AKDENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ

Sayı: 17812098-TİM.AKİB.GSK.SAN.2022/401-3784 Mersin, 10/08/2022
Konu: AB Önlemlerin Etkisiz Kılınması Soruşturması Hk.

Sayın Üyemiz,

Ticaret Bakanlığından iletilen yazıda, AB tarafından Endonezya menşeli bazı sıcak haddelenmiş paslanmaz çelik sac ve ruloların ithalatına uygulanan anti-damping önleminin, bu ürünlerin Türkiye'den sevk edilmesi suretiyle, muhtemel etkisiz kılınması ile ilgili olarak, 27 Temmuz 2022 tarihli AB Resmi Gazetesinde yayımlanan açılış bildirimi ile soruşturma açıldığı bilgisi iletildiği ifade edilmiştir.

Konuya ilişkin olarak Ticaret Bakanlığına ulaşmış şikayet metni ile eki, görüş bildirmeniz için ilişikte sunulmaktadır.

Bilgilerini rica ederim

Mehmet Ali ERKAN
Genel Sekreter

Ek:
1- SSHR_Circumvention_Body
2- SSHR_Circumvention_Annexes

5070 sayılı kanun gereğince Mehmet Ali Erkan tarafından (10.8.2022 11:13:30) tarafından güvenli elektronik imza ile imzalanmıştır.

Akdeniz İhracatçı Birlikleri Genel Sekreterliği
Limonluk Mah. Vali Hüseyin Aksoy Caddesi No:4
Yenişehir/MERSİN
Telefon: (0324) 325 37 37 Fax.: (0324) 325 41 42
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Ayrıntılı bilgi için: Osman Bülbül - Uzman

ACCIAI
SPECIALI
TERNI

LETTER OF SUPPORT

Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey

1. Identity (name, address, telephone, fax) of the company supporting the application

   Name: Acciai Speciali Terni S.p.A.

   Address: Viale B. Brin 218, 05100 Terni, Italia

   Tel: +39 0744 4901
   Fax: +39 0744 490 752
   E-Mail: info@acciaiterni.it

   The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Date: 25/05/2022

Name and signature of authorised official

MARIO C.
CALDONAZZO
Chief Executive Officer

DIMITRI
MENECALI
Plant Director

LETTER OF SUPPORT

Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey

1. Identity (name, address, telephone, fax) of the company supporting the application

   Name: Acerinox Europa SAU

   Address: Avda. Acerinox Europa, s/n Poligono Industrial Palmones, 11379, Los Barrios Cadiz, Spain

   Address for Communications: Calle Santiago de Compostela 100, 28035 Madrid, Spain

   Tel:
   Fax: Confidential information (personal data)
   E-Mail:

   The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Signed in Madrid, 30th May 2022

ACERINOX EUROPA, S.A.U.

Luis Gimeno Valledor
Secretary General Acerinox SA

LETTER OF SUPPORT

Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey

1. Identity (name, address, telephone, fax) of the company supporting the application

Name: Aperam Stainless France

Address: 6 Rue André Campra
93210 La Plaine Saint-Denis Cedex

Tel: +33 1 71920652
Fax: +33 1 71920798
E-Mail: stainless@aperam.com

The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Date: 25 May 2022

Name and signature of authorised official

Nicolas Changeur
Chief Marketing Officer
Aperam Stainless Europe

outokumpu
high performance stainless steel

LETTER OF SUPPORT

Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey

1. Identity (name, address, telephone) of the company supporting the application

Name: **Outokumpu Oyj**

Address: **Salmisaarenranta 11, 00180 Helsinki, Finland**

Tel:

E-Mail: Confidential information (personal data)

The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Date: 23 May 2022

Name and signature of authorised official

Pia Aaltonen-Forsell – Chief Financial Officer

EU27 Imports of SSHR (in tonnes)	2018	2019	2020	2021
Imports from Turkey	1.743	2.140	21.535	33.376
Index	***100***	***123***	***1236***	***1915***
Imports from Indonesia	44.863	81.104	3.675	105.784
Index	***100***	***181***	***8***	***236***

Imports of SSHR from Turkey (in tonnes)	2018	2019	2020	2021
Imports in EU27	1.743	2.140	21.535	33.376
Imports in Italy	2	326	19.967	29.851
Italy share of EU27 imports	**0%**	**15%**	**93%**	**89%**

Italy Imports of SSHR (in tonnes)	2018	2019	2020	2021
Imports from Turkey	2	326	19.967	29.851
Index	***100***	***19.156***	***1.174.529***	***1.755.914***
Imports from Indonesia	44.489	80.061	3.041	104.181
Index	***100***	***180***	***7***	***234***

EU27 Import price of SSHR (in EUR/ tonnes)	2018	2019	2020	2021
From Turkey	2.669	2.729	1.634	1.693
Index	***100***	***102***	***61***	***63***
From Indonesia	1.688	1.616	1.680	1.822
Index	***100***	***96***	***100***	***108***

REPORTER	PARTNER	PRODUCT	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	181,47	757,06	63877,61	87594,54
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	289,68	1056,25	100619,60	170438,76
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	1396,94	1531,11	35580,74	43453,25
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	10531,37	15112,65	9189,55	22712,52
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	4470,63	2144,06	2508,15	7736,44
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	437,81	316,57	384,92	481,47
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm	24,53	48,73	527,10	445,19
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm	83,93	410,74	2661,08	856,44
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm	10,89	21,56	3,61	42,80
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	1206551,83	1331852,46	322993,76	839167,14
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	2106637,19	2284984,52	740863,99	1142339,29
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	628324,36	627960,02	146110,55	482621,10
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	452434,21	464415,39	241709,67	298675,34
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	143453,40	112375,49	89571,53	103417,55
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	13611,42	12196,41	8732,68	4442,52
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm	53366,17	55306,00	27949,87	41922,45
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm	30757,12	63900,49	20359,27	11047,92
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm	61645,98	69702,31	15031,24	73035,55
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm		631,60	63539,62	86239,10
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm		1048,00	100601,72	169617,00
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm		1504,66	35528,52	42546,50
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	17,00			102,79
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm				
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm		72,18		
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm				
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	975583,65	1059907,86	250039,89	724491,94
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	1782359,55	2051865,36	591012,72	981662,76
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	515027,71	525491,43	103389,98	465044,00
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	17976,29	14151,57	9709,37	16876,92
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	3243,24	2159,34	2136,07	2336,79
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	261,20	632,76	86,81	775,02
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm	4952,67	3787,99	2352,57	6416,96
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm	498,48	333,79	158,10	446,44
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm	51609,94	59637,88	11344,66	70015,83
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm		238,45	112,82	40884,05
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	152906,00	262424,50	12021,62	416307,10
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	238096,85	420286,15	19820,20	361230,20
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	56290,64	118781,25		239358,85
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	351,13	6364,84	3577,61	61,41
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	820,66	2539,13	1154,26	
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	161,14	404,68		
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm				
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm			64,04	
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm		238,45		40884,05
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	152906,00	261928,70	11528,70	404784,90
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	238096,85	419663,95	18878,50	356782,25
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	53889,78	118781,25		239358,85
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm				

Volume in Tonne

REPORTER	PARTNER	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
EU27	Turkey	1.743	2.140	21.535	33.376
Italy (incl. San Marino 'SM' -> 1993)	Turkey	2	326	19.967	29.851
EU27	Indonesia	44.863	81.104	3.675	105.784
Italy (incl. San Marino 'SM' -> 1993)	Indonesia	44.489	80.061	3.041	104.181
EU27	World	469.678	502.269	161.332	299.667
Italy (incl. San Marino 'SM' -> 1993)	World	335.151	371.797	97.023	226.807

Value In EUR

REPORTER	PARTNER	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
EU27	Turkey	4.650.515	5.840.599	35.197.342	56.492.832
Italy (incl. San Marino 'SM' -> 1993)	Turkey	3.240	505.691	31.294.022	45.671.951
EU27	Indonesia	75.706.983	131.039.312	6.175.009	192.727.199
Italy (incl. San Marino 'SM' -> 1993)	Indonesia	75.010.117	129.035.365	4.962.455	189.742.468
EU27	World	869.665.334	881.328.670	285.281.486	590.108.029
Italy (incl. San Marino 'SM' -> 1993)	World	593.150.494	612.624.989	152.901.828	414.964.754

EUR per tonne

REPORTER	PARTNER	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
EU27	Turkey	2.669	2.729	1.634	1.693
Italy (incl. San Marino 'SM' -> 1993)	Turkey	1.906	1.553	1.567	1.530
EU27	Indonesia	1.688	1.616	1.680	1.822
Italy (incl. San Marino 'SM' -> 1993)	Indonesia	1.686	1.612	1.632	1.821
EU27	World	1.852	1.755	1.768	1.969
Italy (incl. San Marino 'SM' -> 1993)	World	1.770	1.648	1.576	1.830

REPORTER	PARTNER	PRODUCT	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	57910	123221	10002843	13589622
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	53345	162435	15838399	26140866
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	215136	240072	5544037	6749742
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	2957637	4430015	2402099	7062107
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	1185946	627723	713161	2403766
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	142114	107536	132018	167376
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm	8851	18925	112744	141649
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm	24029	102168	435135	223497
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm	5547	28504	16906	14207
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	223046596	239105287	58696026	165674699
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	360532456	364908056	110037816	199523727
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	114660729	103685719	23393217	93712421
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	96157546	100169520	50577370	72003126
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	30030394	22980200	16330361	24271457
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	5454270	4337043	5363081	1670299
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm	17294639	16722574	11197825	13803515
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm	9391340	15405852	6222380	4851822
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm	13097364	14014419	3463410	14596963
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm		97422	9940692	13183993
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm		161651	15830651	25922340
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm		232605	5522679	6513123
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	3240			52495
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm				
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm		14013		
Italy (incl. San Marino 'SM' -> 1993)	Turkey	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm				
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	179304146	185547227	44929801	138774386
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	303542947	322013889	85371737	164366462
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	93365969	88714637	17150517	91366838
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	4086900	2999198	1965169	4187256
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	861314	446373	384767	610415
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	140538	147375	61447	209929
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm	1082136	866176	548609	1532726
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm	163667	135649	76310	231852
Italy (incl. San Marino 'SM' -> 1993)	Extra-EU27 (= 'WORLD' - 'EU27_2020_INTRA')	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm	10602877	11754465	2413471	13684890
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm		41013	21316	7264708
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	25805330	42115061	1969813	77690369
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	40165898	67646350	3245768	65173543
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	9489166	19423688		42583482
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm	67163	1253387	702733	15097
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm	156683	478278	221990	
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm	22743	81535		
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm				
European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm			13389	
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of > 10 mm		41013		7264708
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 4,7 mm and <= 10 mm	25805330	42029625	1881484	75544037
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of >= 3 mm and < 4,75 mm	40165898	67541039	3080971	64350241
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thickness of < 3 mm	9038889	19423688		42583482
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 4,75 mm and <= 10 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of >= 3 mm and < 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a thickness of < 3 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >= 4,75 mm				
Italy (incl. San Marino 'SM' -> 1993)	Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of < 4,75 mm				

FLOW IMPORT
PARTNER Turkey

REPORTER	VALUE_IN_EUROS	PRODUCT/PERIOD	Jan. 2022	Feb. 2022	Mar. 2022	Apr. 2022
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s				
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s	23045	6687586		
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s		11354593		
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s		2443966		
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s	1223180	1131895		
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s	398724	484500		
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s	118	3955		
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s	2274			
European Union - 27 countries (AT, BE, BG	VALUE_IN_EUROS	Flat-rolled products of stainless s	13195	29627		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s				
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s	60,50	40672,11		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s		69100,35		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s		14943,80		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s	3582,47	3151,30		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s	1214,53	1495,67		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s	0,99	8,31		
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s	7,60			
European Union - 27 countries (AT, BE, BG	QUANTITY_IN_100KG	Flat-rolled products of stainless s	12,62	223,78		
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s		6687586		
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s		11336381		
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s		2443966		
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s		104722		
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s	1860			
Italy (incl. San Marino 'SM' -> 1993)	VALUE_IN_EUROS	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s		40672,11		
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s		69043,10		
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s		14943,80		
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s		266,47		
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s				
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s	3,00			
Italy (incl. San Marino 'SM' -> 1993)	QUANTITY_IN_100KG	Flat-rolled products of stainless s				

		Jan. 2022	Feb. 2022	Mar. 2022	Apr. 2022
EU27	QUANTITY_IN_TONNES	488	12.960	-	-
	VALUE_IN_EUROS	1.660.536	22.136.122	-	-
	EUR/ tonne	3.404	1.708	-	-
Italy	QUANTITY_IN_TONNES	0	12.493	-	-
	VALUE_IN_EUROS	1.860	20.572.655	-	-
	EUR/ tonne	6.200	1.647	-	-

FLOW	IMPORT
PARTNER	Turkey
REPORTER	European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE, ES, FI, FR, GR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK)

QUANTITY_IN_100KG	PRODUCT/PERIOD	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
QUANTITY_IN_100KG	Flat-rolled products of stainless steel, of a width of >= 600 mm, not furthe	168,85	757,06	63877,61	87350,14
QUANTITY_IN_100KG	Flat-rolled products of stainless steel, of a width of >= 600 mm, not furthe	289,68	1048,00	100619,60	170298,31
QUANTITY_IN_100KG	Flat-rolled products of stainless steel, of a width of >= 600 mm, not furthe		1472,80	35549,02	42616,72
VALUE_IN_EUROS	Flat-rolled products of stainless steel, of a width of >= 600 mm, not furthe	47262	123221	10002843	13539497
VALUE_IN_EUROS	Flat-rolled products of stainless steel, of a width of >= 600 mm, not furthe	53345	161651	15838399	26117819
VALUE_IN_EUROS	Flat-rolled products of stainless steel, of a width of >= 600 mm, not furthe		227320	5534719	6547764

	Jan.-Dec. 2018	Jan.-Dec. 2019	Jan.-Dec. 2020	Jan.-Dec. 2021
QUANTITY_IN_TONNES	46	328	20.005	30.027
VALUE_IN_EUROS	100.607	512.192	31.375.961	46.205.080
EUR/ tonne	2.194	1.563	1.568	1.539

Price difference with overall imports from Turkey in the EU	154

INFORMATION ON THE TURKISH STAINLESS STEEL INDUSTRY

1. STAINLESS STEEL SLAB PRODUCTION CAPACITY (CRUDE STAINLESS STEEL)

[This section contains sensitive information and estimates of Turkish crude stainless steel production and capacity.]

Information on theoretical capacities

See attached article: *VOD Plant upgraded from VD plant by Primetal technologies receives FAC from Colakoglu in Turkey*

2. TURKISH STAINLESS STEEL COMPANIES

[This section contains sensitive information and estimates of Turkish stainless steel producers.]

Players	**Imports (source)**	**Production capabilities**			
		Stainless slabs	Black SSHR	White SSHR	SSCR
Posco TST	[*sensitive*]	-	-	[*sensitive*]	[*sensitive*]
Trinox	[*sensitive*]	-	-	[*sensitive*]	[*sensitive*]

3. INFORMATION ON TURKISH PRODUCTION / CONSUMPTION

[This section contains sensitive market information on Turkish stainless steel trade and consumption. The available graphs show an increase in imports of stainless steel.]

It notably highlights the fact that the domestic producers of SSCR operate and will continue operating at high level of capacity showing that SSHR produced in Turkey has virtually no commercial opportunities in Turkey. Production of SSHR in Turkey will therefore most likely be exported.

NEWS & PRESS RELEASES

London, February 26, 2021

VOD PLANT UPGRADED FROM VD PLANT BY PRIMETALS TECHNOLOGIES RECEIVES FAC FROM ÇOLAKOĞLU IN TURKEY

- **Heat size of 295 metric tons makes VOD plant largest in the world**
- **VOD treatments allows production of special steels with very low carbon content**
- **First production of some special stainless steel grades in Turkey**
- **Broadens product range and opens up additional markets for Çolakoğlu**

In December 2020, the VOD (Vacuum Oxygen Decarburization) plant, upgraded from an existing VD (Vacuum Degassing) plant by Primetals Technologies at the Dilovası meltshop of Turkish steel producer Çolakoğlu Metalurji A.S. (Çolakoğlu) received the Final Acceptance Certificate. With a heat size of 295 metric tons, the VOD is the largest worldwide. The aim of the modernization project was to enable production of special steels, like IF grades, ULC grades or stainless steels. This

helps Çolakoğlu to broaden its product range and enter additional markets. Immediately after start-up, for the first time in Turkey, stainless steel grades 304 and 304L were produced with the aid of the new VOD plant.

For the VOD plant for Çolakoğlu, Primetals Technologies was responsible for the engineering and supplied all the core components. These included, for example, valve stands, the oxygen blowing lance system as well as filters and a filter cleaning system installed before vacuum pumps. The scope also encompassed the modernization of the existing automation system. The level 2 system including process models was modernized in order to operate the VOD plant. Additionally, all required instrumentation of the equipment was supplied by Primetals Technologies.

Çolakoğlu operates an electric steel plant in Dilovası, in the west of Turkey. The main products of the plant are slabs for further processing in a hot rolling mill, and billets for producing reinforcing steel bars and steel rock bolt. The Çolakoğlu steel making plant, one of the largest in the world, was supplied by Primetals Technologies and is in operation for several years. This latest modernization project marks another step in the successful business partnership of Çolakoğlu and Primetals Technologies.

In the Dilovası meltshop of Turkish steelmaker Çolakoğlu Metalurji A.S. (Çolakoğlu), Primetals Technologies upgraded an existing VD(Vacuum Degassing) plant to a VOD (Vacuum Oxygen Decarburization) plant.

Primetals Technologies, Limited, headquartered in London, United Kingdom, is a pioneer and world leader in the fields of engineering, plant building, and the provision of lifecycle services for the metals industry. The company offers a complete technology, product, and services portfolio that includes integrated electrics and automation, digitalization, and environmental solutions. This covers every step of the iron and steel production chain—from the raw materials to the finished product—and includes the latest rolling solutions for the nonferrous

metals sector. Primetals Technologies is a joint venture of Mitsubishi Heavy Industries and partners, with around 7,000 employees worldwide. To learn more about Primetals Technologies, visit the company website www.primetals.com.

Source: Turkish Government database
https://biruni.tuik.gov.tr/disticaretapp/menu_ing.zul

Imports of stainless steel slabs in Turkey (in tonnes)	2018	2019	2020	2021
Imports from Indonesia	0	6.368	14.172	60.684
Index	***0***	***100***	***223***	***953***
Imports from all sources	0	6.369	14.173	60.711
Index	***0***	***100***	***223***	***953***

country

Year	HS6	HS6 name	Country	Country name	Unit			Import quantity 1	Import quantity 2	Import Euro
2018	721891	Semi-finished products of stainless steel, of rectangular "other than square" cross-section	4	Germany	KG	0	0	1	0	291
			6	United Kingdom	KG	0	0	0	0	0
			Total			**0**	**0**	**1**	**0**	**291**
	Total:					**0**	**0**	**0,001**	**0**	**0,291**
2019	721891	Semi-finished products of stainless steel, of rectangular "other than square" cross-section	4	Germany	KG	0	0	1.320	0	18.867
			700	Indonesia	KG	0	0	6.367.940	0	10.333.764
			Total			**0**	**0**	**6.369.260**	**0**	**10.352.631**
	Total:					**0**	**0**	**6.369**	**0**	**10.352.631**
2020	721891	Semi-finished products of stainless steel, of rectangular "other than square" cross-section	4	Germany	KG	0	0	1.495	0	22.142
			700	Indonesia	KG	0	0	14.171.700	0	20.791.958
			Total			**0**	**0**	**14.173.195**	**0**	**20.814.100**
	Total:					**0**	**0**	**14.173**	**0**	**20.814.100**
2021	721891	Semi-finished products of stainless steel, of rectangular "other than square" cross-section	4	Germany	KG	0	0	755	0	10.352
			61	Czech Republic	KG	0	0	26.209	0	109.134
			81	Uzbekistan	KG	0	0	0	0	-
			700	Indonesia	KG	0	0	60.684.380	0	108.778.772
			Total			**0**	**0**	**60.711.344**	**0**	**108.898.258**
	Total:					**0**	**0**	**60.711**	**0**	**108.898.258**

in kg	Country	TURKEY									
Year	Kode HS Harbor Moon	[01] January	[02] February	[04] April	[05] Mei	[06] June KOLONEDALE	[07] July	[09] September	[October 10	[12] December	Totals
2019	**[72189100] Oth stainless**	318.240							6.038.930		6.357.170
2020	**[72189100] Oth stainless**		4.075.060			10.068.780				10.096.760	24.240.600
2021	**[72189100] Oth stainless**		9.992.640		20.253.700		10.055.680	10.075.900			50.377.920
2022	**[72189100] Semi- finished**			10.121.140							10.121.140
	Totals	318.240	14.067.700	10.121.140	20.253.700	10.068.780	10.055.680	10.075.900	6.038.930	10.096.760	91.096.830

Sumber : https://www.bps.go.id di akses pada 2022_06_09T15_07_29_045Z

TURKEY IMPORTS - SLABS FROM INDONESIA

	HS6	721891	
Year	Month	MT	EUR/MT
2019	1		
	2		
	3	318	1.486
	4		
	5		
	6		
	7		
	8		
	9		
	10		
	11	6.050	1.630
	12		
2020	1		
	2		
	3	4.078	1.499
	4		
	5		
	6		
	7		
	8	10.094	1.454
	9		
	10		
	11		
	12		
2021	1		
	2	10.103	1.505
	3		
	4	10.040	1.505
	5		
	6	10.141	1.759
	7		
	8	20.317	1.850
	9		
	10		
	11	10.083	2.284
	12		
2022	1		
	2		
	3		
	4		
	5		
	6		

TURKEY EXPORTS - HR COIL TO ITALY

	HS6	721912, 721913 and 721914	
Year	Month	MT	EUR/MT
2019	1		
	2		
	3		
	4	315	1.554
	5		
	6		
	7		
	8		
	9	10	1.987
	10		
	11	19	1.971
	12	5.995	1.706
2020	1		
	2		
	3		
	4		
	5		
	6		
	7	4.033	1.456
	8		
	9		
	10	9.875	1.531
	11		
	12	49	1.508
2021	1		
	2		
	3	4.696	1.594
	4	5.018	1.617
	5	5.156	1.543
	6		
	7	5.037	1.591
	8	4.965	1.860
	9	4.919	1.875
	10		
	11		
	12		
2022	1		
	2	12.466	2.119
	3	10.360	1.936
	4	7.357	2.444
	5		
	6		

	Imports	Exports	Balance
Volume (MT)	81.224	80.270	**954**
			99%

In tonnes	Quarter	Turkish stainless slab imports from Indonesia	Turkish SSHR coil exports to Italy	*Balance*
2019	Q1	318		
	Q2		315	*3*
	Q3		10	
	Q4	6.050	6.014	*35*
2020	Q1	4.078		
	Q2			
	Q3	10.094	4.033	*45*
	Q4		9.924	*170*
2021	Q1	10.103	4.696	
	Q2	20.181	10.174	
	Q3	20.317	14.921	*493*
	Q4	10.083		
2022	Q1		22.826	
	Q2		7.357	*218*

In EUR/ Tonnes	Import price of slabs	Export price of SSHR
2019-Shipment 1	1.486	1.554
2019-Shipment 2	1.630	1.706
2020-Shipment 3	1.499	1.456
2021-Shipment 4	1.454	1.531
2021-Shipment 5	1.505	1.606
2021-Shipment 6	1.505	1.567
2021-Shipment 7	1.759	1.868
2021-Shipments 8-9	1.994	2.135
Average difference		74

Exports of SSHR from Turkey (in tonnes)	2018	2019	2020	2021
To the EU27	2.176	8.495	15.477	34.116
Index	***100***	***390***	***711***	***1568***
To other countries	6.476	5.114	3.636	4.599
Index	***100***	***79***	***56***	***71***

Codes used

6-digit 721911,721912,721913,721914,721922,721923,721924,722011,722012

8-digit),72191310,72191390,72191410,72191490,72192210,72192290,72192300,72192400,72201100,72201200

To EU27

		2018	2019	2020	2021
HS8	kg	2.174.763	8.494.941	15.476.946	33.960.154
	metric tonnes	**2175**	**8495**	**15477**	**33960**
HS6	kg	2.175.658	8.494.998	15.476.946	34.116.374
	metric tonnes	**2176**	**8495**	**15477**	**34116**

To All

		2018	2019	2020	2021
HS8	kg	8.652.262	13.609.087	19.112.609	38.715.163
	metric tonnes	**8652**	**13609**	**19113**	**38715**
HS6	kg	8.652.262	13.609.087	19.112.609	38.715.163
	metric tonnes	**8652**	**13609**	**19113**	**38715**

Non EU

		2018	2019	2020	2021
HS8	kg	6.477.499	5.114.146	3.635.663	4.755.009
	metric tonnes	6.477	5.114	3.636	4.755
HS6	kg	6.476.604	5.114.089	3.635.663	4.598.789
	metric tonnes	6.476	5.114	3.636	4.599

External trade by HS8 and partner country

Year	HS8	HS8 name	Country	Country name	Unit	ountry Group	ountry Group	Sum
2018	**Total:**					**2.092.544**	**82.219**	**2.174.763**
2019	**Total:**					**8.386.898**	**108.043**	**8.494.941**
2020	**Total:**					**15.390.116**	**86.830**	**15.476.946**
2021	**Total:**					**33.959.808**	**346**	**33.960.154**

External trade by HS6 and partner country

Year	HS6	HS6 name	Country	Country name	Unit	Export quantity 1	Export quantity 2			Export Euro
2018	721911	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**			**52.499**	**0**	**0**	**0**	**55.067**
	721912	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thic	**Total**			**617.265**	**0**	**0**	**0**	**686.620**
	721913	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**			**2.273.334**	**0**	**0**	**0**	**2.961.461**
	721914	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**			**711.770**	**0**	**0**	**0**	**1.875.978**
	721922	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**			**2.976.496**	**0**	**0**	**0**	**7.351.907**
	721923	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**			**1.096.651**	**0**	**0**	**0**	**2.664.275**
	721924	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**			**105.417**	**0**	**0**	**0**	**263.475**
	722011	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >	**Total**			**359.490**	**0**	**0**	**0**	**335.864**
	722012	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <	**Total**			**459.340**	**0**	**0**	**0**	**566.095**

External trade by HS6 and partner country

Year	HS6	HS6 name	Country	Country name	Unit	Country Group 1	Country Group 2	Sum
2018	**Total:**					**2.093.439**	**82.219**	**2.175.658**
								0
2019	**Total:**					**8.386.955**	**108.043**	**8.494.998**
								0
2020	**Total:**					**15.390.116**	**86.830**	**15.476.946**
								0
2021	**Total:**					**33.960.028**	**156.346**	**34.116.374**

	Total:			**8.652.262**	**0**	**0**	**0**	**16.760.742**
2019	721911	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**72.301**	**0**	**0**	**0**	**68.592**
	721912	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thic	**Total**	**2.531.737**	**0**	**0**	**0**	**4.784.615**
	721913	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**4.069.331**	**0**	**0**	**0**	**6.763.426**
	721914	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**3.030.035**	**0**	**0**	**0**	**16.738.589**
	721922	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**2.423.034**	**0**	**0**	**0**	**6.622.721**
	721923	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**567.616**	**0**	**0**	**0**	**1.226.137**
	721924	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**228.640**	**0**	**0**	**0**	**341.135**
	722011	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >	**Total**	**372.703**	**0**	**0**	**0**	**396.441**
	722012	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <	**Total**	**313.690**	**0**	**0**	**0**	**376.334**
				13.609.087	**0**	**0**	**0**	**37.317.990**
2020	721911	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**70.988**	**0**	**0**	**0**	**111.460**
	721912	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thic	**Total**	**4.149.848**	**0**	**0**	**0**	**6.455.130**
	721913	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**8.097.041**	**0**	**0**	**0**	**11.816.266**
	721914	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**3.393.166**	**0**	**0**	**0**	**4.545.089**

	721922	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**2.027.213**	**0**	**0**	**0**	**4.708.163**
	721923	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**583.704**	**0**	**0**	**0**	**1.333.734**
	721924	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**192.088**	**0**	**0**	**0**	**382.733**
	722011	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >	**Total**	**253.953**	**0**	**0**	**0**	**329.811**
	722012	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <	**Total**	**344.608**	**0**	**0**	**0**	**381.661**
	Total:			**19.112.609**	**0**	**0**	**0**	**30.064.047**
2021	721911	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**52.700**	**0**	**0**	**0**	**128.746**
	721912	Flat-rolled products of stainless steel, of a width of>= 600 mm, not further worked than hot-rolled, in coils, of a thic	**Total**	**9.412.606**	**0**	**0**	**0**	**16.500.674**
	721913	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**17.025.646**	**0**	**0**	**0**	**28.763.125**
	721914	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi	**Total**	**4.849.882**	**0**	**0**	**0**	**8.152.713**
	721922	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**4.841.672**	**0**	**0**	**0**	**14.719.459**
	721923	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**1.906.889**	**0**	**0**	**0**	**5.441.843**
	721924	Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a	**Total**	**117.052**	**0**	**0**	**0**	**270.703**
	722011	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >	**Total**	**231.211**	**0**	**0**	**0**	**313.136**
	722012	Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <	**Total**	**277.505**	**0**	**0**	**0**	**532.815**
				38.715.163	**0**	**0**	**0**	**74.823.214**

MARKET INFORMATION ON THE NEW PATTERN OF TRADE

1. INFORMATION ON HOT ROLLING OF INDONESIAN SLABS [SENSITIVE]

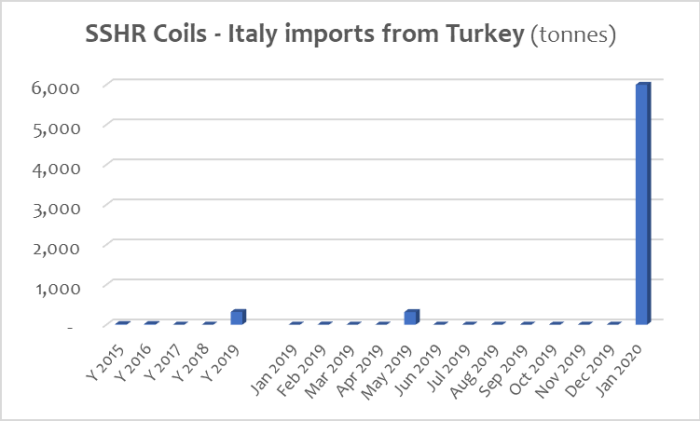
[This section contains business confidential information on Turkish hot-rolling capacity.]

Eurofer's submission in case AD658 (Comments on the provisional Regulation - p.10-11, non confidential)

...

1.2.1.2 Marcegaglia continues its aggressive import strategy from dumping countries

The fact that the business model of the Union's largest SSHR user heavily relies on distortions is further evidenced by the aggressive import strategy is now being implemented by Marcegaglia to undermine the safeguard measures in place. For instance, despite Turkey not being a stainless steel producing country, the figure below demonstrates that stainless steel (black) coils were imported to Italy from Turkey in January 2020. In addition, official customs data shows that in November 2019 Turkey imported around 6,000 tonnes of stainless slabs from Indonesia. Following the rolling operation, this material was then imported Italy as stainless black coils in January 2020. The non-confidential file confirms that, during the IP, Marcegaglia purchased volumes from Turkey (small batch for first industrial trial in May 2019) as reported by the company in its questionnaire.



Source: *Eurostat*

According to the market information available to Eurofer, [*Confidential: information pertaining to the Union producers' market intelligence*]. This anomalous routing made possible the arrival of the Indonesian-sourced distorted material to the EU without being subject to the safeguard measures. Indeed, as Turkey is listed as a developing country and traditionally does not export SSHR to the Union (below 3% import share threshold), it is not covered by the safeguard measures on SSHR.

The Union stainless industry is greatly alarmed that this new routing of Indonesian SSHR, which undermines the existing safeguard measures. [Confidential: information pertaining to the rolling capacity of Turkish steel producers] This routing would not only undermine the effectiveness of the safeguard measures but would put at risk any anti-dumping and possible countervailing measures the Commission would implement in the context of the two running investigations. It is clear that users importing black SSHR to Italy are seeking alternatives to keep on importing SSHR from Indonesia at artificially low prices [Confidential: information pertaining to the Union producers' market intelligence] in order to circumvent any measures affecting Indonesia.

Against this background, it should also be taken into account in the Union's interest assessment with regard to the LDR that the raw material distortions identified in this investigation very seriously threaten the Union market, since they may enter the Union though other import routes.

....

2. INFORMATION ON ANNEALING AND PICKLING CAPACITIES OF MARCEGAGLIA

See attached Marcegaglia's brochure

It is moreover notable that the reduction in the rhythm of the imports of SSHR from Turkey at the end of 2021 coincide with a major incident affecting its AP lines:

See Article on fire at Marcegaglia pickling line in October 2021: https://www.metalbulletin.com/Article/4012004/Marcegaglia-Specialties-pickling-line-out-for-2-3-months-due-to-fire-cold-rolled-stainless-coils.html

MARCEGAGLIA

Gazoldo degli Ippoliti plant

MARCEGAGLIA GROUP

GLOBAL PLAYER IN STEEL

MARCEGAGLIA IS THE ITALIAN INDUSTRIAL GROUP LEADING THE EUROPEAN AND WORLDWIDE STEEL MARKET.
A UNIQUE COMBINATION OF THE DYNAMIC ITALIAN FAMILY BUSINESS MODEL WITH THE GREAT OPERATING CAPACITY AND PRESENCE IN THE INTERNATIONAL MARKETS, TYPICAL OF THE LARGE CORPORATIONS.

6.2 MILLION TONS
PROCESSED YEARLY
5.5 BILLION EUROS SALES
MARCEGAGLIA HOLDING
(**5.3 BILLION EUROS SALES** MARCEGAGLIA STEEL)
6,600 EMPLOYEES
28 STEEL PLANTS
60 SALES OFFICES

1st INDEPENDENT PLAYER
IN STEEL PROCESSING SECTOR IN THE WORLD
1st PRODUCER OF STAINLESS STEEL WELDED TUBES IN THE WORLD
1st PRODUCER OF CARBON STEEL WELDED TUBES IN EUROPE
1st SERVICE CENTER IN ITALY

CORPORATE CULTURE

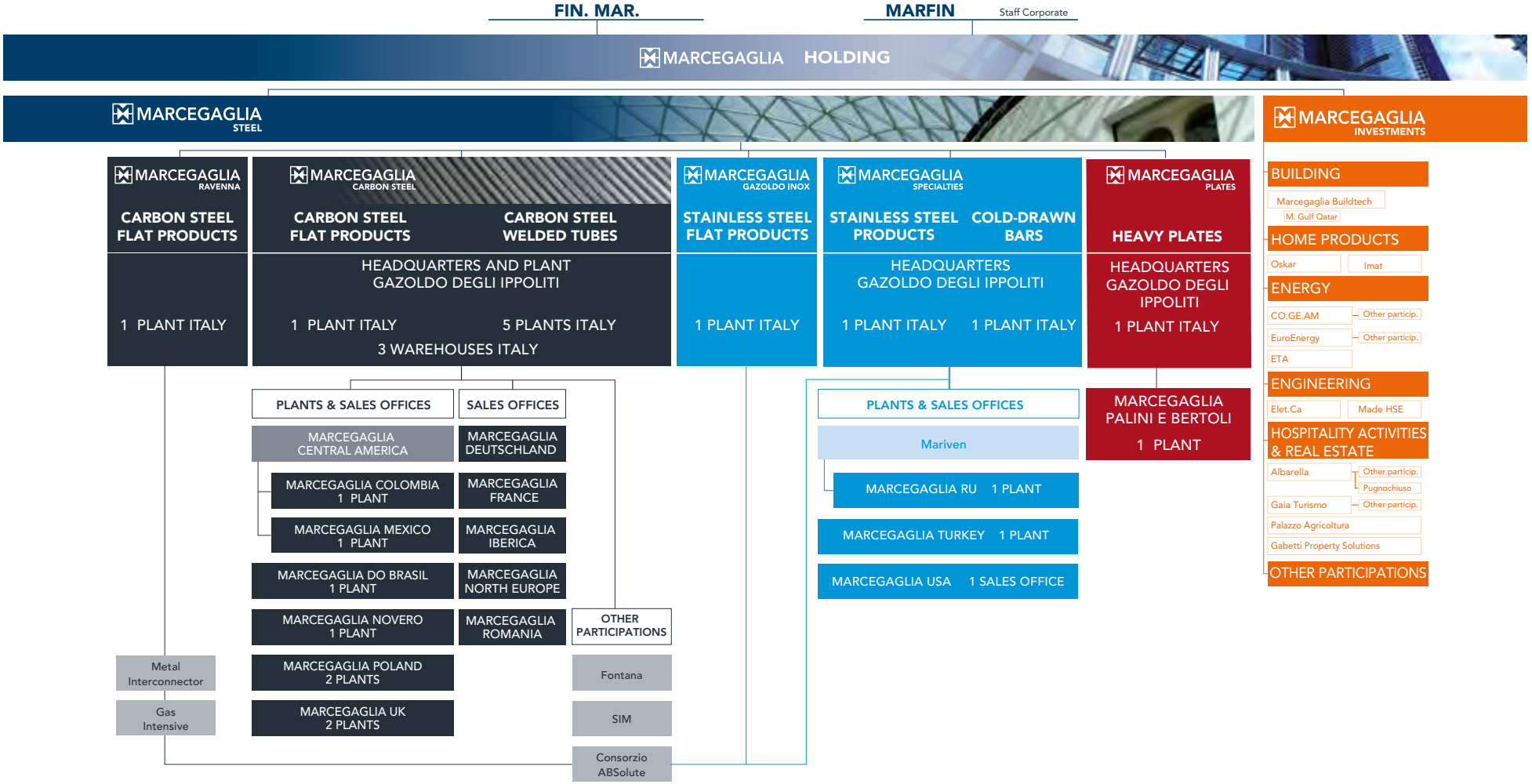
INDEPENDENCE, DYNAMISM, RESILIENCE, COMPETENCE, VERSATILITY, REACTIVITY: IN 60 YEARS OF HISTORY, THESE DISTINCTIVE VALUES MADE MARCEGAGLIA THE PRIVILEGED PARTNER IN THE STEEL PROCESSING INDUSTRY.

THE COMPANY CULTURE IS BASED ON PEOPLE CENTRICITY AND SHARING OF THE SAME KEY VALUES WHICH ARE SHAPING MARCEGAGLIA UNIQUE BUSINESS MODEL.

STEEL CORE

CORE BUSINESS ACTIVITIES, CONTROLLED BY **MARCEGAGLIA STEEL** (HOLDING COMPANY, WHICH REPRESENTS 95% OF TOTAL ACTIVITIES), ARE ORGANIZED THROUGH FIVE DIFFERENT OPERATING COMPANIES: **MARCEGAGLIA CARBON STEEL** AND **MARCEGAGLIA RAVENNA** WITH THE FLAT PRODUCTS AND WELDED TUBES DIVISIONS, **MARCEGAGLIA SPECIALTIES** AND **MARCEGAGLIA GAZOLDO INOX** WITH THE STAINLESS PRODUCTS AND COLD DRAWN BARS DIVISIONS, **MARCEGAGLIA PLATES** FOR THE HEAVY PLATES PRODUCTION.

MARCEGAGLIA INVESTMENTS IS THE HOLDING FOR THE DIVERSIFIED ACTIVITIES (5% OF TOTAL ACTIVITIES).



EMPLOYEES	TURNOVER (M/€)		PRODUCTION (KT/y)	
	3,450 TOTAL		4,650 TOTAL	
4,300	2,300 FLAT PRODUCTS	1,150 WELDED TUBES	3,100 FLAT PRODUCTS	1,550 WELDED TUBES

E	T (M/€)		P (KT/y)	
	1,350 TOTAL		700 TOTAL	
1,000	1,200 STAINLESS STEEL PRODUCTS	150 COLD-DRAWN BARS	500 STAINLESS STEEL PRODUCTS	200 COLD-DRAWN BARS

E	T (M/€)	P (KT/y)
200	400	800

E	R (M/€)	P (KT/y)
1,100	250	50

MARCEGAGLIA CARBON STEEL

Gazoldo degli Ippoliti HQ
Boltiere, ITA
Casalmaggiore, ITA
Corsico, ITA
Dusino San Michele, ITA
Lainate, ITA
Lomagna, ITA
Osteria Grande, ITA
Rivoli, ITA
Tezze sul Brenta, ITA
Dudley, UK
Rotherham, UK
Funza, Colombia
Garuva, Brazil
Kluczbork, Poland
Praszka, Poland
Querétaro, Mexico

SALES OFFICES
Barcelona, Spain
Cluj, Romania
Düsseldorf, Germany
Luxembourg, Luxembourg
Lyon, France

MARCEGAGLIA PLATES

Gazoldo degli Ippoliti HQ
San Giorgio di Nogaro, ITA (2)

MARCEGAGLIA RAVENNA

Ravenna, ITA

MARCEGAGLIA GAZOLDO INOX

Gazoldo degli Ippoliti, ITA

MARCEGAGLIA SPECIALTIES

Gazoldo degli Ippoliti HQ
Contino, ITA
Forlì, ITA
Istanbul, Turkey
Vladimir, Russia

SALES OFFICES
Munhall, USA

HARBOURS AND RAIL TERMINALS
Ravenna, ITA
San Giorgio di Nogaro, ITA

OUR MAIN LOGISTIC HUBS
Kolding, Gdansk, Newport, Antwerpen, Hagen, Siegen, Karlsruhe, Lyon, Constanta, Gemlik, Tarragona

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STEEL IN THE WORLD

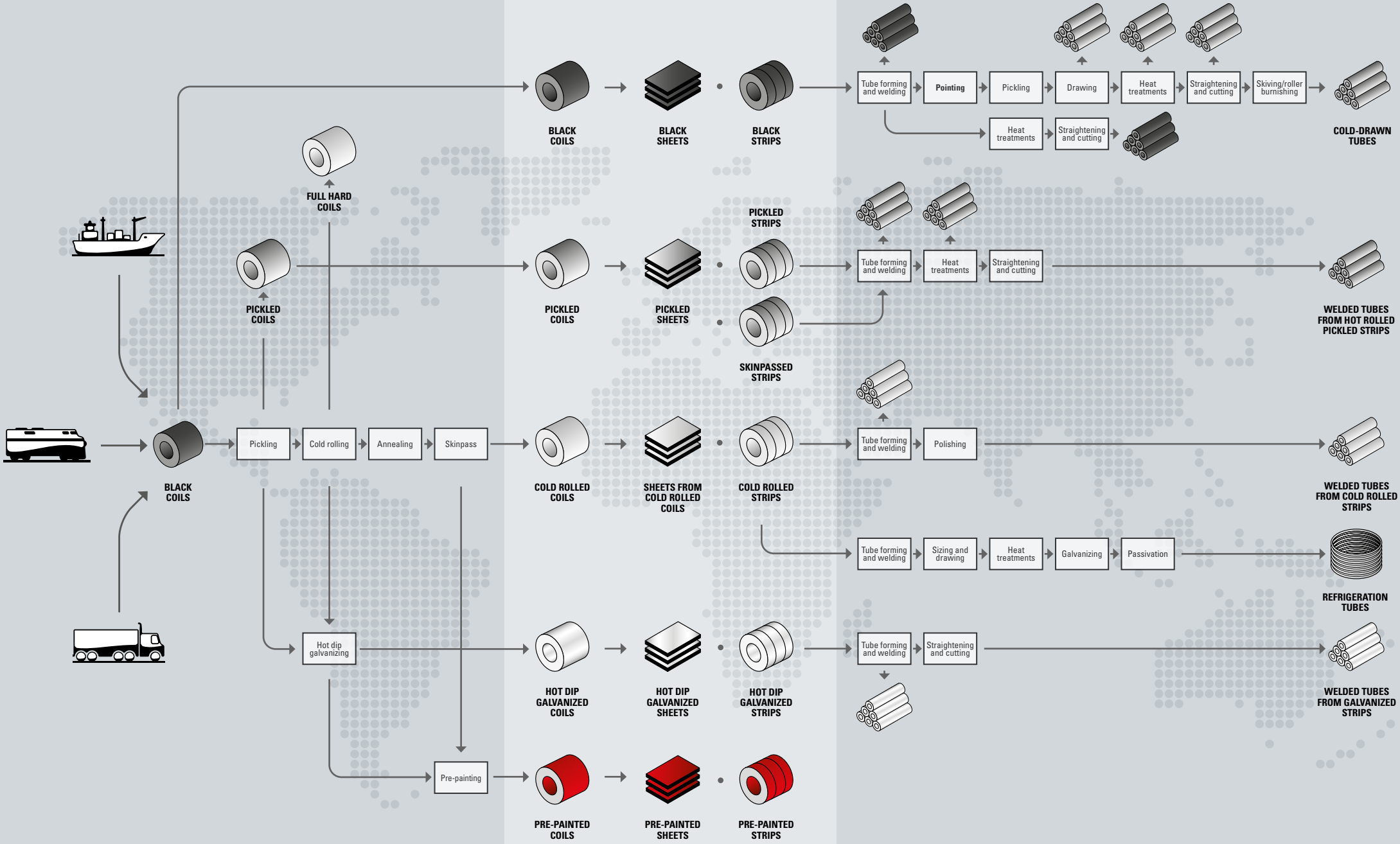
STEEL PRODUCTION	ACTIVITIES	OUTPUT
Via either blast furnace, using iron mineral and carbon, or electric furnace, using re-melted scrap steel.	IRON MAKING STEEL MAKING CASTING HOT ROLLING	COILS BARS HEAVY PLATES

1st TRANSFORMATION	ARE CHEMICALLY AND/OR MECHANICALLY PROCESSED TO MAKE THEM SUITABLE FOR SPECIFIC INDUSTRIAL PURPOSES	PICKLING COLD ROLLING GALVANIZING PRE-PAINTING PICKLING COLD ROLLING	GALVANISED, PICKLED, COLD ROLLED AND PRE-PAINTED COILS STAINLESS STEEL HR/CR COILS
2nd TRANSFORMATION	ADVANCED PROCESSING TO CUSTOMISE STEEL PRODUCTS ON CLIENTS SPECIFIC REQUESTS	TUBE FORMING, SLITTING AND CUTTING TO LENGTH TUBE FORMING, SLITTING AND CUTTING TO LENGTH, DRAWING	TUBES, SHEETS TUBES, STRIPS, STAINLESS SHEETS, DRAWN BARS
DISTRIBUTION	DIRECT SELLING AND/OR RETAILING TO INDUSTRIAL CLIENTS OR FURTHER PROCESSING UNDER REQUEST	FINISHING DISTRIBUTION FINISHING DISTRIBUTION	ALL PRODUCTS ALL PRODUCTS

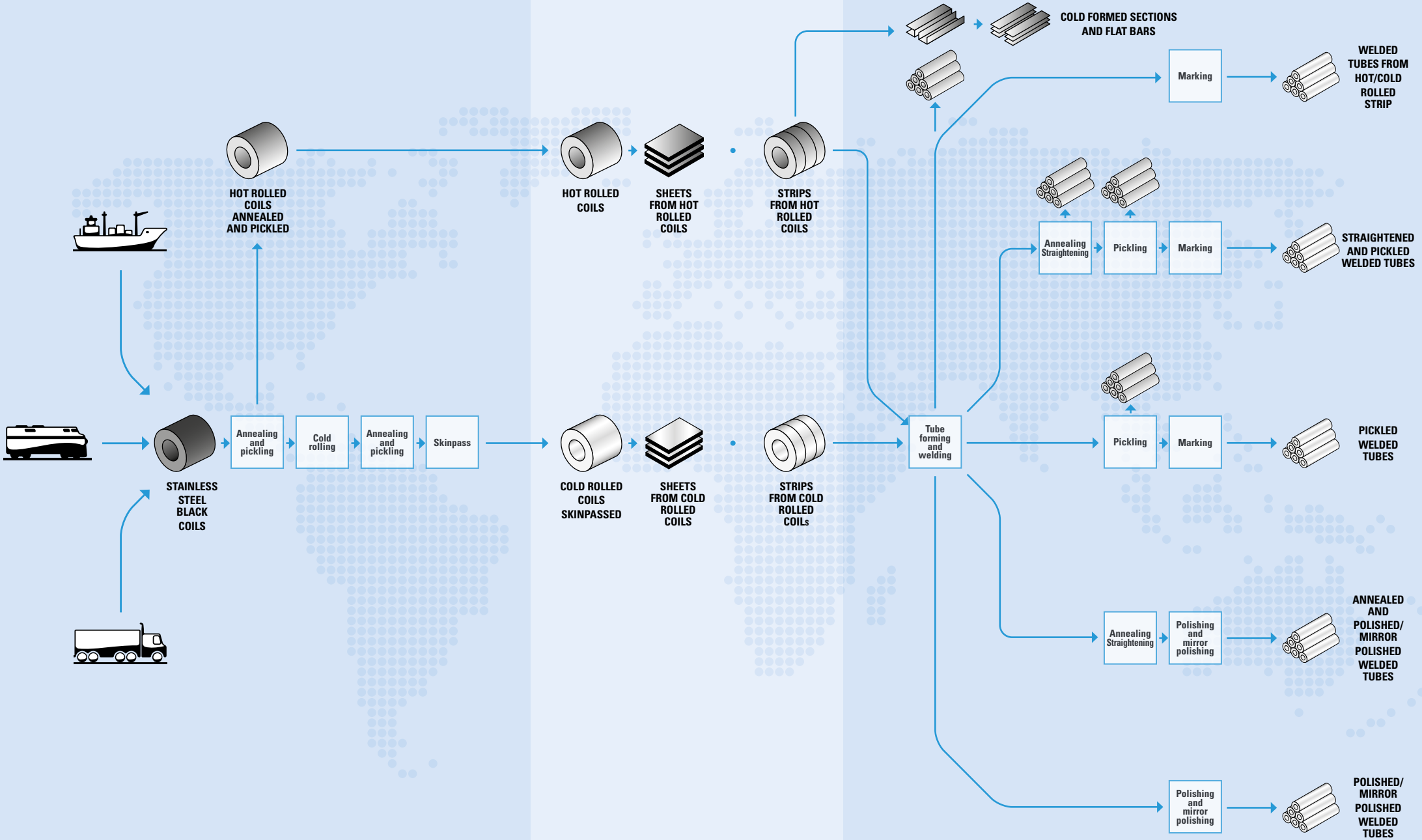
Marcegaglia is covering the whole downstream and distribution steel value chain, both horizontally and vertically, thanks to its **unique strategic position**. Marcegaglia is the first steel processor with a range of products that varies from carbon to stainless, from long to flat products, from commodity to specialty.

Carbon steel products
Stainless steel products

CARBON STEEL MANUFACTURING PROCESS

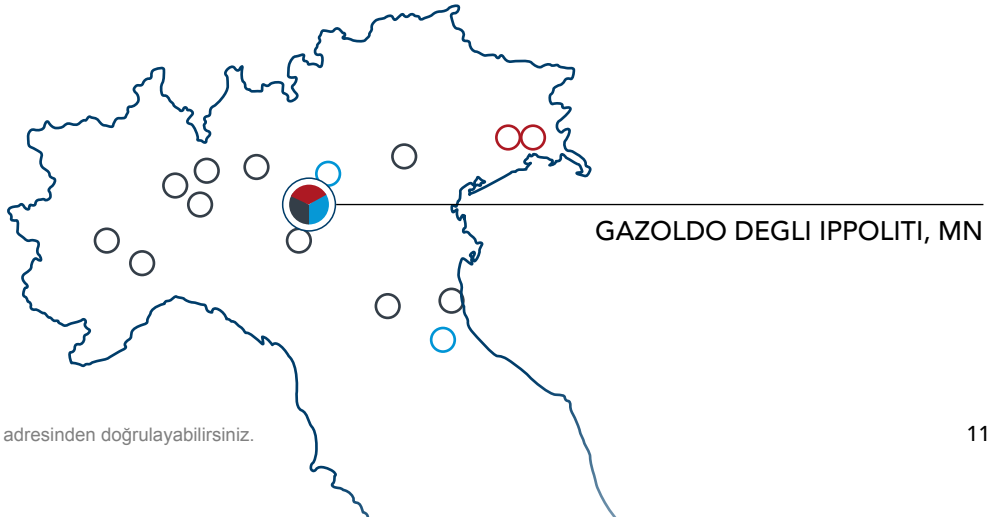


STAINLESS STEEL MANUFACTURING PROCESS



The plant

The history of Marcegaglia begins in **1959** in a 120 square meters craftsman shop in Gazoldo degli Ippoliti, where Steno Marcegaglia starts the manufacturing of cold formed sections for roller shutters. Shortly after, the production of **tubes** from cold rolled strip is started. Within the next two decades, the plant is completed with **carbon steel** cold rolling mills and the production of tubes from hot rolled strip.



The plant

In the 1980s, while the group starts a huge development program in Italy and abroad, the Gazoldo plant is further expanded with the addition of flats and sections (carbon and stainless steel) and the **Headquarters** office manages all central activities related to manufacturing units and sales divisions dedicated to specific products.

The major investment plan started in 2008 included new additions to the plant, with new large units for the annealing and pickling, cold rolling and cut to length of austenitic and ferritic **stainless steels** 1D and 2B finish.

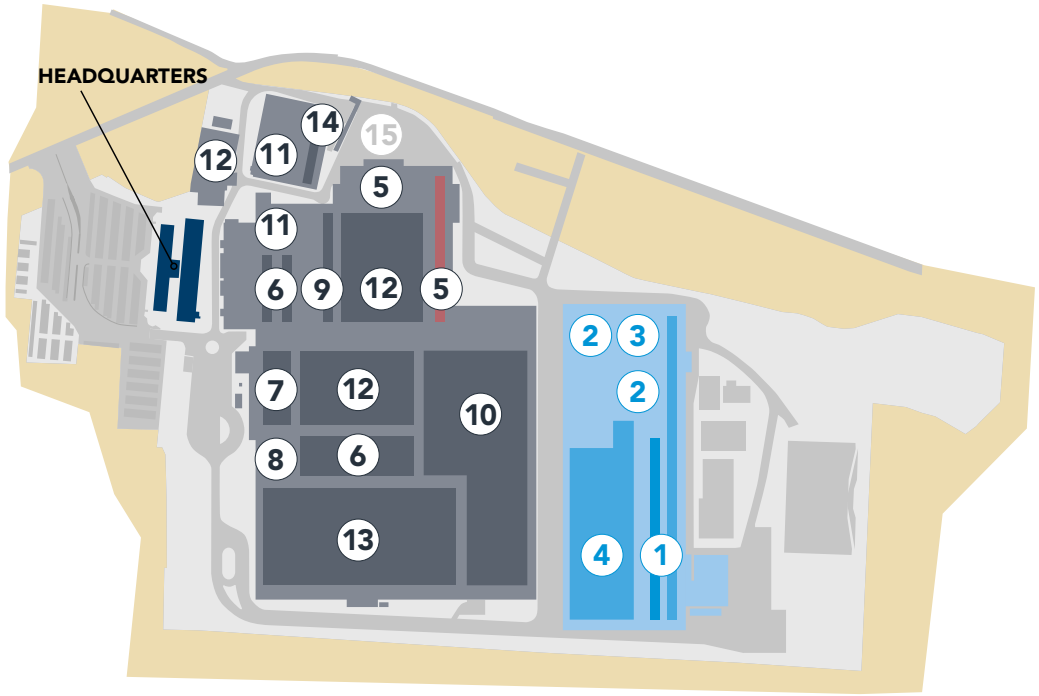
Production areas

Marcegaglia's range of carbon steel and stainless steel products (hot rolled, cold rolled and galvanized) can match the most diverse requirements of target industries in terms of **steel grades**, **dimensions**, **thickness**, **tolerances** and **surface finish**.

The Gazoldo degli Ippoliti plant hosts manufacturing lines for the production of steel **coils**, **strips**, **sheets**, **flat bars**, **welded structural** and **precision tubes,** and for the execution of additional processing.

The plant also hosts the central offices dedicated to **quality control, technical services**, **IT** and **logistic management** of all the group's manufacturing units.

Production areas



STAINLESS STEEL

1. Pickling
2. Cold rolling
3. Annealing Furnaces
4. Service center

CARBON STEEL

5. Pickling
6. Cold rolling
7. Annealing furnaces
8. Skinpass
9. Hot dip galvanizing
10. Sheets service center
11. Strips service center
12. Oscillated wound coils
13. Tube mills
14. Cold formed sections

15. Quality department

STAINLESS STEEL

Pickling

PRODUCT RANGE	
Min. width (mm)	**1,000**
Max. width (mm)	**1,500**
Min. thickness (mm)	**0.80**
Max. thickness (mm)	**6.00**

production lines **2**

manufacturing capacity (t/y) **500,000**

Stainless steel
hot rolled coils
1D finish

STAINLESS STEEL

Cold rolling

PRODUCT RANGE	
Min. width (mm)	**1,000**
Max. width (mm)	**1,500**
Min. thickness (mm)	**0.6**
Max. thickness (mm)	**3**

production lines **2**

manufacturing capacity (t/y) **250,000**

Stainless steel
cold rolled coils
2B finish

STAINLESS STEEL

Service center

New **cut-to-length lines with automated packaging** complete Marcegaglia's range of services in the sector of stainless steel hot rolled and cold rolled flat products.

thickness (mm)	0.3 / 6
width (mm)	1,500

Stainless steel sheets, flat bars, narrow strips

CARBON STEEL

Pickling

PRODUCT RANGE	
Max. width (mm)	**1,500**
Min. thickness (mm)	**1.5**
Max. thickness (mm)	**5**

production line	1
manufacturing capacity (t/y)	600,000

Carbon steel pickled coils
Dry or oil pickled, potentially trimmed and/or skinpassed

CARBON STEEL

Cold rolling

PRODUCT RANGE	
Min. width (mm)	**300**
Max. width (mm)	**800**
Min. thickness (mm)	**0.25**
Max. thickness (mm)	**4**

production lines **4**

manufacturing capacity (t/y) **400,000**

Carbon steel cold rolled coils and strips
with special tolerances upon request

CARBON STEEL

Annealing and skinpass

anneling bases	28
manufacturing capacity (t/y)	280,000
skinpassing lines	2
manufacturing capacity (t/y)	370,000

CARBON STEEL

Hot dip galvanizing

PRODUCT RANGE	
Min. width (mm)	**350**
Max. width (mm)	**745**
Min. thickness (mm)	**0.6**
Max. thickness (mm)	**3.65**

production line **1**

manufacturing capacity (t/y) **75,000**

Galvanized coils and strips
Surface finish: normal, minimized, skinpassed spangle

CARBON STEEL

Service center

cut-to-length lines	9
manufacturing capacity (t/y)	270,000
thickness (mm)	0.5 / 15
max width (mm)	2,000

Carbon steel black sheets, pickled, cold rolled, hot dip galvanized, diamond, teardrop patterned

slitting lines	22
manufacturing capacity (t/y)	800,000
thickness (mm)	0.25 / 6
width	12 / 1,550

Carbon steel strips, pickled, cold rolled, hot dip galvanized

CARBON STEEL

Tube mills

PRODUCT RANGE	
Min. diameter (mm)	**8**
Min. thickness (mm)	**0.5**

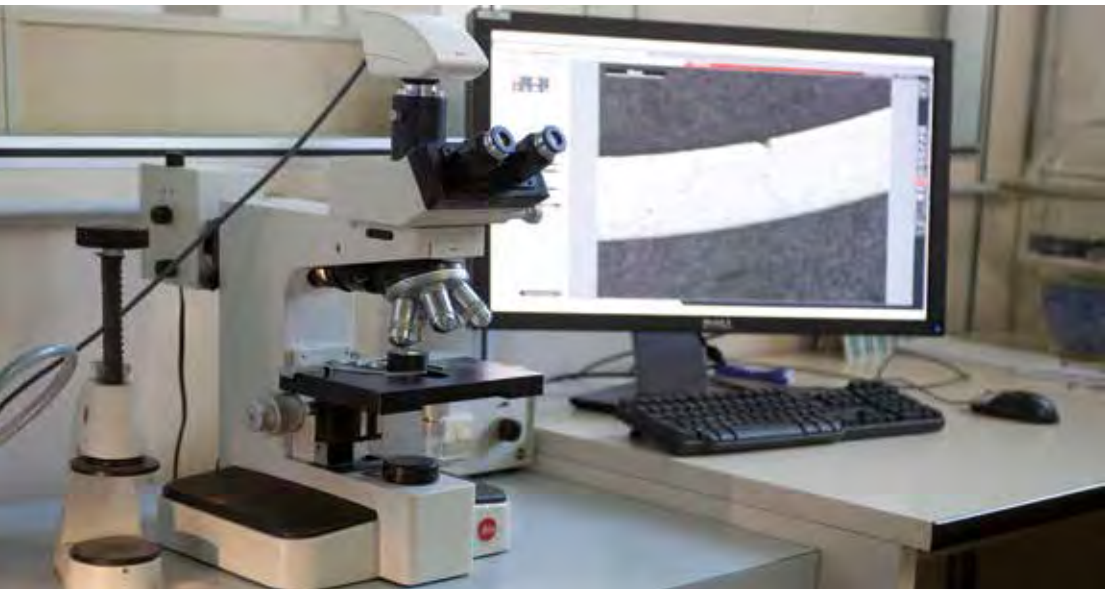
tube mills from hot rolled strips	**4**
tube mills from cold rolled strips	**22**
dedicated slitting lines	**4**
manufacturing capacity (t/y)	**350,000**

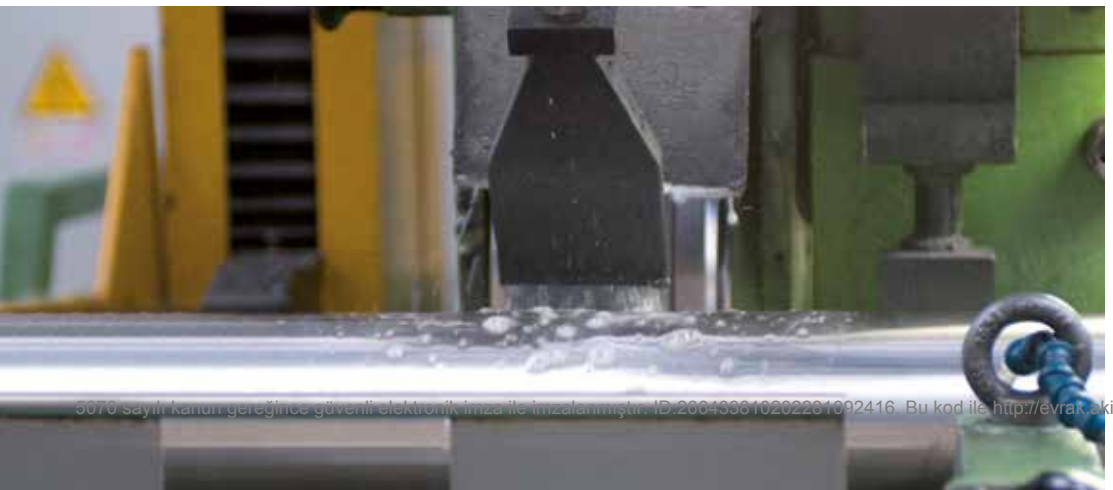
CARBON STEEL

Tube mills

Optional processing

- Suitability for subsequent galvanizing
- Additional heat treatments
- Weld seam removing
- Special end finishing
- Cut to length
- Customer defined marking
- Restricted tolerances
- Welding position
- Specific corrosion protection
- Specific packaging method
- Hot galvanization





Quality

The Quality Management Systems of the production plant, Headquarter offices and building technical offices at Gazoldo degli Ippoliti are **ISO 9001:2015** certified.

Other certifications include:

- CE marking for non-alloy **structural steels** (**EN 10025**)
- CE marking for stainless steel flat products for **construction purposes** (**EN 10088-4**)
- CE marking for **structural tubes** according to EU directive 89/106/EEC (**EN 10219**)
- **AD 2000 W2/W10** for stainless steel flat products for **pressure purposes** according to EU directive 97/23/EC

November 2020

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CARBON STEEL

HEADQUARTERS
via Bresciani, 16 • 46040 Gazoldo Ippoliti, Mantova - Italy
www.marcegaglia.com

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1959-2019
MARCEGAGLIA

Fastmarkets MB

Marcegaglia Specialties pickling line out for 2-3 months due to fire, cold-rolled stainless coils affected

Italian stainless steel re-roller Marcegaglia Specialties reported a fire at one of its flat product pickling lines on Thursday October 14 and will be out of action for two to three months, a company source told Fastmarkets on October 15.

The pickling line, which is located at the company headquarters in Gazoldo Degli Ippoliti in northern Italy, has a capacity of 15,000 tonnes per month.

The company has a...

Imports of stainless Slabs from Indonesia in Turkey

TURKEY IMPORTS - SLABS FROM INDONESIA				
	year	month	MT	EUR/MT
	2021	1		
		2	10.103	1.505
		3		
		4	10.040	1.505
		5		
		6	10.141	1.759
		7		
*		8	20.317	1.850
		9		
		10		
*		11	10.083	2.284
		12		
		Total	***30.284***	***48.156.921***
		Per Unit		1590

Exports of black SSHR from Turkey to Italy

TURKEY EXPORTS - HR COIL TO ITALY			
year	month	MT	EUR/MT
2021	1		
	2		
	3	4.696	1.594
	4	5.018	1.617
	5	5.156	1.543
	6		
	7	5.037	1.591
	8	4.965	1.860
	9	4.919	1.875
	10		
	11		
	12		
Total		***29.791***	***50.027.315***
Per Unit			1.679

Assessment based on import and export price in 2021

Import price slab	1590 €/t
Export price black SSHR	1679 €/t

Cost share of the imported input

Slab cost **94,7%**

Added value of the assembly operation

Hot-rolling cost **5,3%**

* for the purpose of the comparison, only imports matched with corresponding exports are used.

Cost of manufacturing	EU	Indonesia
COM Slab	[1000-3000] €/t	
COM black SSHR	[1050-3150] €/t	
Slab cost	[About 95%]	
Hot-rolling cost*	[About 5%]	

* This includes only hot rolling because black coils do not undergo pickling and annealing

US dollar (USD)

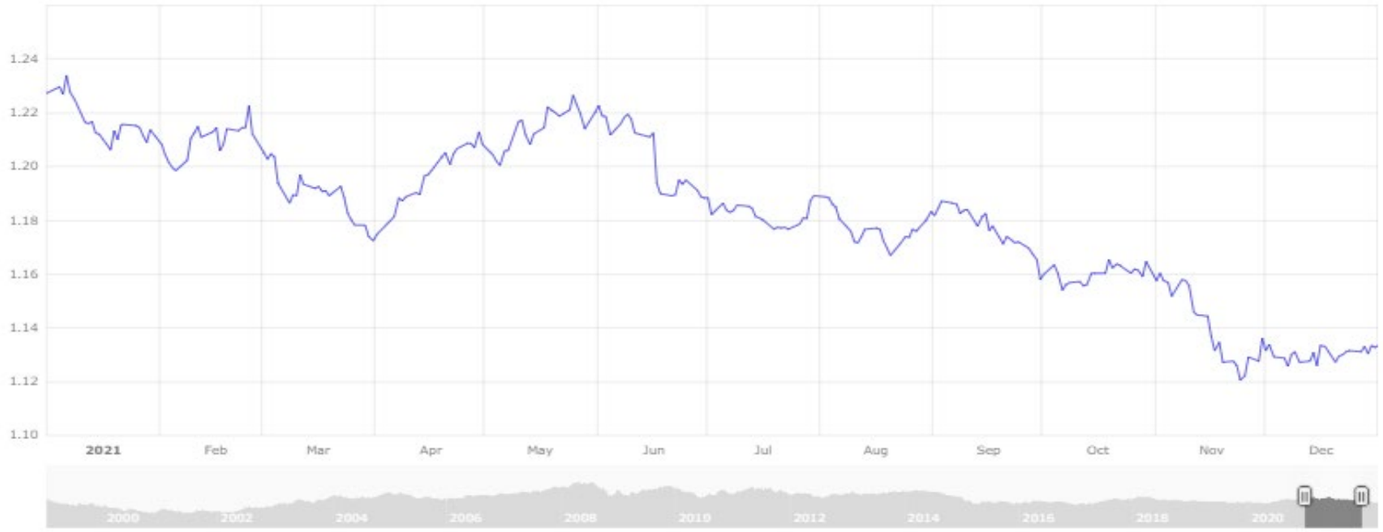
11 April 2022
EUR 1 = USD 1.09 +0.0039(+0.4%)

Change from **4 January 2021** to **31 December 2021**

Min (24 November 2021)	Max (6 January 2021)	Average
1.1206	1.2338	1.1827

Select: EUR vs. USD

Period: 01/01/2021 — 31/12/2021 Zoom: 1m 6m 1y 10y all



1 EUR	1,1827 USD
1 USD	0,84552296 EUR

Please also refer to Annex 4
Sensitive information on costs relating to companies internal data and intelligence

SUPPORTING ELEMENTS ON UNDERMINING OF THE REMEDIAL EFFECT

1. INFORMATION ON NICKEL COSTS

Refer to document: Variation of nickel prices

2. INFORMATION ON TRANSPORTATION COSTS

[This section refers to confidential information given in other annexes. This includes freight rates between Indonesia and the EU, Indonesia and Turkey and Turkey and the EU This document also compares the different transport costs, showing that it is inefficient to reroute SSHR going from Indonesia to the EU via Turkey.]

Indonesia - EU: [50-100] USD

Indonesia- Turkey: [60-130] USD

Turkey - EU: [10-60] USD

Indonesia - EU via Turkey: [70-190] USD

Difference = [20-90] USD

[Another sensitive annex contains detailed information on freight rates]

3. INFORMATION ON THE SHARE OF NICKEL IN SSHR

Refer to document: Nickel share assessment 2021

Assessment based on cost of manufacturing (excluding SG&A, profits)

	EU	Indonesia
COM black SSHR	sensitive	sensitive
Nickel cost	sensitive	sensitive
Share of nickel	***[30-60]%***	***[30-60]%***

Sensitive information relating to the costs of production and

https://www.westmetall.com/en/markdaten.php?action=averages&field=LME_Ni_cash

Nickel

2022

Month	LME Nickel Cash-Settlement
April	33.442,14
March	31.927,22
February	24.178,00
January	22.326,00

2022	27.968,34
2021	18.477,99
2020	13.773,18
2019	13.906,96
IP	12.341,83

Nickel

2021

Month	LME Nickel Cash-Settlement
December	20.070,24
November	19.964,32
October	19.420,24
September	19.398,41
August	19.160,43
July	18.817,05
June	17.943,23
May	17.605,74
April	16.480,70
March	16.459,87
February	18.568,05
January	17.847,60

in USD/ tonne	IP	2019	2020	2021	2022
Nickel LME	12.342	13.907	13.773	18.478	27.968
Index	100	113	112	150	227

Nickel

2020

Month	LME Nickel Cash-Settlement
December	16.807,05
November	15.796,05
October	15.219,36
September	14.866,27
August	14.486,85
July	13.341,35
June	12.703,27
May	12.135,32
April	11.753,20
March	11.873,00
February	12.743,50
January	13.552,95

Nickel

2019

Month	LME Nickel Cash-Settlement
December	13.800,50
November	15.199,52
October	17.113,48
September	17.673,10
August	15.682,14
July	13.462,39
June	11.970,00
May	11.998,33
April	12.819,00
March	13.060,71
February	12.649,75
January	11.454,55

Nickel

2018

Month	LME Nickel Cash-Settlement
December	10.836,84
November	11.253,41
October	12.327,17
September	12.527,25
August	13.432,95
July	13.772,05
June	15.110,95
May	14.356,43
April	13.934,50
March	13.403,57
February	13.576,75
January	12.880,23

Prices & volumes

IP		Source
Indonesia Volume (tonnes)	111512	*table 5 prov. AD Reg.*
Indonesia Price (EUR/ tonnes)	1645	*table 6 prov. AD Reg.*
EU Price (EUR/ tonnes)	1991	*table 11 prov. AD Reg.*
EU Cost (EUR/ tonnes)	1894	*table 11 prov. AD Reg.*
EU target price (profit only) (EUR/ tonnes)	2074	*profit 8,7% as per rec. 233 def AD Reg.*

2021		Source
Price of imports from Turkey (EUR/ tonnes)	1.693	*Annex 2*
Volume of imports from Turkey (tonnes)	33.367	*Annex 2*

Share of Turkish volumes	Turkey 21/ Indonesia IP
	29,9%

Undercutting

Undercutting	14,96%

	2021 price	Customs duty	Undercutting
Turkish import price	1.693	0%	14,96%

Underselling

Underselling (+8,7% target profit)	22,52%

	2021 price	Customs duty	Underselling
Turkish import price	1.693	0%	22,52%

Dumping

		Source
Dumping margin	17,70%	*rec. 75 def. AD Reg.*

Numbers original investigation (price of imports from Indonesia)

2016	2017	2018	IP (July '18-June '19)	
2.203	2.152	1.688	1.645	*table 6 prov. AD Reg.*

Amount of dumping	291	EUR/tonne
Minimum non-dumped price	1.936	EUR/tonne

Average import price (EUR/unit)	2021	Dumping		
		EUR/unit	in %	
Turkey	1693	244	14,39%	*Annex 2*

To the Commission of the European Union

APPLICATION

Under Article 13 of Regulation (EU) No 2016/1036 of the European Parliament and of the Council of 8 June 2016 on protection against dumped imports from countries not being Member States of the European Union

Submitted by

EUROFER

Avenue de Cortenbergh, 172
B-1000 Brussels
Belgium

Application for the initiation of an anti-circumvention investigation concerning imports of hot-rolled stainless steel sheets and coils originating in Turkey

OPEN VERSION

16 June 2022

1. INTRODUCTION

(1) On 7 October 2020, the European Commission (the 'Commission') imposed definitive anti-dumping measures on hot-rolled stainless steel sheets and coils ('SSHR') from Indonesia, the People's Republic of China and Taiwan. In particular, it imposed anti-dumping duties of no less than 17.3% on all Indonesian companies.[1] In its original investigation, the Commission found that such duties would be necessary to eliminate the injury inflicted on the Union industry by the Indonesian dumping.

(2) However, less than two years after the imposition of the duties, concurring evidence shows that duties imposed on imports from Indonesia are clearly and substantially circumvented. There are clear and consistent indications that, in order to avoid duties on Indonesian SSHR, substantial volumes of Indonesian stainless steel slabs are imported in Turkey where they undergo hot-rolling before being exported as Turkish SSHR to the EU. The processing stage that takes place in Turkey, turning slabs into SSHR, is minimal and accounts for no more than 5% of the SSHR final cost, with 95% of the cost being linked to the production of slabs in Indonesia.

(3) It is obvious that this processing stage is carried out in Turkey purely with the intention of avoiding the duties imposed on Indonesian SSHR. The participation of Turkish exporting producers in the production process of SSHR would, if not for the duties, be nonsensical in terms of economic efficiency. In reality, the change in the pattern of trade coincided with the Commission's investigation and the imposition of the anti-dumping duties on imports from Indonesia. Unfortunately, this circumvention of the EU measures has so far been successful.

(4) Beside the change in the pattern of trade, the price level of imports of SSHR from Turkey is extremely low and comparable to the level found to be injurious by the Commission for imports from Indonesia. Coupled with substantial volumes, their abnormally low prices, despite the substantial increase in the costs of raw materials since the original IP, clearly undermine the remedial effect of the AD measures. These prices also give clear indications that imports from Turkey are dumped, up to about 15%.

(5) The information available indicates that the main beneficiary of this circumvention scheme is a major Italian importer/user active in the original investigation. According to the Commission's own finding, this user is a major importer of SSHR from the countries found to have dumped SSHR, and hence massively relied on inputs purchased at dumped prices. Despite specific consideration from the Commission in the original investigation, on the grounds of Union interest, this user appears to be actively engaging in the circumvention of the EU duties by importing SSHR from Turkey to Italy.

(6) It is therefore clear that Turkish "exporting producers" of SSHR engage in circumvention within the meaning of Article 13 of EU Regulation 2016/1036 ('the basic AD Regulation'). The Application demonstrates that there is a change in the pattern of trade stemming from a practice not justified by any reason other than the imposition of the duties, that this change undermines the remedial effects of the duties and that dumping, assessed in relation to the previously established normal values, exists. In such situations, Article 13 of the basic AD Regulation allows

[1] Commission Implementing Regulation (EU) 2020/1408 of 6 October 2020 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, Article 1(2).

the Commission to extend anti-dumping duties imposed on imports from a country to imports from a third countries of the like product "*whether slightly modified or not*".

(7) On behalf of the SSHR Union Industry, Eurofer therefore urges the Commission to ensure that the anti-dumping duties, set to protect the Union industry against injurious unfair imports of SSHR, are enforced. The continuation of the flows of dumped SSHR, despite the findings and measures of the Commission, is a clear challenge to the ability of the EU to provide effective protection against unfair trade. In Eurofer's view, it is of the utmost importance, for the integrity of the Union Trade Defence system, to put an end to such practices swiftly and decisively.

(8) Eurofer therefore respectfully asks the Commission to urgently initiate an investigation under Article 13 of the basic AD Regulation with a view to extend the anti-dumping duties on imports of SSHR from Indonesia to Turkey and to register imports of SSHR from that country.

2. APPLICANT

(9) This Application is submitted by Eurofer, the European Steel Association, on behalf of its members active in the production of SSHR.

Eurofer - the European Steel Association
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Tel: +32 2 738 79 20
Fax: +32 2 738 79 55
Contact Person: Matteo Rigamonti
Email: M.Rigamonti@eurofer.be

(10) Eurofer is the European Steel association, representing more than 95% of steel production in the European Union. Eurofer members are steel companies and national steel federations throughout the EU.

(11) The companies active in the production of SSHR on behalf of which Eurofer files submit this Application are:

- Acerinox Europa SAU
- Aperam Stainless Europe
- Outokumpu Oyj
- Acciai Speciali Terni SpA

(12) These four companies account for the entirety of EU production of SSHR. They acted as Complainant in the original anti-dumping investigation that led to the imposition of duties and actively cooperated to the investigation, including as part of the sample of Union producers. The Applicant is therefore undoubtedly an "interested party" within the meaning of Article 13 of the basic AD Regulation.

Annex 1 - Representation letters

3. PRODUCT CONCERNED AND LIKE PRODUCT

(13) As the circumvention pattern identified occurs through a re-organisation of the production process of the product concerned, the Applicant considers useful to revert briefly on the

characteristics of the products concerned and the like product, as well as on its production process. The developments below are in line with the findings of the Commission over the course of the original investigation.

3.1 Description of the stainless steel hot-rolled flat products

3.1.1 Metallurgical characteristics

(14) Stainless steel is a steel alloy with a minimum content of 10.5% chromium and a maximum content of 1.2% carbon, a metallurgical characteristic shared by all stainless steel families. The addition of chromium provides stainless steel with its stainless properties. When exposed to oxygen, the chromium forms a passivation layer of chromium oxide, which is capable of reforming quickly when the surface is scratched. The layer is too thin to be visible, but protects the metal beneath by making it impermeable to water and air. As a result, stainless steel requires no added surface protection against corrosion.

(15) There are a large number of stainless steel types with widely varying chemical compositions. Stainless steels have traditionally been divided into categories depending on their microstructure at room temperature. This gives a division into four main groups of grades families (i) austenitic, (ii) ferritic, (iii) martensitic and (iv) duplex. All four have different levels of corrosion resistance and strength. The differences result from the controlled addition of alloying elements, notably chromium and nickel.

(16) As found in the original investigation, Indonesian SSHR production principally focuses on austenitic grades, grades containing nickel, as Indonesian exporting producers have access to significant local nickel ore reserves for their production. Nickel-based austenitic grades account for the largest part of the production of stainless steel worldwide, with about 75% of the total production. As an alloying element, nickel enhances important properties of stainless steel such as formability, weldability and ductility, while increasing corrosion resistance in certain applications. Austenitic stainless steel grades are used in a large number of industrial applications such as pumps, piping and heat exchangers, as well as in construction applications.

3.1.2 Production process

Melting stage

(17) The first stage of the production process of SSHR consists in melting the raw materials containing the necessary alloying elements. The melt is then casted into stainless steel slab, a solid thick rectangular-shaped semi-product.

(18) The raw materials used at the melting stage may either be recycled materials with the appropriate chemical composition or ferro-alloys of various grades (share of the alloying element) and, more exceptionally, pure chemical elements. Chromium is usually available as ferrochromium or through stainless steel scraps, while nickel is typically available in scraps and ferronickel. Iron is essentially provided through scraps, or ferro-alloys. As pure nickel and high grade ferronickel are costly compounds subject to significant fluctuations in price, a relatively new type of low-grade

ferro-nickel, produced through smelting, a highly polluting process, of low nickel content laterite ore,[2] the nickel pig iron (NPI),[3] has been increasingly used in Eastern Asia especially.

(19) In the EU, along with the US and Japan, stainless steel producers primarily rely on recycled stainless steel scrap as the main raw material for the production of stainless steel, complemented by high-grade ferro-alloys. These inputs, containing all the chemicals necessary to achieve the desired grades, are melted together in an electric arc furnace (EAF). To remove excess carbon, the molten material is further processed in an argon oxygen decarburisation converter (AOD) and secondary treatments are carried out as necessary. The liquid steel is then processed through a continuous casting process in which the molten metal is poured directly into a mould to produce the required shapes. After leaving the mould, the strand's shell is further cooled until it has completely solidified. The strand is cut into lengths to obtain compact rectangular blocks of crude steel, the stainless steel slabs

(20) In more recent stainless steel producing countries, essentially China and Indonesia, and as found by the Commission over the course of the original investigation, instead of scraps, stainless steel producers essentially rely on low-grade ferro-alloys, the above mentioned NPI. In that process, the NPI and ferro-chrome are melted together either in a blast oxygen furnace (BOF) or in a rotary kiln electric furnaces (RKEF) together with coking coal and a mixture of gravel and sand. It is then poured in an AOD or a vacuum oxygen decarburising converter. The liquid metal obtained is then transferred to the continuous casting machine for transformation into stainless steel slabs.

Hot-rolling stage

(21) In a second step, the stainless steel slab is reheated and transformed into SSHR coils through mechanical hot-rolling.

(22) At the hot-rolling production stage, the slabs are preheated to a high temperature and then reduced to a predetermined thickness in the roller gap of a hot-rolling mill, by pressure applied between one or several sets of two rollers. The resulting product is known as "hot-rolled black band" ("black SSHR"), a product covered by a layer of scale, giving it its black colour.

(23) Most of the production of black SSHR subsequently undergoes hot annealing and pickling to become "hot-rolled white band" or "HRAP" ("white SSHR"). Annealing consists in heating cold steel to make it more suitable for bending and shaping, as well as to prevent breaking and cracking. Pickling is the process through which stainless steel is cleaned using chemical baths of diluted acid to remove impurities such as rust, dirt, scale and oil from the surface, without changing the underlying properties of the metal. The removal of the scales results in the typical white colour of white SSHR.

3.2 Product concerned of the original investigation

(24) Over the course of the original investigation, the Commission ruled that black SSHR was an integral part of the product concerned because both black and white SSHR "*share the same*

[2] Nickel laterite ore is common mostly in tropical environments such as Australia, New Caledonia, Indonesia and the Philippines

[3] NPI usually has a content of about 10-15% nickel, 1% chromium, 83% iron and 3% carbon

basic physical and chemical characteristics and that they form one product group."[4] As a result, the Commission rejected the claims raised by the main importer, who substantially relies on imports of black SSHR, to exclude black SSHR from the scope of the investigation.

(25) It therefore confirmed the product scope and scope of application of the measure as flat-rolled products of stainless steel, whether or not in coils (including products cut-to-length and narrow strip), not further worked than hot-rolled and excluding products, not in coils, of a width of 600 mm or more and of a thickness exceeding 10 mm.[5] The product concerned falls within the following codes of the combined nomenclature: 7219 11, 7219 12, 7219 13, 7219 14, 7219 22, 7219 23, 7219 24, 7220 11 and 7220 12.[6]

4. THE EU AD MEASURES ON INDONESIA ARE CIRCUMVENTED THROUGH IMPORTS OF SSHR FROM TURKEY

4.1 There is a change in the pattern of trade

4.1.1 Significant increase in imports of SSHR from Turkey into the EU

(26) Prior to the initiation of the anti-dumping investigation on imports of SSHR from China, Indonesia and Taiwan, EU importers and users extensively relied on direct imports of SSHR from Indonesia. However, since the initiation of the investigation and, more significantly since the imposition of the measures, the pattern of imports of SSHR into the EU has significantly changed.

(27) While imports of SSHR from Turkey prior to and during the original IP were marginal, they have surged since the initiation of the investigation, the registration of imports and the imposition of the EU provisional and then definitive AD measures on imports from, among others, Indonesia. From 2020, while imports from Indonesia collapsed, their volumes reduced to less than one-twentieth of previous amounts, imports from Turkey increased ten-fold.

EU27 Imports of SSHR (in tonnes)	2018	2019	2020	2021
Imports from Turkey	1 743	2 140	21 535	33 376
Index	***100***	***123***	***1 236***	***1 915***
Imports from Indonesia	44 863	81 104	3 675	105 784
Index	***100***	***181***	***8***	***236***

Annex 2 - Imports of SSHR in the EU

(28) That surge in imports between 2019 and 2020 was confirmed in 2021 when imports of SSHR from Turkey into the EU further increased by 50%, reaching more than 30 thousand tonnes. The available information shows that, between January and April 2022, an additional 30 thousand

[4] Commission Implementing Regulation (EU) 2020/508 of 7 April 2020 imposing a provisional anti-dumping duty on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, para. 46.

[5] Commission Implementing Regulation (EU) 2020/508 of 7 April 2020 imposing a provisional anti-dumping duty on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, para. 36.

[6] Commission Implementing Regulation (EU) 2020/1408 of 6 October 2020 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, Article 1.

tonnes of SSHR were exported from Turkey to the EU. If the trend of the first four months was to be confirmed, imports of SSHR from Turkey would increase four times in the course of 2022.

(29) That new pattern of trade is all the more unexpected given that the massive increase in imports of SSHR from Turkey as from 2020 occurred in the context of a significant slowdown in global activity, as a result of the sanitary crisis and significant restrictions that impeded activity in the EU and worldwide. Imports from Turkey skyrocketed at a time when overall imports of SSHR in the EU reduced significantly, from more than 500 thousand tonnes in 2019 to a mere 161 thousand tonnes in 2020.[7] The increase in imports from Turkey therefore occurred in a context of a general contraction in imports, expectedly unfavourable to the development of new trade flows.

(30) It is also of note that, since 2020, the massive imports of SSHR from Turkey are almost exclusively shipped to Italy, where only a marginal share of imports from Turkey were headed in previous periods. From virtually no imports from Turkey to Italy in 2018, about 90% of the vastly increased Turkish exports of SSHR were shipped in Italy in 2020-2021. Unsurprisingly, the additional 30 thousand tonnes identified in 2022 so far were also shipped to Italy.

Imports of SSHR from Turkey (in tonnes)[8]	2018	2019	2020	2021
Imports in EU27	1 743	2 140	21 535	33 376
Imports in Italy	2	326	19 967	29 851
Italy share of EU27 imports	**0%**	**15%**	**93%**	**89%**

(31) This confirms that the EU investigation and measures on imports of SSHR from Indonesia have coincided in the emergence of a new trade flow for SSHR between Turkey and the EU, and specifically to Italy. A closer look to the differential evolution in imports in Italy from Turkey and Indonesia confirms and reinforce the above EU-wide finding that imports of SSHR from Turkey substituted, to a large extent, imports from Indonesia as from 2020.

Italy Imports of SSHR (in tonnes)[9]	2018	2019	2020	2021
Imports from Turkey	2	326	19 967	29 851
Index	***100***	***16 300***	***998 350***	***1 492 550***
Imports from Indonesia	44 489	80 061	3 041	104 181
Index	***100***	***180***	***7***	***234***

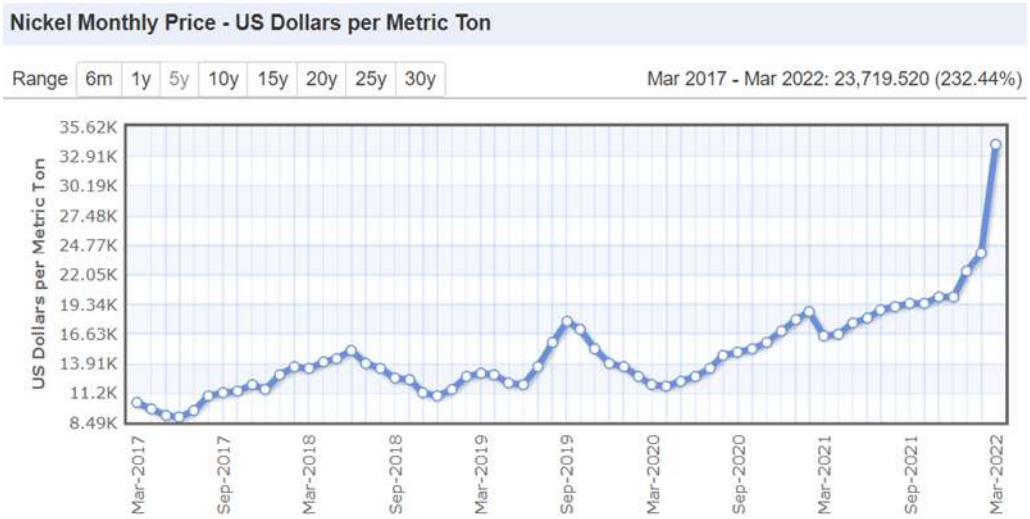
(32) The significant increase in imports, to unprecedented levels, of SSHR from Indonesia in 2021 does not obscure the existence of that change in the pattern of trade. That increase is mostly linked to the fact that Indonesian exporting producers draw significant benefit from an artificially reduced cost of nickel inputs. In the provisional AD Regulation, the Commission had identified that distortion on nickel ore exceeded 30% of the price of the input, a finding further confirmed by the Commission's findings in its recent anti-subsidy investigation on imports of the

[7] See the annex: Imports of SSHR in the EU

[8] See the annex: Imports of SSHR in the EU

[9] See the annex: Imports of SSHR in the EU

downstream stainless steel cold-rolled product.[10] In the context of the significant increase in the worldwide nickel prices, the Indonesian exporting producers are therefore able to compensate to a large extent the price increase resulting from the duties imposed thanks to their massive and increasing unfair advantage on cost of nickel inputs.



Source IndexMundi[11]

(33) The increase in imports of the product concerned from the country targeted by the original investigation, despite the imposition of the measures, does not prevent the Commission from concluding that the measures are being circumvented via a third country. As will be further detailed below, the substantial volume of imports of SSHR from Turkey from 2020 and up to 2022 occurred precisely to alleviate the impact of the duties imposed on imports from Indonesia. That a substantial volume of imports are subject to the duties does not justify the fact that other volumes are circumventing the measures.

4.1.2 Significant increase in imports of Indonesian stainless steel slabs in Turkey

(34) It is not unusual for the imposition of trade defence measures to coincide with an increase in imports from third countries not subject to the measures. However, the increase in imports of SSHR from Turkey to the EU is particularly surprising for one important reason: Turkey has no domestic producer of SSHR and no domestic production of stainless steel crude steel.

(35) Despite significant and increasing steelmaking capacities for carbon steel and downstream transformation capacities, the Turkish stainless steel capacities are limited to cold-rolling activities. The production of that downstream product is undertaken in Turkey by the local subsidiary of a Korean stainless steel producer POSCO, from SSHR imported essentially from its related entities in South Korea and China. A smaller domestic producer, Trinox also imports SSHR from Eastern Asia as feedstock for its production of stainless steel cold-rolled products ("SSCR"). Some Turkish producers have announced investments in crude stainless steel making

[10] Commission implementing Regulation (EU) 2022/433 of 15 March 2022 imposing definitive countervailing duties on imports of stainless steel cold-rolled flat products originating in India and Indonesia and amending Implementing Regulation (EU) 2021/2012 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of stainless steel cold-rolled flat products originating in India and Indonesia

[11] IndexMundi, LME Nickel prices, https://www.indexmundi.com/commodities/?commodity=nickel&months=60.

capacities, but none of these projects appear to have been started yet and none of them were operational in 2020 or 2021. They have also advertised minor capacities for the production of crude stainless steel and trial batches in their electrical and specialty steel and alloys plants, but these are not designed or used to engage in regular production of stainless steel.

Annex 3 - Information on the Turkish stainless steel industry

(36) In the absence of dedicated producers of crude stainless steel or SSHR in Turkey, the increase in imports of SSHR from Turkey can therefore not explained by an increased attractiveness of the Turkish SSHR's prices following the imposition of the measures. It is rather explained by a new pattern of trade of SSHR linking Indonesia to the EU, and specifically Italy, via Turkey. In reality, the significant increase in imports in the EU of SSHR from Turkey closely coincides with the beginning of imports in Turkey of significant volumes of stainless steel slabs from Indonesia. That increase in imports contrast both with the absence of previous imports or of imports from other sources.

Imports of stainless steel slabs in Turkey (in tonnes)	2018	2019	2020	2021
Imports from Indonesia	0	6 368	14 172	60 684
Index	***0***	***100***	***223***	***953***
Imports from all sources	0	6 369	14 173	60 711
Index	***0***	***100***	***223***	***953***

Annex 4 - Imports into Turkey of stainless steel slabs and exports of SSHR

(37) In addition, it must be noted that these imports of stainless steel slabs in Turkey from Indonesia are continuing in 2022. According to Indonesian customs information, 10 121 additional tonnes of stainless steel slabs were shipped to Turkey in April 2022.

(38) As indicated above in the description of the production process for SSHR, these stainless steel slabs are semi-products directly upstream of SSHR in the production process. They have no other use than transformation in SSHR and already contain all the raw materials that will provide SSHR with its chemical characteristic, notably the product grade.

(39) Even if there are no dedicated producers of SSHR in Turkey, the process of hot-rolling stainless steel slabs is essentially the same as the hot-rolling of carbon steel slabs, which is routinely undertaken by Turkish producers of carbon steel hot-rolled flat products. Whereas some adjustments to the process are necessary to account for the physical and chemical characteristics of stainless steel, the same machinery can be used for the hot-rolling of stainless steel and carbon slabs.[12] As evidenced by recent EU investigations into imports of certain hot-rolled flat steel products from Turkey, Turkish producers have significant hot-rolling capacities.[13]

[12] This is not the case for stainless steel casting due, among other, to the need to reduce the carbon content of the melt through use of an AOD of VOD.

[13] Commission implementing Regulation (EU) 2021/1100 of 5 July 2021imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain hot-rolled flat products of iron, non-alloy or other alloy steel originating in Turkey and Commission implementing Regulation (EU) 2021/9 of 6 January 2021 imposing a provisional anti-dumping duty on imports of certain hot-rolled flat products of iron, non-alloy or other alloy steel originating in Turkey

(40) It is therefore clear that Turkish carbon steel producers have processed Indonesian stainless steel slabs into SSHR and exported them to the EU. The existence of that processing is evidenced by an almost perfect coincidence between the volume of Indonesian stainless steel slabs imported in Turkey and the volume of exports of SSHR to the EU - essentially to Italy. The marginal difference in volume and the limited time gap between imports of slabs and exports of SSHR are consistent with the yield associated with the transformation of stainless slabs into SSHR and with the time of processing of the slabs and re-exports of SSHR to the EU. It also shows that there is no domestic consumption in Turkey of the SSHR produced from the Indonesian slabs.

In tonnes	Quarter	Turkish stainless slab imports from Indonesia	Turkish SSHR coil exports to Italy	*Balance*
2019	Q1	318		
	Q2		315	*3*
	Q3		10	
	Q4	6 050	6 014	*35*
2020	Q1	4 078		
	Q2			
	Q3	10 094	4 033	*45*
	Q4		9 924	*170*
2021	Q1	10 103	4 696	
	Q2	20 181	10 174	
	Q3	20 317	14 921	*493*
	Q4	10 083		
2022	Q1		22 826	
	Q2		7 357	*218*

(41) The correspondence between the Turkish SSHR exports and the stainless steel slabs imported from Indonesia is moreover further confirmed by the nickel content of the exports. As found by the Commission in the original investigation, the Indonesian stainless steel - slabs and SSHR - production relies extensively on the Indonesian local (distorted) nickel inputs and is overwhelmingly austenitic. Similarly, the SSHR exported from Turkey to Italy falls under the CN codes 72191210, 72191310 and 72191410, meaning that it is austenitic stainless steel with a nickel content over 2.5%.

(42) Moreover, a comparison of the imports price of each shipment of stainless steel slabs with the export price to Italy of the corresponding export shipments of SSHR reveals that the prices for the products are extremely similar.[14] In view of the very limited cost of transformation of stainless steel slabs into SSHR, as will be detailed below, this further confirms the correspondence between the imports of stainless slabs from Indonesia in Turkey and the exports of SSHR to Italy.

[14] See the annex: Imports into Turkey of stainless steel slabs and exports of SSHR

In EUR/ Tonnes	Import price of slabs	Export price of SSHR
2019-Shipment 1	1486	1554
2019-Shipment 2	1630	1706
2020-Shipment 3	1499	1456
2021-Shipment 4	1454	1531
2021-Shipment 5	1505	1606
2021-Shipment 6	1505	1567
2021-Shipment 7	1759	1868
2021-Shipments 8-9	1994	2135
Average difference		74 EUR/ Tonne

4.1.3 Deliberate and organised change in the pattern of trade

(43) That very similar level of price also provides hints that this new trade pattern is not the spontaneous result of market forces. Such prices significantly limit the ability of the Turkish company transforming stainless steel slabs into SSHR to achieve substantial profit margin on a classic purchase-processing-resale operation. Consequently, these imports and re-exports rather appear to be the result of a deliberate concerted practice aiming at supplying SSHR made from Indonesian slabs in the EU through a Turkish intermediary in charge of the hot-rolling of the stainless slabs, likely through a hire-work agreement. As hot-rolling is sufficient to confer the non-preferential origin to a product, that SSHR imported through the "Turkish route" evades the duties that would apply on direct imports from Indonesia.

(44) In reality, consistent market information available to the Applicant reveal that this new pattern of trade has been set up through an agreement between a major Italian Importer/user of SSHR, active in the original investigation, and the integrated Indonesian exporting producer targeted by that same investigation.[15] The stable and low prices of the slabs imports in Turkey (and SSHR exports to Italy) is moreover consistent with the usual practice of Tsingshan Indonesia to offer long term fixed-prices, in contrast with the practiced of other stainless steel producers on a market driven by volatile raw material costs. The purpose of the agreement between Tsingshan Indonesia and the Italian major user is to ensure that, despite the anti-dumping duties imposed on imports of SSHR from Indonesia, the latter would still be able to access SSHR made from Indonesian semi-products at unfairly low prices.

(45) To that end, the two companies, together with Turkish carbon steel producer Colakoglu Metalurji A.S. ("Colakoglu"), a major Turkish producer of carbon steel with a hot-rolling capacity of about 2.5 million tonnes in 2020, organised a new trade flow between Indonesia, Turkey and the EU. Under that new pattern, stainless steel slabs are imported to Turkey from Indonesia, hot-rolled by Colakoglu and then exported to Italy under the form of SSHR. [confidential market information according to which, Colakoglu advertises its hot-rolling mills as capable to process stainless steel to EU actors].[16] The hot-rolling of Indonesian slabs, most likely under a hire-work agreement, possibly involving the Turkish subsidiary of the Italian major user, allows the Turkish producer to increase its revenues while maximising the capacity use of its hot-rolling lines.

Annex 5 - Market information on the new pattern of trade

[15] Through its companies PT Indonesia Tsingshan Stainless Steel and PT Indonesia Guang Ching Nickel and Stainless Steel Industry

[16] See Annex Market information on the new pattern of trade

(46) As shown above, despite the existence of Turkish SSCR producers, all the SSHR produced through that new pattern of trade is exported to the EU. For shipments of Indonesian slabs to Turkey up to Q2 2021, none of the SSHR produced from these slabs was used domestically in Turkey to produce SSCR. This is because, though Colakoglu can transform the slabs into SSHR, it is unable to undertake the annealing and pickling phase through which black SSHR is transformed into white SSHR, the input used by most re-rollers as the feedstock for SSCR production. The absence of annealing and pickling lines to process black SSHR into white SSHR for Colakoglu and the insufficient capacities of such lines for the Turkish SSCR producers[17] means that the black SSHR produced through that pattern cannot be used in Turkey.

(47) This issue does not exist for the major Italian user. As abundantly evidenced over the course of the original investigation, its production model precisely relies on the use of its own significant annealing and pickling capacities and, therefore, on imports of black SSHR. After annealing and pickling, the Italian user can either directly sell the product as white SSHR on the EU market or further process it into SSCR.

4.2 The change stems from a practice for which there is insufficient due cause or economic justification other than the imposition of the duty

(48) The above described change in the pattern of trade, the substitution of a significant share of imports of SSHR from Indonesia with imports of SSHR produced from Indonesian stainless steel slabs in Turkey, is therefore the result of a re-organisation of the trade flow and the production process arranged between the Indonesian exporting producer targeted by the original investigation, the main EU importer of the product concerned and a Turkish producer.

(49) Such a reorganisation of the trade flow and production process between Indonesia and the EU undoubtedly constitutes a "practice, process or work" through which the EU measures are circumvented, within the meaning of Article 13(1) of the basic AD Regulation. As this practice relies on the slight modification of Indonesian stainless steel slabs into the product concerned, it also constitutes an assembly operation, within the meaning of Article 13(2) of the basic AD Regulation. Regardless of its qualification, it is obvious that this behaviour is essentially justified by the desire to avoid payment of the duties on imports of SSHR from Indonesia, and that the reorganisation of the pattern of trade has insufficient due cause or economic justification.

4.2.1 Practice, process or work

(50) In the absence of an exhaustive list of the practices susceptible to constitute circumvention within the meaning of the basic AD Regulation, the deliberate and coordinated decision of the Indonesian exporting producer and the major EU importer of SSHR to change the pattern of trade undoubtedly constitute a circumvention. At the halfway point between the "slight modification", "consignment" via a third country and the "reorganisation of the patterns and channel of sales", that behaviour precisely aims at avoiding the duties applicable at the EU border by taking advantage of the EU rules on non-preferential origin, as set in Annex 22-01 of the EU Custom Code.

(51) This combination of the reorganisation of the trade flows and of the production process through the transfer in a third country of a processing phase, requiring significant production infrastructure but incurring limited costs of productions, only serves to create an artificial separation between

[17] See the annex: Information on the Turkish stainless steel industry

the country subject to the measures and the EU market. The fact that the hot-rolling process takes place in Turkey, on the sea road between Indonesia and the EU, further confirms that the overall purpose of the operation is to ensure delivery on the EU market of the product normally subject to the measures.

(52) The change in the pattern of trade of SSHR between Turkey and the EU therefore stems from a practice, process or work within the meaning of Article 13(1) of the basic AD Regulation. It is not the accidental result of the reorganisation of trade flows following the imposition of the EU AD measures, nor the result of exogenous economic factors.

4.2.2 Assembly operation

(53) Under Article 13(2) of the basic AD Regulation, the circumvention of a measure may stem from an assembly when (i) the operation started or substantially increased since, or just prior to, the initiation of the anti-dumping investigation and when (ii) the parts concerned from the country subject to measure constitute 60% or more of the total value of the parts of the assembled product and the value added to the parts brought in, during the assembly or completion operation, is lower than 25% of the manufacturing cost.

(54) The figures provided above show that the first condition set in Article 13(2) of the basic AD regulation is manifestly fulfilled. Even if a very limited trial batch of production of SSHR from Indonesian slabs took place in the first half of 2019, the practice only became substantial after the initiation of the investigation and massive volume arrived from Turkey only after the registration of imports from Indonesia in January 2020. Whereas only 315 tonnes were shipped to Italy before the initiation of the investigation, almost 80 thousand tonnes were shipped between the initiation of the measures and April 2022. That the initial intent of the exporting producers and the Italian user could have been to minimise the impact of an expected extension of the EU steel safeguard to imports from Indonesia does not preclude the findings that the scheme was in fact used to circumvent the much more restrictive AD measures on Indonesia.

(55) In addition, the assessment of the respective costs of production of stainless steel slabs and SSHR reveals that slabs account for the overwhelming majority of the cost of production of SSHR. By comparison, the transformation of slabs into SSHR, in particular when the process does not include the pickling and annealing necessary to transform black SSHR into white SSHR, only result in marginal additional costs. As such, an analysis of the cost of production of EU SSHR producers, but also of the cost of production of the Indonesian exporting producer, reveal that, in 2021, the cost of slabs amount to about 95% of the cost of production of SSHR while the processing costs to transform slabs into SSHR amount only to about 5% of that cost.

Cost of manufacturing	EU	Indonesia
COM Slab	[1000-3000] €/t	
COM black SSHR	[1050-3150] €/t	
Slab cost	[About 95%]	
Hot-rolling cost*	[About 5%]	

** This includes only hot-rolling because black coils do not undergo pickling and annealing*

Annex 6 - Assembly operation test

(56) The same conclusions can be reached from the comparison of the import prices of stainless steel slabs from Indonesia in Turkey and the export price of corresponding shipments of SSHR from Turkey to Italy in 2021. The import prices of the Indonesian stainless steel slabs similarly amount to about 95% of the export price of SSHR to Italy. This means that, assuming that no profit is made on these sales, the hot-rolling represent at most about 5% of the cost of production of SSHR.

Turkish import and export prices (2021)	
Turkish import price stainless steel slab	1590 €/t
Turkish export price black SSHR	1679 €/t
Slab cost	94.7%
Hot-rolling cost	5.3%

(57) According to both methodologies, the part imported from the country subject to the measures – the Indonesian slab – represents significantly more than 60% of the total value of the assembled product, and therefore of the parts of that assembled product. In the meantime, the value brought by the assembly operation – the hot-rolling – is considerably lower than 25% of the manufacturing cost of the product. The hot-rolling of imported stainless steel slabs from Indonesia in Turkey therefore also constitutes an assembly operation within the meaning of Article 13(2) of the basic AD Regulation.

4.2.3 Insufficient due cause or economic justification other than the imposition of the duty

(58) Before the imposition of the anti-dumping measures, the Italian user/importer bought the black SSHR directly from Indonesia from the Indonesian exporting producer. This was demonstrably the most efficient trade pattern before the imposition of duties, and indeed this is the most logical and efficient way to obtain SSHR. The imposition of the anti-dumping measures caused a small part of the production process to move to a third country, as a way to reroute Indonesian imports destined for the Union market via Turkey. There is no economically sound reason why the relevant players would otherwise have preferred a Turkish carbon steel producer, with added logistical costs and service fees.

(59) In fact, the main difference between the new pattern of trade and the former is that it induces significant additional inefficiencies. Instead of a single direct shipment of SSHR from Indonesia to the EU, the new pattern of trade implies two distinct shipping operations, also doubling the number of loading and unloading operations. It also require additional road transportations in Turkey from the port for the transportation of the slabs to the hot-rolling plant and then back to the port with the black SSHR. The supplementary maritime transportation cost alone is estimated to represent at least an additional USD [20-90] per tonne in transport costs in 2021.

(60) Beside these added logistics, the new pattern also requires, despite the limited additional costs of the hot-rolling operation, the coordination of the production schedule of two producing entities, including one with very limited experience on the production of the product concerned. It must be reminded that Colakoglu itself is not a stainless steel producer: it is a carbon steel producer with rolling capacity that can incidentally also be used to roll stainless steel. There is nothing that makes them particularly suitable for this kind of stainless steel work. The likely reliance on hire-work also introduces further inefficiencies in the process compared to any integrated production or purchase/resell models. The addition of an independent manufacturer in the production

process also requires the EU user to remunerate a second actor for its own costs but also to provide it with an appropriate profit.

(61) It can hardly be efficient to task a carbon steel producer with hot-rolling of stainless steel considering the specific temperature and rolling time of the products and the fact that stainless scraps, resulting from the yield cannot be re-melted by the Turkish producer. Similarly, the separation of the melting/ casting phase with that of the hot-rolling means that it is no longer possible to benefit from the proximity between slab casting and hot-rolling to save part of the energy necessary to reheat the slab to hot-rolling temperature. Finally, such organisation significantly increases the risk of defects in the production process, likely resulting in an abnormally high level of non-prime products, increasing the overall cost of the operation.

(62) The lack of economic soundness of the pattern of trade set up to avoid the duties imposed on direct imports of SSHR from Indonesia can, moreover, be ascertained through a simple assessment of the exports of SSHR from Turkey. These reveal that the only economic operator engaging in such indirect imports via Turkey is the Italian importer/user. In view of the multiplicity of re-roller worldwide, it could be assumed that, if there was any intrinsic advantage in the hot-rolling of Indonesian stainless steel slabs in Turkey, several re-rollers would be taking advantage of that model. However, the volume of exports reveal that only actors in the area where Indonesian SSHR is subject to AD duties seem to find an economic justification to the Turkish route. Significantly, this route is not even used by Turkish based re-rollers, even for the volumes that could be handled by their limited annealing and pickling capacities, despite a much more advantageous logistic situation.

Exports of SSHR from Turkey (in tonnes)[18]	**2018**	**2019**	**2020**	**2021**
To the EU27	2 176	8 495	15 477	34 116
Index	***100***	***390***	***711***	***1568***
To other countries	6 476	5 114	3 636	4 599
Index	***100***	***79***	***56***	***71***

(63) All these elements very plainly show what is happening: the Indonesian SSHR exports are still being dumped on the Union market, only this time they are taking a *pro forma* detour through Turkey. Moving this marginal part of the production process through Turkey is costly, inefficient and redundant – until one takes the duties into account, which then plainly become the only possible reason for such a manoeuvre to take place. Despite all these inefficiencies, such pattern allows the Italian user to benefit from the particularly low priced Indonesian stainless steel as the additional costs incurred remain significantly lower than the payment of the AD duties due on Indonesian SSHR.

(64) In the absence of the duties, there would be no justification and no economic benefit for the Italian user to rely on such a complex pattern rather than importing directly SSHR from Indonesia. Consequently, it must be held that the change in the pattern of trade stems from a practice for which there is no due cause or economic justification.

(65) The fact that, in the meantime, since 2021, direct imports of SSHR from Indonesia have resumed and even reached unprecedented levels, despite the existence of the AD duties and of the EU

[18] See the annex: Imports into Turkey of stainless steel slabs and exports of SSHR

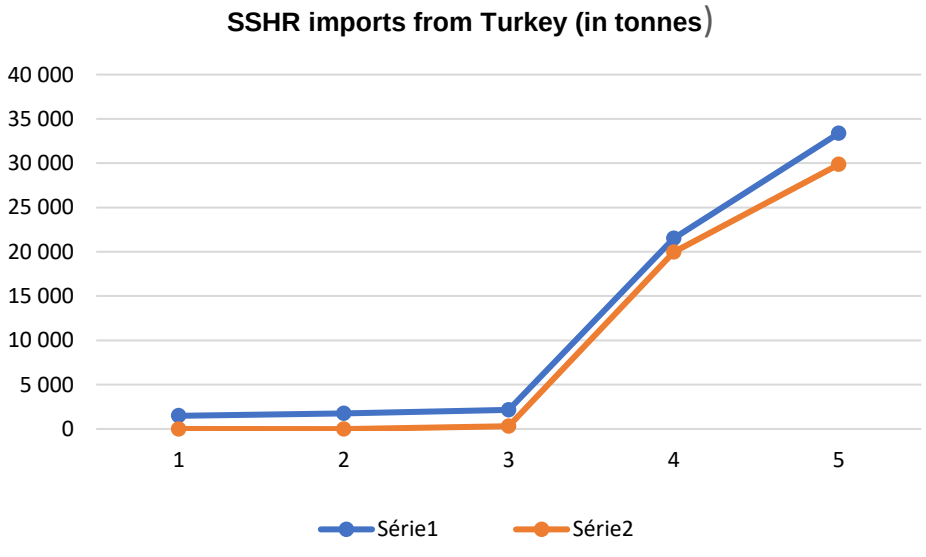
steel safeguard, does not undermine that finding. The steady increase in worldwide nickel prices, to which Tsingshan Indonesia is immune as a result of the Indonesian policies on nickel ore identified in the original investigation (and confirmed over the course of the recent anti-subsidy investigation on SSCR) allows the Indonesian material to regain a competitive edge offsetting the level of the duties solely through the unfair differential on raw material costs. In such conditions, the level of the duties, as Eurofer argued over the course of the original investigation, no longer ensures sufficient protection against unfair imports. However, the continuation of imports of black SSHR from Turkey in parallel to the re-increase in imports from Indonesia shows that, whereas the economically sound pattern of trade would be to import directly from Indonesia, it remains still more advantageous for the Italian user to circumvent the measures via Turkey. Nonetheless, as the volume that can imported through the Turkish route remain subject to the available hot-rolling capacities of the Turkish producer and to sophisticated cooperation mechanism, EU users also rely, in parallel, on direct imports subject to the duties.

5. CIRCUMVENTION UNDERMINES THE REMEDIAL EFFECTS OF THE EU MEASURES

(66) The imposition of AD measures aims to ensure that the Union Industry of a like product is conferred protection against the damaging effect of imports of the product concerned from a third country engaging in dumping. In the original investigation, the Commission highlighted the existence of a significant price impact of imports from Indonesian SSHR and had decided to set the AD duties at the level of the injury elimination level, precisely to neutralise the damaging impact of imports. The circumvention of the measures, via the Turkish route, effectively negates that protection to the detriment of the Union Industry, as it allows for significant volume of imports of SSHR at remarkably depressed prices.

5.1 Significant volume of imports undermining the remedial effect of the measures

(67) As shown above, SSHR imports from Turkey in the EU have skyrocketed since 2019. The imposition of the measures has thus coincided with a dramatically increased imports flow from Turkey, undermining the remedial effects of the measures.



Source: Eurostat

(68) Whereas imports of SSHR from Turkey were almost non-existent up to 2019, they reached 33 376 tonnes in 2021, a volume amounting to almost a third (29.5%) of the 111 512 tonnes imported from Indonesia during the original IP. That volume is more or less equivalent to the imports from Taiwan during the original IP, which represented about 3% of the EU free market. It is therefore far from negligible in terms of volumes. This means that the circumvention of the AD measures in Indonesia via Turkey result in significant additional volumes on the EU market that are evading the duties and are therefore susceptible to have a strong impact on the market.

(69) That significant volume of SSHR imported from Turkey is all the more relevant as it remains on a constant increasing trend. Exports figures from Turkey up to April 2022, the last month for which figures are available, show that an additional 30 183 tonnes had entered the EU, already on a par with the 2021 level while, in parallel, imports of slabs from Indonesia to Turkey continue. However, based on the trend for the first four months of the year, exports of Turkish-processed Indonesian SSHR to the EU in 2022 may reach up to 120 thousand tonnes if the Commission does not address that circumvention pattern. This is all the more likely given that, beside the hot-rolling of Colakoglu, several other Turkish carbon steel producers have announced their intention to start hot-rolling from Indonesian stainless steel slabs. [Confidential market information on other Turkish producers susceptible to engage in hot-rolling of stainless steel].[19]

(70) These significant volumes, combined with the challenging effect of the high volume of low priced direct imports of Indonesian SSHR in 2021 (and 2022 so far), have a significant impact on the EU market in terms of volume and significantly undermines the remedial effects of the measures, in particular as a result of their abnormally low prices.

5.2 Low prices undermining the remedial effect of the measures

(71) Over the course of the original investigation, the Commission found that imports of SSHR from Indonesia significantly undercut EU prices[20] and exerted injurious downward pressure on EU prices. Despite significant increases in worldwide raw material and shipping prices, imports of SSHR from Turkey in the EU exhibited pricing very similar to that of Indonesian material during the original IP, undermining the corrective effect of the AD measures.

5.2.1 Imports of SSHR from Turkey are made at abnormally low prices

(72) The spike in the volume of imports of SSHR from Turkey has coincided with extremely low prices, significantly lower than those of the limited imports existing prior to the beginning of the circumvention. At the level of the product concerned, the price of Turkish imports have has been markedly low and stable, despite the changing conditions of the COVID pandemic and recovery, the significant variation of raw material and shipping costs. As discussed above, these low prices are clear evidence of the origin of the crude steel transformed in Turkey.

[19] See the annex: Market information on the new pattern of trade

[20] Commission Implementing Regulation (EU) 2020/508 of 7 April 2020 imposing a provisional anti-dumping duty on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, rec. 277.

EU27 Import price of SSHR (in EUR/ tonnes)[21]	2018	2019	2020	2021
From Turkey	2 669	2 729	1 634	1 693
Index	***100***	***102***	***61***	***63***
From Indonesia	1 688	1 616	1 680	1 822
Index	***100***	***96***	***100***	***108***

(73) Import prices of SSHR from Turkey in 2020 and 2021 were about 40% below their level of 2018-2019, a reduction by about EUR 1000 per tonne. Those low prices are conspicuously similar to the price level of imports from Indonesia before the imposition of the duties, and of their level, prior to the application of the duties, in 2020. They are even lower than Indonesian prices in 2021.

(74) The extremely low price of the imports of SSHR from Turkey is even more obvious when focusing on the imports of the feedstock used by the major Italian importer/user for its re-rolling operation. For the imports of austenitic coils of SSHR from Turkey, i.e. imports of SSHR with a width equal or exceeding 600 mm of a thickness inferior or equal to 10 mm falling under the CN codes 721912 10, 721913 10 and 721914 10, the average import price in the EU for 2021 amounted to only 1539 EUR/ tonnes. That level is 150 EUR/ tonne lower than the average price of Turkish SSHR import to the EU in 2021 and 30 EUR/ tonne lower than in 2020.[22]

(75) That extremely low price must be weighed against several factors further confirming that imports of SSHR from Turkey undermine the EU measures. As demonstrated above, the evolution of nickel prices since the original IP should have resulted in a significant increase in import prices of SSHR. The Commission found in the original investigation that nickel costs make up more than 17% of the production cost of Indonesian SSHR,[23] a number that is more than [30-60]% for austenitic grade 304 SSHR. Between the IP and 2021, in view of the massive increase in nickel cost, this should have thus resulted in a price increase of at least [15-30]% for SSHR, a trend opposite to what occurred for imports from Turkey. The massive increase in nickel costs in 2022 highlights the risk of a further differential.

Nickel price (in USD/ tonnes)[24]	IP	2019	2020	2021	2022*
Nickel LME	12 342	13 907	13 773	18 478	27 968
Index	***100***	***113***	***112***	***150***	***227***

** Up to April 2022*

Annex 7 - Supporting elements on undermining of the remedial effect

(76) Beside that substantial increase in the cost of the main raw material for austenitic SSHR, the cost of virtually all other factors of production have increased since the IP, including ferro-chromium, energy and shipping. Although stainless steel slabs and SSHR are typically shipped in bulk rather than in containers, the increase in shipping costs should also have had a significant upward effect

[21] See the annex: Imports of SSHR in the EU

[22] See the annex: Imports of SSHR in the EU

[23] Commission Implementing Regulation (EU) 2020/508 of 7 April 2020 imposing a provisional anti-dumping duty on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, rec. 343.

[24] Average of monthly prices, see the annex: Supporting elements on undermining of the remedial effect

on the price of SSHR from Turkey because of the addition of the intermediate processing stage in line with the increase in global shipping costs.

5.2.2 Undercutting and underselling of the EU prices

(77) In the absence of reflecting any cost increase over 2020 and 2021, prices of SSHR imported from Turkey remain extremely close to the Indonesian SSHR prices during the IP. The price level of imports of SSHR from Turkey is significantly lower than the prices of Chinese and Taiwanese imports over the original IP, 1820 EUR/ Tonnes and 1943 EUR/ Tonnes respectively,[25] which were found to cause injury to the Union Industry.

(78) At this price level, the imports of SSHR from Turkey significantly undercut the price level of the EU producers during the original IP. Crucially, that 15% undercutting is obviously underestimated because the Union Industry faced significantly increased raw material and energy costs in 2021. This confirms that imports prices are likely to exert a clear and strong depreciating effect on EU prices, undermining the EU AD measures.

Undercutting	
EU selling price (IP)	1 991 EUR/ tonne
SSHR from Turkey (2021)	1 693 EUR/ tonne
EU custom duties	0%
Undercutting margin	***14.96%***

Annex 8 - Undercutting and underselling assessment

(79) Similarly, an assessment of the underselling based on the EU cost of production during the IP and the target profit[26] shows the injurious impact of the price of the imports to the EU. That level does not account for the findings of the Commission with regard to the situation of individual EU producers under Article 7(2c) and 7(2d) of the basic AD Regulation to account for investments forgone and future environmental costs and is therefore conservative. In view of the cost increase for EU producers since the original IP, it is likely that the actual level of underselling of the Turkish prices is even higher and therefore further undermines the remedial effect of the EU measures.

Underselling[27]	
EU Production cost (IP)	1 894 EUR/ tonne
EU target price (IP)*	2 074 EUR/ tonne
SSHR from Turkey (2021)	1 693 EUR/ tonne
EU custom duties	0%
Underselling margin	***22.52%***

** Accounting only for the target profit*

[25] Commission Implementing Regulation (EU) 2020/508 of 7 April 2020 imposing a provisional anti-dumping duty on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, table 6.

[26] Commission Implementing Regulation (EU) 2020/1408 of 6 October 2020 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, rec. 297 and rec. 331.

[27] See the annex: Undercutting and underselling assessment

(80) The very low price of imports of SSHR from Turkey, and its level comparable to that of Indonesian imports during the original IP, therefore clearly show that the circumvention practice in which the Indonesian exporting producer and the Italian major user engage undermine the remedial effect of the AD measures on imports of SSHR from Indonesia. The undermining effect is further amplified by the fact that Turkish SSHR prices variation over 2020 and 2021 are fully disconnected from the general increase in production costs of austenitic stainless steel, further increasing the pressure on the Union Industry.

6. IMPORTS OF SSHR FROM TURKEY ARE DUMPED

(81) As prices of SSHR from Turkey are very similar to those of SSHR from Indonesia during the original investigation, there is no doubt that the actors engaging in the circumvention of the EU measure also engage in dumping at a significant level. This is all the more likely as these import prices do not reflect the increase in production and transportation costs that have occurred since the original investigation period.

(82) Over the course of the original investigation, the Commission found that the Indonesian exporting producer of SSHR actively engaged in dumping on the EU market. For that exporting producer, it calculated a dumping margin of 17.7%.[28] On the basis of that margin, and in view of available information on the export price of Indonesian SSHR during the original IP, it is therefore possible to assess the level of dumping of the imports of SSHR from Turkey through a comparison of the theoretical non-dumped Indonesian import price with the price of imports from Turkey.

Dumping calculation	
Dumping SSHR imports from Indonesia (IP)	
Indonesian CIF export price to the EU	1 645 EUR/ tonne
Indonesian dumping margin	17.7%
Minimum non dumped CIF price	1 936 EUR/ tonne
Dumping SSHR imports from Turkey (2021)	
Turkish CIF export price to the EU	1 693 EUR/ tonne
Amount of dumping	244 EUR/ tonne
Turkish dumping margin	**14.39%**

Annex 9 - Dumping calculation

(83) Comparison of the import price for Turkish SSHR in 2021 with the elements relating to the normal value of the Indonesian exporting producer over the IP, regardless of the likely upward variation of its costs since then, therefore demonstrate the existence of dumping. That dumping margin – almost 15% – is significant and confirms that the circumvention pattern in which the exporting producer and the importer engage cannot be considered as legitimate. The dumping margin is even significantly higher, up to 25.81%, for the imports of austenitic coils relied on by the Italian importer/user.

[28] Commission Implementing Regulation (EU) 2020/1408 of 6 October 2020 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain hot-rolled stainless steel sheets and coils originating in Indonesia, the People's Republic of China and Taiwan, rec. 75.

(84) The level of the dumping margins confirms that the exporting producer and the Union user/ importer are deliberately evading the EU measures to maintain their trading at unfair conditions to the detriment of the Union Industry and of the effective enforcement of EU trade measures.

7. CONCLUSION

(85) As reported in this Application, there is clear and consistent evidence that, in order to avoid duties on Indonesian SSHR, substantial volumes of Indonesian stainless steel slabs are imported to Turkey where they undergo hot-rolling before being exported as Turkish SSHR to the EU, in conditions undermining the remedial effect of the EU measures and at dumped prices. It is also apparent that this change in the pattern of trade is the result of an elaborated practice aiming precisely at exploiting the blind spots of the EU AD measures on imports of SSHR from Indonesia.

(86) The Commission should therefore act decisively to ensure the sturdiness and reliability of the EU measures in the face of that deliberate challenge to the purpose of the EU Trade Defence measure. Should the Commission fail to act against a practice precisely calibrated to evade the AD duties, such circumvention via Turkey or other countries will hollow out the EU AD measures on SSHR, likely with a spill-over effect on the other EU measures on stainless steel.

(87) In view of the above, Eurofer therefore respectfully requests that the Commission:

- Expeditiously initiates an investigation on imports of SSHR originating of Turkey under Article 13 of the basic AD Regulation
- Registers imports of SSHR from Turkey as from the initiation of the investigation, with a view to applying retroactive duties from that date
- Imposes anti-dumping duties at a level of 17.3% on imports of SSHR from Turkey.

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