



Registration Form

For other Interested Parties, excluding Producers, Importers and Exporters

Subsidy investigation

Case AS0020: Ironing Boards exported from the Republic of Turkey

Period of Investigation:	1 January 2021 to 31 December 2021
Injury Period:	1 January 2018 to 31 December 2021
Deadline for response:	30 December 2022
Case Team Contact:	AS0020@traderemedies.gov.uk
Completed on behalf of:	[Redacted- Company Name]
Party type (select):	<input checked="" type="checkbox"/> Contributor <input type="checkbox"/> Government of relevant foreign country or territory (<i>Interested Party</i>) <input type="checkbox"/> Trade or business association representing overseas exporters or UK importers of the good(s) subject to review (<i>Interested Party</i>) <input type="checkbox"/> Trade or business association representing UK producers of like goods or directly competitive goods (<i>Interested Party</i>)

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

Confidential

Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **30 December 2022**.



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Instructions

I – Who should complete this form?

You should complete this form if you are **not** a producer, importer or overseas exporter of the **goods concerned** or **like goods**. If you are a producer, importer or overseas exporter, please complete the relevant Registration and Pre-Sampling Questionnaire.

II – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of this document. Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

Please see <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#confidential-information-and-non-confidential-summaries> for further information on what can be considered confidential and how to prepare a non-confidential version of this document.

All information provided to the Trade Remedies Authority (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 www.trade-remedies.service.gov.uk/public/cases.



Section A – Your organisation’s interest in the case

To register your organisation’s interest in this case, please complete the text boxes below. You should use this form if you are not a producer, importer or exporter of the **goods concerned** or **like goods**. For a definition of **goods concerned** and **like goods**, please refer to the [original notice of initiation](#).

Please also see the [amended notice of initiation](#).

Please describe your role with regards to the **goods concerned**:

[Redacted-Company Name] provided the following products to Milenyum Metal in 2021:

- **Cold rolled Steel Square and Rectangular Profiles.**
- **Cold rolled Industrial Steel Tubes.**
- **Cold rolled Steel Slitted Strips.**

Please describe your interest in this case:

[Redacted-Company Name] is a private owned company registered in Istanbul Stock Exchange with stock code “[Redacted-Company Code]” and provides inputs to Milenyum Metal. As an input supplier, [Redacted-Company Name] has interest in this case for commercial reasons.



Section B – Additional information

1. Are you, or any of your facilities, located in a Turkish Free Zone? If yes, please provide the following information:

- a. Which of your facilities are in a Free Zone and which are not? Please provide addresses.

**[Redacted-Company Name] Free Zone Branch:
[Redacted-Company Address]**

**[Redacted-Company Name] (main office and factory):
[Redacted-Company Address]**

- b. What was the size of the **corporate**-tax exemption you received as a result of your activities in Free Zone during 2021? Please provide source documentation to support your answer.

The earnings of taxpayers engaged in manufacturing activities in free zones from the sale of products manufactured in the zones are exempt from corporate tax until the end of the annual taxation period, which includes the date of Turkey's full membership to the European Union. In the Corporate Tax Declaration of 2021, [47,000,000-51,000,000] TRY, which is included in the Earnings from Free Zones, is exempted from Corporate Tax. The size of the corporate-tax exemption is [20-25] % of the Earnings from Free Zones, which is [11,000,000-13,000,000] TRY.

- c. What was the size of the **income**-tax exemption you received as a result of your activities in Free Zones during 2021? Please provide source documentation to support your answer.

We did not have any income-tax exemption since we did not export more than 85% of our sales from our free zone branch.

Companies that export at least 85% of the FOB value of the products produced in the free zones abroad are said to be deducted from the tax accrued on the concise declaration to be submitted, and the income tax calculated after the minimum living allowance is applied over the wages paid to the personnel they employ.



- d. What was the total size of the **property**-tax exemptions you received as a result of your activities in Free Zones during 2021? Please provide source documentation to support your answer.

Buildings located in Free Zones are said to be exempt from building tax, provided that they are not rented out, and property tax exemption is benefited from as the building located in the free zone of our company is its own property and not rented out. The size of the property-tax exemption for 2021 is [22,000-27,000] TRY

2. Please complete the following table for your sales in 2021. If possible, please provide audited financial statements and/or management accounts to support the data.

Sales in 2021	Value (TRY)	Volume (kg)
All goods	[1-1.5 Billion]	[120-140 Million]
All steel profiles	[200-245 Million]	[21-25 Million]
Steel profiles manufactured in a Free Zone	[21-25 Million]	[2-2.5 Million]
All cold-rolled sheet	[3.15-3.5 Million]	[340000-390000]
Cold-rolled sheet manufactured in a Free Zone	0	0
All cold-rolled sheet strip	[6-7 Million]	[0.9-1.2 Million]
Cold-rolled sheet strip manufactured in a Free Zone	[5-6 Million]	[0.9-1 Million]
All black steel pipe	[420-500 Million]	[40-46 Million]
Black steel pipe manufactured in a Free Zone	0	0



3. In the Turkish market, what were the average prices of steel profiles, cold-rolled sheet, cold-rolled sheet strip and black steel pipe during 2021 that were not benefiting from subsidies? Please provide supporting evidence. Alternatively, could you please suggest some sources where we may be able to find this information?

Product	Average price in 2021 (TRY/kg)	Source or reference to supporting evidence
Steel profiles	[8.2 - 10]	[Redacted-Company Name] 2021 average sales
Cold-rolled sheet	[7.9 - 9.2]	[Redacted-Company Name] 2021 average sales
Cold-rolled sheet strip	[5.8 – 6.8]	[Redacted-Company Name] 2021 average sales
Black steel pipe	[9.6 – 11.4]	[Redacted-Company Name] 2021 average sales

4. Please answer the following questions about your sales prices:

- a. Are you able to sell steel profiles, cold-rolled sheet, cold-rolled sheet strip or black steel pipe at lower prices as a result of receiving subsidies? If so, please explain how subsidies affect your prices.

No we did not make any extra discounts to our customers in Free Zone.

- b. During 2021, did you sell goods to both customers in Free Zones and customers not in Free Zones?

Yes, we have both customers in Free Zones and customers not in Free Zones.

- c. Excluding VAT and delivery charges, would a customer in a Free Zone receive a different price than a customer outside a Free Zone? For example, would you sell at lower prices to a customer in a Free Zone than to a customer not in a Free Zone? If there are differences, please quantify them and explain why they exist.

No there is not price difference between the customers in Free zone and customers outside Free Zone.

5. Did you benefit from any Türk Eximbank loans during 2021?

If yes, please provide the following information:



- a. Please provide source documentation showing the principal amount as well as the interest payments, principal repayments, guarantee fees, and any other charges/fees that you paid during 2021.
- b. Can sales to customers in Free Zones be counted towards your export commitment for Eximbank loans, or can your export commitments only be fulfilled through exports from Türkiye to other countries?

**We only use Eximbank Credits for our main factory, for our free Zone branch we did not use Eximbank credits for 2021.
All products we sold to Milenyum Metal were produced in our Free Zone Branch and we did not sell any Eximbank benefited products to Milenyum Metal.**

6. Use the box at the end of this section to provide any other relevant information which you think would be useful to help our investigation.

This may include:

- other parties you believe should receive a questionnaire;
- the scope of the investigation; or
- anything else you consider relevant.

There some extra costs in the Free Zone which does not exists outside of Free Zone.

**One of the main the funds, which we pay for each transaction to the Free Zone Customs on flat rate of the amount, not on the base of profit.
In year 2021 we paid [2 – 2.9 Million] TRY.**