of energy consumed). Consequently, Petitioners rely on the experience of Bristol Pipe

purposes of this allegation. Petitioners also note that Commerce has accepted less-than-fair-value allegations in which CPI data, not PPI data, are used for inflation adjustments. *See, e.g., Ammonium Sulfate from the People's Republic of China: Initiation of Less-Than-Fair-Value Investigation*, 81 Fed. Reg. 40,665, 40,668 (Dep't Commerce June 22, 2016); *Utility Scale Wind Towers from the People's Republic of China and Socialist Republic of Vietnam: Initiation of Antidumping Duty Investigations*, 77 Fed. Reg. 3,440, 3,445 (Dep't Commerce Jan. 24, 2012).

⁵ *See* 19 U.S.C. § 1677b(e).

and Tube (“Bristol”), a domestic producer of WSLPP and member of the petitioning industry, and other reasonably available information.⁶

Bristol’s production process is similar to the production processes of Turkish producers and is therefore representative for the purposes of this petition.⁷ Moreover, while Bristol does not produce welded stainless line pipe, the attached affidavit from the Vice President and General Manager of Bristol attests to the fact that the process for manufacturing welded stainless pressure pipe is substantially similar to the process for manufacturing welded stainless line pipe and the usage rates for welded stainless pressure pipe are reasonably reflective of the usage rates for welded stainless line pipe of the same dimensions. Thus, the usage rates for the direct materials and other factors used to produce WSLPP are comparable for producers in the United States and Türkiye.

In addition, as reviewed in Volume I of these petitions, stainless welded line pipe meeting the American Petroleum Institute (“API”) 5LC specification matches the outer diameter and wall thickness dimensions for other welded stainless pipe meeting the American Society for Testing and Materials (“ASTM”) standard A-314. Thus, pipe in standard sizes specified in ASTM A-314 provide a reasonable source for usage rates for line pipe meeting API 5LC.

Petitioners have provided four cost models for the production of WSLPP products made to the following specifications and dimensions:

⁶ All data supplied by Bristol for use in this petition were derived from records prepared by Bristol’s personnel in the ordinary course of business. **Exhibit III-8** contains an affidavit from Kris Podsiad, Vice President and General Manager of Bristol.

⁷ See Affidavit of Kris Podsiad, **Exhibit III-8**.

<i>Product Description</i>	<i>Schedule</i>	<i>Grade</i>	<i>Outside Diameter (Inches)</i>
Welded Stainless Pressure Line Pipe	[]	[]	[]
Welded Stainless Pressure Line Pipe	[]	[]	[]
Welded Stainless Pressure Pipe	[]	[]	[]
Welded Stainless Pressure Pipe	[]	[]	[]

The cost models were chosen to provide two comparisons within the outside diameter range of each of the two HTS codes collectively accounting for more than 95 percent of U.S. imports of WSLPP from Türkiye,⁸ and are thus representative of the costs to produce the pipe in those codes.

1. Direct Materials

Petitioners value the unit factor costs for direct materials based on Turkish import statistics from Global Trade Atlas (“GTA”). Petitioners exclude from such import data the following, where appropriate: (1) imports reflecting a zero quantity or from an unidentified source; (2) imports from nonmarket economy countries (*i.e.*, Armenia, Azerbaijan, Belarus, China, Georgia, Kyrgyzstan, Moldova, Russia, Tajikistan, Turkmenistan, Uzbekistan, and Vietnam); and (3) imports from countries that maintain broadly-available, non-industry specific export subsidies (*i.e.*, India, Indonesia, South Korea, and Thailand). Petitioners multiply each direct material unit factor cost by the usage rate for the corresponding input material to derive the factor cost of that input.

⁸ See U.S. Imports of WSLPP from Türkiye at **Exhibit III-1**.

a) Stainless Steel Substrate

Stainless steel substrate is the primary input used in the production of WSLPP. To value the stainless steel input for the cost models corresponding to HTS 7306.11.0050, Petitioners use an average per MT value of Turkish imports under the six-digit HTS categories 7219.11, 7219.21, 7219.31, 7220.11, and 7220.20 for the product with [] outside diameter and 7219.12, 7219.22, 7219.31, 7220.11, and 7220.20 for the product with [] outside diameter.⁹ For the cost models corresponding to HTS 7306.40.5040, Petitioners use an average per MT value of Turkish imports under the six-digit HTS categories 7219.31, 7219.32, 7219.33, and 7220.20.¹⁰ In order to construct the most accurate normal value, Petitioners relied only on 12-digit HTS subcategories which specify a nickel content of above 2.5%, since the [] specification []. Additionally, Petitioners did not rely on two 12-digit categories for which there was a small amount of imports with aberrational AUVs during the period of investigation and “Other” stainless steel under six-digit HTS 7220.90.

For the constructed value model corresponding to HTS 7306.11.0050, the resulting average unit cost of steel is \$3,730.22 per MT for the [] outside diameter product¹¹ and \$5,330.56 per MT for the [] outside diameter product.¹² For the constructed value models corresponding to HTS 7306.40.5040, the resulting average unit cost of steel substrate is \$4,037.45 per MT for both the [] outside diameter and [] outer diameter products.¹³

⁹ See Steel Substrate Data at **Exhibit III-9**.

¹⁰ See *id.*

¹¹ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

¹² *Id.*

¹³ *Id.*

To calculate the total cost of steel substrate, Petitioners multiply the unit factor cost by the amount of substrate used by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.¹⁴

b) Steel Scrap

Steel scrap is generated as the steel input is slit to the desired width, formed into a tubular shape, and welded together at the edges. The recovery of steel scrap represents an offset to the cost of production. Petitioners value steel scrap using Turkish imports under HTS 7204.21 (“Stainless Steel Waste And Scrap”), excluding 12-digit HTS codes [

] for the reasons discussed above. The unit factor cost for steel scrap is \$1,043.82 per MT.¹⁵ To calculate the total offset to the cost of production, Petitioners multiply the steel scrap unit factor value by the amount of steel scrap generated by Bristol in the WSLPP production process.¹⁶

c) Argon

Argon is used as a “purging gas” in stainless steel welding. Petitioners value argon using an average per kilogram value of Turkish imports under HTS 2804.21 (“Argon”). As usage rates for argon were provided in cubic feet (“CuFT”), Petitioners convert the import data from kilograms to CuFT using conversion information provided at **Exhibit III-15**.¹⁷ The resulting unit factor cost for argon is \$0.03 per CuFT.¹⁸ To calculate the total cost of argon, Petitioners

¹⁴ See constructed value calculations at **Exhibits III-11 – III-14**.

¹⁵ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

¹⁶ See constructed value calculations at **Exhibits III-11 – III-14**.

¹⁷ “Converting Units of Measure for Gas,” Airgas.com, attached at **Exhibit III-15**.

¹⁸ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

multiply the unit factor cost by the amount of argon used by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.¹⁹

d) Hydrogen

Hydrogen is also used in the welding process for WSLPP. Petitioners value hydrogen using an average per kilogram value of Turkish imports under HTS 2804.10.00 (“Hydrogen”). As usage rates for hydrogen were provided in CuFT, Petitioners again convert the import data from kilograms to CuFT using conversion information provided at **Exhibit III-15**.²⁰ The resulting unit factor cost for hydrogen is \$0.09 per CuFT.²¹ To calculate the total cost of hydrogen, Petitioners multiply the unit factor cost by the amount of hydrogen used by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.²²

2. Labor

Petitioners value labor using national statistics published by the International Labour Organization.²³ According to these data, the Turkish average wage rate for workers engaged in manufacturing is equivalent to \$4.75 per hour.²⁴ To calculate the total cost of labor, Petitioners multiply the hourly wage rate by the labor hours expended by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.²⁵

¹⁹ See constructed value calculations at **Exhibits III-11 – III-14**.

²⁰ “Converting Units of Measure for Gas,” Airgas.com, attached at **Exhibit III-15**.

²¹ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

²² See constructed value calculations at **Exhibits III-11 – III-14**.

²³ See ILOSTAT Data Explorer, “Average monthly earnings of employees by sex and economy activity”, attached at **Exhibit III-16**.

²⁴ See Calculation of Turkish Labor Rate at **Exhibit III-17**. 2024 data has been inflated to reflect POI using CPI data, as discussed above, and data reported in local currency has been converted to USD using currency conversion attached at **Exhibit III-18**.

²⁵ See constructed value calculations at **Exhibits III-11 – III-14**.

3. Electricity

Petitioners calculate a unit factor cost for electricity based on the average rate reported by GlobalPetrolPrices.com.²⁶ The Turkish electricity price for businesses is equivalent to \$0.105 per kilowatt hour.²⁷ To calculate the total cost of electricity, Petitioners multiply the electricity rate by the amount of electricity consumed by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.²⁸

4. Overhead, SG&A Expenses, Interest Expenses, and Profit

Petitioners calculate financial ratios for manufacturing overhead, SG&A expenses, interest expenses, and profit from the 2025 financial statements of Borusan Birleşik Boru Fabrikaları Sanayi ve Ticaret Anonim Şirketi (“Borusan”).²⁹ The calculations of these financial ratios are contained in **Exhibit III-21**.

C. Calculation of Normal Value

Petitioners add the factor costs for direct materials, labor, and energy to arrive at the total variable cost of manufacture. To derive the value for factory overhead costs, Petitioners multiply the factory overhead ratio based on Borusan’s financial statements (*i.e.*, 18.12%) by the variable cost of manufacture.³⁰ Petitioners add the value for factory overhead to the variable cost of manufacture to arrive at the total cost of manufacture. Petitioners calculate a value for SG&A

²⁶ See Calculation of Turkish Electricity Prices, attached at **Exhibit III-19**.

²⁷ *Id.*

²⁸ See constructed value calculations at **Exhibits III-11 – III-14**.

²⁹ See Borusan 2025 Financial Statements at **Exhibit III-20**.

³⁰ See Calculation of Surrogate Financial Ratios: Manufacturing Overhead, SG&A, and Profit at **Exhibit III-21**.

and interest expenses by multiplying the SG&A expense and interest ratio from Borusan's financial statements (*i.e.*, 6.25%) by the total cost of manufacture.³¹ Petitioners add the values for SG&A and interest expenses to the total cost of manufacture to arrive at the total cost of production. Next, Petitioners multiply the profit ratio derived from Borusan's financial statements (*i.e.*, 2.84%) by the total cost of production.³² Petitioners then add the value for profit to the total cost of production to arrive at the constructed values of the products in question.

IV. DUMPING MARGINS

The dumping margins, based on comparisons of the U.S. prices and constructed values, are shown in **Exhibit III-22**. These comparisons result in dumping margins ranging from 14.88 percent to 113.28 percent.

V. INJURY TO THE DOMESTIC INDUSTRY

Petitioners allege that less-than-fair-value imports of WSLPP from Türkiye have caused, are causing, and are threatening to cause material injury to the domestic industry. The factual information in support of this allegation is provided in Volume I of this petition.

VI. CONCLUSION AND REQUEST FOR INVESTIGATION

Based on the information in this petition, Petitioners request that Commerce initiate an antidumping duty investigation of WSLPP from Türkiye.

³¹ *Id.*

³² *Id.*

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Investigation

PUBLIC DOCUMENT

**BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**WELDED STAINLESS LINE AND PRESSURE PIPE FROM INDIA,
TÜRKİYE, AND THE UNITED ARAB EMIRATES**

**PETITION FOR THE IMPOSITION
OF ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO
SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED**

**VOLUME VI
INFORMATION RELATING TO TÜRKİYE – COUNTERVAILABLE SUBSIDIES**

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July 15, 2026

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I. COUNTERVAILING DUTIES SHOULD BE IMPOSED ON IMPORTS OF WELDED STAINLESS LINE AND PRESSURE PIPE FROM TÜRKİYE

This volume of the petition presents information reasonably available to Bristol Pipe and Tube Inc., Felker Brothers Corporation, and Primus Pipe and Tube Inc. (“Petitioners”) demonstrating that the production and exportation of welded stainless line and pressure pipe (“WSLPP”) from Türkiye is benefiting from countervailable subsidies within the meaning of Section 771(5) of the Tariff Act of 1930, as amended (“the Act”).¹ Pursuant to Section 701(a)(1) and (2) of the Act, the U.S. Department of Commerce (“Commerce”) shall impose a countervailing duty on merchandise imported from a “Subsidies Agreement” country² where the imported merchandise: (1) is produced or exported by companies that benefit from countervailable subsidies and (2) materially injures or threatens material injury to a domestic industry.³ Both of these requirements are plainly satisfied here. Accordingly, Petitioners request that Commerce investigate and impose countervailing duties with respect to the countervailable subsidies set forth herein and any other countervailable subsidies discovered in the course of the requested countervailing duty investigation.

II. NAME OF THE COUNTRY IN WHICH THE SUBJECT MERCHANDISE IS MANUFACTURED OR PRODUCED

The subject merchandise is manufactured or produced in Türkiye, and the countervailable subsidies have been conferred by the Government of Türkiye (“GOT”) and other government and public entities in Türkiye.

¹ See 19 U.S.C. § 1677 (5).

² As a member of the World Trade Organization (“WTO”), Türkiye is a country under the “Subsidies Agreement.”

³ 19 U.S.C. § 1671(a)(1) and (2).

III. NAMES AND ADDRESSES OF TURKISH PRODUCERS BENEFITTING FROM SUBSIDY PROGRAMS

Petitioners have identified several producers or exporters of WSLPP in Türkiye believed to have benefited from countervailable subsidies and whose products are believed to have been exported to the United States. The full names and addresses of these companies can be found in Volume I of these petitions at Exhibit I-18.

IV. EFFORTS TO OBTAIN INFORMATION

In accordance with the statutory and regulatory provisions for countervailing duty petitions, this volume presents information “reasonably available” to Petitioners concerning possible countervailable subsidies available to, and bestowed on, producers and exporters of the subject merchandise in Türkiye.⁴ Notably, Petitioners do not have to prove at the outset that a subsidy allegation will be confirmed during the course of the investigation or that a potentially countervailable subsidy is actually being used for a subsidy allegation to be included in an investigation.⁵

Petitioners have conducted extensive research to document government subsidies provided by the GOT and other government and public entities to producers and exporters of WSLPP in Türkiye, including a review of the following sources:

(1) Past countervailing duty determinations (*i.e.*, Federal Register notices and available information from case dockets) covering the country, subject merchandise, and or/producers included in this Petition;

(2) Articles and news reports regarding the producers, industry,

⁴ See 19 U.S.C. § 1671a(b)(1); 19 C.F.R. § 351.202 (setting forth the “reasonably available” standard).

⁵ See, *e.g.*, *Forged Steel Fittings from the People’s Republic of China: Final Affirmative Countervailing Duty Determination*, 83 Fed. Reg. 50,342 (Dep’t Commerce Oct. 5, 2018), and accompanying Issues and Decision Memorandum (“IDM”) (ACCESS Barcode: 3758609-02) at Comment 2.

and country in question available through the World Wide Web and online data services;

(3) Where available, public financial information for the producers, industry, and country at issue; and

(4) Reports from the World Trade Organization (“WTO”), European Union, U.S. government, and other governments concerning the producers of the subject merchandise, the industry in Türkiye, and the alleged subsidy programs.

Yet, much of the information that would allow Petitioners to determine with certainty the types and amounts of subsidies received by producers or exporters of WSLPP in Türkiye is difficult or impossible to obtain. As a result of the difficulties inherent in documenting subsidization, Petitioners agree with Commerce that “there are typically no independent sources for data on company-specific benefits resulting from countervailable subsidy programs.”⁶ The most thorough manner in which the type and number of subsidies may be determined is through administrative investigations.

Despite the difficulties in obtaining information, Petitioners investigated and are providing information demonstrating that the GOT and other government and public entities have granted, and continue to grant, various forms of assistance to producers and exporters of WSLPP in Türkiye that constitute countervailable subsidies pursuant to Section 771 of the Act.⁷

V. PERIOD OF INVESTIGATION AND AVERAGE USEFUL LIFE

The most recently completed calendar year as of the filing of these petitions is 2025, and calendar year 2025 is therefore the appropriate period of investigation (“POI”) for this

⁶ *Notice of Preliminary Affirmative Countervailing Duty Determination: Prestressed Concrete Steel Wire Strand from India*, 68 Fed. Reg. 40,629, 40,632 (Dep’t Commerce July 8, 2003).

⁷ *See* 19 U.S.C. § 1677.

proceeding.⁸ In addition to investigating any recurring subsidies granted during the POI and any subsidized loans outstanding during the POI, Commerce is also required to investigate any non-recurring subsidies conferring a benefit that are allocable to the POI.⁹ Commerce will presume the allocation period for non-recurring subsidies to be the average useful life (“AUL”) of renewable physical assets for the industry concerned as listed in the U.S. Internal Revenue Service’s 1977 Class Life Asset Depreciation Range System.¹⁰ In the instant case, the AUL is 15 years.¹¹ Commerce should therefore investigate any non-recurring subsidies received from 2011 to 2025, as well as recurring subsidies and outstanding loans during 2025.

VI. IMPORTS OF WSLPP FROM TÜRKİYE BENEFIT FROM COUNTERVAILABLE SUBSIDIES

The GOT and other government and public entities provide various forms of assistance to producers and exporters of the merchandise under consideration, including grants, preferential lending, income tax deductions and credits, export financing and guarantees, import duty exemptions, and the provision of goods. The available evidence indicates that these forms of assistance constitute countervailable subsidies under Section 771 of the Act because they constitute financial contributions, provide a benefit, and are specific. Petitioners provide descriptions of the various countervailable subsidies available to Turkish producers and exporters of WSLPP below.

⁸ 19 C.F.R. § 351.204(b)(2).

⁹ 19 C.F.R. §§ 351.524(a) and (b), 351.525.

¹⁰ See “Publication 946 (2025): How to Depreciate Property,” *Department of the Treasury, Internal Revenue Service* (excerpt) at p. 103, attached at **Exhibit VI-1**.

¹¹ *Id.* at Table B-2, Asset Class 33.4 (“Manufacture of Primary Steel Mill Products”).

A. Subsidies in Organized Industrial Zones

The GOT has established a number of different regional subsidy programs based on the establishment of different zones, including Organized Industrial Zones (“OIZs”). These programs have been used specifically to help subsidize and improve the performance of exporters in Türkiye. There are 392 OIZs in operation in Türkiye.¹²

According to the GOT, OIZs “are designed to allow companies to operate within an investor-friendly environment with ready-to-use infrastructure and social facilities.”¹³ Available benefits include exemption of real estate duties and other land-use taxes, exemptions of value-added tax for land acquisitions, low-cost water, natural gas, and telecommunications, exemptions from municipality taxes on construction and plant usage, and exemptions from municipality taxes on solid waste.¹⁴ Additional benefits include exemptions from tax on corporate land sales and electricity subsidies that are typically 10 to 25 percent below the national electricity tariff price.¹⁵

In 2019, Taiwanese WSLPP producer YC Inox Co., Ltd. (“YC Inox”) established a Turkish subsidiary, YC Inox TR Çelik Sanayi ve Ticaret A.Ş. (“YC Inox TR”), and purchased land in the Dilovasi Machinery Specialized OIZ in Kocaeli province, investing a total of \$383 million to build three separate production facilities to facilitate exports around the globe.¹⁶ YC

¹² The Investment and Finance Office of the Presidency of the Republic of Türkiye, “Investment Zones,” attached at **Exhibit VI-2**.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ FDI Consultancy, “Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors” (Mar. 27, 2026), attached at **Exhibit VI-3**.

¹⁶ Steel Radar, “Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye” (July 7, 2025), attached at **Exhibit VI-4**; *see also* Daily Sabah, “Taiwanese steel giant to establish plant in Kocaeli” (Dec. 11, 2019), attached at **Exhibit VI-5**.

Inox TR's facility is built on a total area of 100 thousand square meters, consisting of a 35 thousand square meter pipe factory, a 21 thousand square meter steel service center and a 40 thousand square meter industrial pipe factory.¹⁷ YC Inox TR is reported to have begun producing WSLPP at this facility in December 2024, with full production expected to reach more than 30,000 tons of subject merchandise, potentially making it the world's second-largest stainless steel pipe factory.¹⁸

1. Provision of Land in OIZs for LTAR

The provision of land for less than adequate remuneration has historically been available to WSLPP producers under various provisions of Turkish Law. First, between 2003 and 2009, Article 3 of Law No. 4916 provided for "immovables" (*i.e.*, real property) belonging to the Turkish Treasury to be sold to a limited range of entities, including "private companies and public institutions for purposes of developing industry, livestock, technology, small industrial sites, technology development zones, and housing."¹⁹ The legal provision permitting this sale of land expired in 2009. However, any such provision of land would provide a non-recurring benefit that would be attributable to the POI. Under Law No. 5084, the free allocation of land was made available to companies located within priority regions for development, which

¹⁷ Steel Radar, "Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye" (July 7, 2025), attached at **Exhibit VI-4**.

¹⁸ Yieh Corp., "YC Inox's Turkish factory produces first industrial stainless steel pipe" (Dec. 31, 2024), attached at **Exhibit VI-6**.

¹⁹ GOT Letter, "Response of the Government of Turkey to Supplemental Questionnaire in Countervailing Duty Investigation on Common Alloy Aluminum Sheet from the Republic of Turkey," (July 20, 2020) at 53, attached at **Exhibit VI-7**.

includes 54 designated provinces.²⁰ The GOT previously reported that this program ended in 2010.²¹ However, any such provision of land under Law No. 5084 would confer a non-recurring benefit that would be attributable to the POI.

Under the current system, when an OIZ sells a parcel of land, the OIZ itself is fully exempt from any corporate tax, in order that land prices remain competitive.²² A public report indicates that YC Inox TR's Taiwanese parent company acquired 56,000 square meters of land for its Turkish operations for the price of NT \$414 million,²³ or approximately USD \$13,305,960 (USD \$237.61 per square meter).²⁴ Comparable industrial land in Türkiye ranges in price from \$700 to \$1,500 per square meter depending on location, indicating that YC Inox TR was able to purchase land in the Dilovasi Machinery Specialized OIZ at approximately \$462.39 to \$1,262.39 per square meter below its commercial market value, providing an estimated benefit of USD \$25.9 million to \$70.7 million just for this parcel alone.²⁵

²⁰ Excerpts from GOT Letter, "Response of the Government of Turkey in CVD Investigation on Imports of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from Turkey," (Oct. 28, 2015), at 25 and Exhibit 10, attached at **Exhibit VI-8**.

²¹ *Id.* at 26.

²² FDI Consultancy, "Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors" (Mar. 27, 2026), attached at **Exhibit VI-3**.

²³ Yieh Corp., "Taiwanese YC Inox plans to build mill in Turkey" (July 22, 2019), attached at **Exhibit VI-9**.

²⁴ NT \$1 equals approximately USD \$0.03239. *See* exchange rate attached at **Exhibit VI-10**.

²⁵ İmtlak Real Estate, "Guide to Land Investment in Istanbul" (July 12, 2026), attached at **Exhibit VI-11**.

Commerce previously countervailed the provision of land under Law No. 4916 in *Common Alloy Aluminum Sheet from Türkiye*.²⁶ In addition, Commerce countervailed the provision of land under Law No. 5084 in *Heavy Walled Rectangular Pipes and Tubes from Türkiye*.²⁷ Commerce should continue to investigate and countervail the provision of land for LTAR in this investigation.

a. Financial Contribution

The provision of land confers a financial contribution in the form of the provision of a good within the meaning of 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

The provision of land provides a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

The provision of land in an OIZ for less than adequate remuneration is regionally specific pursuant to 19 U.S.C. § 1677(5A)(D)(iv) because it is only available to companies located in OIZs.

²⁶ *Common Alloy Aluminum Sheet From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 86 Fed. Reg. 13,315 (Dep't Commerce Mar. 8, 2021) (*Common Alloy Aluminum Sheet from Türkiye*) and accompanying IDM (ACCESS Barcode: 4093399-02) at Comment 3.

²⁷ *Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 81 Fed. Reg. 47,349 (Dep't Commerce July 21, 2016) (*Heavy Walled Rectangular Pipes and Tubes from Türkiye*) and accompanying IDM (ACCESS Barcode: 3487405-02) at 14-15.

2. Exemption from Property Tax in OIZs

In order to increase investment opportunities in OIZs, pursuant to Article 4(m) of Law No. 1319, the GOT permanently exempted buildings in OIZ from property taxes.²⁸ This law replaced the previous provision under Law No. 1319 in 2017, which only exempted property taxes for five years.

Commerce examined this program under the previous legal provision in *Quartz Surface Products from Türkiye*²⁹ and *Dried Tart Cherries from Türkiye*.³⁰ Given that YC Inox TR has invested USD \$383 million in establishing three separate production facilities in the Dilovasi Machinery Specialized OIZ, the tax savings for this WSLPP producer are likely to be substantial.

a. Financial Contribution

The exemption of property taxes provided for under this program confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

Property tax exemptions under this program confer a benefit to the extent that the tax paid by a firm as a result of the program is less than the tax the firm would have paid in the absence of the program to 19 C.F.R. § 351.509(a)(1).

²⁸ GOT Letter, “Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Brake Drums from the Republic of Türkiye” (Sept. 26, 2024) at 39-40, attached at **Exhibit VI-12**.

²⁹ *Certain Quartz Surface Products From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, In Part*, 85 Fed. Reg. 25,400 (Dep’t Commerce May 1, 2020) (“*Quartz Surface Products from Türkiye*”) and accompanying IDM (ACCESS Barcode: 3969367-02) at 5.

³⁰ *Dried Tart Cherries From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 51,109 (Dep’t Commerce Sep. 27, 2019) and accompanying Preliminary Decision Memorandum (“PDM”) (ACCESS Barcode: 3892729-02) at Appendix, unchanged in *Dried Tart Cherries From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 67,430 (Dep’t Commerce Dec. 10, 2019).

c. Specificity

Because property tax exemptions under this program are limited to companies located in OIZs, the program is regionally specific under 19 U.S.C. § 1677(5A)(D)(iv).

3. Exemptions from Land Acquisition Taxes in OIZs

The GOT normally collects a 20 percent value-added tax on the purchase of land, buildings, and infrastructure.³¹ However, purchasers in OIZs are exempt from this tax. Given the cost of the land, immediate savings can be substantial. For instance, as noted above, YC Inox was able to acquire its first plot of land in the Dilovasi Machinery Specialized OIZ for approximately USD \$13,305,960, generating an immediate tax savings of USD \$2,661,192. Given that YC Inox TR has invested in significant resources in the development of its property in the OIZ, it is likely that the company intends to continue operations there indefinitely. For this reason, Commerce should not treat this program as a normal exemption of a value-added tax. A value-added tax on real estate will not operate like a normal value-added tax on goods, in which the tax is collected and quickly reimbursed as the goods move through the normal chain of commerce. Rather, YC Inox TR is likely to benefit from the uncollected value-added tax for decades, if not indefinitely.

a. Financial Contribution

The exemption of the value-added tax on purchases of land in an OIZ confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

³¹ FDI Consultancy, “Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors” (Mar. 27, 2026), attached at **Exhibit VI-3**. *See also* The Investment and Finance Office of the Presidency of the Republic of Türkiye, “Investment Zones,” attached at **Exhibit VI-2**.

b. Benefit

The tax exemption under this program confers a benefit to the extent that the tax paid by a firm is less than the tax the firm would have paid in the absence of the program to 19 C.F.R. § 351.510(a)(1). Alternatively, Commerce may treat the benefit as a deferral of an indirect tax analogous to a long-term loan, pursuant to 19 C.F.R. § 351.510(a)(2).

c. Specificity

Because property taxes under this program are limited to companies located in OIZs, the program is regionally specific under 19 U.S.C. § 1677(5A)(D)(iv).

4. Provision of Utilities in OIZs for LTAR

The GOT advertises one of the advantages for companies locating in an OIZ as “ready-to-use infrastructure” including utilities such as water, natural gas, electricity, communications, and waste treatment.³² In particular, water, natural gas, and telecommunications are advertised as being available at “low... costs,” while taxes on solid waste may be exempted completely.³³ OIZs may also operate their own electricity distribution companies, which generate or purchase power and pass on discounts to companies located in OIZs at rates 10 to 25 percent below the national tariff rate.³⁴ Within the Dilovasi Machinery Specialized OIZ, electricity is provided by Yeni Elektrik Üretim A.Ş, which is approved by the Ministry of Energy to provide electricity to nearby industrial facilities.³⁵

³² The Investment and Finance Office of the Presidency of the Republic of Türkiye, “Investment Zones,” attached at **Exhibit VI-2**.

³³ *Id.*

³⁴ FDI Consultancy, “Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors” (Mar. 27, 2026), attached at **Exhibit VI-3**.

³⁵ Yeni Elektrik Üretim A.Ş, “About Us,” attached at **Exhibit VI-13**.

a. Financial Contribution

The provision of utilities at reduced rates confers a financial contribution in the form of the provision of a good under 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

The provision of low-cost utilities exclusively in OIZs provides a benefit to the extent that these utilities are provided for less than adequate remuneration when compared a commercial benchmark pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

Because these utilities are available at reduced rates exclusively to companies located in OIZs, benefits provided under this program are regionally specific under 19 U.S.C. § 1677(5A)(D)(iv).

B. Tax and Duty Exemption Programs

1. Deductions from Taxable Income for Export Revenue

Under Addendum 4108 of the Income Tax Law Number 193, Turkish exporters are able to claim lump sum deductions, not to exceed 0.5 percent of the taxpayer's foreign exchange activities, from gross income resulting from exports, construction, maintenance, assembly, and transportation activities abroad.³⁶ The lump sum is intended to cover expenditures related to documentation expenses incurred in relation to the listed activities and may be claimed on a company's annual income tax return. As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

³⁶ GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Brake Drums from the Republic of Türkiye" (Sept. 26, 2024) at 24 and at Exhibit 17, "Article 40/1 of Income Tax Law No. 193," attached at **Exhibit VI-12**.

Commerce previously found this program to be countervailable in *Brake Drums from Türkiye*³⁷ and *Steel Nails from Türkiye*.³⁸

a. Financial Contribution

Deductions from taxable income confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

Because these income tax deductions are tied to export performance this program is deemed specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

2. Inward Processing Certificates (D-3 Certificates)

Under the Inward Processing Certificate Exemption Program administered by Türkiye's Ministry of Trade, companies receive one of two types of inward processing certificates that permit an exemption from paying customs duties on raw materials and intermediate unfinished goods upon importation: D-1 and D-3 certificates. Commerce has previously determined that

³⁷ *Certain Brake Drums From the Republic of Türkiye: Final Affirmative Countervailing Duty Determination*, 90 Fed. Reg. 26,008 (Dep't Commerce June 18, 2025) ("*Brake Drums from Türkiye*") and accompanying IDM (ACCESS Barcode: 4778252-02)

³⁸ *Certain Steel Nails From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 87 Fed. Reg. 51,339 (Dep't Commerce Aug. 22, 2022) ("*Steel Nails from Türkiye*") and accompanying IDM (ACCESS Barcode: 4275038-02) at 4.

D-1 certificates are not countervailable.³⁹ However, using D-3 certificates, an importer may choose to exempt the applicable duties and taxes upon importation of the goods (*i.e.*, the Suspension System). As Commerce has previously recognized, while D-3 certificates are not directly contingent on export performance, “receipt of D-3 certificates is contingent upon the firm holding an {inward process certificate}, and that in granting {inward processing certificates}, the GOT solicits information regarding the export activities of the applying firms.”⁴⁰

Commerce found this program to be countervailable in *Large Diameter Welded Pipe from Türkiye*⁴¹ and *Oil Country Tubular Goods from Türkiye AR2016*.⁴²

a. Financial Contribution

The exemption of customs duties for imported raw materials and intermediate unfinished goods confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

³⁹ See, *e.g.*, *Large Diameter Welded Pipe From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 83 Fed. Reg. 30,697 (Dep’t Commerce June 29, 2018) (“*Large Diameter Welded Pipe from Türkiye Prelim*”) and accompanying PDM (ACCESS Barcode: 3720736-02) at 19-20, unchanged in *Large Diameter Welded Pipe From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 6,367 (Dep’t Commerce Feb. 27, 2019) (“*Large Diameter Welded Pipe from Türkiye*”) and accompanying IDM (ACCESS Barcode: 3796830-02).

⁴⁰ *Large Diameter Welded Pipe from Türkiye Prelim* PDM at 20, unchanged in *Large Diameter Welded Pipe from Türkiye*.

⁴¹ *Large Diameter Welded Pipe from Türkiye* IDM at 5

⁴² *Oil Country Tubular Goods From the Republic of Turkey: Final Results of Countervailing Duty Administrative Review; 2016*; 84 Fed. Reg. 11,504 (Dep’t Commerce Mar. 27, 2019) (*Oil Country Tubular Goods from Türkiye AR2016*) IDM (ACCESS Barcode: 3807928-02) at 4.

b. Benefit

The benefit provided by this program is the amount of customs duties exempted pursuant to 19 C.F.R. § 351.519(a)(1)(ii).

c. Specificity

As Commerce explained in *Large Diameter Welded Pipe from Türkiye*, eligibility to receive inward processing certificates is contingent on export performance, and assistance under this program is therefore specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

3. Tax and Fee Incentives for Renewable Energy

According to the “Guide to Investing in Turkish Renewable Energy Sector” published by the Presidency of the Republic of Türkiye Investment Office, several incentives are available for companies investing in renewable energy generation facilities. Renewable energy generation projects with an investment incentive certificate are exempt from customs duties related to imported machinery and equipment, regardless of the region where the investment takes place.⁴³ In addition, pursuant to Article 43.4 of the Electricity Licensing Regulation, facilities generating electricity from local natural resources and renewables are not required to pay license fees for the first eight years following the completion of power generation plants.⁴⁴ Pre-license and license application fees for these facilities are discounted by 90 percent as well.⁴⁵ Finally, pursuant to Article 4 of Electricity Market Law No. 6446, renewable energy generation plants are eligible to receive a 50 percent discount for transmission system usage fees for the first five years of

⁴³ GOT, “Guide to Investing in Turkish Renewable Energy Sector,” at 21-22, attached at **Exhibit VI-14**.

⁴⁴ *Id.* at 19.

⁴⁵ *Id.*

operation.⁴⁶ Pursuant to this same law, during the period of investing in these electricity generating facilities, all related official transactions are exempt from fees and stamp duties.⁴⁷

Commerce previously found this program to be countervailable in *PC Strand from Türkiye*.⁴⁸

a. Financial Contribution

Exemptions from taxes, customs duties, and fees under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1), while the exemption from the license fee and the reduction in the transmission system usage fee result in direct tax benefits under 19 C.F.R. § 351.509(a)(1).

c. Specificity

As eligibility for assistance under this program is limited to companies investing in renewable energy projects, this program is *de jure* specific under 19 U.S.C. § 1677(5A)(D)(i).

4. Exemption of Exchange Tax for Foreign Exchange Transactions

The GOT provides countervailable subsidies through the exemption of exchange taxes for certain foreign exchange transactions. This program operates under three separate legal provisions. Pursuant to Presidential Decree No. 1106 of 2019 (“Decree No. 1106”), the banking

⁴⁶ *Id.* at 20.

⁴⁷ *Id.*

⁴⁸ *Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination*, 85 Fed. Reg. 80,005 (Dep’t Commerce Dec. 11, 2020) (“*PC Strand from Türkiye*”) and accompanying IDM (ACCESS Barcode: 4062766-02) at 13.

and insurance transaction tax (“BITT”) rate was increased to 0.1 percent on foreign exchange transactions, except for transactions involving “{f}oreign exchange sales {between} banks and authorized institutions or {among} each other”; foreign currency sales made to the Ministry of Treasury and Finance; and “the payment of foreign currency loans, by the lender bank or banks that act as an intermediary in the use of foreign currency loans.”⁴⁹ Presidential Decree No. 1149 of 2019 amended Decree No. 1106 to also apply the exemption from the BITT to “{f}oreign exchange sales to enterprises {that have} an industrial registry certificate” and “{f}oreign exchange sales to exporters who are members of exporters’ unions.”⁵⁰ In December 2019, Law No. 7194 increased the BITT rate on foreign exchange transactions to 0.2 percent.⁵¹

Commerce has countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*,⁵² *PC Strand from Türkiye*,⁵³ and *Aluminum Extrusions from Türkiye*.⁵⁴

a. Financial Contribution

The exemption or reduction of the BITT rate on foreign exchange transactions confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

⁴⁹ GOT Letter, “Response of the Government of Turkey to Supplemental Questionnaire in Countervailing Duty Investigation on Common Alloy Aluminum Sheet from the Republic of Turkey,” (July 20, 2020) at 31-32, attached at **Exhibit VI-7**.

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Common Alloy Aluminum Sheet from Türkiye* IDM at 13.

⁵³ *PC Strand from Türkiye* IDM at 16.

⁵⁴ *Aluminum Extrusions From the Republic of Türkiye: Final Affirmative Countervailing Duty Determination*, 89 Fed. Reg. 80,468 (Dep’t Commerce Oct. 3, 2024) (“*Aluminum Extrusions from Türkiye*”) and accompanying IDM (ACCESS Barcode: 4638385-02) at 7.

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

As Commerce explained in *Common Alloy Aluminum Sheet from Türkiye*, benefits under this program are “limited to firms that conduct certain types of foreign exchange transactions that were exempted by law in Decree Nos. 1106 and 1149,” and thus this program is specific under 19 U.S.C. § 1677(5A)(D)(i).⁵⁵ To the extent that firms qualify for benefits under this program due to their membership in an exporters’ union, this program is deemed specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

5. Tax Exemption for Export Loans

The GOT normally applies a five percent BITT to interest accrued on loans provided by banks that are passed on to customers. However, in order to facilitate the use of bank loans to promote exports and services earning foreign currency , and pursuant to Article 4 of the Communiqué No. 2017/4 on Taxes, Duties and Fees Exemptions for Exports, Transit Trade, Sales and Deliveries Considered as Exports and Foreign Currency Earning Services and Activities, the GOT exempts lending institutions and customers subject to the BITT for transactions and services regarding the exports of their customers. In addition, all pre- and

⁵⁵ *Common Alloy Aluminum Sheet From The Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances in Part, and Alignment of Final Determination With Final Antidumping Duty Determination*, 85 Fed. Reg. 49,629 (Dep’t Commerce Aug. 14, 2020) (*Common Alloy Aluminum Sheet from Türkiye Prelim*) and accompanying PDM (ACCESS Barcode: 4013909-02) at 23, unchanged in final determination.

post-shipment loans provided by banks to finance exports, sales, and deliveries deemed to be exports, as well as foreign currency earning services, are exempt from the BITT.

Commerce countervailed this program in *CAAS from Türkiye AR2023*,⁵⁶ and *Aluminum Foil from Türkiye AR2022*.⁵⁷

a. Financial Contribution

The exemption of the BITT on export loans confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

Because this program is limited to the exemption of a tax on export loans, assistance under this program is therefore specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

6. Special Consumption Tax Refund

The GOT normally applies a “special consumption tax” on certain toxic or hazardous materials (*i.e.*, a sales tax charged on certain goods that are listed in List (I) Schedule (B) and the related articles of the GOT’s Special Consumption Tax Law No. 4760) that can be refunded if those goods are used to produce other goods not listed in Schedule (B) within 12 months after

⁵⁶ *Common Alloy Aluminum Sheet From the Republic of Türkiye: Final Results of Countervailing Duty Administrative Review; 2023*, 91 Fed. Reg. 17,941 (Dep’t Commerce Apr. 9, 2026) (“*CAAS from Türkiye AR2023*”) and accompanying IDM (ACCESS Barcode: 4907345-02) at 5 and Comment 3.

⁵⁷ *Certain Aluminum Foil From the Republic of Türkiye: Final Results of Countervailing Duty Administrative Review; 2022*, (“*Aluminum Foil Türkiye AR2022*”) and accompanying IDM (ACCESS Barcode: 4790199-02) at 3 and Comment 4.

the goods are purchased.⁵⁸ YC Inox TR is the only company in Türkiye that operates a stainless steel pickling line to improve the finish and corrosion resistance of its pipe products.⁵⁹ The process of pickling steel is dependent on the application of highly toxic chemicals to untreated steel, typically consisting of hydrochloric or sulfuric acid. As such, YC Inox TR was likely eligible to use this program during the period of investigation.

Commerce countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*,⁶⁰ *CAAS from Türkiye AR2023*,⁶¹ and *Aluminum Foil from Türkiye AR2022*.⁶²

a. Financial Contribution

Refunds of the special consumption tax confer a financial contribution in the form of either revenue foregone under 19 U.S.C. § 1677(5)(D)(ii) or a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1) or the amount of the refund under 19 C.F.R. § 351.504(a)(1).

⁵⁸ Commerce Memorandum, “Preliminary Analysis of Countervailing Duty Investigation of Common Alloy Aluminum Sheet from the Republic of Turkey” (Dec. 28, 2020) (“CAAS Post-Preliminary Analysis”) at 4-5, attached at **Exhibit VI-15**.

⁵⁹ Oreanco, “YC Inox’s Turkish Triumph Transforms Trade & Technology” (July 23, 2025), attached at **Exhibit VI-16**.

⁶⁰ *Common Alloy Aluminum Sheet from Türkiye* IDM at 14.

⁶¹ *CAAS from Türkiye AR2023* IDM at 5 and Comment 3.

⁶² *Aluminum Foil from Türkiye AR2022* IDM at 3 and Comment 5.

c. Specificity

As Commerce previously explained, because the actual recipients of tax refunds under this program “consists of a group of enterprises purchasing toxic or hazardous materials used in the production of non-toxic/hazardous materials within 12 months,” this program specific because it is limited to a group of enterprises or industries under 19 U.S.C. § 1677(5A)(D)(iii)(I).⁶³

7. Corporate Tax Reduction for Manufacturers

Article 32 of Corporate Tax Law No. 5520 was amended in 2022 to add Paragraph 7, such that the corporate tax rate in Türkiye is reduced by one point to the income of an exporting corporation derived exclusively from exports.⁶⁴ This amendment, Article 15 of Law No. 7351, also amended Article 32 to add Paragraph 8 such that the corporate tax rate is reduced by one point to the earnings obtained from the production activities of the companies that hold an industrial registry certificate and are engaged in production activities.⁶⁵

Commerce found this program to be countervailable in *CAAS from Türkiye AR2023*.⁶⁶

⁶³ CAAS Post-Preliminary Analysis at 5 (unchanged in *Common Alloy Aluminum Sheet from Türkiye*). See also *Certain Aluminum Foil From the Republic of Türkiye: Preliminary Results and Partial Rescission of Countervailing Duty Administrative Review*; 2022, 89 Fed. Reg. 100,959 (Dep’t Commerce Dec. 13, 2024) (“*Aluminum Foil from Türkiye AR2022 Prelim*”) and accompanying PDM ACCESS Barcode: 4676869-02) at 18-19 (unchanged in *Aluminum Foil from Türkiye AR2022*).

⁶⁴ *Common Alloy Aluminum Sheet From the Republic of Türkiye: Preliminary Results of the Countervailing Duty Administrative Review*; 2023, 90 Fed. Reg. 38,453 (Dep’t Commerce Aug. 8, 2025) and accompanying PDM (ACCESS Barcode: 4806532-02) at 21.

⁶⁵ *Id.*

⁶⁶ *CAAS from Türkiye AR2023* IDM at 6 and Comment 2.

a. Financial Contribution

Corporate tax reductions under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

Commerce previously explained that Paragraph 7 of Article 32 is deeded specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).⁶⁷ Moreover, Commerce found that Paragraph 7 of Article 32 is *de facto* specific under 19 U.S.C. § 1677(5A)(D)(iii)(I) because the actual number of enterprises that received the tax rate reduction were limited in number.⁶⁸

C. Turk Eximbank Loan Programs

The Turk Eximbank was established in 1987 as Türkiye's official export credit agency.⁶⁹ The bank's objective is to develop the country's exports, diversify exported goods and service; introduce new markets for exported goods; increase Türkiye's share of exports in international trade; provide exporters and contractors and investors operating abroad with competitiveness and assurance in international markets; and support and encourage investments to be made abroad and the production and sale of investment goods for export purposes.⁷⁰ The entirety of the Turk

⁶⁷ *Id.* at Comment 2.

⁶⁸ *Id.*

⁶⁹ Turk Eximbank, "About Us," attached at **Exhibit VI-17**.

⁷⁰ *Id.*

Eximbank's shares are held by the Turkish Treasury, and thus the Turk Eximbank qualifies as an authority under 19 U.S.C. § 1677(5)(B).⁷¹

The Turk Eximbank makes the following programs available to provide financial assistance to exporters located in Türkiye:

1. Rediscount Program

Turk Eximbank offers a pre-shipment and post-shipment loan rediscounting program that allows exporters, manufacturer-exporters, and manufacturers that produce goods for export to finance exports overseas.⁷² The program operates in coordination with the Turkish Central Bank, “with the purpose to finance {Turkish} companies” by assisting with the exporting of “goods and foreign exchange services at advantageous conditions.”⁷³

Through the pre-shipment aspect of the program, Turk Eximbank finances “exporters during the preshipment period at advantageous conditions” by providing export credits to exporters in either Turkish Lira or other currencies.⁷⁴ For post-shipment loans, Turk Eximbank allows discounting of export receivables in exchange for promissory notes and other documents related to the transaction, with credits of up to \$350 million being available at terms of up to 360 days.⁷⁵

In its most recent annual report, for 2024, Turk Eximbank reports that its pre-shipment and post-shipment rediscount credit program amounted to \$11.7 billion at the end of 2024,

⁷¹ *Id.* See also Turk Eximbank, “2024 Annual Report” at 22, attached at **Exhibit VI-18**.

⁷² Turk Eximbank, “Rediscount Credit Program,” attached at **Exhibit VI-19**.

⁷³ *Id.*

⁷⁴ *Id.*

⁷⁵ Turk Eximbank, “Post-Shipment Rediscount Credit Program,” attached at **Exhibit VI-20**.

accounting for 48.4 percent of Turk Eximbank's total loan volume during that year.⁷⁶ As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce countervailed this program in *Brake Drums from Türkiye*⁷⁷ and *Aluminum Extrusions from Türkiye*.⁷⁸

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because its receipt is contingent on export performance.

2. Pre-Shipment Export Credit Program

Turk Eximbank makes short-term pre-shipment export credits available to exporters and manufacturers of export goods to develop their export trades, diversify their range of products and services, and find new markets.⁷⁹ These loans are made through intermediary banks, with

⁷⁶ Turk Eximbank, "2024 Annual Report" at 49, attached at **Exhibit VI-18**.

⁷⁷ *Brake Drums from Türkiye* IDM at 5.

⁷⁸ *Aluminum Extrusions from Türkiye* IDM at 5-6.

⁷⁹ Turk Eximbank, "Pre-Shipment Export Credit Program," attached at **Exhibit VI-21**.

companies able to receive a maximum of \$25 million in loans under the program.⁸⁰ As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce countervailed this program in *Steel Nails from Türkiye*.⁸¹

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under this program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because receipt of a loan is contingent on export performance.

3. Pre-Export Credit Program

In order to increase the competitive capacity of “exporters, manufacturer-exporters, and manufacturers producing goods for export in international markets,” Turk Eximbank provides “affordable finance solutions” to exporters.⁸² These loans are available up to a maximum of \$25

⁸⁰ *Id.*

⁸¹ *Steel Nails from Türkiye* IDM at 5.

⁸² Turk Eximbank, “Pre-Export Program,” attached at **Exhibit VI-22**.

million.⁸³ As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce previously determined this program to be countervailable in *PC Strand from Türkiye*.⁸⁴

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under this program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) because loan receipt is contingent on export performance.

4. Export-Oriented Investment Credit Program

Through the Export-Oriented Investment Credit Program (aka, the Investment Credit for Export Program), Turk Eximbank makes middle- and long-term financing up to \$75 million, in either U.S. dollars or Euros, available to exporters and manufacturer-exporters for the purpose of financing machines, equipment, and accessories used in the production of goods for export.⁸⁵ Loans under this program cannot be used to finance land, buildings, vehicles, used goods, or

⁸³ *Id.*

⁸⁴ *PC Strand from Türkiye* IDM at 16.

⁸⁵ Turk Eximbank, “Export-Oriented Investment Credit Program,” attached at **Exhibit VI-23**.

construction expenditures.⁸⁶ As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce previously countervailed this program in *PC Strand from Türkiye*.⁸⁷

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for loans under this program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) because receipt of loans is contingent on export performance.

5. Export-Oriented Working Capital Credit Program

The Export-Oriented Working Capital Credit Program, also known as the Export-Oriented Business Investment Loan Program, is a lending program administered by Turk Eximbank. In order to provide financing for the working capital needs of Turkish exporters, Turk Eximbank finances working capital for expenditures related to raw materials, intermediate goods, final goods, and final product purchasing transactions, so long as these expenditures occurred within 180 days of the credit application.⁸⁸ Financing under this program can also be

⁸⁶ *Id.*

⁸⁷ *PC Strand from Türkiye* IDM at 16.

⁸⁸ Turk Eximbank, “Export-Oriented Working Capital Credit Program,” attached at **Exhibit VI-24**.

used to cover the cost of electricity, water, natural gas, and personnel expenses for a one-month period.⁸⁹ The program is open to “{e}xporters, manufacturers, manufacturer-exporters, firms operating foreign exchange earning services and exporters from Türkiye and companies with current operating licenses regarding to produce or purchase-sale in free trade zones in Türkiye.”⁹⁰ As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce countervailed this program in *Steel Nails from Türkiye*⁹¹ and *PC Strand from Türkiye*.⁹²

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because the receipt of the loans is contingent on export performance.

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ *Steel Nails from Türkiye* IDM at 5.

⁹² *PC Strand from Türkiye* IDM at 16.

6. Specific Export Credit Program

The Specific Export Credit program is a short- to medium-term export credit that provides financing for export-oriented Turkish manufacturers which Turk Eximbank deems qualified but which otherwise could not be financed under Turk Eximbank's other programs.⁹³ The program is designed to assist companies which need financing for longer than the 12-month term that applies to the bank's short-term credit programs because of production periods or sales conditions of specific export projects, such as the export of new products or development of new markets.⁹⁴ Funding limits and thresholds as well as other terms are determined on a case-by-case basis. As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce found this program to be countervailable in *Aluminum Foil from Türkiye AR2022*.⁹⁵

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

⁹³ Turk Eximbank, "Specific Export Credit Program," attached at **Exhibit VI-25**.

⁹⁴ *Id.*

⁹⁵ *Aluminum Foil from Türkiye AR2022* IDM at 4.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because receipt of a loan is contingent on export performance.

7. Export Buyer's Credits

Turk Eximbank provides financing to both public and private foreign buyers that import consumer and/or capital goods from Türkiye.⁹⁶ Financing is generally not available to exporters directly but is available through both domestic and foreign banks that work with Turk Eximbank to facilitate loans. Domestic banks borrow directly from Turk Eximbank and then offer reduced-cost financing to Turkish exporters. These domestic banks are in turn required to have a foreign branch, subsidiary bank, or correspondent bank in the country where the goods are to be shipped and become indebted to the Turk Eximbank on behalf of the foreign buyer.⁹⁷ Turk Eximbank also provides credit lines to reputable foreign banks that borrow on behalf of the foreign buyers.⁹⁸ For loans with terms under 24 months, Turk Eximbank may finance up to 100 percent of the export contract value of the exported goods.⁹⁹ For longer loans, Turk Eximbank limits financing to 85 percent of the contract value.¹⁰⁰ Importers make credit applications directly to the foreign bank, which in turn may access its credit facility with Turk Eximbank.¹⁰¹ As

⁹⁶ Turk Eximbank, "International Trade Finance Programs," attached at **Exhibit VI-26**.

⁹⁷ Turk Eximbank, "Buyer's Credits Through Domestic Banks," attached at **Exhibit VI-27**.

⁹⁸ Turk Eximbank, "Buyer's Credits Through Foreign Banks," attached at **Exhibit VI-28**.

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ *Id.*

Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce determined this program to be countervailable in *PC Strand from Türkiye*.¹⁰²

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because its loans are contingent on export performance.

8. Export Credit Guarantees (aka Letter of Guarantee Program)

The Turk Eximbank provides letters of guarantee to exporters “in order to enable them to enter new markets and to enhance their business volumes {} abroad.”¹⁰³ The program is limited to manufacturer-exporters, contract firms, and shipbuilding firms.¹⁰⁴ As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

¹⁰² *PC Strand from Türkiye* IDM at 17.

¹⁰³ Turk Eximbank, “Letter of Guarantee Program,” attached at **Exhibit VI-29**.

¹⁰⁴ *Id.*

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.506(a)(1) to the extent that the total amount a firm pays for the loan with the government-provided guarantee is less than the total amount the firm would pay for a comparable commercial loan that the firm could actually obtain on the market absent the government provided guarantee, including any difference in guarantee fees.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because its use is contingent on export performance.

D. Provision of Natural Gas for Less than Adequate Remuneration

The natural gas market in Türkiye is controlled by Boru Hatlari Ile Petrol Tasima AS (Petroleum Pipeline Corporation, or “BOTAŞ”), a state-owned entity. BOTAŞ was established in 1974 pursuant to Decree No. 8/7871 and restructured in 1995 as a State-Owned Enterprise pursuant to Council of Ministers Decree No. 95/6526.¹⁰⁵ Although originally established to transport crude oil from Iraq to Türkiye, today BOTAŞ is responsible for: 1) crude oil and natural gas pipeline operations; 2) liquid natural gas (“LNG”) and regasification operations; 3) port services related to gas and oil; 4) design and construction of oil and natural gas pipelines; 5)

¹⁰⁵ BOTAŞ, “Corporate Profile,” attached at **Exhibit VI-30**.

natural gas and LNG trade; 6) natural gas and LNG storage; and 7) international natural gas and oil transportation projects.¹⁰⁶

Until 2001, BOTAŞ had monopoly rights, by law, on natural gas imports, exports, distribution, sales, and pricing pursuant to Decree No. 397.¹⁰⁷ Under the Natural Gas Market Law (“Law No. 4646”) promulgated in 2001, the GOT abolished that formal control over the natural gas market, with the expectation that the monopoly position of BOTAŞ would cease by 2009.¹⁰⁸ The GOT’s market liberalization has not materialized, however. According to the International Energy Agency (“IEA”),

BOTAŞ, a vertically integrated firm, dominates the natural gas sector. In addition to building and operating Türkiye’s natural gas infrastructure, BOTAŞ accounted for 1.88 Tcf (95%) of Türkiye’s natural gas imports, 1.87 Tcf {52.95 billion standard cubic meters} of total natural gas sales domestically, and about 21 Bcf of natural gas exports in 2022.¹⁰⁹

As recently as 2022, natural gas consumption in Türkiye was estimated at 60.44 billion cubic meters.¹¹⁰ Accordingly, BOTAŞ appears to supply nearly all of Türkiye’s domestic natural

¹⁰⁶ *Id.*

¹⁰⁷ IEA, *Energy Policies of IEA Countries: Turkey 2009 Review*, (2009) at 70-71, attached at **Exhibit VI-31**.

¹⁰⁸ M. Oğuzcan Bulbul, *Liberalization of the Turkish Natural Gas Market*, Rekabet Dergisi Competition Journal, vol. 11, (Jan. 2010) at 20, attached at **Exhibit VI-32**.

¹⁰⁹ U.S. Energy Information Administration, *Country Analysis Brief: Türkiye* (July 11, 2023) at 3, attached at **Exhibit VI-33** (footnotes omitted); *see also* Convert Units Website Excerpt, attached at **Exhibit VI-34** (providing conversion of trillion cubic feet to billion cubic meter).

¹¹⁰ Zeynep Beyza Karabay, *Türkiye’s gas consumption estimate for 2022 shows year-on-year 18.8% rise*, AA Energy (Jan. 28, 2022), attached at **Exhibit VI-35**; Semih Ergur, *Increasing Usage of Natural Gas in Turkey and Its Effect on Local Economy*, Climate Scorecard (June 5, 2022), attached at **Exhibit VI-36**.

gas consumption, with power plants and the industrial sector consuming 28.6 and 26.7 percent, respectively, of natural gas in Türkiye in 2021.¹¹¹

BOTAŞ, as Commerce has previously determined, is an extension of the state and, therefore, a government authority.¹¹² WSLPP producers such as YC Inox TR likely consume natural gas in the production of subject merchandise, particularly in the pickling process which requires a steady heat supply to maintain the thermal load in chemical baths.¹¹³

Commerce previously found this program to be countervailable in *Rebar from Türkiye*¹¹⁴ and *PC Strand from Türkiye*.¹¹⁵

a. Financial Contribution

The provision of natural gas confers a financial contribution in the form of the provision of a good under 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

Pursuant to 19 U.S.C. § 1677(5)(E)(iv), a benefit is conferred when the government provides a good or service for less than adequate remuneration. Commerce’s regulations set forth a hierarchy of three potential benchmarks to utilize in determining whether a good is provided for less than adequate remuneration: (i) market prices from actual transactions within the country under investigation (“tier one”); (ii) world market prices that would be available to purchasers in

¹¹¹ *Id.*

¹¹² *PC Strand from Türkiye* PDM at 29, unchanged in final determination.

¹¹³ Yieh Corp., “YC Inox starts stainless steel sanitary tube production in Turkish plant” (Oct. 16, 2024), attached at **Exhibit VI-37**.

¹¹⁴ *Steel Concrete Reinforcing Bar From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 82 Fed. Reg. 23,188 (Dep’t Commerce May 22, 2017) and accompanying IDM (ACCESS Barcode: 3572958-02) at 8-12.

¹¹⁵ *PC Strand from Türkiye* IDM at 15-16.

the country under investigation (“tier two”); or (3) an assessment of whether the government price is consistent with market principles (“tier three”).¹¹⁶ Though the preference is to use a “tier one” benchmark, where, as here, Commerce should determine that the government distorts the market for a good or service, prices for those goods and services in the country will be considered unreliable and are not an appropriate basis of comparison for determining whether there is a benefit.¹¹⁷ Consistent with Commerce’s prior findings, because Türkiye’s natural gas market is dominated by BOTAŞ, Commerce should use a world market price to compare to Turkish domestic prices and conclude that this subsidy provides a benefit to WSLPP producers.¹¹⁸ Based on this methodology, Commerce has calculated subsidy rates for this program in recent countervailing duty proceedings of up to 3.30 percent *ad valorem*.¹¹⁹

c. Specificity

Industrial users, including those in the metals industries, and powerplant users are the primary beneficiaries of subsidized natural gas costs in Türkiye. As such, this group of industries is the predominant user of the subsidy and receives a disproportionately large amount of the subsidy, and the subsidy is therefore specific under 19 U.S.C. §§ 1677(5A)(D)(iii)(II) and (III).

¹¹⁶ See also 19 C.F.R. § 351.511(a)(2).

¹¹⁷ See, e.g., *Certain Oil Country Tubular Goods From the People’s Republic of China: Preliminary Affirmative Countervailing Duty Determination, Preliminary Negative Critical Circumstances Determination*, 74 Fed. Reg. 47,210, 47,219 (Dep’t Commerce Sept. 15, 2009); see also *Notice of Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination: Certain Softwood Lumber Products From Canada*, 67 Fed. Reg. 15,545 (Dep’t Commerce Apr. 2, 2002) and accompanying IDM at “Analysis of Programs, Provincial Stumpage Programs Determined to Confer Subsidies, Benefit.”

¹¹⁸ 19 C.F.R. § 351.511(a)(2)(ii).

¹¹⁹ *Steel Concrete Reinforcing Bar From the Republic of Turkey: Final Results of Countervailing Duty Administrative Review; 2017*, 85 Fed. Reg. 16,056 (Dep’t Commerce Mar. 20, 2020) and accompanying IDM (ACCESS Barcode: 3954383-02) at 4.

E. Grant Programs

1. Grants through the Scientific and Technological Research Council of Türkiye

The GOT provides grants for designated research and development (“R&D”) projects through the GOT’s Scientific and Technological Research Council of Türkiye (“TUBITAK”) to support research, technology development, and innovation activities of Turkish companies.¹²⁰ In particular, TUBITAK commissioned the “1515 Support Program,” also known as the “Frontier R&D Laboratory Support Program,” to “make Türkiye a global attraction center in certain scientific and technological areas.”¹²¹ The program provides support amounting to 75 percent of the R&D budget (not exceeding TL 10 million) to companies investing at least TRY 15 million in R&D expenditures in any year within the last three years.¹²² TUBITAK also makes available the “1511 – R&D and Innovation Projects program” (also known as the “Research Technology Development and Innovation Projects in Priority Areas Grant Program”) to support company projects in priority areas of Türkiye by: 1) increasing technological competence and knowledge; 2) evaluating existing capabilities in different areas; 3) developing unique technologies; and 4) gaining acceleration in technological development.¹²³

¹²⁰ GOT, “Guide to State Incentives for Investments in Türkiye,” at 25, attached at **Exhibit VI-38**.

¹²¹ *Id.*

¹²² *Id.*

¹²³ *Id.*; see also *Prestressed Concrete Steel Wire From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, in Part*, 85 Fed. Reg. 59,287 (Dep’t Commerce Sep. 21, 2020) (“*PC Strand from Türkiye Prelim*”) and accompanying PDM (ACCESS Barcode: 4026877-02) at 27-28, unchanged in *PC Strand from Türkiye*.

Commerce countervailed the grants provided by TUBITAK in *PC Strand from Türkiye*.¹²⁴

a. Financial Contribution

Grants provided under these programs confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under these programs exists in the amount of the grants provided pursuant to 19 C.F.R. § 351.504(a)(1).

c. Specificity

Commerce previously determined that recipients of TUBITAK grants are limited in number and that this program is therefore *de facto* specific under 19 U.S.C. § 1677(5A)(D)(iii)(I).¹²⁵ Commerce also has determined that TUBITAK grants under the 1511 program are specific pursuant to 19 U.S.C. § 1677(5A)(D)(iv) because they are only available to companies located in designated geographic regions.¹²⁶

2. Renewable Energy Support Mechanism (YEKDEM)

The GOT provides support to electricity producers utilizing renewable energy sources through guaranteed tariff rates pursuant to the Law on Usage of Renewable Energy Resources for Generating Electric Energy No. 5346 (“Renewable Energy Law No. 5346”). Renewable Energy Resource Certificates (“RER Certificates”) are issued by the Electricity Market Regulatory Authority to power generators who are then entitled to a set feed-in tariff that

¹²⁴ *PC Strand from Türkiye* IDM at 15.

¹²⁵ *PC Strand from Türkiye Prelim* PDM at 28, unchanged in *PC Strand from Türkiye*.

¹²⁶ *Id.*

guarantees a minimum threshold purchase price for their generated electricity for a period of 10 years¹²⁷ for electricity sold through Enerji Piyasaları İşletme A.Ş., the electricity marketplace operator.¹²⁸ The applicable tariff prices vary by generating source, with power generated by hydroelectric or wind facilities being paid \$0.073 per KWH, geothermal-based facilities being paid \$0.105 per KWH, and biomass and solar power production being paid \$0.133 per KWH.¹²⁹ If domestically-manufactured equipment is used in the facility, the guaranteed tariffs may increase due to a local content bonus.¹³⁰

YC Inox TR holds a Renewable Energy Certificate in Türkiye and therefore likely qualifies for assistance under this program.¹³¹ Commerce countervailed this program in *PC Strand from Türkiye*¹³² and *Aluminum Foil from Türkiye AR2022*.¹³³

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

¹²⁷ Renewable Energy Law No. 5346, **Exhibit VI-39**.

¹²⁸ *Aluminum Foil from Türkiye AR2022 Prelim* PDM at 24. See also Excerpts from GOT Letter, “Response of the Government of Turkey in 2016 Countervailing Duty Administrative Review on Imports of Steel Concrete Reinforcing Bar from Turkey,” (May 14, 2018) at 58, **Exhibit VI-40**.

¹²⁹ GOT, “Guide to Investing in Turkish Renewable Energy Sector,” at 16, **Exhibit VI-14**.

¹³⁰ *Id.*

¹³¹ Steel Radar, “Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye” (July 7, 2025), attached at **Exhibit VI-4**.

¹³² *PC Strand from Türkiye* IDM at 17.

¹³³ *Aluminum Foil from Türkiye AR2022* IDM at 5.

c. Specificity

Because this program is limited to companies that are engaged in renewable energy projects, it is *de jure* specific under 19 U.S.C. § 1677(5A)(D)(i).

3. Foreign Market Research and Market Entry Support

The GOT provides multiple avenues of support to assist exporters with promoting sales activities. According to the “Guide to State Incentives for Investments in Türkiye,” these incentives include: 1) support of up to 70 percent for expenses related to international market research trips; 2) support of up to 60 percent for reporting and foreign company acquisitions; 3) support of up to 75 percent for acquisitions of foreign companies with advanced technology; 4) support of up to 80 percent for costs of subscription to e-commerce sites.¹³⁴ As Turkish WSLPP producers are significant exporters, it is likely that they qualify for assistance under this program.

Commerce previously countervailed this program in *PC Strand from Türkiye*.¹³⁵

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

¹³⁴ GOT, “Guide to State Incentives for Investments in Türkiye,” at 29, attached at **Exhibit VI-38**.

¹³⁵ *PC Strand from Türkiye* IDM at 15.

c. Specificity

Because funds under this program are only available to exporters, this program is specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

4. Support for the Development of International Competitiveness

Companies located in OIZs, or that are members of trade or exporters unions, are eligible to receive assistance under the “Support for the Development of International Competitiveness” program.¹³⁶ This program provides several types of assistance to exporters: 1) up to \$400,000 for expenditures related to requirement analysis, training, advisory, and promotion activities; 2) up to \$150,000 for expenditures relating to foreign marketing activities; 3) up to \$100,000 for expenditures to be incurred for procurement committees’ organizations; and 4) up to 75 percent of employment expenses for a maximum of two specialized employees assigned to projects under this program.¹³⁷

Commerce found this program to be countervailable in *Brake Drums from Türkiye*.¹³⁸

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

¹³⁶ GOT, “Guide to State Incentives for Investments in Türkiye,” at 29, attached at **Exhibit VI-38**.

¹³⁷ *Id.*

¹³⁸ *Brake Drums from Türkiye* IDM at Appendix.

c. Specificity

Benefits under this program are limited to exporters and, as such, are deemed specific as under 19 U.S.C. § 1677(5A)(A) and (B).

5. Domestic and Foreign Fair Support Program

In order to support the participation of Turkish companies in domestic and international trade fairs, increase exports, and support promotional activities, Türkiye's Ministry of Trade reimburses companies for certain expenditures made in relation to participation in trade fairs.¹³⁹ The domestic aspect of this program was established in 2016 pursuant to "Communique No. 2014/4 on Supporting Sectoral International Domestic Fairs,"¹⁴⁰ while participating in foreign trade fairs was included in 2017 pursuant to the "Communique No. 2017/4 on Supporting Participation in Fairs Abroad."¹⁴¹ According to the GOT's "Guide to State Incentives for Investments in Türkiye," reimbursement of up to 75 percent of eligible costs is available.¹⁴² To participate in the program, companies must be a member of an exporters' association.¹⁴³

Reports indicate that YC Inox TR, a prominent Turkish exporter of WSLPP, participated in the International Elevator Istanbul Fair in 2025.¹⁴⁴ It is therefore likely that the company

¹³⁹ GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Certain Steel Nails from the Republic of Turkey," (Public Version) (Mar. 28, 2022) at 100, **Exhibit VI-41**.

¹⁴⁰ *Id.* at 216.

¹⁴¹ *Id.* at 100.

¹⁴² GOT, "Guide to State Incentives for Investments in Türkiye," at 29, **Exhibit VI-38**.

¹⁴³ GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Certain Steel Nails from the Republic of Turkey," (Public Version) (Mar. 28, 2022) at 216, **Exhibit VI-41**.

¹⁴⁴ Kocaeli TV, "Companies from Kocaeli will showcase their innovations at the International Elevator Istanbul Fair" (May 8, 2025), attached at **Exhibit VI-42**; *see also* Asansor.Istanbul, "Instagram" (May 13, 2025), attached at **Exhibit VI-43**.

qualified for assistance under this program during the POI. Commerce previously countervailed both the domestic and foreign aspects of this program in *Brake Drums from Türkiye*¹⁴⁵ and *Steel Nails from Türkiye*.¹⁴⁶

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

c. Specificity

As Commerce explained in *Steel Nails*, applicants for funds under both the domestic and foreign aspects of this program are evaluated based on their membership in an exporters' association.¹⁴⁷ Accordingly, the program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B).

6. Turquality Program

Through the Turquality program, the GOT provides support for firms in brand building in Türkiye and abroad and to create positive public opinion for Turkish products.¹⁴⁸ Pursuant to Communiqué No. 2006/4, the "Overseas Branding of Turkish Products, Promotion of Turkish

¹⁴⁵ *Brake Drums from Türkiye* IDM at 5-6.

¹⁴⁶ *Steel Nails from Türkiye* IDM at 4.

¹⁴⁷ *Certain Steel Nails From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination*, 87 Fed. Reg. 34,649 (Dep't Commerce June 7, 2022) ("*Steel Nails from Türkiye Prelim*") and accompanying PDM (ACCESS Barcode: 4247320-02) at 13-14, unchanged in *Steel Nails from Türkiye*.

¹⁴⁸ Ministry of Trade, "Turquality®," attached at **Exhibit VI-44**.

Product Image and Supporting Turquality” program, the GOT offers financing and reimbursement for expenses related to international trademark registration, certification and quality marks, salaries of fashion/industrial designers and product development engineers, and promotional activities.¹⁴⁹ Support of up to 50 percent is provided for expenditures related to promotion or advertisements, store rents, or advisors which are incurred by Turkish companies to build their brands abroad.¹⁵⁰

Commerce countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*.¹⁵¹

a. Financial Contribution

Grants and financing provided under this program constitute a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1). To the extent that companies have received financing to support their trade and promotional activities, a benefit exists pursuant to 19 C.F.R. § 351.505(a)(1)-(a)(2).

c. Specificity

As Commerce explained in *Common Alloy Aluminum Sheet from Türkiye*, applicants for funds under this program are evaluated according to their potential to create a positive

¹⁴⁹ *Common Alloy Aluminum Sheet from Türkiye Prelim PDM* at 23.

¹⁵⁰ GOT, “Guide to State Incentives for Investments in Türkiye,” at 29, **Exhibit VI-38**.

¹⁵¹ *Common Alloy Aluminum Sheet from Türkiye IDM* at 13.

international brand image,¹⁵² and thus the program is deemed specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B). Moreover, the GOT characterizes this program as an export incentive.¹⁵³

7. Incentives under Türkiye's Research & Development Law

Türkiye provides incentives to companies engaged in R&D pursuant to Law No. 5746 on Supporting Research, Development and Design Activities ("Law No. 5746") of 2008, which sets forth several incentives that are available for R&D investment projects.¹⁵⁴ Assistance available under Law No. 5746 includes: 1) corporate income tax deductions for R&D and design expenses; 2) income tax exemptions for the salaries of R&D and support personnel; 3) contributions for employers' social security premiums for R&D and support personnel; 4) stamp duty exemptions for all documentation on R&D and innovation facilities; 5) capital support for technology and innovation; 6) customs duty exemptions for imported goods used for R&D; and 7) insurance premium support.¹⁵⁵ In 2021, this program was extended to 2028.¹⁵⁶

Commerce countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*,¹⁵⁷ *Aluminum Foil from Türkiye*,¹⁵⁸ and *Quartz Products from Türkiye*.¹⁵⁹

¹⁵² *Common Alloy Aluminum Sheet from Türkiye Prelim* PDM 24, unchanged in *Common Alloy Aluminum Sheet from Türkiye*.

¹⁵³ GOT, "Guide to State Incentives for Investments in Türkiye," at 29, **Exhibit VI-38**.

¹⁵⁴ GOT, "Law on Supporting Research, Development and Design Activities No. 5746," **Exhibit VI-45**.

¹⁵⁵ *Id.* at Article 3.

¹⁵⁶ Ekin İnal & Mert Müstecaplıoğlu, "Turkey has extended R&D and design centers incentive program," Norton Rose Fulbright (Mar. 29, 2021), attached as **Exhibit VI-46**.

¹⁵⁷ *Common Alloy Aluminum Sheet from Türkiye* IDM at 131.

¹⁵⁸ *Certain Aluminum Foil From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 52,884 (Dep't Commerce Sep. 23, 2021) and accompanying IDM (ACCESS Barcode: 4161743-02) at 7.

¹⁵⁹ *Quartz Surface Products from Türkiye* IDM at 5.

a. Financial Contribution

The tax incentives under this program constitute a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The capital contribution and insurance premium incentives provide financial contributions in the form of direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

The tax incentives under this program confer a benefit in the amount of the tax saved pursuant to 19 C.F.R. § 351.509(a). Any customs duty exemptions confer a benefit in the amount of duty exempted pursuant to 19 C.F.R. § 351.510(a). Finally, any capital contribution or insurance premium support confers a benefit in the amount of the grant pursuant to 19 C.F.R. § 351.504(a)(1).

c. Specificity

As Commerce explained in *Common Alloy Aluminum Sheet from Türkiye*, this program is specific pursuant to under 19 U.S.C. § 1677(5A)(D)(i) because it is “limited to enterprises that maintain technology center businesses, R&D centers, and design centers as specified in Article 1(2) of Law No. 5746.”¹⁶⁰

F. Investment Incentive Program

In 2012, the GOT, through the Ministry of Industry and Technology, implemented the Investment Incentives Program (“IEP”) pursuant to Council of Ministers’ Decree No. 2012/3305

¹⁶⁰ *Common Alloy Aluminum Sheet from Türkiye* PDM at 22, unchanged in the final determination.

(“Decree No. 2012/3305”).¹⁶¹ The IEP consists of several different incentive schemes which largely provide the same subsidy benefits but with varying criteria. These incentive schemes are: 1) the General Investment Incentive Scheme (“GIIS”); 2) the Regional Investment Incentive Scheme (“RIIS”); 3) the Large Scale Investment Incentive Scheme (“LSIIS”); 4) the Strategic Investment Incentive Scheme (“SIIS”); and 5) the Project-based Investment Incentive Scheme (“PIIS”). Per Article 3 of Decree No. 2012/3305, the IEP divides Türkiye into six regions accounting for differing socio-economic development levels.¹⁶²

1. General Investment Incentive Scheme

The GIIS authorizes Turkish producers that meet minimum investment thresholds to apply to the Ministry of Economy for an investment certificate permitting the duty-free import of equipment. The minimum investments to qualify for assistance under this program are TRY one million in Regions 1 and 2 and at least TRY 500,000 for Regions 3 to 6.¹⁶³

Commerce countervailed this program in *Steel Nails from Türkiye*.¹⁶⁴

a. Financial Contribution

The exemption from customs duties for imported equipment under this program confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

¹⁶¹ Decree No. 2012/3305, attached at **Exhibit VI-47**. See also *Certain Brake Drums From the Republic of Türkiye: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 89 Fed. Reg. 95,740 (Dep’t Commerce Dec. 3, 2024) and accompanying PDM (ACCESS Barcode: 4670837-02) at 16.

¹⁶² Decree No. 2012/3305, at Article 3, attached at **Exhibit VI-47**.

¹⁶³ *Id.*

¹⁶⁴ *Steel Nails from Türkiye* IDM at 6.

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.510(a).

c. Specificity

As the qualifications for assistance under this program are limited to companies making specified minimum investments that vary by region, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv).¹⁶⁵

2. Regional Investment Incentive Scheme

Benefits under the RIIS are available to producers in all six regions of Türkiye but vary based on the region and sectors in which the investment is made. Per Annex 2A of Decree No. 2012/3305, investments made in the “{m}ain metal industry” and “{m}etal goods” industries are eligible for benefits, with investments ranging from TRY 500,000 to TRY 4 million being required, depending on the region.¹⁶⁶ Available incentives include: 1) customs duty exemptions; 2) corporate tax reductions of 15 to 55 percent of investment expenditures; 3) social security premium support for the employer’s share; 4) land allocation; and 5) interest rate support.¹⁶⁷ In addition, in Region 6 exclusively, assistance with respect to income tax withholding support and social security premium support for the employee’s share are also available.¹⁶⁸

¹⁶⁵ *Steel Nails from Türkiye Prelim PDM* at 21, unchanged in *Steel Nails from Türkiye*.

¹⁶⁶ Decree No. 2012/3305, at Article 5, **Exhibit VI-47**.

¹⁶⁷ GOT, “Guide to State Incentives for Investments in Türkiye,” at 6, 9, **Exhibit VI-38**.

¹⁶⁸ *Id.* at 6, 13.

Commerce countervailed several aspects of this program in *Steel Nails from Türkiye*,¹⁶⁹ and found each of the benefits that were not exclusive to Region 6 to be countervailable in *Brake Drums from Türkiye*.¹⁷⁰

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, and exemptions from social security premium under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations confers a financial contribution in the form of a good under 19 U.S.C. § 1677(5)(D)(iii). Interest rate support confers a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

Exemptions from customs duties under this program provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions and exemptions from social security premiums provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). The benefit from the interest rate support is the amount of the support provided pursuant to 19 C.F.R. § 351.504(a)(1). Land allocations provide a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

¹⁶⁹ *Steel Nails from Türkiye Prelim PDM* at 18-20; unchanged in *Steel Nails from Türkiye*.

¹⁷⁰ *Brake Drums from Türkiye IDM* at Appendix.

c. Specificity

Because benefits under this program are limited to certain industries and regions, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv), respectively.

3. Large Scale Investment Incentive Scheme

Pursuant to Annex 3 of Decree No. 2012/3305, under the LSIIS, the GOT makes investment incentives available for 12 investment categories, including “Investments on Metal Production: Investments on final metal production from ore and/or concentrate of metallic minerals.” A minimum investment of TRY 50 million is required to qualify.¹⁷¹ Available incentives include: 1) customs duty exemptions; 2) tax deductions ranging from 25 to 65 percent; 3) social security premium support for the employer’s share ranging from two to 12 percent; and 4) land allocation.¹⁷² In addition, in Region 6 exclusively, assistance with respect to income tax withholding support and social security premium support for the employee’s share is also available.¹⁷³

WSLPP producers qualify for assistance under this program as metal producers. For instance, YC Inox TR produces flat steel at its Kocaeli in addition to WSLPP.¹⁷⁴ Commerce found each of the benefits available under this program to be countervailable in *Brake Drums from Türkiye*.¹⁷⁵

¹⁷¹ GOT, “The Investment Incentive Program of Turkey,” **Exhibit VI-48**; *see also* Decree No. 2012/3305 at Annex 3, **Exhibit VI-47**.

¹⁷² GOT, “The Investment Incentive Program of Turkey,” **Exhibit VI-48**.

¹⁷³ *Id.*

¹⁷⁴ Oreanco, “YC Inox’s Turkish Triumph Transforms Trade & Technology” (July 23, 2025), attached at **Exhibit VI-16**.

¹⁷⁵ *Brake Drums from Türkiye* IDM at Appendix.

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, and exemptions from social security premiums under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations confers a financial contribution in the form of a good under 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

Exemptions from customs duties under this program provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions and exemptions from social security premiums provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). Land allocations provide a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

Because benefits under this program are limited to certain industries and regions, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv), respectively.

4. Strategic Investment Incentive Scheme

Under Article 8 of Decree No. 2012/3305, investments that are aimed at the production of products with high import dependency are considered “strategic investments.”¹⁷⁶ For investments to qualify for incentives, the following requirements must be met: 1) a minimum investment amount of at least TRY 50 million; 2) the product’s domestic production capacity is less than its import volume; 3) the investment increases the domestic value added by 40 percent;

¹⁷⁶ Decree No. 2012/3305, **Exhibit VI-47**.

and 4) the product has an import value of at least USD 50 million in the past year.¹⁷⁷ Available investment incentives include: 1) customs duty exemptions; 2) tax deductions of 50 percent; 3) social security premium support for the employer's share for seven to 10 years; 4) land allocation; and 5) interest rate support of up to TRY 75 million.¹⁷⁸

Commerce found each of the benefits available under this program to be countervailable in *Brake Drums from Türkiye*.¹⁷⁹

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, and exemptions from social security premiums under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations confers a financial contribution in the form of a good under 19 U.S.C. § 1677(5)(D)(iii). Interest rate support confers a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

Exemptions from customs duties under this program provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions and exemptions from social security premiums provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). The benefit from the interest rate support is the amount of the support provided pursuant to 19 C.F.R. § 351.504(a)(1). Land allocations provide

¹⁷⁷ GOT, "Guide to State Incentives for Investments in Türkiye," at 6, **Exhibit VI-38**; *see also* GOT, "The Investment Incentive Program of Turkey," **Exhibit VI-48**.

¹⁷⁸ *Id.*

¹⁷⁹ *Brake Drums from Türkiye* IDM at Appendix.

a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

Because benefits under this program are limited to certain industries and regions, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv), respectively.

5. Project-based Investment Incentive Scheme

In November 2016, the GOT launched a project-based incentive program “designed to promote investments deemed to help meet critical national needs,... ensure sufficient supply levels of strategic goods and services, {and} boost technological capacity, R&D efforts, competitiveness and added value in production...”¹⁸⁰ by means of providing “tailor-made incentive mechanisms... for selected investors” pursuant to the PIIS.¹⁸¹ Eligibility criteria include: 1) a minimum investment amount of TRY one billion; 2) a focus on the production of technologically intensive and strategic products; 3) high added-value in investment and manufacturing; and 4) a focus on reducing import dependency.¹⁸² Available incentives include: 1) cashback support; 2) customs duty exemptions; 3) corporate tax reductions of up to 200 percent of investment expenditures; 4) social security premium support for the employer’s share for up to 10 years; 5) income tax withholding support for 10 years; 6) qualified personnel support for up to five years; 7) energy support for up to 50 percent of energy expenditures for up to 10

¹⁸⁰ Norton Rose Fulbright, “Turkish Government Launches Project-Based Incentive Program to Boost Investments,” (May 7, 2017), **Exhibit VI-49**.

¹⁸¹ GOT, “Guide to State Incentives for Investments in Türkiye,” at 15, **Exhibit VI-38**.

¹⁸² *Id.*

years; 8) interest rate support for up to 10 years; 9) capital contributions up to 49 percent of the investment amount; 10) land allocation; 11) infrastructure support; 12) purchasing guarantees; and 13) facilitation of authorization, permit, and license procedures.

Commerce found this program to be countervailable in *Brake Drums from Türkiye*.¹⁸³

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, exemptions from social security premiums, income tax withholding support, and the facilitation of authorizations, permits, and licenses under this program confer financial contributions in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations and infrastructure support confer financial contributions in the form of a good under 19 U.S.C. § 1677(5)(D)(iii). Cashback support, personnel support, energy support, interest rate support, and capital contributions confer financial contributions in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i). Purchasing guarantees provide a financial contribution in the form of the purchase of a good under 19 U.S.C. § 1677(5)(D)(iv).

b. Benefit

Exemptions from customs duties and the facilitation of authorizations, permits, and licenses provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions, exemptions from social security premiums, and exemptions from income tax withholdings provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). Capital contributions, energy support, interest rate support, and personnel support each bestow a benefit in the amount of the support provided

¹⁸³ *Brake Drums from Türkiye* IDM at Appendix.

pursuant to 19 C.F.R. § 351.504(a)(1). Land allocations provide a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2). Infrastructure support and purchasing guarantees provide a benefit under 19 U.S.C. § 1677(5)(E).

c. Specificity

Because benefits under this program are limited to firms making minimum investments in accordance with stated project goals, this program is specific under 19 U.S.C. § 1677(5A)(D)(i).

VII. CONCLUSION

As described herein, producers and exporters of WSLPP in Türkiye are benefitting from substantial countervailable subsidies that are causing material injury to the domestic industry in the United States. Petitioners therefore respectfully request that Commerce initiate a countervailing duty investigation of imports of WSLPP from Türkiye.

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