

LETTER OF SUPPORT

Application for an investigation on imports of stainless steel cold rolled flat products from third countries evading the measures on imports of stainless steel cold rolled flat products from Indonesia

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

- Name: Acciai Speciali Terni S.p.A.
- Address: V.le B. Brin 218, 05100 Terni (IT)
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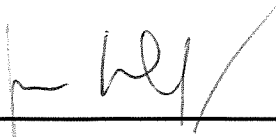
The persons who should be contacted for this entity are set out below. Please ensure that all such persons are copied on correspondence with this entity.

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

Signed in Terni, 22-06-2023

Vice-President

Mario Carlo Arvedi Caldonazzo



Annex I - Confidential



LETTER OF SUPPORT

Application for an investigation on imports of stainless steel cold rolled flat products from third countries evading the measures on imports of stainless steel cold rolled flat products from Indonesia

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

- Name: Acerinox Europa SAU
- Address: Avda. Acerinox Europa, s/n Poligono Industrial Palmones, 11379, Los Barrios Cadiz, Spain
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The persons who should be contacted for this entity are set out below. Please ensure that all such persons are copied on correspondence with this entity.

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

Signed in Madrid, 21st June 2023



Luis Gimeno Valledor
Secretary General Acerinox SA

Annex I - Contact person: Confidential

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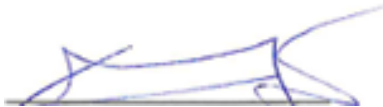
Identity (name, address, telephone, fax) of the company supporting the application

- Name: Aperam Stainless Euroe
- Address: 6, rue André Campra 93210 La Plaine Saint- Denis France
- Address for Communications: 6, rue André Campra 93210 La Plaine Saint- Denis France, email : stainless@aperam.com
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The persons who should be contacted for this entity are set out below. Please ensure that all such persons are copied on correspondence with this entity.

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

Signed in Paris, July 23rd 2023



Nicolas Changeur

CEO Aperam Services and Solutions & CMO Europe

Annex I - Contact person: Confidential

LETTER OF SUPPORT

Application for an investigation on imports of stainless steel cold rolled flat products from third countries evading the measures on imports of stainless steel cold rolled flat products from Indonesia

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

- Name: **Outokumpu Oyj**
- Address: **Salmisaarenranta 11, 00180 Helsinki, Finland**
- Address for Communications: **Confidential**
- Tel: **Confidential**

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

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

Pia Aaltonen-Forsell

Signed in Helsinki, 21 June

Pia Aaltonen-Forsell – Chief Financial Officer

Annex I - Contact person: Confidential

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
Outokumpu Oy	Salmisaarenranta 11	00180	Helsinki	Finland						https://www.outokumpu.com/
Acciai Speciali Terni	Viale B. Brin 218	05100	Terni	Italy						https://www.acciaterni.it/
Aperam Stainless France	6 Rue André Campra	93210	La Plaine Saint-Denis	France						https://www.aperam.com/
Acerinox Europa SAU	Calle Santiago de Compostela 100	28035	Madrid	Spain						https://www.acerinox.com/
Marcegaglia Specialties	via Bresciani, 16	46040	Gazoldo degli Ippoliti	Italy						https://www.marcegaglia.com/
Otelinox	16, Gaesti Street	130087	Targoviste, Dambovita	Romania						http://www.otelinox.com/
SJÜ ACRONI	Cesta Boris Kidriča 44	4270	Jesenice	Slovenia						https://slj.acroni.si/

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
Eurofer	172 Avenue d	1000	Brussels	Belgium						https://www.eurofer.eu/

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
IISIA (Indonesian Iron and Steel Industry Association)										https://www.iisia.or.id/

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
YIEH CORP.										https://www.yieh.com/en/Contact
WALSIN										https://www.walsin.com/walsin/home.do
TANGENG										http://www.tangeng.com.tw/eindex.asp
Tung Mung										https://www.tungmung.com.tw/index.html
Yuan Long										https://en.ylss.com.tw/
Chia Far										https://www.chiafar.com/en/
Chien Shing										www.csssc.com.tw

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
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TSIA (Taiwan Steel & Iron Industries Association)

<https://www.tsiia.org.tw/>

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
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Yongjin
POSCO
Hoa Binh

<https://www.poscovietnam.com/vn/main/getMain.do>
www.inoxhoabinh.vn

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
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Vietnam Steel Association

<http://vsa.com.vn>

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
Assan TST/POSCO Trinox										https://poscoassan.com.tr/ https://www.trinoxmetal.com/

Company	Street	Zip code	Town	Country	Tel	Fax	E-Fax	E-mail	E-mail 2	Website
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Turkish
Steel
Producers
Associatio
n

<https://celik.org.tr/en/iletisim/>

Methodology for the assessment of "indirect imports"

This note explains how EUROFER has assessed the volume of indirect imports of SSCR from Indonesia in the EU. These imports are referred to as "indirect" because they result from the processing, in a country other than Indonesia or the EU, of SSCR inputs into SSCR before export to the EU.

Through a detailed assessment of official statistics and market intelligence, EUROFER is able to provide an estimate of the indirect imports. That assessment reveals a systemic and wide-ranging evasion of the duties on imports of SSCR from Indonesia because of the existence of a double flow: import of stainless steel semi-products from Indonesia to a third country and imports of SSCR from that third country into the EU.

1. PRELIMINARY REMARKS

Stainless steel slab and SSHR: slabs are semi-finished steel products. They are the output of the first stage of the production process of flat steel. The inputs necessary for the production of steel are melted in a furnace and then poured via a casting machine into solid rectangular shaped thick steel products called slabs. Slabs already contain all the raw material necessary for the production of the flat steel. Stainless steel hot rolled flat product, or "SSHR" is the next phase in the production process of SSCR. It is produced from the hot-rolling of slabs into coils. SSHR can either be black, when it has not yet undergone final annealing and pickling, or white when it has achieved that stage.

Production of stainless steel slabs in Indonesia: In Indonesia, the stainless steel slabs are produced from nickel pig iron (NPI) which itself contains the nickel ore found to be subsidised on machinery/land also found to be subsidised. It is important to have in mind that the Indonesian stainless steel operations do not solely focus on the export of finished products but also rely to a large extent on exports of semi-finished products. Due to the massive subsidies received, the Indonesian exporters has such a cost advantage that it can be more profitable, even for integrated producers, to idle upstream capacities and rely on Indonesian imports of semi-finished products rather than self-production. Similarly, re-rollers operating outside of Indonesia will find the Indonesian semi-products cheaper than the alternative produced domestically or imported from other sources. Therefore, Indonesian stainless steel tend to integrate the worldwide stainless steel trade flows at various level - both finished and semi-products - widely exporting the distortions resulting from the subsidisation in Indonesia.

Austenitic stainless steel and imports figures: Stainless steel is essentially characterised by its chromium content which provides it with its anti-corrosion properties. However, stainless steel can also be distinguished based on whether or not it contains another alloy: nickel. The two main families of grades of stainless steel are therefore austenitic (containing nickel) or ferritic (with no nickel). Due to the high price of nickel, the difference between the two families of stainless steel is also visible in the price of the products, with austenitic stainless steel being more expensive than ferritic stainless steel. That distinction between the two families of stainless steel is particularly important when considering imports - direct or indirect - from Indonesia. This is because the Indonesian stainless steel complex has precisely been established to exploit the subsidised nickel resources in that country. Therefore, exports from Indonesia are almost exclusively focused on austenitic materials, which even if sold at unnaturally low prices remain more expensive than ferritic products.

Processing of a slab/ of SSHR in a third country confers non-preferential origin: As the Commission recently found in case R778, the transformation of a stainless steel slab into the product directly downstream the hot-rolled flat stainless steel (SSHR) for which the slabs is the sole input brings very limited added value. The same is true for the processing phase directly after the hot-rolling, the

transformation of SSHR into SSCR via cold-rolling (see assembly part). Nonetheless, transformation of the slabs into SSHR or SSCR or of SSHR into SSCR confers non-preferential origin under the list rules of Annex 22-01 of the delegated act of the EU Custom code. This means that the "indirect imports" imports of Indonesian SSCR in the EU assessed by EUROFER are formally originating in the targeted third country.

Imports of Indonesian stainless steel in the EU: Over the last few years, the Commission has initiated several trade actions to address imports of stainless steel products from Indonesia, with AD measures on SSHR and AD and CVD measures on SSCR. Although these measures have their limitations, on account notably of the extent of the nickel price distortion in Indonesia, they mostly allow dealing with the imports of Indonesian SSHR and SSCR. For SSCR in particular, the imposition of the AS measures on SSCR in March 2022 has allowed to significantly reduce imports.

Imports of Indonesian stainless steel in third countries: As evidenced by the Commission over the recent years, Indonesia's massive stainless steel production capacity has been built from scratch in the recent years. As Indonesia only has a very limited consumption of stainless steel, this industrial powerbase is entirely dedicated to exports. Indonesia's stainless steel semi-finished and finished products exports have gone from negligible in 2015 to the first worldwide, overtaking China, already in 2020. Those production capacity and therefore exports are overwhelmingly dedicated to austenitic (nickel-based) stainless steel, to leverage the advantage granted by the Indonesian government on nickel ore. Consequently, these massive capacities, in a sector already plagued by Chinese overcapacities, have deeply affected traditional trade flows for stainless steel over a very short period of time. Massive exports from Indonesia have not only targeted the EU market but also all the other markets and in particular close-by Asian countries. In these countries, imports of Indonesian stainless steel products have substituted to a large extent domestic supply of finished products (SSCR) or of intermediate products (slabs, SSHR) thanks to their major price advantage.

Stainless exports codes 7218 to 7223									
in tonnes	2015	2016	2017	2018	2019	2020	2021	2022	'22 vs '15
Indonesia	55,481	82,683	690,194	1,938,656	2,270,480	2,920,475	4,780,511	4,685,534	8345%
China	2,937,246	3,416,169	3,414,701	3,369,826	3,008,972	2,827,993	3,866,285	3,928,422	34%
EU27	1,531,281	1,556,686	1,639,236	1,653,875	1,444,605	1,261,011	1,301,808	1,189,481	-22%
Taiwan	1,058,849	1,238,307	1,350,631	1,289,638	1,124,975	945,873	1,247,101	1,101,189	4%
South Korea	1,415,009	1,476,756	1,527,232	1,627,712	1,547,516	1,358,770	1,250,294	936,003	-34%
India	661,372	723,662	815,024	750,167	727,955	673,235	892,203	786,459	19%
Japan	872,824	867,448	823,681	797,661	687,606	591,752	701,838	594,505	-32%
United States	802,429	801,184	955,888	657,423	428,225	310,477	342,641	344,952	-57%
South Africa	315,920	422,159	405,392	353,160	307,551	243,807	267,584	200,776	-36%

Imports in the EU of stainless steel produced from Indonesian semi-products from third countries: The increasing use of cheaper Indonesian stainless steel semi-finished products (slabs, SSHR) in the production of finished SSCR in third countries has mechanically led to the rapid appearance of a new trade flow: the imports in the EU of austenitic SSCR produced in third countries from Indonesian slabs or SSHR (the "indirect" imports of Indonesian SSCR). These flows have grown exponentially and now represent a significant share of the EU market. That significant increase is due to the fact that they share with the direct imports of SSCR from Indonesia a major advantage over EU producers: the heavy subsidisation of the upstream phase of the production process. However, as processing of slabs or SSHR into SSCR confers the non-preferential origin, they are not subject to the measures imposed on Indonesian imports of SSCR from Indonesia.

2. METHODOLOGY FOR THE ASSESSMENT OF INDIRECT IMPORTS

2.1 Presentation of the methodology

Methodology for the quantification of the indirect imports of SSCR to the EU: Due to the non-preferential origin rules, it is impossible to assess the extent of these indirect imports or double flow of SSCR solely by looking at EU import statistic as those do not provide any information on whether the slab or SSHR used to produce SSCR originate in Indonesia or elsewhere. EUROFER has therefore prepared a comprehensive assessment looking at (i) the imports in the third country, according to its official database, of stainless steel semi-finished products (slabs, SSHR) from Indonesia and all other sources, (ii) the production of stainless steel slabs in the country, if any and (iii) the imports in the EU of stainless steel from that third country. As Indonesian-produced stainless steel is solely nickel-based, the analysis focuses on austenitic stainless steel, based on actual custom data when they provide for the distinction (EU, Turkey, Taiwan) and/or on the relevant production split between austenitic and other types of stainless steel in the third country when the distinction is not available.

Relevant third countries: For the purpose of the assessment, EUROFER has focused exclusively on countries for which it had identified a sizeable flow of imports of stainless slabs and/or SSHR from Indonesia, a sizeable flow of exports of SSCR to the EU as well as a significant price impact on the EU market/ the perspective of an additional price impact. This means that the analysis is conservative because other flows likely exists.

The assessment therefore covers Taiwan, Turkey and Vietnam. The flows via these countries have been assessed both jointly and on an individual basis.

Application of the methodology: The methodology works in two-steps: first, assessing the share of Indonesian inputs in the total output of the country of austenitic SSCR; second, applying that share to the exports to the EU in order to obtain a reasonable assumption of the volume of SSCR from the third country which in fact contains Indonesian slabs or SSHR. The assessment is made on a quarterly basis and, in order to account for the processing of the Indonesian semi-products in the third country, a standard 3-month delay between imports of semi-finished product and exports of SSCR is taken into account. The methodology is subject to minor adjustments when available information for a country allow presenting a more accurate assessment.

2.2 Application for a country with melting capacities: Taiwan

Taiwanese custom statistics allow the identification of whether import and exports are austenitic or not. Out of the four countries assessed, Taiwan is the sole country with its own melting and hot-rolling capacities. In that country, Indonesian SSCR inputs may therefore be slabs or SSHR.

1. *Identification of the imports of austenitic semi products: the methodology isolates on one hand the imports from Indonesia and the imports from third countries of stainless slabs and SSHR. As the Taiwanese database allows identifying austenitic products, the analysis focuses only on these products.*
2. *Calculation of the domestic melting of austenitic stainless steel: As Taiwan has a domestic production of stainless steel slabs, that source of semi-product is also accounted for. Based on the proportion of austenitic stainless steel in the overall quantify of stainless steel slabs produced in Taiwan for the relevant period, a quantity of domestic austenitic production is calculated.*

3. Definition of the origin of semi-products in exports of SSCR from Taiwan: Based on the imports of austenitic semi-products and the production of domestic austenitic slabs, a ratio is calculated to assess the share of Indonesian SSHR and slabs over the total inputs available in Taiwan for the production of austenitic SSCR (domestic, Indonesian inputs, third countries inputs). That ratio is considered representative of the output of SSCR independently of whether it is sold domestically or exported to the EU or a third country.
4. Calculation of the volume of indirect imports of Indonesian melted SSCR to the EU via Taiwan: the ratio defined above is then applied to the total volume of imports of austenitic stainless steel in the EU (Eurostats imports under the CN codes for Ni>2,5% and CN codes ending in 3100 and falling under "other" whose average prices correspond to austenitic prices). To account for the processing of the inputs and the shipping to the EU, a three months delay is applied, meaning that the ratio defined for quarter N is applied to imports in the EU in quarter N+1.
5. Assessment of the maximum volume of imports of Indonesian melted SSCR to the EU via Taiwan: Beside the estimated volume of indirect imports estimated according to the methodology described above, an alternative methodology is also used to assess the maximum possible level of indirect imports of SSCR melted in Indonesia via Taiwan. That assessment consists in a comparison of the volume of semi-products imported in Taiwan from Indonesia with the imports in the EU of austenitic SSCR from Taiwan on the following quarter (three months delay). The lower of the two figures corresponds to the maximum volume of imports of SSCR from Taiwan integrating Indonesian inputs into the EU.

2.3 Application for a country without melting capacities: Vietnam

The methodology for Vietnam¹ is essentially the same as used for Taiwan with the following differences:

1. *These databases do not allow identifying whether imported inputs (in that case exclusively SSHR) are austenitic or ferritic. For Indonesia, due to the focus on nickel-based stainless steel, all imports are considered as being austenitic. For imports from other origins, an assessment is made on the basis of the overall share of austenitic stainless steel in melting in Asia (according to ISSF) to define the share of austenitic SSHR in imports from third countries. This assessment is conservative due to the pre-eminence of Indonesia in melting of austenitic stainless steel.*
2. *In the absence of domestic melting capacities for stainless steel in that country (production of SSCR is exclusively from re-rolling SSHR), inputs from the production of SSCR are 100% imported. This means that the ratio to define the origin of the semi-products used as inputs in the production of SSCR is calculated solely by a comparison between imports from Indonesia and imports from another source.*

With regard to **Turkey**, whereas the principles are the same, additional factors are considered. First, as the Turkish custom statistics allow identifying the austenitic SSHR and SSCR, it is not necessary to rely on estimates to identify austenitic materials. Second, as imports of Indonesian slabs in Turkey were already investigated by the Commission in case R778 and it is known that these were exported to the EU as SSHR, slabs are therefore not accounted for in the assessment of the indirect imports of Indonesian SSCR for which EUROFER only relies on imports into Turkey of Indonesian SSHR.

¹ The Vietnamese data are identified via exports and imports from third countries due to an incomplete set of Vietnamese data

**Indirect imports of Indonesian melted SSCR to the EU via third countries - Estimate
In tonnes**

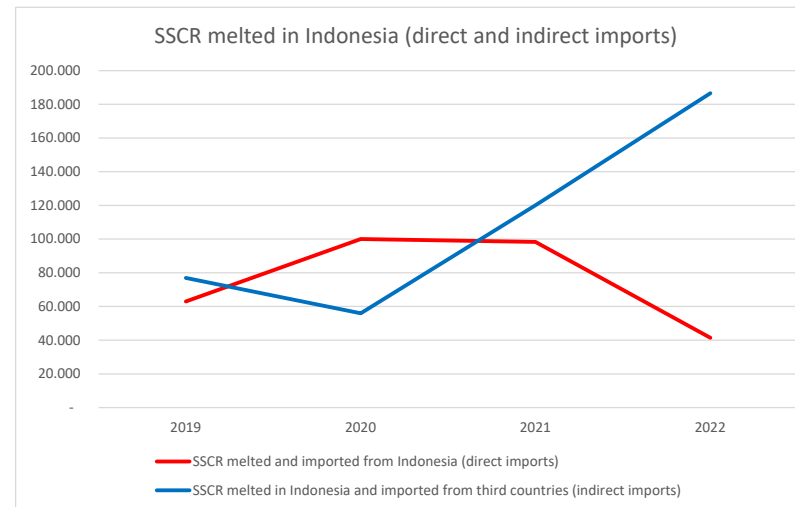
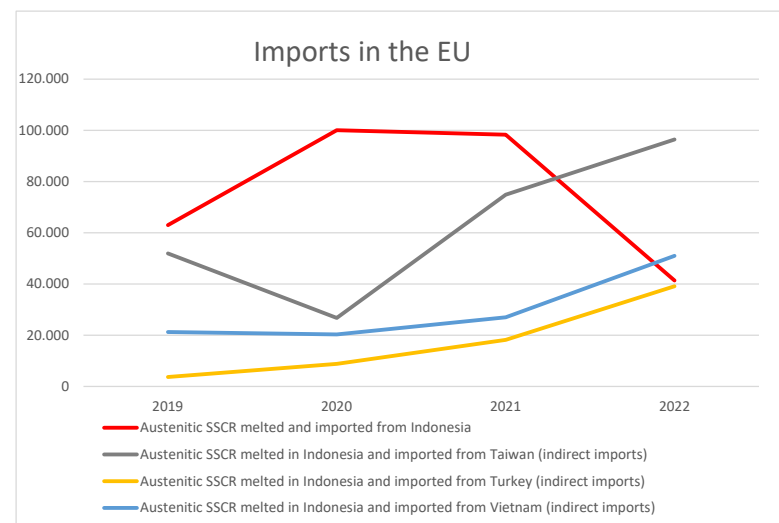
	2019	2020	2021	2022
Austenitic SSCR melted and imported from Indonesia	62.974	100.055	98.329	41.400
Austenitic SSCR melted in Indonesia and imported from Taiwan (indirect imports)	51.927	26.764	74.884	96.454
Austenitic SSCR melted in Indonesia and imported from Turkey (indirect imports)	3.667	8.842	18.199	39.142
Austenitic SSCR melted in Indonesia and imported from Vietnam (indirect imports)	21.305	20.310	26.976	50.983
Imports of SSCR melted in Indonesia (direct and indirect imports)	139.872	155.970	218.388	227.978
SSCR melted and imported from Indonesia (direct imports)	62.974	100.055	98.329	41.400
SSCR melted in Indonesia and imported from third countries (indirect imports)	76.898	55.915	120.059	186.578
Other SSCR imported from third countries	512.026	372.316	400.096	720.405
SSCR imports of austenitic (total)	651.898	528.286	618.484	948.383

Indirect imports of Indonesian melted SSCR to the EU via third countries - Maximum 2022

41.400
141.452
89.678
75.044
347.574
41.400
306.174
642.209
948.383

**Total EU Imports of SSCR (Eurostats)
all grades**

	2019	2020	2021	2022
Total EU imports	928.993	776.245	893.946	1.300.417
Taiwan	185.614	125.070	218.792	251.418
Turkey	87.967	73.833	105.600	125.057
Vietnam	36.855	35.338	51.559	86.720
Targeted countries	310.436	234.241	375.951	463.195
Indonesia	72.768	106.488	107.364	51.379



In tonnes	2019	2020	2021	2022
Indonesia (total SSCR)	72.768	106.488	107.364	51.379
Taiwan	51.927	26.764	74.884	96.454

In tonnes	2019	2020	2021	2022
Indonesia (total SSCR)	72.768	106.488	107.364	51.379
Turkey	3.667	8.842	18.199	39.142

In tonnes	2019	2020	2021	2022
Indonesia (total SSCR)	72.768	106.488	107.364	51.379
Vietnam	21.305	20.310	26.976	50.983

In tonnes	2019	2020	2021	2022
Indonesia (total SSCR)	72.768	106.488	107.364	51.379
3 countries	76.898	55.915	120.059	186.578

In tonnes	2019	2020	2021	2022
Imports from Indonesia in the EU	72.768	106.488	107.364	51.379
Index	100	146	148	71
of which austenitic SSCR	62.974	100.055	98.329	41.400
Index	100	159	156	66
Imports in the EU of SSCR from the targeted countries	310.436	234.241	375.951	463.195
Index	100	75	121	149
of which Indirect imports in the EU	76.898	55.915	120.059	186.578
Index	100	73	156	243
Imports of SSCR from Taiwan	185.614	125.070	218.792	251.418
Index	100	67	118	135
Of which indirect imports	51.927	26.764	74.884	96.454
Index	100	52	144	186
Imports of SSCR from Turkey	87.967	73.833	105.600	125.057
Index	100	84	120	142
Of which indirect imports	3.667	8.842	18.199	39.142
Index	100	241	496	1.067
Imports of SSCR from Vietnam	36.855	35.338	51.559	86.720
Index	100	96	140	235
Of which indirect imports	21.305	20.310	26.976	50.983
Index	100	95	127	239

3 countries

In tonnes and %	2019	2020	2021	2022
Inputs sourced from Indonesia	761.512	836.642	1.276.119	1.205.724
Inputs from other sources	Confidential business information			
Total imports of austenitics in the EU	197.344	131.297	236.022	306.320
Indirect imports in the EU (with 3 month delay)	76.898	55.915	120.059	186.578
Total imports in the EU of SSCR	310.436	234.241	375.951	463.195

Taiwan

In tonnes and %	2019	2020	2021	2022
Inputs sourced from Indonesia	548.647	631.372	960.353	747.941
Inputs from other sources	Confidential business information			
Total imports of austenitics in the EU	100.617	48.490	116.306	141.452
Indirect imports in the EU (with 3 month delay)	51.927	26.764	74.884	96.454
Total imports in the EU of SSCR	185.614	125.070	218.792	251.418

Turkey

In tonnes and %	2019	2020	2021	2022
Inputs sourced from Indonesia (SSHR only)	15.500	26.402	73.367	100.795
Inputs from other sources	145.105	142.024	148.848	144.861
Total imports of austenitics in the EU	61.702	50.012	75.378	89.824
Indirect imports in the EU (with 3 month delay)	3.667	8.842	18.199	39.142
Total imports in the EU of SSCR	87.967	73.833	105.600	125.057

Vietnam

In tonnes and %	2019	2020	2021	2022
Inputs sourced from Indonesia (SSHR only)	197.366	178.868	242.399	356.987
Total Austenitic inputs from other sources	116.445	122.035	143.830	140.204
Total imports of austenitics in the EU	35.025	32.795	44.338	75.044
Indirect imports in the EU (with 3 month delay)	21.305	20.310	26.976	50.983
Total imports in the EU of SSCR	36.855	35.338	51.559	86.720

In tonnes and %	2019	2020	2021	2022
Inputs from Indonesia	761.512	836.642	1.276.119	1.205.724
Index	100	110	168	158
Imports of SSCR in the EU	310.436	234.241	375.951	463.195
Index	100	75	121	149
Of which Indirect imports in the EU	76.898	55.915	120.059	186.578
Index	100	73	156	243

In tonnes	2019	2020	2021	2022
Inputs from Indonesia	548.647	631.372	960.353	747.941
Index	100	115	175	136
Imports of SSCR in the EU	185.614	125.070	218.792	251.418
Index	100	67	118	135
Of which Indirect imports in the EU	51.927	26.764	74.884	96.454
Index	100	52	144	186

In tonnes	2019	2020	2021	2022
Inputs from Indonesia	15.500	26.402	73.367	100.795
Index	100	170	473	650
Imports of SSCR in the EU	87.967	73.833	105.600	125.057
Index	100	84	120	142
Of which Indirect imports in the EU	3.667	8.842	18.199	39.142
Index	100	241	496	1.067

In tonnes	2019	2020	2021	2022
Inputs from Indonesia	197.366	178.868	242.399	356.987
Index	100	91	123	181
Imports of SSCR in the EU	36.855	35.338	51.559	86.720
Index	100	96	140	235
Of which Indirect imports in the EU	21.305	20.310	26.976	50.983
Index	100	95	127	239

*Imports from Indonesia in the targeted countries aggregated from data provider available upon subscription, based on official custom database
Information on melting of slabs in relevant countries available from company specific evidence and internal intelligence*

Exports from Indonesia (all de:	2017	2018	2019	2020	2021	2022
Slabs	302.837	207.859	243.809	153.602	484.906	723.830
SSHR Wide Strips	324.109	1.221.896	1.608.666	1.171.342	2.028.868	1.608.445
Slabs + SSHR Wide Strips	626.946	1.429.754	1.852.475	1.324.944	2.513.774	2.332.275

	Company	Cold-rolling capacity in '000 tonnes
Taiwan	Walsin Lihwa	350-500
	YUSCO	600-800
	Tung Mung	150-250
	Yuan Long	100-170
	Chia Far	50-100
	Chien Shing	70-130
	Tang Eng	200-275
Turkey	POSCO	275-425
	Trinox	Minimum 75
Vietnam	Yongjin	250
	POSCO	200-400
	Hoa Binh	150-220
Indonesia	PT Jindal Indonesia	150-200
	Indonesia Ruipu Stainless steel	1000-1500

Source: <https://www.linkedin.com/company/trinox-stainless-steel/about/>

Overview

TRINOX METAL, serves as an stainless steel flat producer since 2014 in Çorlu production facilities which Turkey's first cold rolling manufacturer of stainless steel DAIYANG METAL had began operations in 2007.

TRINOX's production facilities are located in an area of 80,000 square meters in Avrupa Serbest Bolgesi (ASB) region, Northern Tekirdag. The company has 75,000 tons of production capacity per year and can produce 60,000 tons of 2B surface and 15,000 tons of BA surface.

As an affiliate company of a world-famous stainless-steel processing business group, Trinox metal is engaged in entire value chain from production to processing and marketing and strives for customer satisfaction with a deeper understanding of the fast-changing business environments that today's customers are facing.

With a humble vision to become the most beloved and reliable supplier, the genuine Turkish corporation actively fulfills principles of excellence and devotion and exerts a great deal of effort to get growing while achieving customer advocacy.

Website

<http://www.trinoxmetal.com>

Confidential information not susceptible of summarisation

Statement in the complaint:

"The plant started operation in 2022 (...)"

Source:

Kallanish [Kallanish, Yongjin Vietnam sees first coil production, 22 March 2022, https://www.kallanish.com/en/news/steel/market-reports/article-details/yongjin-vietnam-sees-first-coil-production-0322/.](https://www.kallanish.com/en/news/steel/market-reports/article-details/yongjin-vietnam-sees-first-coil-production-0322/)

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22 MAR 11:50 **Yongjin Vietnam sees first coil production**

799 Views

Publicly listed Zhejiang Yongjin Metal Technology Company announced on Monday that it has officially started production at its Vietnamese stainless steel plant. Kallanish notes, Yongjin Metal Technology (Vietnam) Company was established in April 2019. It started the construction of a 250,000 tonnes/year capacity precision cold rolled stainless steel strip project in Tinh Tien Giang in 2020. The main equipment includes two 1,450mm cold rolling lines and one 1,450...

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NEWS

The Cornerstone Laying Ceremony of Guangdong Yongjin Project Was Successfully Held

Time: 2018 06 25

Visits: 2,202

On the morning of June 22, the Cornerstone Laying Ceremony of the 680,000-ton Precision Stainless Steel Deep Processing Project of Guangdong Yongjin Metal Technology Co. LTD. was successfully held at the port industrial park of Yangjiang High-tech Development Zone. More than 300 people attended the ceremony, including CHEN Xiaoshan, the secretary of Yangjiang Municipal Party Committee, LIN Ruixi, the secretary-general of Yangjiang Municipal Party Committee, LIN Jinqiu, the deputy director of the standing committee of the municipal people's congress and secretary of the party committee of Yangjiang High-tech Development Zone, ZHANG Lei, the deputy mayor of Yangjiang City, and the other municipal and district leaders, as well as XIANG Guangda, the chairman of TSINGSHAN's board of directors, HUANG Ping, the chairman of GDFTG, LIN Xiamiao, the chairman of board of supervisors of provincial enterprises accredited by provincial SASAC, WANG Lei, the chairman of GQMT, HE Congzhen, the general manager of GQMT and guests from the other iron and steel enterprises.

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Project of Guangdong Yongjin Metal Technology Co. LTD. was successfully held at the port industrial park of Yangjiang High-tech Development Zone. More than 300 people attended the ceremony, including CHEN Xiaoshan, the secretary of Yangjiang Municipal Party Committee, LIN Ruixi, the secretary-general of Yangjiang Municipal Party Committee, LIN Jinqiu, the deputy director of the standing committee of the municipal people's congress and secretary of the party committee of Yangjiang High-tech Development Zone, ZHANG Lei, the deputy mayor of Yangjiang City, and the other municipal and district leaders, as well as XIANG Guangda, the chairman of TSINGSHAN's board of directors, HUANG Ping, the chairman of GDFTG, LIN Xiamiao, the chairman of board of supervisors of provincial enterprises accredited by provincial SASAC, WANG Lei, the chairman of GQMT, HE Congzhen, the general manager of GQMT and guests from the other iron and steel enterprises.

At the ceremony, DONG Zhaoyong, the chairman of Guangdong Yongjin, introduced the overall situation of the project. And the municipal and district leaders have delivered speeches successively. WANG Lei delivered a speech on behalf of GQMT. He pointed out that the construction of Guangdong Yongjin 680,000-ton precision stainless steel deep processing project was of great significance for the development of the stainless-steel industry in Yangjiang. GQMT firmly believed that the cooperation and alliance with Yongjin would eventually beneficial to the realization of the dream of high-end stainless steel cluster production and make greater contributions to the development of China's stainless steel industry.

At the end of the ceremony, the leaders and guest representatives jointly laid the stone on the foundation site symbolizing the completion of the Foundation Stone Laying Ceremony.

Internal intelligence of the applicant on the relationship between the Tsingshan Indonesia and exporters in third countries, information on supply etc... not susceptible of further summarisation

Internal intelligence of the applicant on the relationship between the Tsingshan Indonesia and exporters in third countries, information on supply etc... not susceptible of further summarisation

60% threshold assessment

	Value of Indonesian input in total value of inputs	
	Unadjusted reported value	Adjusted fair value (+21,4% to Indonesian inputs value)
Taiwan	62,3%	66,7%
Vietnam	60,4%	64,9%
Turkey- Trinox	>90%	>90%

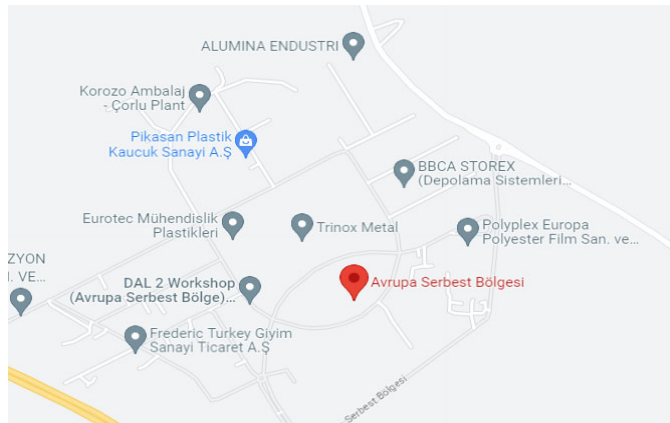
Summary of confidential information

2022

	Value in EUR		
	No adjustment	Adjusted for subsidisation (+21,4% to value)	
Relevant Inputs from Indonesia value	1.600.000.000 - 2.000.000.000		<i>Indonesian inputs susceptible to be used in re-rolling operation</i>
Relevant Inputs from Indonesia via third countries	Negligible	Business confidential information	<i>Indonesian inputs imported via countries with no production of SSHR or from countries where Indonesian inputs are used for the production of SSHF including domestic melting and other imports</i>
Inputs from other sources	1.150.000.000 - 1.450.000.000		<i>Inputs not susceptible to be used in re-rolling operation, originating from other sources</i>
Inputs not susceptible to be used in SSCR to the EU	230.000.000 - 280.000.000		
Share of Indonesian inputs	62,3%	66,7%	

OVERVIEW	
Company name	Trinox Metal Industry and Trade AS
Establishment	2007
Address	European Free Zone Osman Sahin Bulvari No.7 Ergene, Tekirdag – TURKEY
Products	Cold Rolled Stainless Steel Coil
Classes	300 Series – 304(L), 309, 316(L), etc. 400 Series - 420, 430, 439, 441, etc.
Surfaces	BA, 2B, Scotch Bright, No.4, Linen
Dimensions	(2B) 0.30–2.00mm X 1300mm (BA) 0.15–1.20mm X 800mm

GENEL BAKIS	
Sirket Adı	Trinox Metal Sanayi ve Ticaret A.S
Kurulus	2007
Adres	Avrupa Serbest Bölgesi Osman Sahin Bulvari No.7 Ergene, Tekirdag – TÜRKİYE
Ürünler	Soguk haddelenmis Paslanmaz Çelik Rulo
Sınıflar	300 Serisi – 304(L), 309, 316(L), vb. 400 Serisi - 420, 430, 439, 441, vb.
Yüzeyler	BA, 2B, Scotch Bright, No.4, Linen
Öçüler	(2B) 0.30–2.00mm X 1300mm (BA) 0.15–1.20mm X 800mm



- 1/ Trinox is established on the European Free Zone Osman Sahin Bulvari, in Turkish "Avrupa Serbest Bölgesi"
- 2/ It is the sole producer of SSCR established on that zone
- 3/ [Confidential information summarised as follows : Trinox purchases SSHR]
- 4/ Imports and export by Trinox can be tracked based on the custom clearing point

		2022	
		Value in EUR	
		No adjustment	Adjusted for subsidisation (+21,4% to value)
Indonesian inputs		150.000.000 - 200.000.000	Business confidential information
Other imported inputs		5.975.000 - 6.500.000	
All inputs		155.975.000 - 206.500.000	
Share of Indonesian inputs		>90%	>90%

Summary of confidential information

	2022		
	Value in EUR		
	No adjustment	Adjusted for subsidisation (+21,4% to value)	
Relevant Inputs from Indonesia value	775.000.000 - 875.000.000		<i>Indonesian inputs susceptible to be used in re-rolling operation</i>
Relevant Inputs from Indonesia via third countries	35.000.000 - 45.000.000		<i>Indonesian inputs imported via countries with no production of SSHR or from countries where Indonesian inputs are used for the production of SSHR</i>
Relevant Inputs from other sources	500.000.000 - 600.000.000		<i>Inputs susceptible to be used in re-rolling operation originating from other sources</i>
Share of Indonesian inputs	60,4%	64,9%	

Information for 2023 show an even higher estimated level of Indonesian Inputs in the Vietnamese inputs used for production of SSCR

General methodology

The calculation aim at assessing the share of Indonesian inputs in the production of SSCR in the countries through which indirect imports from the countries concerned occur.

The calculation was adapted on a country specific basis for Taiwan and Vietnam depending on the following:

- Specificities of the production process in the country
- Availability and level of details of the custom statistics from the countries

It relies on the fact that slabs or SSHR are the sole "part" to be assessed in the context of an assembly operation test.

In general, the approach is the following:

1/ Valuation of the inputs from Indonesia based on custom statistics

2/ Valuation of the inputs from third countries based on custom statistics (imports). When applicable, valuation of the inputs produced in third countries based on reasonable inferences.

3/ When inputs are imported from a country in which there is no production of the inputs, the actual origin of the inputs is defined based on available information and split between Indonesian and non-Indonesian origin.

4/ Valuation of the inputs not used for the production of exports to the EU (overly expensive imports, imports linked to grade not exported to the EU, value of exports not produced from Indonesian inputs...)

Calculation of the share of the value of the share of Indonesian inputs on the total share of inputs potentially used for the production of SSCR in the country for exports to the EU as follows:

$$\text{Indonesian input value} / (\text{Indonesian input value} + \text{other input value} - \text{excluded input value}) = X\%$$

A second calculation is then made accounting for a corrected value of the Indonesian inputs, accounting for the subsidisation taking place in Indonesia, as follows:

$$(\text{Indonesian input value} * (1 + \text{CVD duty rate})) / ((\text{Indonesian input value} * (1 + \text{CVD duty rate})) + \text{other input value} - \text{excluded input value}) = X\%$$

The above calculation are made with regards to SSCR as a whole but is also available for austenitic SSCR only.

With regard to Turkey, the very same assessment is made on a company specific level based on the custom clearance point used by the company.

Summary

Product	Product stage	Total cost	Processing cost to SSCR	Added value share to produce SSCR from input
<i>slab 304</i>	slabs	2000-3800 EUR/t	Business confidential information	[10-14]%
<i>304 black band</i>	black SSHR	2000-3800 EUR/t		[4-8]%
<i>304 white band 3mm</i>	white SSHR	2250-4050 EUR/t		[2-6]%
<i>304 2B 2mm</i>	SSCR	2250-4050 EUR/t		

* Cost of production of 1 tonne of the products for (i) actual data for EU producer Company A (EU) in 2022) and (ii) estimated cost of Asian producer Company B (Asia) in 2022

The costs of production include:

- Charge cost: inputs used for the production as well as their average prices for 2022
- Energy
- Labor
- Other consumable
- yield effects

In tonnes	2019	2020	2021	2022
Total imports	929.004	776.148	893.946	1.300.417
Index	100	84	96	140
Imports from targeted countries	310.440	234.156	375.936	463.195
Index	100	75	121	149
Of which Indirect imports	76.898	55.915	120.059	186.578
Index	100	73	156	243
Imports from other countries (excluding China)	608.352	528.000	483.486	528.822
Index	100	87	79	87
Imports from China	10.212	13.992	34.524	308.400
Index	100	137	338	3.020

cf. Annex volume of indirect imports

All SSCR

	Indirect imports only		Total SSCR imports		Indirect imports share of total imports of SSCR
	2022		2022		
Taiwan	96.454	2,4%	251.418	6,1%	38,4%
Turkey	39.142	1,0%	125.057	3,1%	31,3%
Vietnam	50.983	1,2%	86.720	2,1%	58,8%
Total	186.578	4,6%	463.195	11,3%	40,3%
SSCR EU Market (total)	4.088.315		4.088.315		

Austenitic SSCR

	Indirect imports only		Total imports of austenitic SSCR		Indirect imports share of total imports of austenitic SSCR
	2022		2022		
Taiwan	96.454	3,3%	141.452	4,8%	68,2%
Turkey	39.142	1,3%	89.678	3,1%	43,6%
Vietnam	50.983	1,7%	75.044	2,6%	67,9%
Total	186.578	6,4%	306.174	10,5%	60,9%
Austenitic SSCR EU Market	2.924.511		2.924.511		

Indirect imports of Indonesian melted SSCR to the EU via third countries - Estimated

Indirect imports of Indonesian melted SSCR to the EU via third countries - Maximum

EU consumption and market share (All SSCR) (in tonnes and %)	2019	2020	2021	2022
SSCR EU Market	3.628.512	3.325.224	3.853.431	4.088.315
EU mills deliveries	2.699.508	2.549.076	2.959.485	2.787.898
Imports	929.004	776.148	893.946	1.300.417
Of which SSCR imported from targeted countries	310.440	234.156	375.936	463.195
Of which indirect austenitic SSCR melted in Indonesia	76.898	55.915	120.059	186.578
market share EU mills	74,4%	76,7%	76,8%	68,2%
market share imports	25,6%	23,3%	23,2%	31,8%
Of which SSCR from targeted countries	8,6%	7,0%	9,8%	11,3%
Of which indirect SSCR melted in Indonesia	2,1%	1,7%	3,1%	4,6%

Based on the austenitic sales of EU mills and imports
SSCR EU market for austenitic (estimate)

	2019	2020	2021	2022
	2.699.614	2.478.453	2.841.849	2.924.511

EU consumption and market share (aust. SSCR) (in tonnes and %)	2019	2020	2021	2022
market share EU mills austenitic	75,9%	78,7%	78,2%	67,6%
market share imports austenitic	24,1%	21,3%	21,8%	32,4%
Of which austenitic SSCR imported from targeted countries	7,3%	5,3%	8,3%	10,5%
Of which indirect SSCR melted in Indonesia	2,8%	2,3%	4,2%	6,4%

	2019	2020	2021	2022
Total Imports of SSCR from Indonesia	72.768	106.488	107.364	51.379
Imports of austenitic SSCR from Indonesia	62.974	100.055	98.329	41.400
Market share of imports of SSCR from Indonesia	2,0%	3,2%	2,8%	1,3%
Market share of imports of austenitic SSCR from Indonesia for austenitic sales	2,3%	4,0%	3,5%	1,4%

	2022
SSCR EU Market	4.088.315
EU mills deliveries	2.787.898
Imports	1.300.417
Austenitic SSCR from third countries	306.174
market share EU mills	
market share imports	
<i>Of which m.s. of indirect aust melted in Indonesia</i>	7,5%

market share EU mills austenitic	68%
market share imports austenitic	32%
<i>Of which m.s. of indirect aust melted in Indonesia</i>	10,5%

Nota: figures in the table below are monthly averages

to/month	EU27 Market supply	Deliveries by EU mills	Third Countries out EU27	of which:				
Period				China	Taiwan	Turkey	Vietnam	Indonesia
average 2022	340.699	232.325	108.368	25.700	20.952	10.421	7.227	4.282
average 2021	321.119	246.624	74.496	2.877	18.234	8.797	4.297	8.947
average 2020	277.102	212.423	64.679	1.166	10.415	6.153	2.945	8.874
average 2019	302.376	224.959	77.417	851	15.468	7.331	3.071	6.064

Sources: Imports: Eurostat/Comext
EU mills deliveries: EUROFER

	2019	2020	2021	2022	
EU Market	3.628.512	3.325.224	3.853.431	4.088.389	
Imports targeted countries	310.440	234.156	375.936	463.195	
of which indirect imports	76.898	55.915	120.059	186.578	<i>Cf annex volume of indirect imports</i>
Total imports	929.004	776.148	893.946	1.300.417	
of which austenitic	651.898	528.286	618.484	948.383	<i>Cf annex volume of indirect imports</i>
Imports of SSCR from Taiwan	185.614	125.070	218.792	251.418	<i>Cf annex volume of indirect imports</i>
Of which indirect imports	51.927	26.764	74.884	96.454	<i>Cf annex volume of indirect imports</i>
Imports of SSCR from Turkey	87.967	73.833	105.600	125.057	<i>Cf annex volume of indirect imports</i>
Of which indirect imports	3.667	8.842	18.199	39.142	<i>Cf annex volume of indirect imports</i>
Imports of SSCR from Vietnam	36.855	35.338	51.559	86.720	<i>Cf annex volume of indirect imports</i>
Of which indirect imports	21.305	20.310	26.976	50.983	<i>Cf annex volume of indirect imports</i>
Imports of SSCR from Indonesia	72.768	106.488	107.364	51.379	<i>Cf annex volume of indirect imports</i>
of wich austenitic SSCR	62.974	100.055	98.329	41.400	<i>Cf annex volume of indirect imports</i>

Nickel price

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

in USD/ tonne

2022	
Month	LME Nickel Cash-Settlement
December	28.854
November	25.257
October	21.936
September	22.682
August	21.998
July	21.483
June	25.838
May	27.950
April	33.298
March	31.861
February	24.178
January	22.326

2019	
Month	LME Nickel Cash-Settlement
December	13.801
November	15.200
October	17.113
September	17.673
August	15.682
July	13.462
June	11.970
May	11.998
April	12.819
March	13.061
February	12.650
January	11.455

Average 25.638 USD/ Tonnes

13.907 USD/ Tonnes

increase by **84,4%**

EU COP for SSCR

2022
3400-3700 EUR/ Tonnes

2019
2100-2400 EUR/ Tonnes

Average COGS for the Applicant

increase by **54,8%**

2022	All SSCR	indirect imports only
Undercutting by import from Taiwan	13,7%	18,5%
Undercutting by import from Turkey	14,5%	19,7%
Undercutting by import from Vietnam	11,2%	16,8%

2022	All SSCR	indirect imports only
Undercutting by imports from third countries	13,5%	18,3%

Taiwan

EU Imports from Taiwan tonnes	2022				2022
	Q1	Q2	Q3	Q4	Fy
SSCR (total)	81.127	72.978	49.924	47.389	251.418
SSCR (<2.5% Ni)	31.512	31.452	26.139	20.863	109.966
SSCR (>2.5% Ni and 3100)	47.280	39.174	22.864	25.583	134.901
SSCR (others)	2.335	2.352	921	943	6.551
SSCR (>2.5% Ni, 3100 and others)	49.615	41.526	23.785	26.526	141.452

Share	Duty	Landed price 2022	Comparable EU price	UC
54,3%	6,80%	3.151	3.652	13,7%

EU Imports from Taiwan euro/tonne	2022				2022
	Q1	Q2	Q3	Q4	Fy
SSCR (total)	2.626	2.965	3.092	3.335	2951
SSCR (<2.5% Ni)	2.076	2.263	2.401	2.394	2267
SSCR (>2.5% Ni and 3100)	2.964	3.491	3.847	4.075	3477
SSCR (others)	3.217	3.602	3.989	4.080	3588
SSCR (>2.5% Ni, 3100 and others)	2.976	3.497	3.852	4.075	3482

Turkey

EU Imports from Turkey tonnes	2022				2022
	Q1	Q2	Q3	Q4	Fy
SSCR (total)	27.969	36.819	36.468	23.801	125.057
SSCR (<2.5% Ni)	10.171	10.930	7.732	6.400	35233
SSCR (>2.5% Ni and 3100)	17.009	25.459	28.363	16.760	87.591
SSCR (others)	789	430	373	641	2.233
SSCR (>2.5% Ni, 3100 and others)	17.798	25.889	28.736	17.401	89824

Share	Duty	Landed price 2022	Comparable EU price	UC
27,0%	0%	3.374	3.945	14,5%

EU Imports from Turkey euro/tonne	2022				2022
	Q1	Q2	Q3	Q4	Fy
SSCR (total)	3.008	3.321	3.578	3.574	3374
SSCR (<2.5% Ni)	2.276	2.354	2.401	2.414	2353
SSCR (>2.5% Ni and 3100)	3.422	3.725	3.911	4.032	3785
SSCR (others)	3.524	3.951	2.717	3.191	3376
SSCR (>2.5% Ni, 3100 and others)	3.426	3.728	3.895	4.001	3774

Vietnam

EU Imports from Vietnam tonnes	2022				2022
	Q1	Q2	Q3	Q4	Fy
SSCR (total)	17.864	17.074	24.503	27.279	86.720
SSCR (<2.5% Ni)	3.521	2.745	4.220	1.190	11676
SSCR (>2.5% Ni and 3100)	13.967	14.329	20.283	26.089	74.668
SSCR (others)	376	0	0	0	376
SSCR (>2.5% Ni, 3100 and others)	14.343	14.329	20.283	26.089	75044

Share	Duty	Landed price 2022	Comparable EU price	UC
19%	0%	3.748	4.222	11,2%

EU Imports from Vietnam euro/tonne	2022				2022
	Q1	Q2	Q3	Q4	Fy
SSCR (total)	3.101	3.489	3.751	4.330	3748
SSCR (<2.5% Ni)	2.427	2.661	2.623	2.596	2570
SSCR (>2.5% Ni and 3100)	3.280	3.647	3.986	4.409	3937
SSCR (others)	2.757	0	0	0	2757
SSCR (>2.5% Ni, 3100 and others)	3.266	3.647	3.986	4.409	3931

TOTAL UC
13,5%

Total imports 3 countries 463.195

Comparable EU price is defined based on the import mix of the targeted country and the the EU price splits of Applicants for austenitic and ferritic SSCR

Indirect imports

Calculation of the prices of the indirect imports

1/ Indirect imports are austenitic

2/ Indirect imports benefit from austenitic inputs from Indonesia that are at a lower price than other austenitic imports

3/ In some countries, possibility to see the difference in price of austenitic inputs (Taiwan and Turkey), for Vietnam no possibility

4/ Definition of country specific or general ratio at SSHR level (to avoid issues of Slabs vs SSHR mix)

	Indonesian SSHR/ Non Indonesian SSHR
Taiwan	94,22%
Turkey	91,78%
Vietnam	85,30% Estimated based on average prices in Taiwan and Turkey

		Taiwan	Turkey	Vietnam
Total imports of austenitics in the EU	tonne	141.452	89.824	75.044
Average price of austenitic imports	EUR/ tonne	3.482	3.774	3.931
Indirect imports in the EU	tonne	96.454	39.142	50.983
Share of indirect imports	%	68,19%	43,58%	67,94%
Other imports of austenitic in the EU	tonne	44.998	50.682	24.061
Share of other imports	%	31,81%	56,42%	32,06%
Price indirect imports	EUR/ tonne	3.416	3.593	3.725
Price other austenitic imports	EUR/ tonne	3.625	3.915	4.367

Cf. annex volume of indirect imports

	2022	UC	Applicable duty
	border	duty paid	%
Taiwan	3416	3648	18,5%
Turkey	3593	3593	19,7%
Vietnam	3725	3725	16,8%
			%
			6,80%
			0%
			0%

Average price import price 2022 (indirect) 3.657 EUR/ Tonne
 EU price to unrelated austenitic SSCR in 2022 4.476 EUR/ Tonne

Source: average sales price of the Applicant

Undercutting 18,3%

Austenitic imports

Volume of indirect imports in the EU in tonnes	2022
Taiwan	96.454
Turkey	39.142
Vietnam	50.983

Price of Imports in the EU (Eurostats) in EUR/tonnes	2022
Taiwan	3.482
Turkey	3.774
Vietnam	3.931

Price of imports in the EU with applicable duties in EUR/tonnes	duty	2022 duty paid	UC
Taiwan	6,8%	3.719	16,9%
Turkey	0,0%	3.774	15,7%
Vietnam	0,0%	3.931	12,2%

Average price import price 2022 (indirect) 3.789 EUR/ Tonne
EU price to unrelated austenitic SSCR in 2022 4.476 EUR/ Tonne

Source: average sales price of Applicant

Undercutting 15,3%

Source: Applicants internal Intelligence

Austenitic SSCR

<i>in EUR/ tonne</i>	Price information	EUROSTAT CIF +duty	Difference in price
Example of Turkish prices - 2022	3000-3300	3.774	474-774
Example of Taiwan prices - 2022	3000-3300	3.719	419-719
Example of Company A (Turkey) price - Q4 2022	3400-3700	4.001	301-601

Source Annex 9 - UC all imports

1. Step 1: increase in export price for Indonesian SSCR to assess increase in Indonesian NV

- 1/ Excluding exports to China because of the existence of related companies (and information on exports of unprocessed 2E SSCR)
 2/ Excluding exports to the EU (as they were found to be dumped and therefore not representative)

	IP	2022	Variation
Volume	168.624	156.690	
Value	268.426.176	419.936.497	
EUR/ Tonne	1.592	2.680	168%

2. Step 2: Calculation of the prices of the indirect imports

- 1/ Indirect imports are austenitic
 2/ Indirect imports benefit from austenitic inputs from Indonesia that are at a lower price than other austenitic imports
 3/ In some countries, possibility to see the difference in price of austenitic inputs (Taiwan and Turkey), for Vietnam no possibility
 4/ Definition of country specific or general ratio at SSHR level (to avoid issues of Slabs vs SSHR mix)

	Price diff. Indirect / other	
Taiwan	94,22%	
Turkey	91,78%	
Average	85,30%	Estimated based on average prices in Taiwan and Turkey

		Taiwan	Turkey	Vietnam	
Total imports of austenitics in the EU	tonne	141.452	89.824	75.044	Source UC indirect imports of SSCR in Annex undercutting
Average price of austenitic imports	EUR/ tonne	3482	3774	3931	Source UC indirect imports of SSCR in Annex undercutting
Indirect imports in the EU	tonne	96.454	39.142	50.983	Source UC indirect imports of SSCR in Annex undercutting
Share of indirect imports	%	68,19%	43,58%	67,94%	
Other imports of austenitic in the EU	tonne	44.998	50.682	24.061	
Share of other imports	%	31,81%	56,42%	32,06%	
Price indirect imports	EUR/ tonne	3.416	3.593	3.725	
Price other austenitic imports	EUR/ tonne	3.625	3.915	4.367	

3. Step 3: Dumping caculation

- 1/ Calculation of the adjusted Indonesian EP for 2022
 2/ Definition of the non-dumped EU price for imports in 2022 based on residual AD duty
 3/ Dumping calculation for indirect imports
 4/ Dumping calculation for total imports

Dumping calculation	IP	2022	
Dumping SSCR imports from Indonesia (IP)			
Indonesian CIF export price to the EU	1962	3303	Source AD prov Reg
Indonesian dumping margin	20,20%	20,20%	Source AS Reg
Minimum non dumped CIF price	2.358	3.970	

Indirect imports	EUR/ tonne	Dumping	Dumping margin
Taiwan	3416	555	16,2%
Turkey	3593	377	10,5%
Vietnam	3725	246	6,6%

Total imports	EUR/ tonne	Dumping	Dumping margin
Taiwan	2.951	1.020	34,6%
Turkey	3.374	596	17,7%
Vietnam	3.748	223	5,9%

source UC overall imports (annex 9)

Dumping calculation	Overall imports	Indirect imports
Taiwan	34,6%	16,2%
Turkey	17,7%	10,5%
Vietnam	5,9%	6,6%