

PUBLIC RECORD VERSION
'Kroman Celik' RESPONSE to Supplementary Questionnaire

Question:

1. Reference is made to the applicant's submission dated 6 December 2019¹ and the applicant's comments in relation to the price list provided for İÇDAŞ Iron & Steel. It is noted that two price lists were provided with Kroman's response to the exporter questionnaire. These were:

- C-3.1.3 İÇDAŞ Price List; and
- C-3.1.4 Kardemir Price List.

Can you please provide the following information in relation to these price lists:

- a. Details of who İÇDAŞ and Kardemir are, including the function of these companies and the range of products these companies produce, including whether they produce steel reinforcing bar and sell steel reinforcing bar on the Turkish domestic market;

RESPONSE:

Icdas and Kardemir are private steel producers in Turkey. Both companies produce and sell steel rebar in Turkey.

Icdas has been producing construction steel and alloyed steel since 1970, is the second biggest steel producer of Turkey with its production capacity.

<https://www.icdas.com.tr/pages/5752/3725/f/en-US/History.aspx>

Kardemir is the first integrated iron and steel factory of Turkey were laid by on 10th September of 1939. https://www.kardemir.com/about_us

- b. Confirmation whether these companies are related to Kroman and, if so, describe the nature of the relationship(s);

RESPONSE:

Icdas is not related to Kroman. [REDACTED]

[REDACTED] (detail on shareholding)

- c. Confirmation whether Kroman sells products to or buys products from either İÇDAŞ or Kardemir. If so, please provide details of these products;

RESPONSE:

Kroman [REDACTED]

[REDACTED] (details on purchases) (Kroman sold profile which is a non-subject product to Kardemir and Icdas

¹ EPR document number 40

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- d. Confirmation whether these price lists are publically available. If so, please provide copies of these price lists for the public record. If not, please provide a redacted version of these price lists which enables interested parties to understand the contents of these prices lists; and

RESPONSE:

Even though Icdas has a dedicated webpage for its price list, the company stopped publishing prices on their website. See

https://www.icdas.com.tr/pages/5741/4738/f/tr-TR/Guncel_Fiyat_Listesi.aspx

Kardemir's price lists are being published at

https://www.kardemir.com/fiyat_listesi *Kroman's purpose in providing the price lists was to show that length was not a factor in price.*

- e. Only a partial translation has been provided for the Kardemir price list. Please provide a full translation of this price list.

RESPONSE:

Please see Attachment 1e (Confidential information)

2. An excerpt from the Canadian Border Services Agency (CBSA) reinvestigation report was provided (exhibit C-3.1.2 CBSA Ruling Letter) in Kardemir's exporter questionnaire response. This report included the following statement in relation to the determination of normal values:

Almost all domestic sales of rebar in the Appendix 3 domestic sales database were produced and sold to meet the Turkish Standards Institute's TSE 708 IIIA specification. This is a different, but similar rebar specification to the subject goods (CSA G30.18-09). Kroman also had a few domestic sales of rebar to other European and North American standards under the following specifications that are also considered similar to the CSA specification for subject goods: BS 4449/05, ASTM A 615, DIN 488, NS 3576-3:2012, ROCT P 52544-2006. Kroman sold rebar to unrelated domestic customers in various grades depending on the specification. Consistent with past practice and selection of like goods for other exporters in Turkey, the CBSA selected all sales of rebar with a 420 minimum yield strength (N/mm²) and 500 minimum yield strength as like goods. Other yield strengths removed from consideration as like goods.

It is not clear from the report excerpt provided whether this is full description of how CBSA used the sales of 420 and 500 minimum yield strength steel reinforcing bar to determine the normal value. **Please provide the remainder of this section of the CBSA report.**

RESPONSE:

Please see Attachment 2 for the full CBSA Ruling Letter (Confidential information)

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3. Kroman disclosed sales of steel reinforcing bar manufactured to the following standards on the Turkish domestic market during the investigation period for Investigation 495:

- AS-NZS 4671 2001
- ASTM A615
- BS 4449-1997
- BS 4449-2005
- DIN 488
- G30.18-09 (REAFFIRMED 2014)
- TS 708 2016

It is noted that steel reinforcing bar manufactured to standards NS 3576-3:2012 and ROCT P 52544-2006, which are specified in the CBSA report, were not disclosed as being sold on the domestic market during the investigation period for Investigation 495. Can you please advise why steel reinforcing bar manufactured to these standards was not sold on the Turkish domestic market during the investigation period for Investigation 495.

RESPONSE:

The following grades are not used in Turkey. The grades are not sold in the domestic market regularly. The sales which CBSA reports are the goods which are overrun sales of the export orders.

4. Please provide source documents relating to the following domestic sale:

Domestic sales invoices		
Sample no.	Invoice no.	Invoice date
1		

The source documents to be provided include:

- purchase orders and order confirmations;
- commercial invoices;
- packing lists;
- proof of payment for invoice (e.g. bank statements)
- invoices for inland transport (where applicable); and
- relevant mill test certificates.

RESPONSE:

Please see Attachment 4 (Confidential information)