USITC Inv. Nos. 701-TA ___, 731-TA-___-___
DOC Inv. No. C-489-859
Total Pages: 1,482
Investigation

PUBLIC DOCUMENT

BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION

WELDED STAINLESS LINE AND PRESSURE PIPE FROM INDIA, TÜRKIYE, AND THE UNITED ARAB EMIRATES

PETITION FOR THE IMPOSITION OF ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED

VOLUME VI
INFORMATION RELATING TO TÜRKIYE – COUNTERVAILABLE SUBSIDIES

SCHAGRIN ASSOCIATES
900 Seventh Street NW
Washington, D.C. 20001
(202) 223-1700

Counsel to Bristol Pipe and Tube Inc.,
Felker Brothers Corporation, and
Primus Pipe and Tube Inc.

July 15, 2026

TABLE OF CONTENTS

TABLE OF EXHIBITS

VI-1	"Publication 946 (2025) : How to Depreciate Property," *Department of the Treasury, Internal Revenue Service* (excerpt)	Public
VI-2	The Investment and Finance Office of the Presidency of the Republic of Türkiye, "Investment Zones"	Public
VI-3	FDI Consultancy, "Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors" (Mar. 27, 2026)	Public
VI-4	Steel Radar, "Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye" (July 7, 2025)	Public
VI-5	Daily Sabah, "Taiwanese steel giant to establish plant in Kocaeli" (Dec. 11, 2019)	Public
VI-6	Yieh Corp., "YC Inox's Turkish factory produces first industrial stainless steel pipe" (Dec. 31, 2024)	Public
VI-7	GOT Letter, "Response of the Government of Turkey to Supplemental Questionnaire in Countervailing Duty Investigation on Common Alloy Aluminum Sheet from the Republic of Turkey," (July 20, 2020)	Public
VI-8	GOT Letter, "Response of the Government of Turkey in CVD Investigation on Imports of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from Turkey," (Oct. 28, 2015)	Public
VI-9	Yieh Corp., "Taiwanese YC Inox plans to build mill in Turkey" (July 22, 2019)	Public
VI-10	Exchange-Rates.org, "Taiwan Dollar (TWD) To US Dollar (USD) Exchange Rate History for 2025"	Public
VI-11	Imtilak Real Estate, "Guide to Land Investment in Istanbul" (July 12, 2026)	Public
VI-12	GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Brake Drums from the Republic of Türkiye" (Sept. 26, 2024)	Public
VI-13	Yeni Elektrik Üretim A.Ş, "About Us"	Public
VI-14	GOT, "Guide to Investing in Turkish Renewable Energy Sector"	Public
VI-15	Commerce Memorandum, "Preliminary Analysis of Countervailing Duty Investigation of Common Alloy Aluminum Sheet from the Republic of Turkey" (Dec. 28, 2020)	Public
VI-16	Oreanco, "YC Inox's Turkish Triumph Transforms Trade & Technology" (July 23, 2025)	Public
VI-17	Turk Eximbank, "About Us"	Public
VI-18	Turk Eximbank, "2024 Annual Report"	Public
VI-19	Turk Eximbank, "Rediscount Credit Program"	Public
VI-20	Turk Eximbank, "Post-Shipment Rediscount Credit Program"	Public
VI-21	Turk Eximbank, "Pre-Shipment Export Credit Program"	Public

VI-22	Turk Eximbank, "Pre-Export Program"	Public
VI-23	Turk Eximbank, "Export-Oriented Investment Credit Program"	Public
VI-24	Turk Eximbank, "Export-Oriented Working Capital Credit Program"	Public
VI-25	Turk Eximbank, "Specific Export Credit Program"	Public
VI-26	Turk Eximbank, "International Trade Finance Programs"	Public
VI-27	Turk Eximbank, "Buyer's Credits Through Domestic Banks"	Public
VI-28	Turk Eximbank, "Buyer's Credits Through Foreign Banks"	Public
VI-29	Turk Eximbank, "Letter of Guarantee Program"	Public
VI-30	BOTAŞ, "Corporate Profile"	Public
VI-31	IEA, *Energy Policies of IEA Countries: Turkey 2009 Review*, (2009)	Public
VI-32	M. Oğuzcan Bulbul, *Liberalization of the Turkish Natural Gas Market*, Rekabet Dergisi Competition Journal, vol. 11, (Jan. 2010)	Public
VI-33	U.S. Energy Information Administration, *Country Analysis Brief: Türkiye* (July 11, 2023)	Public
VI-34	Convert Units Website Excerpt	Public
VI-35	Zeynep Beyza Karabay, *Turkiye's gas consumption estimate for 2022 shows year-on-year 18.8% rise*, AA Energy (Jan. 28, 2022)	Public
VI-36	Semih Ergur, *Increasing Usage of Natural Gas in Turkey and Its Effect on Local Economy*, Climate Scorecard (June 5, 2022)	Public
VI-37	Yieh Corp., "YC Inox starts stainless steel sanitary tube production in Turkish plant" (Oct. 16, 2024)	Public
VI-38	GOT, "Guide to State Incentives for Investments in Türkiye"	Public
VI-39	Renewable Energy Law No. 5346	Public
VI-40	Excerpts from GOT Letter, "Response of the Government of Turkey in 2016 Countervailing Duty Administrative Review on Imports of Steel Concrete Reinforcing Bar from Turkey," (May 14, 2018)	Public
VI-41	GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Certain Steel Nails from the Republic of Turkey," (Public Version) (Mar. 28, 2022)	Public
VI-42	Kocaeli TV, "Companies from Kocaeli will showcase their innovations at the International Elevator Istanbul Fair" (May 8, 2025)	Public
VI-43	Asansor.Istanbul, "Instagram" (May 13, 2025)	Public
VI-44	Ministry of Trade, "Turquality®"	Public
VI-45	GOT, "Law on Supporting Research, Development and Design Activities No. 5746"	Public
VI-46	Ekin İnal & Mert Müstecaplıoğlu, "Turkey has extended R&D and design centers incentive program," Norton Rose Fulbright (Mar. 29, 2021)	Public

VI-47	Council of Ministers' Decree No. 2012/3305	Public
VI-48	GOT, "The Investment Incentive Program of Turkey"	Public
VI-49	Norton Rose Fulbright, "Turkish Government Launches Project-Based Incentive Program to Boost Investments," (May 7, 2017)	Public

I. COUNTERVAILING DUTIES SHOULD BE IMPOSED ON IMPORTS OF WELDED STAINLESS LINE AND PRESSURE PIPE FROM TÜRKIYE

This volume of the petition presents information reasonably available to Bristol Pipe and Tube Inc., Felker Brothers Corporation, and Primus Pipe and Tube Inc. ("Petitioners") demonstrating that the production and exportation of welded stainless line and pressure pipe ("WSLPP") from Türkiye is benefiting from countervailable subsidies within the meaning of Section 771(5) of the Tariff Act of 1930, as amended ("the Act").[1] Pursuant to Section 701(a)(1) and (2) of the Act, the U.S. Department of Commerce ("Commerce") shall impose a countervailing duty on merchandise imported from a "Subsidies Agreement" country[2] where the imported merchandise: (1) is produced or exported by companies that benefit from countervailable subsidies and (2) materially injures or threatens material injury to a domestic industry.[3] Both of these requirements are plainly satisfied here. Accordingly, Petitioners request that Commerce investigate and impose countervailing duties with respect to the countervailable subsidies set forth herein and any other countervailable subsidies discovered in the course of the requested countervailing duty investigation.

II. NAME OF THE COUNTRY IN WHICH THE SUBJECT MERCHANDISE IS MANUFACTURED OR PRODUCED

The subject merchandise is manufactured or produced in Türkiye, and the countervailable subsidies have been conferred by the Government of Türkiye ("GOT") and other government and public entities in Türkiye.

---

1 *See* 19 U.S.C. § 1677 (5).

2 As a member of the World Trade Organization ("WTO"), Türkiye is a country under the "Subsidies Agreement."

3 19 U.S.C. § 1671(a)(1) and (2).

III. NAMES AND ADDRESSES OF TURKISH PRODUCERS BENEFITTING FROM SUBSIDY PROGRAMS

Petitioners have identified several producers or exporters of WSLPP in Türkiye believed to have benefited from countervailable subsidies and whose products are believed to have been exported to the United States. The full names and addresses of these companies can be found in Volume I of these petitions at Exhibit I-18.

IV. EFFORTS TO OBTAIN INFORMATION

In accordance with the statutory and regulatory provisions for countervailing duty petitions, this volume presents information "reasonably available" to Petitioners concerning possible countervailable subsidies available to, and bestowed on, producers and exporters of the subject merchandise in Türkiye.[4] Notably, Petitioners do not have to prove at the outset that a subsidy allegation will be confirmed during the course of the investigation or that a potentially countervailable subsidy is actually being used for a subsidy allegation to be included in an investigation.[5]

Petitioners have conducted extensive research to document government subsidies provided by the GOT and other government and public entities to producers and exporters of WSLPP in Türkiye, including a review of the following sources:

> (1) Past countervailing duty determinations (*i.e.*, Federal Register notices and available information from case dockets) covering the country, subject merchandise, and or/producers included in this Petition;
>
> (2) Articles and news reports regarding the producers, industry,

---

4 *See* 19 U.S.C. § 1671a(b)(l); 19 C.F.R. § 351.202 (setting forth the "reasonably available" standard).

5 *See, e.g., Forged Steel Fittings from the People's Republic of China: Final Affirmative Countervailing Duty Determination*, 83 Fed. Reg. 50,342 (Dep't Commerce Oct. 5, 2018), and accompanying Issues and Decision Memorandum ("IDM") (ACCESS Barcode: 3758609-02) at Comment 2.

> and country in question available through the World Wide Web and online data services;
>
> (3) Where available, public financial information for the producers, industry, and country at issue; and
>
> (4) Reports from the World Trade Organization ("WTO"), European Union, U.S. government, and other governments concerning the producers of the subject merchandise, the industry in Türkiye, and the alleged subsidy programs.

Yet, much of the information that would allow Petitioners to determine with certainty the types and amounts of subsidies received by producers or exporters of WSLPP in Türkiye is difficult or impossible to obtain. As a result of the difficulties inherent in documenting subsidization, Petitioners agree with Commerce that "there are typically no independent sources for data on company-specific benefits resulting from countervailable subsidy programs."[6] The most thorough manner in which the type and number of subsidies may be determined is through administrative investigations.

Despite the difficulties in obtaining information, Petitioners investigated and are providing information demonstrating that the GOT and other government and public entities have granted, and continue to grant, various forms of assistance to producers and exporters of WSLPP in Türkiye that constitute countervailable subsidies pursuant to Section 771 of the Act.[7]

V. PERIOD OF INVESTIGATION AND AVERAGE USEFUL LIFE

The most recently completed calendar year as of the filing of these petitions is 2025, and calendar year 2025 is therefore the appropriate period of investigation ("POI") for this

---

[6] *Notice of Preliminary Affirmative Countervailing Duty Determination: Prestressed Concrete Steel Wire Strand from India*, 68 Fed. Reg. 40,629, 40,632 (Dep't Commerce July 8, 2003).

[7] *See* 19 U.S.C. § 1677.

proceeding.[8] In addition to investigating any recurring subsidies granted during the POI and any subsidized loans outstanding during the POI, Commerce is also required to investigate any non-recurring subsidies conferring a benefit that are allocable to the POI.[9] Commerce will presume the allocation period for non-recurring subsidies to be the average useful life ("AUL") of renewable physical assets for the industry concerned as listed in the U.S. Internal Revenue Service's 1977 Class Life Asset Depreciation Range System.[10] In the instant case, the AUL is 15 years.[11] Commerce should therefore investigate any non-recurring subsidies received from 2011 to 2025, as well as recurring subsidies and outstanding loans during 2025.

VI. IMPORTS OF WSLPP FROM TÜRKIYE BENEFIT FROM COUNTERVAILABLE SUBSIDIES

The GOT and other government and public entities provide various forms of assistance to producers and exporters of the merchandise under consideration, including grants, preferential lending, income tax deductions and credits, export financing and guarantees, import duty exemptions, and the provision of goods. The available evidence indicates that these forms of assistance constitute countervailable subsidies under Section 771 of the Act because they constitute financial contributions, provide a benefit, and are specific. Petitioners provide descriptions of the various countervailable subsidies available to Turkish producers and exporters of WSLPP below.

---

8 19 C.F.R. § 351.204(b)(2).

9 19 C.F.R. §§ 351.524(a) and (b), 351.525.

10 *See* "Publication 946 (2025): How to Depreciate Property," *Department of the Treasury, Internal Revenue Service* (excerpt) at p. 103, attached at **Exhibit VI-1**.

11 *Id*. at Table B-2, Asset Class 33.4 ("Manufacture of Primary Steel Mill Products").

A. Subsidies in Organized Industrial Zones

The GOT has established a number of different regional subsidy programs based on the establishment of different zones, including Organized Industrial Zones ("OIZs"). These programs have been used specifically to help subsidize and improve the performance of exporters in Türkiye. There are 392 OIZs in operation in Türkiye.[12]

According to the GOT, OIZs "are designed to allow companies to operate within an investor-friendly environment with ready-to-use infrastructure and social facilities."[13] Available benefits include exemption of real estate duties and other land-use taxes, exemptions of value-added tax for land acquisitions, low-cost water, natural gas, and telecommunications, exemptions from municipality taxes on construction and plant usage, and exemptions from municipality taxes on solid waste.[14] Additional benefits include exemptions from tax on corporate land sales and electricity subsidies that are typically 10 to 25 percent below the national electricity tariff price.[15]

In 2019, Taiwanese WSLPP producer YC Inox Co., Ltd. ("YC Inox") established a Turkish subsidiary, YC Inox TR Çelik Sanayi ve Ticaret A.Ş. ("YC Inox TR"), and purchased land in the Dilovasi Machinery Specialized OIZ in Kocaeli province, investing a total of $383 million to build three separate production facilities to facilitate exports around the globe.[16] YC

---

12 The Investment and Finance Office of the Presidency of the Republic of Türkiye, "Investment Zones," attached at **Exhibit VI-2**.

13 *Id.*

14 *Id.*

15 FDI Consultancy, "Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors" (Mar. 27, 2026), attached at **Exhibit VI-3**.

16 Steel Radar, "Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye" (July 7, 2025), attached at **Exhibit VI-4**; *see also* Daily Sabah, "Taiwanese steel giant to establish plant in Kocaeli" (Dec. 11, 2019), attached at **Exhibit VI-5**.

Inox TR's facility is built on a total area of 100 thousand square meters, consisting of a 35 thousand square meter pipe factory, a 21 thousand square meter steel service center and a 40 thousand square meter industrial pipe factory.[17] YC Inox TR is reported to have begun producing WSLPP at this facility in December 2024, with full production expected to reach more than 30,000 tons of subject merchandise, potentially making it the world's second-largest stainless steel pipe factory.[18]

1. Provision of Land in OIZs for LTAR

The provision of land for less than adequate remuneration has historically been available to WSLPP producers under various provisions of Turkish Law. First, between 2003 and 2009, Article 3 of Law No. 4916 provided for "immovables" (*i.e.*, real property) belonging to the Turkish Treasury to be sold to a limited range of entities, including "private companies and public institutions for purposes of developing industry, livestock, technology, small industrial sites, technology development zones, and housing."[19] The legal provision permitting this sale of land expired in 2009. However, any such provision of land would provide a non-recurring benefit that would be attributable to the POI. Under Law No. 5084, the free allocation of land was made available to companies located within priority regions for development, which

---

[17] Steel Radar, "Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye" (July 7, 2025), attached at **Exhibit VI-4**.

[18] Yieh Corp., "YC Inox's Turkish factory produces first industrial stainless steel pipe" (Dec. 31, 2024), attached at **Exhibit VI-6**.

[19] GOT Letter, "Response of the Government of Turkey to Supplemental Questionnaire in Countervailing Duty Investigation on Common Alloy Aluminum Sheet from the Republic of Turkey," (July 20, 2020) at 53, attached at **Exhibit VI-7**.

includes 54 designated provinces.[20] The GOT previously reported that this program ended in 2010.[21] However, any such provision of land under Law No. 5084 would confer a non-recurring benefit that would be attributable to the POI.

Under the current system, when an OIZ sells a parcel of land, the OIZ itself is fully exempt from any corporate tax, in order that land prices remain competitive.[22] A public report indicates that YC Inox TR's Taiwanese parent company acquired 56,000 square meters of land for its Turkish operations for the price of NT $414 million,[23] or approximately USD $13,305,960 (USD $237.61 per square meter).[24] Comparable industrial land in Türkiye ranges in price from $700 to $1,500 per square meter depending on location, indicating that YC Inox TR was able to purchase land in the Dilovasi Machinery Specialized OIZ at approximately $462.39 to $1,262.39 per square meter below its commercial market value, providing an estimated benefit of USD $25.9 million to $70.7 million just for this parcel alone.[25]

---

20 Excerpts from GOT Letter, "Response of the Government of Turkey in CVD Investigation on Imports of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from Turkey," (Oct. 28, 2015), at 25 and Exhibit 10, attached at **Exhibit VI-8**.

21 *Id.* at 26.

22 FDI Consultancy, "Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors" (Mar. 27, 2026), attached at **Exhibit VI-3**.

23 Yieh Corp., "Taiwanese YC Inox plans to build mill in Turkey" (July 22, 2019), attached at **Exhibit VI-9**.

24 NT $1 equals approximately USD $0.03239. *See* exchange rate attached at **Exhibit VI-10**.

25 Imtilak Real Estate, "Guide to Land Investment in Istanbul" (July 12, 2026), attached at **Exhibit VI-11**.

Commerce previously countervailed the provision of land under Law No. 4916 in *Common Alloy Aluminum Sheet from Türkiye*.[26] In addition, Commerce countervailed the provision of land under Law No. 5084 in *Heavy Walled Rectangular Pipes and Tubes from Türkiye*.[27] Commerce should continue to investigate and countervail the provision of land for LTAR in this investigation.

a. Financial Contribution

The provision of land confers a financial contribution in the form of the provision of a good within the meaning of 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

The provision of land provides a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

The provision of land in an OIZ for less than adequate remuneration is regionally specific pursuant to 19 U.S.C. § 1677(5A)(D)(iv) because it is only available to companies located in OIZs.

---

[26] *Common Alloy Aluminum Sheet From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 86 Fed. Reg. 13,315 (Dep't Commerce Mar. 8, 2021) (*Common Alloy Aluminum Sheet from Türkiye*) and accompanying IDM (ACCESS Barcode: 4093399-02) at Comment 3.

[27] *Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 81 Fed. Reg. 47,349 (Dep't Commerce July 21, 2016) (*Heavy Walled Rectangular Pipes and Tubes from Türkiye*) and accompanying IDM (ACCESS Barcode: 3487405-02) at 14-15.

2. Exemption from Property Tax in OIZs

In order to increase investment opportunities in OIZs, pursuant to Article 4(m) of Law No. 1319, the GOT permanently exempted buildings in OIZ from property taxes.[28] This law replaced the previous provision under Law No. 1319 in 2017, which only exempted property taxes for five years.

Commerce examined this program under the previous legal provision in *Quartz Surface Products from Türkiye*[29] and *Dried Tart Cherries from Türkiye*.[30] Given that YC Inox TR has invested USD $383 million in establishing three separate production facilities in the Dilovasi Machinery Specialized OIZ, the tax savings for this WSLPP producer are likely to be substantial.

a. Financial Contribution

The exemption of property taxes provided for under this program confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

Property tax exemptions under this program confer a benefit to the extent that the tax paid by a firm as a result of the program is less than the tax the firm would have paid in the absence of the program to 19 C.F.R. § 351.509(a)(1).

---

28 GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Brake Drums from the Republic of Türkiye" (Sept. 26, 2024) at 39-40, attached at **Exhibit VI-12**.

29 *Certain Quartz Surface Products From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, In Part*, 85 Fed. Reg. 25,400 (Dep't Commerce May 1, 2020) ("*Quartz Surface Products from Türkiye*") and accompanying IDM (ACCESS Barcode: 3969367-02) at 5.

30 *Dried Tart Cherries From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 51,109 (Dep't Commerce Sep. 27, 2019) and accompanying Preliminary Decision Memorandum ("PDM") (ACCESS Barcode: 3892729-02) at Appendix, unchanged in *Dried Tart Cherries From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 67,430 (Dep't Commerce Dec. 10, 2019).

c. Specificity

Because property tax exemptions under this program are limited to companies located in OIZs, the program is regionally specific under 19 U.S.C. § 1677(5A)(D)(iv).

3. Exemptions from Land Acquisition Taxes in OIZs

The GOT normally collects a 20 percent value-added tax on the purchase of land, buildings, and infrastructure.[31] However, purchasers in OIZs are exempt from this tax. Given the cost of the land, immediate savings can be substantial. For instance, as noted above, YC Inox was able to acquire its first plot of land in the Dilovasi Machinery Specialized OIZ for approximately USD $13,305,960, generating an immediate tax savings of USD $2,661,192. Given that YC Inox TR has invested in significant resources in the development of its property in the OIZ, it is likely that the company intends to continue operations there indefinitely. For this reason, Commerce should not treat this program as a normal exemption of a value-added tax. A value-added tax on real estate will not operate like a normal value-added tax on goods, in which the tax is collected and quickly reimbursed as the goods move through the normal chain of commerce. Rather, YC Inox TR is likely to benefit from the uncollected value-added tax for decades, if not indefinitely.

a. Financial Contribution

The exemption of the value-added tax on purchases of land in an OIZ confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

---

[31] FDI Consultancy, "Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors" (Mar. 27, 2026), attached at **Exhibit VI-3**. *See also* The Investment and Finance Office of the Presidency of the Republic of Türkiye, "Investment Zones," attached at **Exhibit VI-2**.

b. Benefit

The tax exemption under this program confers a benefit to the extent that the tax paid by a firm is less than the tax the firm would have paid in the absence of the program to 19 C.F.R. § 351.510(a)(1). Alternatively, Commerce may treat the benefit as a deferral of an indirect tax analogous to a long-term loan, pursuant to 19 C.F.R. § 351.510(a)(2).

c. Specificity

Because property taxes under this program are limited to companies located in OIZs, the program is regionally specific under 19 U.S.C. § 1677(5A)(D)(iv).

4. Provision of Utilities in OIZs for LTAR

The GOT advertises one of the advantages for companies locating in an OIZ as "ready-to-use infrastructure" including utilities such as water, natural gas, electricity, communications, and waste treatment.[32] In particular, water, natural gas, and telecommunications are advertised as being available at "low… costs," while taxes on solid waste may be exempted completely.[33] OIZs may also operate their own electricity distribution companies, which generate or purchase power and pass on discounts to companies located in OIZs at rates 10 to 25 percent below the national tariff rate.[34] Within the Dilovasi Machinery Specialized OIZ, electricity is provided by Yeni Elektrik Üretim A.Ş, which is approved by the Ministry of Energy to provide electricity to nearby industrial facilities.[35]

---

32 The Investment and Finance Office of the Presidency of the Republic of Türkiye, "Investment Zones," attached at **Exhibit VI-2**.

33 *Id.*

34 FDI Consultancy, "Organized Industrial Zones (OSBs) in Turkey: A Complete Guide for Foreign Investors" (Mar. 27, 2026), attached at **Exhibit VI-3**.

35 Yeni Elektrik Üretim A.Ş, "About Us," attached at Exhibit **VI-13**.

a. Financial Contribution

The provision of utilities at reduced rates confers a financial contribution in the form of the provision of a good under 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

The provision of low-cost utilities exclusively in OIZs provides a benefit to the extent that these utilities are provided for less than adequate remuneration when compared a commercial benchmark pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

Because these utilities are available at reduced rates exclusively to companies located in OIZs, benefits provided under this program are regionally specific under 19 U.S.C. § 1677(5A)(D)(iv).

B. Tax and Duty Exemption Programs

1. Deductions from Taxable Income for Export Revenue

Under Addendum 4108 of the Income Tax Law Number 193, Turkish exporters are able to claim lump sum deductions, not to exceed 0.5 percent of the taxpayer's foreign exchange activities, from gross income resulting from exports, construction, maintenance, assembly, and transportation activities abroad.[36] The lump sum is intended to cover expenditures related to documentation expenses incurred in relation to the listed activities and may be claimed on a company's annual income tax return. As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

---

[36] GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Brake Drums from the Republic of Türkiye" (Sept. 26, 2024) at 24 and at Exhibit 17, "Article 40/1 of Income Tax Law No. 193," attached at **Exhibit VI-12**.

Commerce previously found this program to be countervailable in *Brake Drums from Türkiye*[37] and *Steel Nails from Türkiye*.[38]

a. Financial Contribution

Deductions from taxable income confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

Because these income tax deductions are tied to export performance this program is deemed specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

2. Inward Processing Certificates (D-3 Certificates)

Under the Inward Processing Certificate Exemption Program administered by Türkiye's Ministry of Trade, companies receive one of two types of inward processing certificates that permit an exemption from paying customs duties on raw materials and intermediate unfinished goods upon importation: D-1 and D-3 certificates. Commerce has previously determined that

37 *Certain Brake Drums From the Republic of Türkiye: Final Affirmative Countervailing Duty Determination*, 90 Fed. Reg. 26,008 (Dep't Commerce June 18, 2025) ("*Brake Drums from Türkiye*") and accompanying IDM (ACCESS Barcode: 4778252-02)

38 *Certain Steel Nails From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 87 Fed. Reg. 51,339 (Dep't Commerce Aug. 22, 2022) ("*Steel Nails from Türkiye*") and accompanying IDM (ACCESS Barcode: 4275038-02) at 4.

D-1 certificates are not countervailable.[39] However, using D-3 certificates, an importer may choose to exempt the applicable duties and taxes upon importation of the goods (*i.e.*, the Suspension System). As Commerce has previously recognized, while D-3 certificates are not directly contingent on export performance, "receipt of D-3 certificates is contingent upon the firm holding an {inward process certificate}, and that in granting {inward processing certificates}, the GOT solicits information regarding the export activities of the applying firms."[40]

Commerce found this program to be countervailable in *Large Diameter Welded Pipe from Türkiye*[41] and *Oil Country Tubular Goods from Türkiye AR2016*.[42]

a. Financial Contribution

The exemption of customs duties for imported raw materials and intermediate unfinished goods confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

[39] *See, e.g.*, *Large Diameter Welded Pipe From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 83 Fed. Reg. 30,697 (Dep't Commerce June 29, 2018) ("*Large Diameter Welded Pipe from Türkiye Prelim*") and accompanying PDM (ACCESS Barcode: 3720736-02) at 19-20, unchanged in *Large Diameter Welded Pipe From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 6,367 (Dep't Commerce Feb. 27, 2019) ("*Large Diameter Welded Pipe from Türkiye*") and accompanying IDM (ACCESS Barcode: 3796830-02).

[40] *Large Diameter Welded Pipe from Türkiye Prelim* PDM at 20, unchanged in *Large Diameter Welded Pipe from Türkiye*.

[41] *Large Diameter Welded Pipe from Türkiye* IDM at 5

[42] *Oil Country Tubular Goods From the Republic of Turkey: Final Results of Countervailing Duty Administrative Review; 2016*; 84 Fed. Reg. 11,504 (Dep't Commerce Mar. 27, 2019) (*Oil Country Tubular Goods from Türkiye AR2016*) IDM (ACCESS Barcode: 3807928-02) at 4.

b. Benefit

The benefit provided by this program is the amount of customs duties exempted pursuant to 19 C.F.R. § 351.519(a)(1)(ii).

c. Specificity

As Commerce explained in *Large Diameter Welded Pipe from Türkiye*, eligibility to receive inward processing certificates is contingent on export performance, and assistance under this program is therefore specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

3. Tax and Fee Incentives for Renewable Energy

According to the "Guide to Investing in Turkish Renewable Energy Sector" published by the Presidency of the Republic of Türkiye Investment Office, several incentives are available for companies investing in renewable energy generation facilities. Renewable energy generation projects with an investment incentive certificate are exempt from customs duties related to imported machinery and equipment, regardless of the region where the investment takes place.[43] In addition, pursuant to Article 43.4 of the Electricity Licensing Regulation, facilities generating electricity from local natural resources and renewables are not required to pay license fees for the first eight years following the completion of power generation plants.[44] Pre-license and license application fees for these facilities are discounted by 90 percent as well.[45] Finally, pursuant to Article 4 of Electricity Market Law No. 6446, renewable energy generation plants are eligible to receive a 50 percent discount for transmission system usage fees for the first five years of

[43] GOT, "Guide to Investing in Turkish Renewable Energy Sector," at 21-22, attached at **Exhibit VI-14**.

[44] *Id.* at 19.

[45] *Id.*

operation.[46] Pursuant to this same law, during the period of investing in these electricity generating facilities, all related official transactions are exempt from fees and stamp duties.[47]

Commerce previously found this program to be countervailable in *PC Strand from Türkiye*.[48]

a. Financial Contribution

Exemptions from taxes, customs duties, and fees under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1), while the exemption from the license fee and the reduction in the transmission system usage fee result in direct tax benefits under 19 C.F.R. § 351.509(a)(1).

c. Specificity

As eligibility for assistance under this program is limited to companies investing in renewable energy projects, this program is *de jure* specific under 19 U.S.C. § 1677(5A)(D)(i).

4. Exemption of Exchange Tax for Foreign Exchange Transactions

The GOT provides countervailable subsidies through the exemption of exchange taxes for certain foreign exchange transactions. This program operates under three separate legal provisions. Pursuant to Presidential Decree No. 1106 of 2019 ("Decree No. 1106"), the banking

---

46 *Id.* at 20.

47 *Id.*

48 *Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination*, 85 Fed. Reg. 80,005 (Dep't Commerce Dec. 11, 2020) ("*PC Strand from Türkiye*") and accompanying IDM (ACCESS Barcode: 4062766-02) at 13.

and insurance transaction tax ("BITT") rate was increased to 0.1 percent on foreign exchange transactions, except for transactions involving "{f}oreign exchange sales {between} banks and authorized institutions or {among} each other"; foreign currency sales made to the Ministry of Treasury and Finance; and "the payment of foreign currency loans, by the lender bank or banks that act as an intermediary in the use of foreign currency loans."[49] Presidential Decree No. 1149 of 2019 amended Decree No. 1106 to also apply the exemption from the BITT to "{f}oreign exchange sales to enterprises {that have} an industrial registry certificate" and "{f}oreign exchange sales to exporters who are members of exporters' unions."[50] In December 2019, Law No. 7194 increased the BITT rate on foreign exchange transactions to 0.2 percent.[51]

Commerce has countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*,[52] *PC Strand from Türkiye*,[53] and *Aluminum Extrusions from Türkiye*.[54]

a. Financial Contribution

The exemption or reduction of the BITT rate on foreign exchange transactions confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

---

[49] GOT Letter, "Response of the Government of Turkey to Supplemental Questionnaire in Countervailing Duty Investigation on Common Alloy Aluminum Sheet from the Republic of Turkey," (July 20, 2020) at 31-32, attached at **Exhibit VI-7**.

[50] *Id.*

[51] *Id.*

[52] *Common Alloy Aluminum Sheet from Türkiye* IDM at 13.

[53] *PC Strand from Türkiye* IDM at 16.

[54] *Aluminum Extrusions From the Republic of Türkiye: Final Affirmative Countervailing Duty Determination*, 89 Fed. Reg. 80,468 (Dep't Commerce Oct. 3, 2024) ("*Aluminum Extrusions from Türkiye*") and accompanying IDM (ACCESS Barcode: 4638385-02) at 7.

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

As Commerce explained in *Common Alloy Aluminum Sheet from Türkiye*, benefits under this program are "limited to firms that conduct certain types of foreign exchange transactions that were exempted by law in Decree Nos. 1106 and 1149," and thus this program is specific under 19 U.S.C. § 1677(5A)(D)(i).[55] To the extent that firms qualify for benefits under this program due to their membership in an exporters' union, this program is deemed specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

5. Tax Exemption for Export Loans

The GOT normally applies a five percent BITT to interest accrued on loans provided by banks that are passed on to customers. However, in order to facilitate the use of bank loans to promote exports and services earning foreign currency , and pursuant to Article 4 of the Communiqué No. 2017/4 on Taxes, Duties and Fees Exemptions for Exports, Transit Trade, Sales and Deliveries Considered as Exports and Foreign Currency Earning Services and Activities, the GOT exempts lending institutions and customers subject to the BITT for transactions and services regarding the exports of their customers. In addition, all pre- and

---

[55] *Common Alloy Aluminum Sheet From The Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances in Part, and Alignment of Final Determination With Final Antidumping Duty Determination*, 85 Fed. Reg. 49,629 (Dep't Commerce Aug. 14, 2020) (*Common Alloy Aluminum Sheet from Türkiye Prelim*) and accompanying PDM (ACCESS Barcode: 4013909-02) at 23, unchanged in final determination.

post-shipment loans provided by banks to finance exports, sales, and deliveries deemed to be exports, as well as foreign currency earning services, are exempt from the BITT.

Commerce countervailed this program in *CAAS from Türkiye AR2023*,[56] and *Aluminum Foil from Türkiye AR2022*.[57]

a. Financial Contribution

The exemption of the BITT on export loans confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

Because this program is limited to the exemption of a tax on export loans, assistance under this program is therefore specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

6. Special Consumption Tax Refund

The GOT normally applies a "special consumption tax" on certain toxic or hazardous materials (*i.e.*, a sales tax charged on certain goods that are listed in List (I) Schedule (B) and the related articles of the GOT's Special Consumption Tax Law No. 4760) that can be refunded if those goods are used to produce other goods not listed in Schedule (B) within 12 months after

---

[56] *Common Alloy Aluminum Sheet From the Republic of Türkiye: Final Results of Countervailing Duty Administrative Review; 2023*, 91 Fed. Reg. 17,941 (Dep't Commerce Apr. 9, 2026) ("*CAAS from Türkiye AR2023*") and accompanying IDM (ACCESS Barcode: 4907345-02) at 5 and Comment 3.

[57] *Certain Aluminum Foil From the Republic of Türkiye: Final Results of Countervailing Duty Administrative Review; 2022*, ("*Aluminum Foil Türkiye AR2022*") and accompanying IDM (ACCESS Barcode: 4790199-02) at 3 and Comment 4.

the goods are purchased.[58] YC Inox TR is the only company in Türkiye that operates a stainless steel pickling line to improve the finish and corrosion resistance of its pipe products.[59] The process of pickling steel is dependent on the application of highly toxic chemicals to untreated steel, typically consisting of hydrochloric or sulfuric acid. As such, YC Inox TR was likely eligible to use this program during the period of investigation.

Commerce countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*,[60] *CAAS from Türkiye AR2023*,[61] and *Aluminum Foil from Türkiye AR2022*.[62]

a. Financial Contribution

Refunds of the special consumption tax confer a financial contribution in the form of either revenue foregone under 19 U.S.C. § 1677(5)(D)(ii) or a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1) or the amount of the refund under 19 C.F.R. § 351.504(a)(1).

---

58 Commerce Memorandum, "Preliminary Analysis of Countervailing Duty Investigation of Common Alloy Aluminum Sheet from the Republic of Turkey" (Dec. 28, 2020) ("CAAS Post-Preliminary Analysis") at 4-5, attached at **Exhibit VI-15**.

59 Oreanco, "YC Inox's Turkish Triumph Transforms Trade & Technology" (July 23, 2025), attached at **Exhibit VI-16**.

60 *Common Alloy Aluminum Sheet from Türkiye* IDM at 14.

61 *CAAS from Türkiye AR2023* IDM at 5 and Comment 3.

62 *Aluminum Foil from Türkiye AR2022* IDM at 3 and Comment 5.

c. Specificity

As Commerce previously explained, because the actual recipients of tax refunds under this program "consists of a group of enterprises purchasing toxic or hazardous materials used in the production of non-toxic/hazardous materials within 12 months," this program specific because it is limited to a group of enterprises or industries under 19 U.S.C. § 1677(5A)(D)(iii)(I).[63]

7. Corporate Tax Reduction for Manufacturers

Article 32 of Corporate Tax Law No. 5520 was amended in 2022 to add Paragraph 7, such that the corporate tax rate in Türkiye is reduced by one point to the income of an exporting corporation derived exclusively from exports.[64] This amendment, Article 15 of Law No. 7351, also amended Article 32 to add Paragraph 8 such that the corporate tax rate is reduced by one point to the earnings obtained from the production activities of the companies that hold an industrial registry certificate and are engaged in production activities.[65]

Commerce found this program to be countervailable in *CAAS from Türkiye AR2023.*[66]

---

[63] CAAS Post-Preliminary Analysis at 5 (unchanged in *Common Alloy Aluminum Sheet from Türkiye*). *See also Certain Aluminum Foil From the Republic of Türkiye: Preliminary Results and Partial Rescission of Countervailing Duty Administrative Review; 2022*, 89 Fed. Reg. 100,959 (Dep't Commerce Dec. 13, 2024) ("*Aluminum Foil from Türkiye AR2022 Prelim*") and accompanying PDM ACCESS Barcode: 4676869-02) at 18-19 (unchanged in *Aluminum Foil from Türkiye AR2022*).

[64] *Common Alloy Aluminum Sheet From the Republic of Türkiye: Preliminary Results of the Countervailing Duty Administrative Review; 2023*, 90 Fed. Reg. 38,453 (Dep't Commerce Aug. 8, 2025) and accompanying PDM (ACCESS Barcode: 4806532-02) at 21.

[65] *Id.*

[66] *CAAS from Türkiye AR2023* IDM at 6 and Comment 2.

a. Financial Contribution

Corporate tax reductions under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1).

c. Specificity

Commerce previously explained that Paragraph 7 of Article 32 is deeded specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).[67] Moreover, Commerce found that Paragraph 7 of Article 32 is *de facto* specific under 19 U.S.C. § 1677(5A)(D)(iii)(I) because the actual number of enterprises that received the tax rate reduction were limited in number.[68]

C. Turk Eximbank Loan Programs

The Turk Eximbank was established in 1987 as Türkiye's official export credit agency.[69] The bank's objective is to develop the country's exports, diversify exported goods and service; introduce new markets for exported goods; increase Türkiye's share of exports in international trade; provide exporters and contractors and investors operating abroad with competitiveness and assurance in international markets; and support and encourage investments to be made abroad and the production and sale of investment goods for export purposes.[70] The entirety of the Turk

---

[67] *Id.* at Comment 2.

[68] *Id.*

[69] Turk Eximbank, "About Us," attached at **Exhibit VI-17**.

[70] *Id.*

Eximbank's shares are held by the Turkish Treasury, and thus the Turk Eximbank qualifies as an authority under 19 U.S.C. § 1677(5)(B).[71]

The Turk Eximbank makes the following programs available to provide financial assistance to exporters located in Türkiye:

1. Rediscount Program

Turk Eximbank offers a pre-shipment and post-shipment loan rediscounting program that allows exporters, manufacturer-exporters, and manufacturers that produce goods for export to finance exports overseas.[72] The program operates in coordination with the Turkish Central Bank, "with the purpose to finance {Turkish} companies" by assisting with the exporting of "goods and foreign exchange services at advantageous conditions."[73]

Through the pre-shipment aspect of the program, Turk Eximbank finances "exporters during the preshipment period at advantageous conditions" by providing export credits to exporters in either Turkish Lira or other currencies.[74] For post-shipment loans, Turk Eximbank allows discounting of export receivables in exchange for promissory notes and other documents related to the transaction, with credits of up to $350 million being available at terms of up to 360 days.[75]

In its most recent annual report, for 2024, Turk Eximbank reports that its pre-shipment and post-shipment rediscount credit program amounted to $11.7 billion at the end of 2024,

---

[71] *Id. See also* Turk Eximbank, "2024 Annual Report" at 22, attached at **Exhibit VI-18**.

[72] Turk Eximbank, "Rediscount Credit Program," attached at **Exhibit VI-19**.

[73] *Id.*

[74] *Id.*

[75] Turk Eximbank, "Post-Shipment Rediscount Credit Program," attached at **Exhibit VI-20**.

accounting for 48.4 percent of Turk Eximbank's total loan volume during that year.[76] As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce countervailed this program in *Brake Drums from Türkiye*[77] and *Aluminum Extrusions from Türkiye*.[78]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because its receipt is contingent on export performance.

2. Pre-Shipment Export Credit Program

Turk Eximbank makes short-term pre-shipment export credits available to exporters and manufacturers of export goods to develop their export trades, diversify their range of products and services, and find new markets.[79] These loans are made through intermediary banks, with

---

76 Turk Eximbank, "2024 Annual Report" at 49, attached at **Exhibit VI-18**.

77 *Brake Drums from Türkiye* IDM at 5.

78 *Aluminum Extrusions from Türkiye* IDM at 5-6.

79 Turk Eximbank, "Pre-Shipment Export Credit Program," attached at **Exhibit VI-21**.

companies able to receive a maximum of $25 million in loans under the program.[80] As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce countervailed this program in *Steel Nails from Türkiye*.[81]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under this program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because receipt of a loan is contingent on export performance.

3. Pre-Export Credit Program

In order to increase the competitive capacity of "exporters, manufacturer-exporters, and manufacturers producing goods for export in international markets," Turk Eximbank provides "affordable finance solutions" to exporters.[82] These loans are available up to a maximum of $25

---

80 *Id.*

81 *Steel Nails from Türkiye* IDM at 5.

82 Turk Eximbank, "Pre-Export Program," attached at **Exhibit VI-22**.

million.[83] As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce previously determined this program to be countervailable in *PC Strand from Türkiye*.[84]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under this program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) because loan receipt is contingent on export performance.

4. Export-Oriented Investment Credit Program

Through the Export-Oriented Investment Credit Program (aka, the Investment Credit for Export Program), Turk Eximbank makes middle- and long-term financing up to $75 million, in either U.S. dollars or Euros, available to exporters and manufacturer-exporters for the purpose of financing machines, equipment, and accessories used in the production of goods for export.[85] Loans under this program cannot be used to finance land, buildings, vehicles, used goods, or

---

83 *Id.*

84 *PC Strand from Türkiye* IDM at 16.

85 Turk Eximbank, "Export-Oriented Investment Credit Program," attached at **Exhibit VI-23**.

construction expenditures.[86] As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce previously countervailed this program in *PC Strand from Türkiye*.[87]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for loans under this program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) because receipt of loans is contingent on export performance.

5. Export-Oriented Working Capital Credit Program

The Export-Oriented Working Capital Credit Program, also known as the Export-Oriented Business Investment Loan Program, is a lending program administered by Turk Eximbank. In order to provide financing for the working capital needs of Turkish exporters, Turk Eximbank finances working capital for expenditures related to raw materials, intermediate goods, final goods, and final product purchasing transactions, so long as these expenditures occurred within 180 days of the credit application.[88] Financing under this program can also be

---

86 *Id.*

87 *PC Strand from Türkiye* IDM at 16.

88 Turk Eximbank, "Export-Oriented Working Capital Credit Program," attached at **Exhibit VI-24**.

used to cover the cost of electricity, water, natural gas, and personnel expenses for a one-month period.[89] The program is open to "{e}xporters, manufacturers, manufacturer-exporters, firms operating foreign exchange earning services and exporters from Türkiye and companies with current operating licenses regarding to produce or purchase-sale in free trade zones in Türkiye."[90] As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce countervailed this program in *Steel Nails from Türkiye*[91] and *PC Strand from Türkiye*.[92]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because the receipt of the loans is contingent on export performance.

---

89 *Id.*

90 *Id.*

91 *Steel Nails from Türkiye* IDM at 5.

92 *PC Strand from Türkiye* IDM at 16.

6. Specific Export Credit Program

The Specific Export Credit program is a short- to medium-term export credit that provides financing for export-oriented Turkish manufacturers which Turk Eximbank deems qualified but which otherwise could not be financed under Turk Eximbank's other programs.[93] The program is designed to assist companies which need financing for longer than the 12-month term that applies to the bank's short-term credit programs because of production periods or sales conditions of specific export projects, such as the export of new products or development of new markets.[94] Funding limits and thresholds as well as other terms are determined on a case-by-case basis. As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce found this program to be countervailable in *Aluminum Foil from Türkiye AR2022*.[95]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

---

93 Turk Eximbank, "Specific Export Credit Program," attached at **Exhibit VI-25**.

94 *Id.*

95 *Aluminum Foil from Türkiye AR2022* IDM at 4.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because receipt of a loan is contingent on export performance.

7. Export Buyer's Credits

Turk Eximbank provides financing to both public and private foreign buyers that import consumer and/or capital goods from Türkiye.[96] Financing is generally not available to exporters directly but is available through both domestic and foreign banks that work with Turk Eximbank to facilitate loans. Domestic banks borrow directly from Turk Eximbank and then offer reduced-cost financing to Turkish exporters. These domestic banks are in turn required to have a foreign branch, subsidiary bank, or correspondent bank in the country where the goods are to be shipped and become indebted to the Turk Eximbank on behalf of the foreign buyer.[97] Turk Eximbank also provides credit lines to reputable foreign banks that borrow on behalf of the foreign buyers.[98] For loans with terms under 24 months, Turk Eximbank may finance up to 100 percent of the export contract value of the exported goods.[99] For longer loans, Turk Eximbank limits financing to 85 percent of the contract value.[100] Importers make credit applications directly to the foreign bank, which in turn may access its credit facility with Turk Eximbank.[101] As

---

[96] Turk Eximbank, "International Trade Finance Programs," attached at **Exhibit VI-26**.

[97] Turk Eximbank, "Buyer's Credits Through Domestic Banks," attached at **Exhibit VI-27**.

[98] Turk Eximbank, "Buyer's Credits Through Foreign Banks," attached at **Exhibit VI-28**.

[99] *Id.*

[100] *Id.*

[101] *Id.*

Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

Commerce determined this program to be countervailable in *PC Strand from Türkiye*.[102]

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.505(a)(1) equal to the difference between the amount paid by the company for its loans under the program and the amount the company would have paid on comparable commercial loans.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because its loans are contingent on export performance.

8. Export Credit Guarantees (aka Letter of Guarantee Program)

The Turk Eximbank provides letters of guarantee to exporters "in order to enable them to enter new markets and to enhance their business volumes {} abroad."[103] The program is limited to manufacturer-exporters, contract firms, and shipbuilding firms.[104] As Turkish WSLPP producers exported goods to the United States during the POI, they are eligible to benefit under this program.

---

102 *PC Strand from Türkiye* IDM at 17.

103 Turk Eximbank, "Letter of Guarantee Program," attached at **Exhibit VI-29**.

104 *Id.*

a. Financial Contribution

The program provides a financial contribution in the form of a direct transfer of funds from the GOT within the meaning of 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit exists under this program pursuant to 19 C.F.R. § 351.506(a)(1) to the extent that the total amount a firm pays for the loan with the government-provided guarantee is less than the total amount the firm would pay for a comparable commercial loan that the firm could actually obtain on the market absent the government provided guarantee, including any difference in guarantee fees.

c. Specificity

The program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B) as an export subsidy because its use is contingent on export performance.

D. Provision of Natural Gas for Less than Adequate Remuneration

The natural gas market in Türkiye is controlled by Boru Hatlari Ile Petrol Tasima AS (Petroleum Pipeline Corporation, or "BOTAŞ"), a state-owned entity. BOTAŞ was established in 1974 pursuant to Decree No. 8/7871 and restructured in 1995 as a State-Owned Enterprise pursuant to Council of Ministers Decree No. 95/6526.[105] Although originally established to transport crude oil from Iraq to Türkiye, today BOTAŞ is responsible for: 1) crude oil and natural gas pipeline operations; 2) liquid natural gas ("LNG") and regasification operations; 3) port services related to gas and oil; 4) design and construction of oil and natural gas pipelines; 5)

[105] BOTAŞ, "Corporate Profile," attached at **Exhibit VI-30**.

natural gas and LNG trade; 6) natural gas and LNG storage; and 7) international natural gas and oil transportation projects.[106]

Until 2001, BOTAŞ had monopoly rights, by law, on natural gas imports, exports, distribution, sales, and pricing pursuant to Decree No. 397.[107] Under the Natural Gas Market Law ("Law No. 4646") promulgated in 2001, the GOT abolished that formal control over the natural gas market, with the expectation that the monopoly position of BOTAŞ would cease by 2009.[108] The GOT's market liberalization has not materialized, however. According to the International Energy Agency ("IEA"),

> BOTAŞ, a vertically integrated firm, dominates the natural gas sector. In addition to building and operating Türkiye's natural gas infrastructure, BOTAŞ accounted for 1.88 Tcf (95%) of Türkiye's natural gas imports, 1.87 Tcf {52.95 billion standard cubic meters} of total natural gas sales domestically, and about 21 Bcf of natural gas exports in 2022.[109]

As recently as 2022, natural gas consumption in Türkiye was estimated at 60.44 billion cubic meters.[110] Accordingly, BOTAŞ appears to supply nearly all of Türkiye's domestic natural

---

[106] *Id.*

[107] IEA, *Energy Policies of IEA Countries: Turkey 2009 Review*, (2009) at 70-71, attached at **Exhibit VI-31**.

[108] M. Oğuzcan Bulbul, *Liberalization of the Turkish Natural Gas Market*, Rekabet Dergisi Competition Journal, vol. 11, (Jan. 2010) at 20, attached at **Exhibit VI-32**.

[109] U.S. Energy Information Administration, *Country Analysis Brief: Türkiye* (July 11, 2023) at 3, attached at **Exhibit VI-33** (footnotes omitted); *see also* Convert Units Website Excerpt, attached at **Exhibit VI-34** (providing conversion of trillion cubic feet to billion cubic meter).

[110] Zeynep Beyza Karabay, *Turkiye's gas consumption estimate for 2022 shows year-on-year 18.8% rise*, AA Energy (Jan. 28, 2022), attached at **Exhibit VI-35**; Semih Ergur, *Increasing Usage of Natural Gas in Turkey and Its Effect on Local Econom*y, Climate Scorecard (June 5, 2022), attached at **Exhibit VI-36**.

gas consumption, with power plants and the industrial sector consuming 28.6 and 26.7 percent, respectively, of natural gas in Türkiye in 2021.[111]

BOTAŞ, as Commerce has previously determined, is an extension of the state and, therefore, a government authority.[112] WSLPP producers such as YC Inox TR likely consume natural gas in the production of subject merchandise, particularly in the pickling process which requires a steady heat supply to maintain the thermal load in chemical baths.[113]

Commerce previously found this program to be countervailable in *Rebar from Türkiye*[114] and *PC Strand from Türkiye*.[115]

a. Financial Contribution

The provision of natural gas confers a financial contribution in the form of the provision of a good under 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

Pursuant to 19 U.S.C. § 1677(5)(E)(iv), a benefit is conferred when the government provides a good or service for less than adequate remuneration. Commerce's regulations set forth a hierarchy of three potential benchmarks to utilize in determining whether a good is provided for less than adequate remuneration: (i) market prices from actual transactions within the country under investigation ("tier one"); (ii) world market prices that would be available to purchasers in

---

111 *Id.*

112 *PC Strand from Türkiye* PDM at 29, unchanged in final determination.

113 Yieh Corp., "YC Inox starts stainless steel sanitary tube production in Turkish plant" (Oct. 16, 2024), attached at **Exhibit VI-37**.

114 *Steel Concrete Reinforcing Bar From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 82 Fed. Reg. 23,188 (Dep't Commerce May 22, 2017) and accompanying IDM (ACCESS Barcode: 3572958-02) at 8-12.

115 *PC Strand from Türkiye* IDM at 15-16.

the country under investigation ("tier two"); or (3) an assessment of whether the government price is consistent with market principles ("tier three").[116] Though the preference is to use a "tier one" benchmark, where, as here, Commerce should determine that the government distorts the market for a good or service, prices for those goods and services in the country will be considered unreliable and are not an appropriate basis of comparison for determining whether there is a benefit.[117] Consistent with Commerce's prior findings, because Türkiye's natural gas market is dominated by BOTAŞ, Commerce should use a world market price to compare to Turkish domestic prices and conclude that this subsidy provides a benefit to WSLPP producers.[118] Based on this methodology, Commerce has calculated subsidy rates for this program in recent countervailing duty proceedings of up to 3.30 percent *ad valorem*.[119]

c. Specificity

Industrial users, including those in the metals industries, and powerplant users are the primary beneficiaries of subsidized natural gas costs in Türkiye. As such, this group of industries is the predominant user of the subsidy and receives a disproportionately large amount of the subsidy, and the subsidy is therefore specific under 19 U.S.C. §§ 1677(5A)(D)(iii)(II) and (III).

---

[116] *See also* 19 C.F.R. § 351.511(a)(2).

[117] *See, e.g.*, *Certain Oil Country Tubular Goods From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, Preliminary Negative Critical Circumstances Determination*, 74 Fed. Reg. 47,210, 47,219 (Dep't Commerce Sept. 15, 2009); *see also Notice of Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination: Certain Softwood Lumber Products From Canada*, 67 Fed. Reg. 15,545 (Dep't Commerce Apr. 2, 2002) and accompanying IDM at "Analysis of Programs, Provincial Stumpage Programs Determined to Confer Subsidies, Benefit."

[118] 19 C.F.R. § 351.511(a)(2)(ii).

[119] *Steel Concrete Reinforcing Bar From the Republic of Turkey: Final Results of Countervailing Duty Administrative Review; 2017*, 85 Fed. Reg. 16,056 (Dep't Commerce Mar. 20, 2020) and accompanying IDM (ACCESS Barcode: 3954383-02) at 4.

E. Grant Programs

1. Grants through the Scientific and Technological Research Council of Türkiye

The GOT provides grants for designated research and development ("R&D") projects through the GOT's Scientific and Technological Research Council of Türkiye ("TUBITAK") to support research, technology development, and innovation activities of Turkish companies.[120] In particular, TUBITAK commissioned the "1515 Support Program," also known as the "Frontier R&D Laboratory Support Program," to "make Türkiye a global attraction center in certain scientific and technological areas."[121] The program provides support amounting to 75 percent of the R&D budget (not exceeding TL 10 million) to companies investing at least TRY 15 million in R&D expenditures in any year within the last three years.[122] TUBITAK also makes available the "1511 – R&D and Innovation Projects program" (also known as the "Research Technology Development and Innovation Projects in Priority Areas Grant Program") to support company projects in priority areas of Türkiye by: 1) increasing technological competence and knowledge; 2) evaluating existing capabilities in different areas; 3) developing unique technologies; and 4) gaining acceleration in technological development.[123]

---

[120] GOT, "Guide to State Incentives for Investments in Türkiye," at 25, attached at **Exhibit VI-38**.

[121] *Id.*

[122] *Id.*

[123] *Id.*; *see also Prestressed Concrete Steel Wire From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, in Part*, 85 Fed. Reg. 59,287 (Dep't Commerce Sep. 21, 2020) ("*PC Strand from Türkiye Prelim*") and accompanying PDM (ACCESS Barcode: 4026877-02) at 27-28, unchanged in *PC Strand from Türkiye*.

Commerce countervailed the grants provided by TUBITAK in *PC Strand from Türkiye*.[124]

a. Financial Contribution

Grants provided under these programs confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under these programs exists in the amount of the grants provided pursuant to 19 C.F.R. § 351.504(a)(1).

c. Specificity

Commerce previously determined that recipients of TUBITAK grants are limited in number and that this program is therefore *de facto* specific under 19 U.S.C. § 1677(5A)(D)(iii)(I).[125] Commerce also has determined that TUBITAK grants under the 1511 program are specific pursuant to 19 U.S.C. § 1677(5A)(D)(iv) because they are only available to companies located in designated geographic regions.[126]

2. Renewable Energy Support Mechanism (YEKDEM)

The GOT provides support to electricity producers utilizing renewable energy sources through guaranteed tariff rates pursuant to the Law on Usage of Renewable Energy Resources for Generating Electric Energy No. 5346 ("Renewable Energy Law No. 5346"). Renewable Energy Resource Certificates ("RER Certificates") are issued by the Electricity Market Regulatory Authority to power generators who are then entitled to a set feed-in tariff that

---

[124] *PC Strand from Türkiye* IDM at 15.

[125] *PC Strand from Türkiye Prelim* PDM at 28, unchanged in *PC Strand from Türkiye*.

[126] *Id.*

guarantees a minimum threshold purchase price for their generated electricity for a period of 10 years[127] for electricity sold through Enerji Piyasalari Isletme A.S., the electricity marketplace operator.[128] The applicable tariff prices vary by generating source, with power generated by hydroelectric or wind facilities being paid $0.073 per KWH, geothermal-based facilities being paid $0.105 per KWH, and biomass and solar power production being paid $0.133 per KWH.[129] If domestically-manufactured equipment is used in the facility, the guaranteed tariffs may increase due to a local content bonus.[130]

YC Inox TR holds a Renewable Energy Certificate in Türkiye and therefore likely qualifies for assistance under this program.[131] Commerce countervailed this program in *PC Strand from Türkiye*[132] and *Aluminum Foil from Türkiye AR2022*.[133]

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

---

127 Renewable Energy Law No. 5346, **Exhibit VI-39**.

128 *Aluminum Foil from Türkiye AR2022 Prelim* PDM at 24. *See also* Excerpts from GOT Letter, "Response of the Government of Turkey in 2016 Countervailing Duty Administrative Review on Imports of Steel Concrete Reinforcing Bar from Turkey," (May 14, 2018) at 58, **Exhibit VI-40**.

129 GOT, "Guide to Investing in Turkish Renewable Energy Sector," at 16, **Exhibit VI-14**.

130 *Id.*

131 Steel Radar, "Huge investment of USD 383 million from Stainless steel giant YC INOX in Türkiye" (July 7, 2025), attached at **Exhibit VI-4**.

132 *PC Strand from Türkiye* IDM at 17.

133 *Aluminum Foil from Türkiye AR2022* IDM at 5.

c. Specificity

Because this program is limited to companies that are engaged in renewable energy projects, it is *de jure* specific under 19 U.S.C. § 1677(5A)(D)(i).

3. Foreign Market Research and Market Entry Support

The GOT provides multiple avenues of support to assist exporters with promoting sales activities. According to the "Guide to State Incentives for Investments in Türkiye," these incentives include: 1) support of up to 70 percent for expenses related to international market research trips; 2) support of up to 60 percent for reporting and foreign company acquisitions; 3) support of up to 75 percent for acquisitions of foreign companies with advanced technology; 4) support of up to 80 percent for costs of subscription to e-commerce sites.[134] As Turkish WSLPP producers are significant exporters, it is likely that they qualify for assistance under this program.

Commerce previously countervailed this program in *PC Strand from Türkiye*.[135]

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

---

[134] GOT, "Guide to State Incentives for Investments in Türkiye," at 29, attached at **Exhibit VI-38**.

[135] *PC Strand from Türkiye* IDM at 15.

c. Specificity

Because funds under this program are only available to exporters, this program is specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B).

4. Support for the Development of International Competitiveness

Companies located in OIZs, or that are members of trade or exporters unions, are eligible to receive assistance under the "Support for the Development of International Competitiveness" program.[136] This program provides several types of assistance to exporters: 1) up to $400,000 for expenditures related to requirement analysis, training, advisory, and promotion activities; 2) up to $150,000 for expenditures relating to foreign marketing activities; 3) up to $100,000 for expenditures to be incurred for procurement committees' organizations; and 4) up to 75 percent of employment expenses for a maximum of two specialized employees assigned to projects under this program.[137]

Commerce found this program to be countervailable in *Brake Drums from Türkiye*.[138]

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

---

[136] GOT, "Guide to State Incentives for Investments in Türkiye," at 29, attached at **Exhibit VI-38**.

[137] *Id.*

[138] *Brake Drums from Türkiye* IDM at Appendix.

c. Specificity

Benefits under this program are limited to exporters and, as such, are deemed specific as under 19 U.S.C. § 1677(5A)(A) and (B).

5. Domestic and Foreign Fair Support Program

In order to support the participation of Turkish companies in domestic and international trade fairs, increase exports, and support promotional activities, Türkiye's Ministry of Trade reimburses companies for certain expenditures made in relation to participation in trade fairs.[139] The domestic aspect of this program was established in 2016 pursuant to "Communique No. 2014/4 on Supporting Sectoral International Domestic Fairs,"[140] while participating in foreign trade fairs was included in 2017 pursuant to the "Communique No. 2017/4 on Supporting Participation in Fairs Abroad."[141] According to the GOT's "Guide to State Incentives for Investments in Türkiye," reimbursement of up to 75 percent of eligible costs is available.[142] To participate in the program, companies must be a member of an exporters' association.[143]

Reports indicate that YC Inox TR, a prominent Turkish exporter of WSLPP, participated in the International Elevator Istanbul Fair in 2025.[144] It is therefore likely that the company

---

[139] GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Certain Steel Nails from the Republic of Turkey," (Public Version) (Mar. 28, 2022) at 100, **Exhibit VI-41**.

[140] *Id.* at 216.

[141] *Id.* at 100.

[142] GOT, "Guide to State Incentives for Investments in Türkiye," at 29, **Exhibit VI-38**.

[143] GOT Letter, "Response of the Government of Türkiye to Initial Questionnaire in Countervailing Duty Investigation on Certain Steel Nails from the Republic of Turkey," (Public Version) (Mar. 28, 2022) at 216, **Exhibit VI-41**.

[144] Kocaeli TV, "Companies from Kocaeli will showcase their innovations at the International Elevator Istanbul Fair" (May 8, 2025), attached at **Exhibit VI-42**; *see also* Asansor.Istanbul, "Instagram" (May 13, 2025), attached at **Exhibit VI-43**.

qualified for assistance under this program during the POI. Commerce previously countervailed both the domestic and foreign aspects of this program in *Brake Drums from Türkiye* [145] and *Steel Nails from Türkiye*.[146]

a. Financial Contribution

Grants provided under this program confer a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1).

c. Specificity

As Commerce explained in *Steel Nails*, applicants for funds under both the domestic and foreign aspects of this program are evaluated based on their membership in an exporters' association.[147] Accordingly, the program is deemed specific under 19 U.S.C. § 1677(5A)(A) and (B).

6. Turquality Program

Through the Turquality program, the GOT provides support for firms in brand building in Türkiye and abroad and to create positive public opinion for Turkish products.[148] Pursuant to Communique No. 2006/4, the "Overseas Branding of Turkish Products, Promotion of Turkish

---

[145] *Brake Drums from Türkiye* IDM at 5-6.

[146] *Steel Nails from Türkiye* IDM at 4.

[147] *Certain Steel Nails From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination*, 87 Fed. Reg. 34,649 (Dep't Commerce June 7, 2022) ("*Steel Nails from Türkiye Prelim*") and accompanying PDM (ACCESS Barcode: 4247320-02) at 13-14, unchanged in *Steel Nails from Türkiye*.

[148] Ministry of Trade, "Turquality®," attached at **Exhibit VI-44**.

Product Image and Supporting Turquality" program, the GOT offers financing and reimbursement for expenses related to international trademark registration, certification and quality marks, salaries of fashion/industrial designers and product development engineers, and promotional activities.[149] Support of up to 50 percent is provided for expenditures related to promotion or advertisements, store rents, or advisors which are incurred by Turkish companies to build their brands abroad.[150]

Commerce countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*.[151]

a. Financial Contribution

Grants and financing provided under this program constitute a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

A benefit conferred under this program exists in the amount of the grant provided pursuant to 19 C.F.R. § 351.504(a)(1). To the extent that companies have received financing to support their trade and promotional activities, a benefit exists pursuant to 19 C.F.R. § 351.505(a)(1)-(a)(2).

c. Specificity

As Commerce explained in *Common Alloy Aluminum Sheet from Türkiye*, applicants for funds under this program are evaluated according to their potential to create a positive

---

[149] *Common Alloy Aluminum Sheet from Türkiye Prelim* PDM at 23.

[150] GOT, "Guide to State Incentives for Investments in Türkiye," at 29, **Exhibit VI-38**.

[151] *Common Alloy Aluminum Sheet from Türkiye* IDM at 13.

international brand image,[152] and thus the program is deemed specific as an export subsidy under 19 U.S.C. § 1677(5A)(A) and (B). Moreover, the GOT characterizes this program as an export incentive.[153]

7. Incentives under Türkiye's Research & Development Law

Türkiye provides incentives to companies engaged in R&D pursuant to Law No. 5746 on Supporting Research, Development and Design Activities ("Law No. 5746") of 2008, which sets forth several incentives that are available for R&D investment projects.[154] Assistance available under Law No. 5746 includes: 1) corporate income tax deductions for R&D and design expenses; 2) income tax exemptions for the salaries of R&D and support personnel; 3) contributions for employers' social security premiums for R&D and support personnel; 4) stamp duty exemptions for all documentation on R&D and innovation facilities; 5) capital support for technology and innovation; 6) customs duty exemptions for imported goods used for R&D; and 7) insurance premium support.[155] In 2021, this program was extended to 2028.[156]

Commerce countervailed this program in *Common Alloy Aluminum Sheet from Türkiye*,[157] *Aluminum Foil from Türkiye*,[158] and *Quartz Products from Türkiye*.[159]

---

[152] *Common Alloy Aluminum Sheet from Türkiye Prelim* PDM 24, unchanged in *Common Alloy Aluminum Sheet from Türkiye*.

[153] GOT, "Guide to State Incentives for Investments in Türkiye," at 29, **Exhibit VI-38**.

[154] GOT, "Law on Supporting Research, Development and Design Activities No. 5746," **Exhibit VI-45**.

[155] *Id.* at Article 3.

[156] Ekin İnal & Mert Müstecaplıoğlu, "Turkey has extended R&D and design centers incentive program," Norton Rose Fulbright (Mar. 29, 2021), attached as **Exhibit VI-46**.

[157] *Common Alloy Aluminum Sheet from Türkiye* IDM at 13l.

[158] *Certain Aluminum Foil From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 52,884 (Dep't Commerce Sep. 23, 2021) and accompanying IDM (ACCESS Barcode: 4161743-02) at 7.

[159] *Quartz Surface Products from Türkiye* IDM at 5.

a. Financial Contribution

The tax incentives under this program constitute a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The capital contribution and insurance premium incentives provide financial contributions in the form of direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

The tax incentives under this program confer a benefit in the amount of the tax saved pursuant to 19 C.F.R. § 351.509(a). Any customs duty exemptions confer a benefit in the amount of duty exempted pursuant to 19 C.F.R.§ 351.510(a). Finally, any capital contribution or insurance premium support confers a benefit in the amount of the grant pursuant to 19 C.F.R. § 351.504(a)(1).

c. Specificity

As Commerce explained in *Common Alloy Aluminum Sheet from Türkiye*, this program is specific pursuant to under 19 U.S.C. § 1677(5A)(D)(i) because it is "limited to enterprises that maintain technology center businesses, R&D centers, and design centers as specified in Article 1(2) of Law No. 5746."[160]

F. Investment Incentive Program

In 2012, the GOT, through the Ministry of Industry and Technology, implemented the Investment Incentives Program ("IEP") pursuant to Council of Ministers' Decree No. 2012/3305

---

[160] *Common Alloy Aluminum Sheet from Türkiye* PDM at 22, unchanged in the final determination.

("Decree No. 2012/3305").[161] The IEP consists of several different incentive schemes which largely provide the same subsidy benefits but with varying criteria. These incentive schemes are: 1) the General Investment Incentive Scheme ("GIIS"); 2) the Regional Investment Incentive Scheme ("RIIS"); 3) the Large Scale Investment Incentive Scheme ("LSIIS"); 4) the Strategic Investment Incentive Scheme ("SIIS"); and 5) the Project-based Investment Incentive Scheme ("PIIS"). Per Article 3 of Decree No. 2012/3305, the IEP divides Türkiye into six regions accounting for differing socio-economic development levels.[162]

1. General Investment Incentive Scheme

The GIIS authorizes Turkish producers that meet minimum investment thresholds to apply to the Ministry of Economy for an investment certificate permitting the duty-free import of equipment. The minimum investments to qualify for assistance under this program are TRY one million in Regions 1 and 2 and at least TRY 500,000 for Regions 3 to 6.[163]

Commerce countervailed this program in *Steel Nails from Türkiye*.[164]

a. Financial Contribution

The exemption from customs duties for imported equipment under this program confers a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii).

---

[161] Decree No. 2012/3305, attached at **Exhibit VI-47**. *See also Certain Brake Drums From the Republic of Türkiye: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 89 Fed. Reg. 95,740 (Dep't Commerce Dec. 3, 2024) and accompanying PDM (ACCESS Barcode: 4670837-02) at 16.

[162] Decree No. 2012/3305, at Article 3, attached at **Exhibit VI-47**.

[163] *Id.*

[164] *Steel Nails from Türkiye* IDM at 6.

b. Benefit

The benefit provided by this program is the amount of revenue foregone pursuant to 19 C.F.R. § 351.510(a).

c. Specificity

As the qualifications for assistance under this program are limited to companies making specified minimum investments that vary by region, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv).[165]

2. Regional Investment Incentive Scheme

Benefits under the RIIS are available to producers in all six regions of Türkiye but vary based on the region and sectors in which the investment is made. Per Annex 2A of Decree No. 2012/3305, investments made in the "{m}ain metal industry" and """{m}etal goods" industries are eligible for benefits, with investments ranging from TRY 500,000 to TRY 4 million being required, depending on the region.[166] Available incentives include: 1) customs duty exemptions; 2) corporate tax reductions of 15 to 55 percent of investment expenditures; 3) social security premium support for the employer's share; 4) land allocation; and 5) interest rate support.[167] In addition, in Region 6 exclusively, assistance with respect to income tax withholding support and social security premium support for the employee's share are also available.[168]

---

165 *Steel Nails from Türkiye Prelim* PDM at 21, unchanged in *Steel Nails from Türkiye*.

166 Decree No. 2012/3305, at Article 5, **Exhibit VI-47**.

167 GOT, "Guide to State Incentives for Investments in Türkiye," at 6, 9, **Exhibit VI-38**.

168 *Id.* at 6, 13.

Commerce countervailed several aspects of this program in *Steel Nails from Türkiye*,[169] and found each of the benefits that were not exclusive to Region 6 to be countervailable in *Brake Drums from Türkiye*.[170]

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, and exemptions from social security premium under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations confers a financial contribution in the form of a good under 19 U.S.C. § 1677(5)(D)(iii). Interest rate support confers a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

Exemptions from customs duties under this program provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions and exemptions from social security premiums provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). The benefit from the interest rate support is the amount of the support provided pursuant to 19 C.F.R. § 351.504(a)(1). Land allocations provide a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

---

[169] *Steel Nails from Türkiye Prelim* PDM at 18-20; unchanged in *Steel Nails from Türkiye*.

[170] *Brake Drums from Türkiye* IDM at Appendix.

c. Specificity

Because benefits under this program are limited to certain industries and regions, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv), respectively.

3. Large Scale Investment Incentive Scheme

Pursuant to Annex 3 of Decree No. 2012/3305, under the LSIIS, the GOT makes investment incentives available for 12 investment categories, including "Investments on Metal Production: Investments on final metal production from ore and/or concentrate of metallic minerals." A minimum investment of TRY 50 million is required to qualify.[171] Available incentives include: 1) customs duty exemptions; 2) tax deductions ranging from 25 to 65 percent; 3) social security premium support for the employer's share ranging from two to 12 percent; and 4) land allocation.[172] In addition, in Region 6 exclusively, assistance with respect to income tax withholding support and social security premium support for the employee's share is also available.[173]

WSLPP producers qualify for assistance under this program as metal producers. For instance, YC Inox TR produces flat steel at its Kocaeli in addition to WSLPP.[174] Commerce found each of the benefits available under this program to be countervailable in *Brake Drums from Türkiye*.[175]

---

[171] GOT, "The Investment Incentive Program of Turkey," **Exhibit VI-48**; *see also* Decree No. 2012/3305 at Annex 3, **Exhibit VI-47**.

[172] GOT, "The Investment Incentive Program of Turkey," **Exhibit VI-48**.

[173] *Id.*

[174] Oreanco, "YC Inox's Turkish Triumph Transforms Trade & Technology" (July 23, 2025), attached at **Exhibit VI-16**.

[175] *Brake Drums from Türkiye* IDM at Appendix.

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, and exemptions from social security premiums under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations confers a financial contribution in the form of a good under 19 U.S.C. § 1677(5)(D)(iii).

b. Benefit

Exemptions from customs duties under this program provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions and exemptions from social security premiums provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). Land allocations provide a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

Because benefits under this program are limited to certain industries and regions, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv), respectively.

4. Strategic Investment Incentive Scheme

Under Article 8 of Decree No. 2012/3305, investments that are aimed at the production of products with high import dependency are considered "strategic investments."[176] For investments to qualify for incentives, the following requirements must be met: 1) a minimum investment amount of at least TRY 50 million; 2) the product's domestic production capacity is less than its import volume; 3) the investment increases the domestic value added by 40 percent;

---

[176] Decree No. 2012/3305, **Exhibit VI-47**.

and 4) the product has an import value of at least USD 50 million in the past year.[177] Available investment incentives include: 1) customs duty exemptions; 2) tax deductions of 50 percent; 3) social security premium support for the employer's share for seven to 10 years; 4) land allocation; and 5) interest rate support of up to TRY 75 million.[178]

Commerce found each of the benefits available under this program to be countervailable in *Brake Drums from Türkiye*.[179]

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, and exemptions from social security premiums under this program confer a financial contribution in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations confers a financial contribution in the form of a good under 19 U.S.C. § 1677(5)(D)(iii). Interest rate support confers a financial contribution in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i).

b. Benefit

Exemptions from customs duties under this program provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions and exemptions from social security premiums provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). The benefit from the interest rate support is the amount of the support provided pursuant to 19 C.F.R. § 351.504(a)(1). Land allocations provide

---

[177] GOT, "Guide to State Incentives for Investments in Türkiye," at 6, **Exhibit VI-38**; *see also* GOT, "The Investment Incentive Program of Turkey," **Exhibit VI-48**.

[178] *Id.*

[179] *Brake Drums from Türkiye* IDM at Appendix.

a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2).

c. Specificity

Because benefits under this program are limited to certain industries and regions, this program is specific under 19 U.S.C. § 1677(5A)(D)(i) and (iv), respectively.

5. Project-based Investment Incentive Scheme

In November 2016, the GOT launched a project-based incentive program "designed to promote investments deemed to help meet critical national needs,… ensure sufficient supply levels of strategic goods and services, {and} boost technological capacity, R&D efforts, competitiveness and added value in production…"[180] by means of providing "tailor-made incentive mechanisms… for selected investors" pursuant to the PIIS.[181] Eligibility criteria include: 1) a minimum investment amount of TRY one billion; 2) a focus on the production of technologically intensive and strategic products; 3) high added-value in investment and manufacturing; and 4) a focus on reducing import dependency.[182] Available incentives include: 1) cashback support; 2) customs duty exemptions; 3) corporate tax reductions of up to 200 percent of investment expenditures; 4) social security premium support for the employer's share for up to 10 years; 5) income tax withholding support for 10 years; 6) qualified personnel support for up to five years; 7) energy support for up to 50 percent of energy expenditures for up to 10

---

[180] Norton Rose Fulbright, "Turkish Government Launches Project-Based Incentive Program to Boost Investments," (May 7, 2017), **Exhibit VI-49**.

[181] GOT, "Guide to State Incentives for Investments in Türkiye," at 15, **Exhibit VI-38**.

[182] *Id.*

years; 8) interest rate support for up to 10 years; 9) capital contributions up to 49 percent of the investment amount; 10) land allocation; 11) infrastructure support; 12) purchasing guarantees; and 13) facilitation of authorization, permit, and license procedures.

Commerce found this program to be countervailable in *Brake Drums from Türkiye*.[183]

a. Financial Contribution

Exemptions from customs duties, corporate tax reductions, exemptions from social security premiums, income tax withholding support, and the facilitation of authorizations, permits, and licenses under this program confer financial contributions in the form of revenue foregone under 19 U.S.C. § 1677(5)(D)(ii). The provision of land allocations and infrastructure support confer financial contributions in the form of a good under 19 U.S.C. § 1677(5)(D)(iii). Cashback support, personnel support, energy support, interest rate support, and capital contributions confer financial contributions in the form of a direct transfer of funds under 19 U.S.C. § 1677(5)(D)(i). Purchasing guarantees provide a financial contribution in the form of the purchase of a good under 19 U.S.C. § 1677(5)(D)(iv).

b. Benefit

Exemptions from customs duties and the facilitation of authorizations, permits, and licenses provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.510(a)(1). Corporate tax reductions, exemptions from social security premiums, and exemptions from income tax withholdings provide a benefit in the amount of the revenue foregone pursuant to 19 C.F.R. § 351.509(a)(1). Capital contributions, energy support, interest rate support, and personnel support each bestow a benefit in the amount of the support provided

[183] *Brake Drums from Türkiye* IDM at Appendix.

pursuant to 19 C.F.R. § 351.504(a)(1). Land allocations provide a benefit to the extent that the land is provided for less than adequate remuneration when compared to actual commercial land transactions within Türkiye pursuant to 19 C.F.R. § 351.511(a)(1) and (a)(2). Infrastructure support and purchasing guarantees provide a benefit under 19 U.S.C. § 1677(5)(E).

c. Specificity

Because benefits under this program are limited to firms making minimum investments in accordance with stated project goals, this program is specific under 19 U.S.C. § 1677(5A)(D)(i).

VII. CONCLUSION

As described herein, producers and exporters of WSLPP in Türkiye are benefitting from substantial countervailable subsidies that are causing material injury to the domestic industry in the United States. Petitioners therefore respectfully request that Commerce initiate a countervailing duty investigation of imports of WSLPP from Türkiye.