



Subsidy Questionnaire (Government) Case ER0080: Certain Rainbow Trout exported from Türkiye

Period of Investigation (POI):	<input type="text" value="1 January 2025 to 31 December 2025"/>
Injury period:	<input type="text" value="1 January 2022 to 31 December 2025"/>
Deadline for response:	<input type="text" value="22 March 2026"/>
Contact details:	<input type="text" value="ER0080@traderemedies.gov.uk"/>
To be completed on behalf of:	<input type="text" value="Please complete"/>

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

- Confidential
 Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 22 March 2026.



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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

This expiry review is in reference to the Trade Remedies Authority's [Trade remedies notice 2021/12: countervailing duty on certain rainbow trout originating in Türkiye](#) and will consider whether the subsidisation of certain rainbow trout originating in Türkiye causing injury to the UK industry is continuing or likely to recur if the goods were no longer subject to the current countervailing duty.

A subsidy exists if there is:

- a financial contribution by a foreign authority which confers a benefit on the recipient (usually an industry or business manufacturing goods); or
- a form of income or price support.

Not all subsidies are countervailable (meaning they can be offset through trade remedies). A subsidy is countervailable if it is specific to certain companies or industries and granted either directly or indirectly for the manufacture, production, export or transport of goods.

Why should I take part?

We are seeking your cooperation as the government of Türkiye to inform our review of whether the current countervailing duty should be maintained, varied or revoked.

The information your government provides will help us to determine a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section.

Please provide all the information requested by 22 March 2026. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.



Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at ER0080@traderemedies.gov.uk.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. You will need to substantiate all your information with relevant data. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annex and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to Türkiye, please explain why.
- If the answer to a question is "zero", "no" or "none", please write this rather than leaving the answer blank.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.



- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Please refer to the case number, ER0080, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do *not* provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on <https://www.trade-remedies.service.gov.uk/public/case/ER0080/>.



What happens next

Once you have completed your questionnaire responses including the corresponding annex and any additional documents requested, you must upload both confidential and non-confidential versions through our [Trade Remedies Service](#).

Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required; and
- the non-confidential responses will be placed on the public file.



The scope of this review

Goods subject to review

This review covers **certain rainbow trout** exported from **Türkiye**, described as:

Rainbow trout (*Oncorhynchus mykiss*)

- live weighing 1.2kg or less each
- fresh, chilled, frozen or smoked: in the form of whole fish (with heads on), whether or not gilled, whether or not gutted, weighing 1.2kg or less each
- with heads off, whether or not gilled, whether or not gutted, weighing 1kg or less each in the form of fillets weighing 400g or less each

These **certain rainbow trout** are currently classifiable within the following commodity code(s)

- 03 01 91 90 11
- 03 02 11 80 11
- 03 03 14 90 11
- 03 04 42 90 10
- 03 04 82 90 10
- 03 05 43 00 11

These codes are only given for information.

In this questionnaire, these goods will be referred to as **‘the goods subject to review’**. Any reference to the ‘goods’ or ‘goods subject to review’ in this questionnaire refers to the goods description above, regardless of the tariff classification code under which they are exported.



Trade Remedies
Authority

Trade Remedies Authority
 Confidential Non-confidential



SECTION A: General information

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Government dept./ body/ organisation:	The Ministry of Trade of The Republic of Türkiye	
Name (point of contact):		
Position:	Head of Department – Trade Expert	
Address:	The Ministry of Trade – The Republic of Türkiye Söğütözü Mah. 2176. Sk. No:63 06530 Çankaya / ANKARA	
Telephone No:	+90 312 204 75 00	
Email:		
Website:	https://www.trade.gov.tr/	

A2 About the sector

1. Please provide a description of the sector producing certain rainbow trout and the relevant upstream industries, including the main inputs industries. Please detail any changes over the past 5 years such as entry to or exit from the sectors and mergers or acquisitions.

As of 2024, there are 1742 rainbow trout farming facilities in Türkiye that have produced 169,473 tons of products. The data for 2025 has not been verified yet. (2025 data have not been officially verified yet)

The breakdown of these facilities classified according to the size of businesses is given as follows: 55.28% of the businesses are small family farms with a capacity of 0-50 tons/year, 20.37% are medium-sized businesses with a capacity of 51-249 tons/year, and 24.35% are businesses with a production capacity of 250 tons/year and above.

Appendix reference:

2. Please describe the main distribution channels in the certain rainbow trout sector and the degree of any upstream or downstream vertical integration.

Trout which is produced in Türkiye are either supplied to the domestic market or exported by Turkish companies.

Appendix reference:



3. Please describe any forms of government involvement with either domestic producers of certain rainbow trout or upstream main inputs suppliers.

There is no government involvement with either domestic producers of rainbow trout or upstream raw materials supplier in terms of direct or indirect ownership of companies.

Appendix reference:

4. Please specify any changes to laws or government regulations that have affected the sector for certain rainbow trout since 01 January 2025.

There are no changes to laws or government regulations that have affected the sector for rainbow trout during the POI. However, there has been a change which was put into force in 2025 regarding the rate for direct subsidies. Please see relevant section for the details of the change.

Appendix reference:

5. Please describe the ownership structure of your domestic industry that produces certain rainbow trout. In your response, indicate what share of the industry is represented by state-invested enterprises (SIEs), state-owned enterprises (SOEs), foreign-invested enterprises (FIEs) and domestically-owned private enterprises.

Neither the Government of Türkiye nor any public or private entity under the control of government, holds direct or indirect ownership interest in any of rainbow trout producers.

Appendix reference:

6. Please complete **Annex 1, A2 – Domestic manufacturers & traders** listing all domestic manufacturers and traders of the goods subject to review operating in 1 January 2025 to 31 December 2025. Where the government is represented in the company or is a shareholder in it, please:
- provide a description and diagram of the organisational structure covering all subsidiaries and associated companies; and
 - attach copies of the last two annual reports.

*Please refer to the **Exhibit 3** for the list. There is no company of which government is represented or is a shareholder in it.*

Appendix reference:

7. Please complete **Annex 1, A2 – Domestic upstream suppliers** listing all domestic upstream suppliers of main inputs related to the production of the good



subject to review from 1 January 2025 to 31 December 2025. Where the government is represented in the company or is a shareholder in it, please:

- provide a description and diagram of the organisational structure covering all subsidiaries and associated companies; and
- attach copies of the last two annual reports.

Please refer to the **Exhibit 3** for the list. There is no company of which government is represented or is a shareholder in it.

Appendix reference:

8. Please use the table below to provide details of any industry associations that represent producers of certain rainbow trout (both national and regional).

Central Union of Aquaculture (SUYMERBİR) and producer associations under SUYMERBİR are as follows:

Name of industry association	Level of representation (e.g. national)	Address	Website	Contact details (email/telephone no.)
Su Ürünleri Yetiştiricileri Üretici Merkez Birliği – Central Union of Aquaculture (SUYMERBİR)	National	Mustafa Kemal Mah. 2127. Sok. Manolya Apt. No: 34/5 Çankaya / ANKARA	http://suymerbir.org.tr	info@suymerbir.org.tr Phone: 0312 417 8051 Fax: 0312 417 8052
MUĞLA ALABALIK YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Cumhuriyet Mahallesi, İnönü Caddesi, Hanımağa Apt. No:18/2 Seydikemer / MUĞLA		muglaalabalik@hotmail.com Phone 554 6488748
ANTALYA İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	TOKLU Balık Çiftliği Ünsal Mahallesi, 5160 Sokak, No: 77/A, Kepez/ANTALYA		
ÇAMELİ ALABALIK	Regional	Elmalı Mahallesi, No:302, 20980 Çameli / DENİZLİ		



YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ				
ISPARTA İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Gazi Kemal Mahallesi, 120 Dalboyunoğlu Caddesi, No: 2, Daire: 2 Merkez / ISPARTA		
BURDUR İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Hakan Su Ürünleri Konak Mahallesi, Yeni Balık Hali, No: 1, PK: 49 BURDUR		
RİZE İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Çağlayan Market Fındıklı RİZE		
TRABZON İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Su Ürünleri Merkez Araştırma Enstitüsü Müdürlüğü Vali Adil Yazar Cad, No:14 Kaşüstü, Yomra, 61250, TRABZON		
BODRUM VE MİLAS SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Atatürk Mahallesi, 270 Sokak, No: 5/1 Güllük, Milas / MUĞLA		info@milsu.com 533 6909433
BATMAN İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Yeşiltepe Mahallesi, 2315 Sokak, No: 67, Merkez / BATMAN		
ELAZIĞ İLİ VE İLÇELERİ İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Kallar Mahallesi, Aşağı Çarşı İçi, No: 76 Keban / ELAZIĞ		
MİLAS İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Baharlı Sanayi Sitesi, 4. Cadde, No: 64 Milas MUĞLA		
KÜTAHYA İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	MERSU Su Ürünleri Yem San. ve Tic. AŞ. Karasu Mevkii PK: 4 Bozüyük / BİLECİK		info@mersu.com.tr 532 7759453
MALATYA ALABALIK YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Eski Kışla Caddesi İstanbuluolu İş Hanı Kat 3 No: 81 Merkez / MALATYA		



KAYSERİ İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Organize Sanayi Bölgesi 8. Cad. No: 27 Merkez / KAYSERİ		
KAHRAMANMARAŞ İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Suçatı Mah. Fırnız Sokak, No: 70/A On İki Şubat / KAHRAMANMAR AŞ		
VAN İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Vali Mithat Bey Mah, Hastane Cad, Nedim Odabaş İş Merkezi B Blok, Kat: 2 No:34 İpek Yolu /VAN		
SİNOP-SAMSUN SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Küplüağzı Köyü Yakakent / SAMSUN		
AYDIN İLİ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Noordzee Su Ürünleri Güllük Mahallesi Milas-Güllük Karayolu Üzeri No:12 Güllük / Milas / MUĞLA		
SAKARYA, BOLU VE DÜZCE İLLERİ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Kadifekale Mahallesi No:1 Dereçi Mevkii Hendek/SAKARYA		
ARTVIN İLİ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Çarşı Mahallesi Cumhuriyet Caddesi No:32/1 ARTVİN		
SIVAS İÇ SU ÜRÜNLERİ YETİŞTİRİCİLERİ ÜRETİCİ BİRLİĞİ	Regional	Çınarcık Mahallesi Atatürk Bulvarı 281/3 Gürün/SIVAS		

A3 Imports and exports

1. Please complete **Annex 1, A3 – Imports and exports** with quarterly data on import and export volumes and values of certain rainbow trout, for the past 5 calendar years. Please specify in the annex whether values are based on ex-works, CIF, FOB, etc.

ANSWER:

*Please refer to the **Exhibit 3** for the data.*



2. Please complete **Annex 1, A3 – Upstream imports and exports** with quarterly data for the past 5 calendar years on import and export volumes for upstream inputs:

Please specify in the annex whether values are based on ex-works, CIF, FOB, etc.

ANSWER:

*Please refer to the **Exhibit 3** for the data.*

Please bear in mind that trade values for the main inputs are not specific for rainbow trout farming and applies to all products within the aquaculture spectrum.



SECTION B: Government involvement in the sector producing Certain rainbow trout

B1 Roles and responsibilities of government

Please identify and describe the specific roles of all levels of central and regional government and/or any public bodies that are involved in the activities below. Such roles could relate to administration, government policies, regulations or decisions affecting the relevant sectors, both direct and indirect. Please provide contact details for the officials responsible for the roles you identify, including mailing address, email address and telephone number.

1. Involvement in policy, economic regulation and decision-making activities related to the production of certain rainbow trout and <main inputs.

There is no government involvement in policy, economic regulation and decision-making activities related to the production of rainbow trout and main inputs/raw materials.

Appendix reference:

2. Involvement in the manufacture, sale, purchase or acquisition of certain rainbow trout and the main input used in their production.

There is no government involvement in the manufacture, sale, purchase or acquisition of rainbow trout and the main inputs/raw materials used in their production.

Appendix reference:

3. The general supervision of the sector for certain rainbow trout, with reference to the management and administration of any SIEs or SOEs that operate within it.

There is no SIE or SOE which supervises the sector of rainbow trout.

Appendix reference:

4. Any requirements affecting market entry for production of certain rainbow trout and main input, including any environmental regulations affecting either sector.

All producers which are planning to establish a facility for production of aquacultural products, are obliged to apply to the Ministry of Agriculture and Forestry (MAF) to obtain an aquaculture certificate. This application should include project details of the facility, all environmental and feasibility reports of the applicant.

Appendix reference:



5. The integration of producers of certain rainbow trout and main input.

There is no government involvement in the integration of producers of rainbow trout and main inputs/raw materials.

Appendix reference:

6. The provision of industrial policy and guidance related to the certain rainbow trout and/or the main input sectors.

There is no industrial policy and guidance related to the rainbow trout and/or the main inputs/raw materials sectors.

Appendix reference:

7. Any regulation of land-use affecting production of certain rainbow trout and/or main input.

There is no regulation of land-use affecting production of rainbow trout and/or main inputs/raw materials.

Appendix reference:

8. Any banking or financial regulations relating to production of certain rainbow trout and/or main upstream input.

There is no banking or financial regulation relating to production of rainbow trout and/or main inputs/raw materials.

Appendix reference:

9. The inspection and investigation of facilities that produce certain rainbow trout , e.g. health and safety compliance, environmental standards and quality assurance.

Trout producer facilities are subject to investigations by the MAF for the health and safety compliance, environmental standards and quality assurance.

Appendix reference:

10. The issuing of import licenses and certificates for main inputs used in the production of certain rainbow trout.

The MAF issues sanitary certificate for the importation of fish eggs according to their compliance with the health standards.

Appendix reference:



11. The implementation of export controls, including the issuing of export licensing relating to certain rainbow trout and the main upstream input.

There is no implementation of export controls, including the issuing of export licensing relating to rainbow trout and the main inputs/raw materials.

Appendix reference:

12. The imposition and supervision of taxation, including export taxes, export tax rebates and value added tax (including any rebates) in relation to certain rainbow trout and main upstream input.

There is no implementation and supervision of taxation, including export taxes, export tax rebates and value added tax (including any rebates) in relation to rainbow trout and main inputs/raw materials.

Appendix reference:

B2 Laws and regulations

1. Please list and provide a copy of any laws, regulations, directives or guidelines specific to the regulation of the price of certain rainbow trout and the main input used to produce them. In your answer, please specify the relevant government authorities responsible for each law or regulation.

There are no laws, regulations, directives or guidelines specific to the regulation of the price of rainbow trout and the main inputs/raw materials used to produce them.

Appendix reference:

2. Please list and provide a copy of any laws, regulations, directives or guidelines specific to investment in projects related to certain rainbow trout and main input used in their production. In your answer, please specify the relevant government authorities responsible for each law or regulation.

There are no laws, regulations, directives or guidelines specific to investment in projects related to rainbow trout and main inputs/raw materials used in their production.

Appendix reference:

B3 Taxes and tariffs



1. Please provide a schedule for the last 5 calendar years showing the corporate tax rates applicable to producers of both certain rainbow trout and main inputs. Please explain any differences in taxation rates between and whether these differences are due to government policies.

Corporate tax rates do not differ between sectors. The corporate tax rate was 25% in 2021, 23% in 2022, and 25% in 2023-2025.

Appendix reference:

2. In relation to the question above, please indicate and provide details of any industry-specific tax exemptions or tax rebates.

There is no industry-specific tax exemption or tax rebate.

Appendix reference:

3. Please detail the tariff rates and/or quotas applying to imports and exports of certain rainbow trout and/or main inputs during the past 5 calendar years.

*There is no quotas applying to imports and exports of rainbow trout and/or main inputs/raw materials during the past 5 calendar years. Please see **Exhibit 1** for the tariff rates applied to imports of rainbow trout.*

Appendix reference:

4. Please provide a schedule for value added tax (VAT) or equivalent export rebates applicable to exports of certain rainbow trout and/or main inputs for the last 5 calendar years.

All exports are exempted from VAT. There are no export rebates applicable to exports of rainbow trout and/or main inputs/raw materials.

Appendix reference:

5. If any export quotas have applied to certain rainbow trout and/or main inputs during the last 5 calendar years, please specify the relevant government authorities responsible for setting and monitoring the quotas

There is no export quotas have applied to rainbow trout and/or main inputs/raw materials during the last 5 calendar years.

Appendix reference:

B4 Financial assistance

1. Please provide details of any financial assistance provided, in the last 5 calendar years, by the government of Türkiye for production of certain rainbow trout or main inputs.



YEARS	<i>Portion-sized</i>	
	<i>Amount Supported (Kg)</i>	<i>Direct Support Amount (₹)</i>
<i>2021</i>	<i>43,521,282</i>	<i>31,829,607</i>
<i>2022</i>	<i>35,688,797</i>	<i>37,096,501</i>
<i>2023</i>	<i>44,400,846</i>	<i>53,114,454</i>
<i>2024</i>	<i>60,289,849</i>	<i>74,383,896</i>
<i>2025</i>	<i>57,004,494</i>	<i>92,369,049</i>

The amount and value of support given to rainbow trout, the subject of this review, over the last 5 calendar years are given below.

Appendix reference:



2. Please provide details of any government involvement in the issuance of debt and/or equity instruments to any company involved in the production of certain rainbow trout and/or the main inputs industry in the last 5 calendar years. In each case, please provide:
- name and address of each relevant company;
 - reasoning for the form of financial instrument(s) used;
 - the number and value of shares or bonds;
 - the period of investments; and
 - the rate of return(s) and/or expected yields.

There is no government involvement in the issuance of debt and/or equity instruments to any company involved in the production of rainbow trout and/or the main inputs/raw materials industry.

Appendix reference:

3. If any of the instruments identified in the question above are listed in any securities exchange in Türkiye or abroad, please identify:
- the name of the securities exchange; and
 - any known trading restrictions by the company and/or the securities exchange.

N/A

Appendix reference:

4. Please indicate and specify the value of any government of Türkiye guarantee(s) for any commercial loans provided to any companies involved in producing certain rainbow trout or main inputs in the last 5 calendar years.

There is no GoT's guarantee(s) for any commercial loans provided to any companies involved in producing rainbow trout or main inputs/raw materials.

Appendix reference:

B5 Market access and government policy initiatives

1. Please provide details on whether any producers of certain rainbow trout or main inputs operating in your country have required any types of licenses for production, or government verification for entering the market in the last 5 calendar years? If so, please substantiate your answer with evidence.

All producers which are planning to establish a facility for production of aquacultural products, are obliged to apply to the MAF to obtain an aquaculture certificate. This application should include project details of the facility, all environmental and feasibility reports of the applicant.



Appendix reference:

2. Please indicate and explain any restrictions (such as limits or quotas) placed on the production and/or export of certain rainbow trout in Türkiye in the last 5 calendar years. Please substantiate your answer with evidence.

There are no restrictions (such as limits or quotas) placed on the production and/or export of rainbow trout in Türkiye.

Appendix reference:

3. Please identify and provide details of any government policies and/or initiatives that directly or indirectly affect the certain rainbow trout sector or the aquaculture industry.

There are no specific policies and/or initiatives that directly or indirectly affect the rainbow trout sector or the aquaculture industry. The MAF is responsible to regulate the standards regarding environment, quality and food safety by inspecting all aquaculture industry.

Appendix reference:

4. Please identify and explain any government of Türkiye's economic, industrial and social, strategies or plans, in effect since 1 January 2025, that directly or indirectly affect producers of certain rainbow trout or main inputs. Please substantiate your answer with evidence.

There are no economic, industrial, social strategies, plans or frameworks of the GOT, in effect since the start of POI.

Appendix reference:



SECTION C: Subsidies

C1 Subsidy programmes

The table below contains a list of the programmes that are being considered by this expiry review. Please note that programme titles listed are to the best of the TRA's knowledge and may differ from official programme titles used by government of Türkiye.

Please provide the information requested for each of the programmes identified in the table below and for any additional programmes government of Türkiye has identified. To be relevant to this review, programmes should have conferred a benefit for producers of certain rainbow trout during the POI.

Table 1 - Subsidy programmes

No.	Subsidy name	Subsidy type
1	Direct subsidies to producers of trout (Decree No. 2019/1691)	Grant
2	Direct subsidies to organic producers of trout	Grant
3	Specific support for juveniles' scheme	Grant
4	Subsidised discarding fishing vessels scheme (Article 4 paragraph (9) of the Decree No. 2012/36)	Grant
5	Subsidised insurance scheme	Grant
6	Subsidised consultancy scheme	Grant
7	Subsidised loans scheme	Loan
8	Subsidised fuel scheme (General Communiqué on Special Consumption Tax Serial No.6 of 31 December 2003)	Tax exemption
9	Investment incentive certificate: • Tax related incentives scheme	Tax exemption
10	Investment incentive certificate: • Social Security Premium Support (SSP) programme	Grant
11	Investment incentive certificate: • Interest support for interest rates paid credit	Loan guarantee
12	Investment incentive certificate: • Land allocation scheme	Provision of goods and services

+ Add additional rows as required

1. Please use the text box below to record any programmes in **Table 1 – Subsidy programmes** that government of Türkiye is unfamiliar with. If government of



Türkiye is aware of the programme that it seems to relate to, or one that is similar, please provide its official name and its subsidy type below. In addition, please include any such programmes in the table above and answer the questions that follow with reference to these programme(s).

Investment incentive program (IEP) consists of 4 separate incentive schemes: “Regional Investment Incentive Scheme” (RIIS), “Large Scale Investment Incentive Scheme” (LSIIS), “Strategic Investment Incentive Scheme” (SIIS) and “General Investment Incentive Scheme” (GIIS). The scope of each incentive scheme under the Decree No. 2012/3305 varies with different aspects of support measures.

The remaining names and the types of the programs provided in Table 1 are correct.

Appendix reference:

2. Please indicate in the text box below if government of Türkiye is aware of any other programmes that constitute a subsidy and are not addressed in **Table 1** or in the question above. This includes any market development assistance programmes or domestic support programmes that are related to the production of certain rainbow trout and conferred a benefit during 1 January 2025 to 31 December 2025.

Please add any such programmes to **Table 1**, clearly indicating the subsidy type and name of the programme.

GOT is not aware of any programmes that are related to production of trout that conferred a benefit responded companies during the POI.

Appendix reference:

C2 General information on programmes

1. Please answer each of the following questions for **all** programmes listed in **Table 1**, including any additional programmes that have been identified in the previous section.

Please use the programme numbers listed in the table when referencing programmes and provide evidence to support responses.

For **each** programme, please provide full details of the following:



- the policy objective and/or purpose of the programme;
- the nature or form of the subsidy;
- the nature of benefits or concessions granted;
- when the programme was established;
- the duration of the programme; and
- the laws and regulations under which the subsidy is granted (including English translations);
- how the programme operates; and
- which government of Türkiye authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)

For all programmes that are no longer operational, please state the date from which a company could no longer apply for, or claim benefits through, them. Please substantiate all your answers with evidence.

Program No.1: Direct subsidies to producers of trout

- the policy objective and/or purpose of the programme;

ANSWER:

The purpose of the program is to encourage the increase in efficiency, diversity and quality of production, to ensure sufficient food supply, to increase the hygiene and technical infrastructure of the production facilities.

- the nature or form of the subsidy;

ANSWER:

The nature of this program is grant.

- the nature of benefits or concessions granted;

ANSWER:

A company each year can apply to direct support for its annual production amount pertaining to that year. For 2025, the basic support amount was 1,50 TL/kg for production up to 350 tons/year. No support is granted for trout production exceeding 350 tons/year.

On the other hand, multiple enterprises in the same area owned by the same persons



are treated as a single enterprise for support, therefore, the amount of support provided has decreased drastically because the amount that multiple enterprises can now benefit is limited to the amount that a single company can benefit.

Aquaculture Type	Base Support (TL/kg)	Project Capacity ≤50 tons/year (TL/kg)	Union Membership (TL/kg)	Primary Agricultural Organization Membership (TL/kg)	Closed Circuit Production (TL/kg)
Trout, Carp (kg) Up to 350,000 kg/year (inclusive)	1,50	2,00	0,10	0,05	5,00
New Species (kg) Up to 350,000 kg/year (inclusive)	3,75	2,50	0,25	0,05	6,00
Mussels (kg) Up to 350,000 kg/year (inclusive)	1,50	-	0,10	0,05	-
Earthen Ponds (kg) Up to 30,000 kg/year (inclusive)	2,00	2,00	0,15	0,05	-

Notes:

a) Enterprises meeting base support conditions and additional technical criteria (capacity ≤50 tons/year, union membership, primary agricultural organization membership, closed circuit production) receive additional payments.



c) Maximum annual support: 30,000 kg for earthen ponds; 350,000 kg for others.

- when the programme was established;

ANSWER:

The program is established within the context of the Presidential Decree No. 8760 dated 25/7/2024 regarding Livestock Support to be Provided in the Years 2024-2026. The current support scheme is being implemented on the basis of the rates shown in the Presidential Decree No: 10395 that has been published on the Official Journal dated 9/14/2025 amending the Presidential Decree No. 8760.

- the duration of the programme; and

ANSWER:

The applicable period is set to be between 2024 and 2026.

- the laws and regulations under which the subsidy is granted (including English translations);

ANSWER:

The program is established within the context of the Presidential Decree No. 8760 dated 25/7/2024 regarding Livestock Support to be Provided in the Years 2024-2026. The current support scheme is being implemented on the basis of the rates shown in the Presidential Decree No: 10395 that has been published on the Official Journal dated 9/14/2025 amending the Presidential Decree No. 8760. Please see **Exhibit 2**.

- how the programme operates; and

ANSWER:

A company applies to the MAF every year to obtain a support for its production in that year. MAF evaluates the application which includes all details of the trout production of the company. Following the approval of the documents submitted and the completion of the required monitoring, inspections and controls in the plants; the support payment summaries/inventories are prepared by the provincial/district directorates of the MAF.



- which GoT authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)

ANSWER:

MAF is responsible for administering the program. The data on products and payment amounts are recorded in the aquaculture registration system of which MAF keeps the records of registered farmers, such as their contact information, sales, production, etc.

Appendix reference:

2. Please provide details of future changes expected to the programmes listed in **Table 1**.

There is no anticipated changes in programme other than updating the support per unit values.

Appendix reference:

C3 Programme eligibility

Please answer each of the following questions for **all** programmes listed in **Table 1** above. Your responses should include information on any additional programmes that have been identified and added to the table in the process of completing this questionnaire.

In the questions that follow, please use the programme numbers listed in **Table 1** to refer to programmes and substantiate responses with evidence.

1. For each programme, please explain the application process, including details of any application fees charged by the relevant government authority.

Please see our response to question named "how the programme operates" under section C2.

Appendix reference:

2. For each programme, please describe the decision-making process used by the relevant government authority to approve or reject an application. Please clearly indicate any differences in the process across different types of subsidies or programmes.

Production is monitored through inspections carried out by provincial directorates at livestock farms. The activity is being monitored. Documents submitted by producers are examined by the provincial directorates, and applications deemed appropriate are evaluated.

Appendix reference:



3. Please answer the following questions regarding eligibility for receiving benefits provided under each programme:
 - a. Please specify whether eligibility for the programme is at all conditional on a company's export performance. If so, please provide details of the criteria that apply.

No. Eligibility is not conditional on a company's export performance.

Appendix reference:

- b. Please specify whether eligibility for the programme is at all conditional on a company's use of domestic goods over imported goods, and if so please provide details.

No. Eligibility is not conditional on a company's use of domestic goods over imported goods.

Appendix reference:

- c. Please specify whether eligibility for the programme is at all conditional upon, or limited to, the location of companies or industries within specific regions. If so, please specify the companies or industries and the designated regions.

No. Eligibility is not conditional on the location of companies or industries within specific regions.

Appendix reference:

- d. Please specify whether eligibility for the programme is limited to any individual or groups of companies and/or industries. If so, please detail the relevant companies and/or industries and the laws that govern this criterion.

No. Eligibility is not limited to any individual or groups of companies and/or industries.

Appendix reference:

C4 Subsidies received under the programmes

1. Please complete **Annex C4 – Programme beneficiaries** identifying **all** companies that accrued or received a subsidy (or subsidies) under the programmes during 01 January 2025 to 31 December 2025. This may include benefits from programmes that were in place well before the POI. Please add additional rows as required.



Please ensure the columns under 'Programme information' are populated using the exact information in **Table 1**, ensuring any programme(s) detailed in Section C1 are included.

ANSWER:

*Annex C-4 is completed and presented as **Exhibit 3**.*

- 2. Please identify and provide copies of any contractual agreements between the government of Türkiye and any companies that receive benefits under the programme (e.g. loan contracts, grant contracts, etc.).

N/A

Appendix reference:

- 3. For **each** programme beneficiary listed in **Annex C4 – Programme beneficiaries**, please answer the following questions:

- a. Please explain the subsidy (or subsidies) provided to the beneficiary. Include an explanation of whether the subsidy was one-off or recurring, including the years it recurred and whether the subsidy varied between years. Please also explain how the amount stated in **Annex C4** has been estimated, including the methodology and assumptions used (if relevant).

Please see our response to question named "the nature of benefits or concessions granted" under section C2.

Appendix reference:

- b. Please indicate what functions the company performs and specify whether the nature of any such functions could be recognised as being equivalent to those of a Foreign Authority.

N/A

Appendix reference:

- c. Please state whether any of the company's functions are undertaken on behalf of government of Türkiye and specify whether the company is required to support government of Türkiye policies.

N/A

Appendix reference:



- d. If the company has been trusted, vested or tasked with any responsibility normally associated with a Foreign Authority please specify the nature and function of this responsibility and provide copies of the relevant legal instruments or regulations.

N/A

Appendix reference:

- e. Please indicate whether the company has the authority to entrust or direct a private body to undertake responsibilities or functions on behalf of the Foreign Authority.

No.

Appendix reference:

- 4. For **each** SIE and SOE identified in **Annex C4**, if any, please answer the following questions:

- a. Please indicate any payments and/or injections of funds provided by government of Türkiye to the SIE/SOE (e.g. grants, awards, purchase of shares, injection of capital funds etc.). Please detail the date, amount and the reason(s) for the provision.

There is no SIE or SOE identified under Annex C4.

Appendix reference:

- b. Please identify and provide details on whether the SIE/SOE has any financial liabilities with any financial institutions in which government of Türkiye holds an interest.

N/A

Appendix reference:

- c. Please detail how each SIE/SOE funds its operations.

N/A

Appendix reference:

- d. Please explain how and to whom the SIE/SOE distributes its profits.

N/A

Appendix reference:



- e. Please explain how the performance of the SIE/SOE is measured, specifying which authority in government of Türkiye inspects or reviews its performance (e.g. output and quality performance, employee performance, financial performance etc.) Include an explanation of what action, if any, is taken by such authorities if its performance targets are not met.

N/A

Appendix reference:

- f. Please provide details of any official government of Türkiye reporting methods and/or procedures that the SIE/SOE must comply with.

N/A

Appendix reference:

Program No.2: Direct subsidies to organic producers of trout

ANSWER:

As the European Commission already concluded, this program is not operational since 2015. The last year for a company to receive benefits from this program was 2016. Therefore, questions are not responded¹.

Program No.3: Specific support for juveniles scheme

ANSWER:

As the European Commission already concluded, this program is not operational since 2013. The last year for a company to receive benefits from this program was 2014. Therefore, questions are not responded².

Program No.4: Subsidised discarding fishing vessels scheme (Article 4 paragraph (9) of the Decree No. 2012/36)

¹ Recital 24 of the COMMISSION IMPLEMENTING REGULATION (EU) 2018/823 of 4 June 2018 terminating the partial interim review of the countervailing measures applicable to imports of certain rainbow trout originating in the Republic of Turkey

² Recital 60 of the COMMISSION IMPLEMENTING REGULATION (EU) No 1195/2014 of 29 October 2014 imposing a provisional countervailing duty on imports of certain rainbow trout originating in Turkey



ANSWER:

Fishery products are mainly classified under four categories: Sea Fish, Other Sea Products, Aquaculture Production and Freshwater Products. Rainbow Trout, whether produced in inland waters or marine waters, is falling under the category of “Aquaculture Production” and hence, is not subject to fishing/hunting activities. Accordingly, trout production is not relevant with the use of fishing boats/vessels and therefore, fishing boats/vessels under the scope of this program. Therefore, questions are not responded.

TRA reviewed Program No. 4 and 8 during the transition review and found that these programs are not relevant to this review. Therefore, we request the TRA to remove these programs from this review as well.

Program No.5: Subsidised insurance scheme

C2 General information on programmes

3. Please answer each of the following questions for **all** programmes listed in **Table 1**, including any additional programmes that have been identified in the previous section.

Please use the programme numbers listed in the table when referencing programmes and provide evidence to support responses.

For **each** programme, please provide full details of the following:

- the policy objective and/or purpose of the programme;
- the nature or form of the subsidy;
- the nature of benefits or concessions granted;
- when the programme was established;
- the duration of the programme; and
- the laws and regulations under which the subsidy is granted (including English translations);
- how the programme operates; and
- which government of Türkiye authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)



- the policy objective and/or purpose of the programme;

ANSWER:

Following a risk analysis and an assessment process, aquaculture products grown in seas and inland waters are covered by the Agriculture Insurance Pool (TARSİM) considering the general and technical conditions accepted for aquaculture products. In this manner, deaths arising from diseases, pollution and poisoning beyond the farmer's control, all natural hazards, accidents, predators and algal bloom are covered. The policy holder/insured shall present relevant documents to insurer and to the TARSİM³.

- the nature or form of the subsidy;

ANSWER:

A premium is calculated for the policy holder/insurer. The amount of premium support provided by the Government and the insurance premium to be paid by the policy holder/insured are separately indicated in the policy. Hence, the policy holder/insured only pays the insurance premium excluding premium support provided by the Government within the context of Article 13 of the Law 5363.

- the nature of benefits or concessions granted;

ANSWER:

A premium is calculated for the policy holder/insurer. The amount of premium support provided by the Government and the insurance premium to be paid by the policy holder/insured are separately indicated in the policy. Hence, the policy holder/insured only pays the insurance premium excluding premium support provided by the Government within the context of Article 13 of the Law 5363.

- when the programme was established;

³ Recital 90 of the COMMISSION IMPLEMENTING REGULATION (EU) No 1195/2014 of 29 October 2014 imposing a provisional countervailing duty on imports of certain rainbow trout originating in Turkey



ANSWER:

This program has been administered since 2007.

- the duration of the programme; and

ANSWER:

There is not any specific determined duration for this program.

- the laws and regulations under which the subsidy is granted (including English translations);

ANSWER:

Please see **Exhibit 4** for the Agricultural Insurance Law No. 5363 and Decree No. 9308 regarding Risks, Products and Regions which will be included to the Scope by Agricultural Insurance Pool in 2025 and Premium Support Rates.

- how the programme operates; and

ANSWER:

A premium is calculated for the policy holder/insurer. The amount of premium support provided by the Government and the insurance premium to be paid by the policy holder/insured are separately indicated in the policy. Hence, the policy holder/insured only pays the insurance premium excluding premium support provided by the Government within the context of Article 13 of the Law 5363.

- which GoT authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)

ANSWER:

TARSİM keeps the details of the insurance of the companies.



For all programmes that are no longer operational, please state the date from which a company could no longer apply for, or claim benefits through, them. Please substantiate all your answers with evidence.

Please see the programme specific information that has been provided.

Appendix reference:

4. Please provide details of future changes expected to the programmes listed in **Table 1**.

Please see the programme specific information that has been provided.

Appendix reference:

C3 Programme eligibility

Please answer each of the following questions for **all** programmes listed in **Table 1** above. Your responses should include information on any additional programmes that have been identified and added to the table in the process of completing this questionnaire.

In the questions that follow, please use the programme numbers listed in **Table 1** to refer to programmes and substantiate responses with evidence.

4. For each programme, please explain the application process, including details of any application fees charged by the relevant government authority.

Please see our response to question named “how the programme operates” under section C2.

Appendix reference:

5. For each programme, please describe the decision-making process used by the relevant government authority to approve or reject an application. Please clearly indicate any differences in the process across different types of subsidies or programmes.

Please see our response to question named “how the programme operates” under section C2.

Appendix reference:



6. Please answer the following questions regarding eligibility for receiving benefits provided under each programme:

e. Please specify whether eligibility for the programme is at all conditional on a company's export performance. If so, please provide details of the criteria that apply.

No. Eligibility is not conditional on a company's export performance.

Appendix reference:

f. Please specify whether eligibility for the programme is at all conditional on a company's use of domestic goods over imported goods, and if so please provide details.

No. Eligibility is not conditional on a company's use of domestic goods over imported goods.

Appendix reference:

g. Please specify whether eligibility for the programme is at all conditional upon, or limited to, the location of companies or industries within specific regions. If so, please specify the companies or industries and the designated regions.

No. Eligibility is not conditional on the location of companies or industries within specific regions.

Appendix reference:

h. Please specify whether eligibility for the programme is limited to any individual or groups of companies and/or industries. If so, please detail the relevant companies and/or industries and the laws that govern this criterion.

No. Eligibility is not limited to any individual or groups of companies and/or industries.

Appendix reference:

C4 Subsidies received under the programmes

5. Please complete **Annex C4 – Programme beneficiaries** identifying **all** companies that accrued or received a subsidy (or subsidies) under the programmes during 01 January 2025 to 31 December 2025. This may include



benefits from programmes that were in place well before the POI. Please add additional rows as required.

Please ensure the columns under ‘Programme information’ are populated using the exact information in **Table 1**, ensuring any programme(s) detailed in Section C1 are included.

ANSWER:

*Please see **Exhibit 5** for program beneficiaries.*

- 6. Please identify and provide copies of any contractual agreements between the government of Türkiye and any companies that receive benefits under the programme (e.g. loan contracts, grant contracts, etc.).

N/A

Appendix reference:

- 7. For **each** programme beneficiary listed in **Annex C4 – Programme beneficiaries**, please answer the following questions:

- f. Please explain the subsidy (or subsidies) provided to the beneficiary. Include an explanation of whether the subsidy was one-off or recurring, including the years it recurred and whether the subsidy varied between years. Please also explain how the amount stated in **Annex C4** has been estimated, including the methodology and assumptions used (if relevant).

Please see our response to question named “the nature of benefits or concessions granted” under section C2.

Appendix reference:

- g. Please indicate what functions the company performs and specify whether the nature of any such functions could be recognised as being equivalent to those of a Foreign Authority.

N/A

Appendix reference:

- h. Please state whether any of the company’s functions are undertaken on behalf of government of Türkiye and specify whether the company is required to support government of Türkiye policies.



No.

Appendix reference:

- i. If the company has been trusted, vested or tasked with any responsibility normally associated with a Foreign Authority please specify the nature and function of this responsibility and provide copies of the relevant legal instruments or regulations.

N/A

Appendix reference:

- j. Please indicate whether the company has the authority to entrust or direct a private body to undertake responsibilities or functions on behalf of the Foreign Authority.

No.

Appendix reference:

- 8. For **each** SIE and SOE identified in **Annex C4**, if any, please answer the following questions:

- g. Please indicate any payments and/or injections of funds provided by government of Türkiye to the SIE/SOE (e.g. grants, awards, purchase of shares, injection of capital funds etc.). Please detail the date, amount and the reason(s) for the provision.

N/A

Appendix reference:

- h. Please identify and provide details on whether the SIE/SOE has any financial liabilities with any financial institutions in which government of Türkiye holds an interest.

N/A

Appendix reference:

- i. Please detail how each SIE/SOE funds its operations.

N/A

Appendix reference:



j. Please explain how and to whom the SIE/SOE distributes its profits.

N/A

Appendix reference:



- k. Please explain how the performance of the SIE/SOE is measured, specifying which authority in government of Türkiye inspects or reviews its performance (e.g. output and quality performance, employee performance, financial performance etc.) Include an explanation of what action, if any, is taken by such authorities if its performance targets are not met.

N/A

Appendix reference:

- l. Please provide details of any official government of Türkiye reporting methods and/or procedures that the SIE/SOE must comply with.

N/A

Appendix reference:

Program No.6: Subsidised consultancy scheme

ANSWER:

The objective of this program is supporting individuals and institutions, which provide agricultural consultancy services to agricultural enterprises, and enabling agricultural extension and consultancy system to reach a pluralistic, efficient and productive structure.

The beneficiaries are not the producers but the individuals and institutions, which provide agricultural consultancy services. Therefore questions are not responded.

Program No.7: Subsidised Loans scheme

C2 General information on programmes

- the policy objective and/or purpose of the programme;

ANSWER:



The objective of this program is to support the agricultural development in Türkiye.

- the nature or form of the subsidy;

ANSWER:

T.C. Ziraat Bankası, T.C. Ziraat Katılım Bankası (since 2023) and Agricultural Credit Cooperatives (ACC) provide low-interest rate loans to agricultural production.

- the nature of benefits or concessions granted;

ANSWER:

Loan applications, which are related to the financing of agricultural activities of real and legal persons, are assessed. For aquaculture farming, Ziraat Bankası's discount rates on the effective interest rates for the "investment loan" and "operation loan" are 50% and 50%, respectively (interest rate discounts ranging from 50% to 100%), with a credit line maximum of 40.000.000 TL. Ziraat Katılım Bankası's discount rates on the effective interest rates for the "investment loan" and "operation loan" are 25% and 25% respectively with a credit line maximum of 40.000.000 TL.

- when the programme was established;

ANSWER:

This program has been administered since 2004.

- the duration of the programme; and

ANSWER:

There is not any specific determined duration for this program.

- the laws and regulations under which the subsidy is granted (including English translations);

ANSWER:



Please see **Exhibit 6** for the Presidential Decree No. 8039 on “The Provision of Treasury Interest-Supported Investment and Operating Loans for Agricultural Production by T.C. Ziraat Bank A.Ş. and Agricultural Credit Cooperatives” and Presidential Decree No. 8038 on “The Provision of Treasury Profit Rate-Supported Investment and Operating Financing for Agricultural Production by Ziraat Katılım Bankası A.Ş.

- how the programme operates; and

ANSWER:

Since the incurred losses resulted from default on payment are not compensated by the Treasury, the Bank and ACCs carefully evaluate the loan applications. In this sense, the creditworthiness of the producers, loan allocation criteria, maturities, collateralization of loans, repayment conditions and other respective issues are determined within the context of the respective procedures and regulatory principles of the Bank and ACCs in accordance with the prevailing banking procedures in Türkiye. In other words, the Bank and ACCs evaluate the applicants according to their own risk assessment due to the capital risk.

- which government of Türkiye authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)

ANSWER:

The Ministry of Treasury and Finance is responsible for administrating the legislations.

T.C.Ziraat Bankası A.Ş., Ziraat Katılım Bankası A.Ş and ACC are responsible for evaluating and concluding the applications of companies

- Please provide details of future changes expected to the programmes listed in **Table 1**.

ANSWER:

The aforementioned Decrees numbered 8038 and 8039 are in force between January 1, 2024, and December 31, 2026.



C3 Programme eligibility

Please answer each of the following questions for **all** programmes listed in **Table 1** above. Your responses should include information on any additional programmes that have been identified and added to the table in the process of completing this questionnaire.

In the questions that follow, please use the programme numbers listed in **Table 1** to refer to programmes and substantiate responses with evidence.

- 7. For each programme, please explain the application process, including details of any application fees charged by the relevant government authority.

Please see our response to question named “how the programme operates” under section C2.

Appendix reference:

- 8. For each programme, please describe the decision-making process used by the relevant government authority to approve or reject an application. Please clearly indicate any differences in the process across different types of subsidies or programmes.

Please see our response to question named “how the programme operates” under section C2.

Appendix reference:

- 9. Please answer the following questions regarding eligibility for receiving benefits provided under each programme:
 - i. Please specify whether eligibility for the programme is at all conditional on a company’s export performance. If so, please provide details of the criteria that apply.

No. Eligibility is not conditional on a company’s export performance.

Appendix reference:

- j. Please specify whether eligibility for the programme is at all conditional on a company’s use of domestic goods over imported goods, and if so please provide details.

No. Eligibility is not conditional on a company’s use of domestic goods over imported goods.

Appendix reference:



- k. Please specify whether eligibility for the programme is at all conditional upon, or limited to, the location of companies or industries within specific regions. If so, please specify the companies or industries and the designated regions.

No. Eligibility is not conditional on the location of companies or industries within specific regions.

Appendix reference:

- l. Please specify whether eligibility for the programme is limited to any individual or groups of companies and/or industries. If so, please detail the relevant companies and/or industries and the laws that govern this criterion.

Agricultural production can be subject to these loans. The list of the subjects of the credits are provided at **Exhibit 6**.

Appendix reference:

C4 Subsidies received under the programmes

9. Please complete **Annex C4 – Programme beneficiaries** identifying **all** companies that accrued or received a subsidy (or subsidies) under the programmes during 01 January 2025 to 31 December 2025. This may include benefits from programmes that were in place well before the POI. Please add additional rows as required.

Please ensure the columns under 'Programme information' are populated using the exact information in **Table 1**, ensuring any programme(s) detailed in Section C1 are included.

ANSWER:

Companies operating under rainbow trout sector did not use any agricultural loan from ACCs during the period from 01 January 2025 to 31 December 2025.

The confidentiality requirements in the Banking Law No. 5411 do not allow the Bank to release such information. Therefore, information regarding the loans used from Ziraat Bankası and Ziraat Katılım Bankası can be obtained from sampled companies.



10. Please identify and provide copies of any contractual agreements between the government of Türkiye and any companies that receive benefits under the programme (e.g. loan contracts, grant contracts, etc.).

N/A.

Appendix reference:

11. For **each** programme beneficiary listed in **Annex C4 – Programme beneficiaries**, please answer the following questions:

- k. Please explain the subsidy (or subsidies) provided to the beneficiary. Include an explanation of whether the subsidy was one-off or recurring, including the years it recurred and whether the subsidy varied between years. Please also explain how the amount stated in **Annex C4** has been estimated, including the methodology and assumptions used (if relevant).

Please see our response to question named “the nature of benefits or concessions granted” under section C2.

Appendix reference:

- l. Please indicate what functions the company performs and specify whether the nature of any such functions could be recognised as being equivalent to those of a Foreign Authority.

N/A.

Appendix reference:

- m. Please state whether any of the company’s functions are undertaken on behalf of government of Türkiye and specify whether the company is required to support government of Türkiye policies.

No.

Appendix reference:

- n. If the company has been trusted, vested or tasked with any responsibility normally associated with a Foreign Authority please specify the nature and function of this responsibility and provide copies of the relevant legal instruments or regulations.

N/A.

Appendix reference:



- o. Please indicate whether the company has the authority to entrust or direct a private body to undertake responsibilities or functions on behalf of the Foreign Authority.

No.

Appendix reference:

12. For **each** SIE and SOE identified in **Annex C4**, if any, please answer the following questions:

- m. Please indicate any payments and/or injections of funds provided by government of Türkiye to the SIE/SOE (e.g. grants, awards, purchase of shares, injection of capital funds etc.). Please detail the date, amount and the reason(s) for the provision.

N/A.

Appendix reference:

- n. Please identify and provide details on whether the SIE/SOE has any financial liabilities with any financial institutions in which government of Türkiye holds an interest.

N/A.

Appendix reference:

- o. Please detail how each SIE/SOE funds its operations.

N/A.

Appendix reference:

- p. Please explain how and to whom the SIE/SOE distributes its profits.

N/A.

Appendix reference:



- q. Please explain how the performance of the SIE/SOE is measured, specifying which authority in government of Türkiye inspects or reviews its performance (e.g. output and quality performance, employee performance, financial performance etc.) Include an explanation of what action, if any, is taken by such authorities if its performance targets are not met.

N/A.

Appendix reference:

- r. Please provide details of any official government of Türkiye reporting methods and/or procedures that the SIE/SOE must comply with.

N/A.

Appendix reference:

**Program No.8: Subsidised fuel scheme
(General Communiqué on Special Consumption Tax Serial No.6 of 31
December 2003)**

ANSWER:

Fishery products are mainly classified under four categories: Sea Fish, Other Sea Products, Aquaculture Production and Freshwater Products. Rainbow Trout, whether produced in inland waters or marine waters, is falling under the category of “Aquaculture Production” and hence, is not subject to fishing/hunting activities. Accordingly, trout production is not relevant with the use of fishing boats/vessels and therefore, fishing boats/vessels under the scope of this program. Therefore, questions are not responded.

Moreover, TRA reviewed this program during the transition review and found that this program is not relevant to this review. Therefore, we request the TRA to remove this program from this review as well.

Program No.9: Investment encouragement certificate: Tax related incentives scheme

Program No.10: Investment encouragement certificate: Social Security Premium Support (SSP) programme

Program No.11: Investment encouragement certificate: Interest support for interest rates paid credit

Program No.12: Investment encouragement certificate: Land allocation scheme



ANSWER:

Investment incentive program (IEP) consists of 4 separate incentive schemes: “Regional Investment Incentive Scheme” (RIIS), “Large Scale Investment Incentive Scheme” (LSIIS), “Strategic Investment Incentive Scheme” (SIIS) and “General Investment Incentive Scheme” (GIIS). The scope of each incentive scheme under the Decree No. 2012/3305 varies with different aspects of support measures.

Therefore, these 4 programs are responded as one program under IEP.

C2 General information on programmes

- the policy objective and/or purpose of the programme;

ANSWER:

The government policy behind IEP is to steer savings into high added value investments, to boost production and employment, to encourage regional, large scale and strategic investments with high research and development content for increasing international competitiveness, to increase foreign direct investments, to reduce regional development disparities, to promote investments for clustering, environment protection and R&D.

- the nature or form of the subsidy;

ANSWER:

Pursuant to the current Decree No. 2012/3005 IEP consists of 4 separate incentive schemes: Regional Investment Incentive Scheme (RIIS), Large Scale Investment Incentive Scheme (LSIIS), Strategic Investment Incentive Scheme (SIIS) and General Investment Incentive Scheme (GIIS).

A company should have an investment incentive certificate issued by Ministry of Industry and Technology (MoIT) to have a support under IEP.



The scope of each incentive scheme under the Decree No. 2012/3305 varies with different aspects of support measures which are provided in the table below:

Customs Duty Exemption: Investment machinery and equipment imported within the scope of the incentive certificate are exempted from customs duty set in the Import Regime Decree. The customs duties are exempted for the companies, which have an incentive certificate, during import operations under the control of the Ministry of Trade.

Value Added Tax (VAT) Exemption: Investment machinery and equipment imported and/or locally provided within the scope of the incentive certificate are exempted from VAT. The companies, which have an incentive certificate, do not pay VAT for the machinery and equipment under the control of Ministry of Treasury and Finance.

VAT paid for domestically purchased or imported machinery (i.e., normal purchases not under the GIIS program) can be offset in the same month or in the coming months depending on the company's VAT balance, while companies that receive a VAT exemption through the GIIS can claim an exemption when the machinery and equipment is domestically purchased or imported. In either scenario, the company does not pay the VAT – it is either exempted (under the GIIS) or used as an offset (purchases not made under the GIIS) and, thus, there is no financial contribution because there is no revenue forgone. Program participants are not better off than any other company which purchases machinery and equipment without participating under the GIIS and, therefore, the program is not specific in conferring its benefit.

In its Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Certain Quartz Surface Products from Turkey, dated April 27, 2020, USDOC found that VAT portion of the RIIS – VAT and Customs Duty Exemption program does not provide a benefit under 19 CFR 350.510(a) by stating "...The record evidence supports a finding that this is a normal VAT system, which under our practice does not confer a benefit. Thus, in accordance with 19 CFR 351.510(a), we determine that the VAT exemption portion of this program confers no benefit."



Interest Rate Support: This support is available for investment loans, borrowed to finance the investment, with a maturity of at least one year for Regional Investments (Region 3, 4, 5 and 6), Strategic Investments, R&D and Environment Investments. MoE covers a portion of the interest/profit share of the loans that do not exceed 70% of the fixed investment amount registered on the certificate for a specific period which would not exceed 5 years. The amount of interest rate support and the support rate is limited for each region differently. For example, the maximum amount of interest rate support is 500.000 TL for Region 3; 600.000 TL for Region 4; 700.000 TL for Region 5 and 900.000 TL for Region 6.

Social Security Premium (SSP) Support for Employer's Share: For any additional employment created by an investment with an incentive certificate under Regional, Large Scale and Strategic Investment Incentive Schemes, the amount corresponding to the employer's share of the social security premium on legal minimum wage, paid by the investor, is covered by the Social Security Institution. In order for an investor to benefit from this support, the project should be concluded and a completion visa should be granted.

Tax Reduction: Reduced income or corporate tax rates are applied for the companies until the total deduction reaches the "contribution amount". There are two different rates for the implementation of this support; "contribution rate" and "discount rate". The discount rate is used to find the reduced income/corporate tax rate of the company. The contribution rate is used to find the total deduction. Multiplication of contribution rate with total investment amount gives the contribution amount. The Ministry of Treasury and Finance applies reduced income/corporate tax rate for the company until total deduction reaches the contribution amount.

Land Allocation: State-owned lands are allocated for investments with incentive certificate under large scale, strategic and regional incentive schemes in accordance with the rules and principles defined by the Ministry of Treasury and Finance, depending on the availability of such land in the provinces where investments are made.



VAT Refund: VAT collected on the building & construction expenses made for Strategic Investments is rebated provided that the fixed investment amount is over 500 million TL.

Social Security Premium Support for Employee's Share (Only for Region 6) : This scheme allows for the Ministry to cover the employee's share of the social security premium paid by the investor to the Social Security Institution in the amount corresponding to the legal minimum wage, for additional personnel recruited for new investments in Region 6. This support is available for Regional, Large Scale and Strategic investments in Region 6 only and for 10 years.

Income Tax Withholding Support (Only for Region 6): For additional employment created by the investments to be realized within the scope of the incentive certificates issued for Region 6, the income tax that is calculated on the basis of the portion of the employees' wages that corresponds to the minimum wage is not levied. This support is available for the investments in Region 6 only for 10 years.

- the nature of benefits or concessions granted;

ANSWER:

Please see our response above.

- when the programme was established;

ANSWER:

The Decree No. 2012/3305 was put into force on June 15, 2012.

- the duration of the programme; and

ANSWER:

There is not any specific determined duration for this program.



- the laws and regulations under which the subsidy is granted (including English translations);

ANSWER:

Please see **Exhibit 8** for the Decree No 2012/3305.

ANSWER:

- how the programme operates; and

ANSWER:

The companies which meet the eligibility criteria can apply for an incentive certificate to the MoIT. Thereafter, companies benefit from support measures during the specified investment period by the help of the incentive certificate.

- which government of Türkiye authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)

ANSWER:

Ministry of Industry and Technology is responsible for administering the program. The Ministry of Industry and Technology is located in Mustafa Kemal Mahallesi Dumlupınar Bulvarı 2151.Cadde No:154/A 06530 Çankaya /ANKARA. MoIT keeps records of the details of the certificates of the companies.

For all programmes that are no longer operational, please state the date from which a company could no longer apply for, or claim benefits through, them. Please substantiate all your answers with evidence.

N/A

Appendix reference:

5. Please provide details of future changes expected to the programmes listed in **Table 1**.



At the time of the original investigation, the relevant schemes were governed by Decree No. 2012/3305, which entered into force on 15 June 2012. Subsequently, the MoIT introduced a new framework in May 2025, which entered into force on 29 May 2025 through Decree No. 2025/9903.

Appendix reference:

C3 Programme eligibility

Please answer each of the following questions for **all** programmes listed in **Table 1** above. Your responses should include information on any additional programmes that have been identified and added to the table in the process of completing this questionnaire.

In the questions that follow, please use the programme numbers listed in **Table 1** to refer to programmes and substantiate responses with evidence.

- 10. For each programme, please explain the application process, including details of any application fees charged by the relevant government authority.

Please see our response to question named “how the programme operates” under section C2.

Appendix reference:

- 11. For each programme, please describe the decision-making process used by the relevant government authority to approve or reject an application. Please clearly indicate any differences in the process across different types of subsidies or programmes.

Please see our response to question named “how the programme operates” under section C2.

Appendix reference:

- 12. Please answer the following questions regarding eligibility for receiving benefits provided under each programme:

- m. Please specify whether eligibility for the programme is at all conditional on a company’s export performance. If so, please provide details of the criteria that apply.

No. Eligibility is not conditional on a company’s export performance



Appendix reference:

- n. Please specify whether eligibility for the programme is at all conditional on a company’s use of domestic goods over imported goods, and if so please provide details.

No. Eligibility is not conditional on a company’s use of domestic goods over imported goods.

Appendix reference:

- o. Please specify whether eligibility for the programme is at all conditional upon, or limited to, the location of companies or industries within specific regions. If so, please specify the companies or industries and the designated regions.

No. Eligibility is not conditional on the location of companies or industries within specific regions.

Appendix reference:

- p. Please specify whether eligibility for the programme is limited to any individual or groups of companies and/or industries. If so, please detail the relevant companies and/or industries and the laws that govern this criterion.

No. Eligibility is not limited to any individual or groups of companies and/or industries.

Appendix reference:

C4 Subsidies received under the programmes

- 13. Please complete **Annex C4 – Programme beneficiaries** identifying **all** companies that accrued or received a subsidy (or subsidies) under the programmes during 01 January 2025 to 31 December 2025. This may include benefits from programmes that were in place well before the POI. Please add additional rows as required.

Please ensure the columns under ‘Programme information’ are populated using the exact information in **Table 1**, ensuring any programme(s) detailed in Section C1 are included.

- 14. Please identify and provide copies of any contractual agreements between the government of Türkiye and any companies that receive benefits under the programme (e.g. loan contracts, grant contracts, etc.).



During the period from 01 January 2025 to 31 December 2025, no companies accrued or received subsidies under the support measures administered and paid by the MoIT.

Appendix reference:

15. For **each** programme beneficiary listed in **Annex C4 – Programme beneficiaries**, please answer the following questions:

- p. Please explain the subsidy (or subsidies) provided to the beneficiary. Include an explanation of whether the subsidy was one-off or recurring, including the years it recurred and whether the subsidy varied between years. Please also explain how the amount stated in **Annex C4** has been estimated, including the methodology and assumptions used (if relevant).

N/A

Appendix reference:

- q. Please indicate what functions the company performs and specify whether the nature of any such functions could be recognised as being equivalent to those of a Foreign Authority.

N/A

Appendix reference:

- r. Please state whether any of the company’s functions are undertaken on behalf of government of Türkiye and specify whether the company is required to support government of Türkiye policies.

N/A

Appendix reference:

- s. If the company has been trusted, vested or tasked with any responsibility normally associated with a Foreign Authority please specify the nature and function of this responsibility and provide copies of the relevant legal instruments or regulations.

N/A

Appendix reference:

- t. Please indicate whether the company has the authority to entrust or direct a private body to undertake responsibilities or functions on behalf of the Foreign Authority.



N/A

Appendix reference:

16. For **each** SIE and SOE identified in **Annex C4**, if any, please answer the following questions:

- s. Please indicate any payments and/or injections of funds provided by government of Türkiye to the SIE/SOE (e.g. grants, awards, purchase of shares, injection of capital funds etc.). Please detail the date, amount and the reason(s) for the provision.

N/A

Appendix reference:

- t. Please identify and provide details on whether the SIE/SOE has any financial liabilities with any financial institutions in which government of Türkiye holds an interest.

N/A

Appendix reference:

- u. Please detail how each SIE/SOE funds its operations.

N/A

Appendix reference:

- v. Please explain how and to whom the SIE/SOE distributes its profits.

N/A

Appendix reference:



- w. Please explain how the performance of the SIE/SOE is measured, specifying which authority in government of Türkiye inspects or reviews its performance (e.g. output and quality performance, employee performance, financial performance etc.) Include an explanation of what action, if any, is taken by such authorities if its performance targets are not met.

N/A

Appendix reference:

- x. Please provide details of any official government of Türkiye reporting methods and/or procedures that the SIE/SOE must comply with.

N/A

Appendix reference:



SECTION D: Checklist and appendices

This section is an aid to ensuring all sections of this questionnaire are completed.

Section	Please tick if you have responded to all questions
Section A – General information	x
Section B – Government involvement in the certain rainbow trout sector	x
Section C – Subsidies	x

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
Exhibit 1	The Annex on Tariff Rates and Quotas
Exhibit 2	The translations of the art. 3 on aquaculture production supports of the Presential Decree No: 8760
Exhibit 3	Annexed tables on manufacturer/trade, upstream suppliers, beneficiaries and import/export values
Exhibit 4	The translations on the Agricultural Insurance Law No. 5363
Exhibit 5	The list of Programme 5 Beneficiaries
Exhibit 6	The translations on Presidential Decree No: 8039
Exhibit 7	The translations on Decree No:2012-3305

+Add additional rows as required