

**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**



Sayı : 35649853-TİM.KİB.GSK.TEŞVİK.2025/651-4017

Giresun, 25/12/2025

Konu : Kanada / Karbon ve Alaşımlı Çelik Teller Anti-Damping Soruşturması

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2025 / 741**

- İlgi:**
- a) 29/04/2025 tarih 255 sayılı sirkülerimiz
 - b) 01/05/2025 tarih 263 sayılı sirkülerimiz
 - c) 22/08/2025 tarih 478 sayılı sirkülerimiz
 - d) 17/09/2025 tarih 538 sayılı sirkülerimiz
 - e) 25/09/2025 tarih 561 sayılı sirkülerimiz

Sayın üyemiz,

Bilindiği üzere, Kanada tarafından, ülkemizin yanı sıra Çin, Çin Tayvanı, Hindistan, İtalya, Malezya, Portekiz, İspanya, Tayland ve Vietnam menşeli karbon ve alaşımlı çelik teller ("carbon and alloy steel wire") ithalatına karşı yürütülen anti-damping soruşturması ile ilgili gelişmeler ilgede kayıtlı sirkülerimiz ile duyurulmuştur.

Bu defa, Ottawa Ticaret Müşavirliğinin bir yazısına atfen, T.C. Ticaret Bakanlığı İthalat Genel Müdürlüğünden alınan 24/12/2025 tarih 117112520 sayılı yazıda;

Kanada Sınır Hizmetleri Kurumu (CBSA) tarafından dampingin mevcudiyetine yönelik yürütülen soruşturma kapsamında 18 Aralık 2025 tarihli ekli bildirim ile gerekçeli nihai kararın açıklandığı, söz konusu gerekçeli nihai kararda, ülkemiz bakımından özel piyasa şartlarının (PMS) bulunduğuna ilişkin iddiaların; Türkiye Cumhuriyeti Hükümeti tarafından uygulanan fiyat tavanları, dalgalı ekonomik koşullar, Rusya ve Çin'den filmaşın ithalatı nedeniyle fiyatların bozulduğu iddiası ve devlet destekleri başlıkları altında incelendiği,

Bu çerçevede CBSA tarafından;

- Kamu projelerinin toplam inşaat faaliyetleri içinde sınırlı bir paya sahip olduğu ve iddia edilen fiyat tavanlarının ihracatçıların fiili satış fiyatlarını etkilemediği,
- Türkiye'de yüksek enflasyon bulunmakla birlikte çelik ürünlerinin ABD doları bazında fiyatlandığı ve fiyatların dolar bazında istikrarlı seyrettiği,

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• Rusya ve Çin'den düşük fiyatlı filmaşın ithalatı mevcut olmakla birlikte, söz konusu ithalatın Türkiye pazarını bozacak düzeyde olmadığı ve Türkiye'de filmaşın ile çelik tel fiyatlarının karşılaştırılan diğer ülkelerle paralel seyrettiği,

• Türkiye Cumhuriyeti Hükümeti'nin çelik tel sektörüne yönelik bir destek programının varlığına ilişkin somut bilgi bulunmadığı,

hususlarının değerlendirildiği ve **Türkiye çelik tel sektöründe özel piyasa şartlarının (PMS) bulunduğuna ilişkin yeterli delilin bulunmadığına hükmedildiği** ifade edilmektedir.

Bilgilerinize sunarız.

e-imzalıdır
Sertaç Ş. TORAMANOĞLU
Genel Sekreter

Ek: Gerekçeli Nihai Karar (46 sayfa)



OTTAWA, December 18, 2025

SW 2025 IN

STATEMENT OF REASONS

Concerning the final determination with respect to the dumping of

**CERTAIN CARBON AND ALLOY STEEL WIRE
ORIGINATING IN OR EXPORTED FROM
CHINA, CHINESE TAIPEI, INDIA, ITALY, MALAYSIA,
PORTUGAL, SPAIN, THAILAND, TÜRKIYE, AND VIETNAM**

DECISION

On December 3, 2025, pursuant to paragraph 41(1)(b) of the *Special Import Measures Act*, the Canada Border Services Agency made a final determination respecting the dumping of certain carbon and alloy steel wire originating in or exported from the People's Republic of China, the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu, the Republic of India, the Italian Republic, the Federation of Malaysia, the Portuguese Republic, the Kingdom of Spain, the Kingdom of Thailand, the Republic of Türkiye, and the Socialist Republic of Vietnam

Cet *Énoncé des motifs* est également disponible en français.
This *Statement of Reasons* is also available in French.

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SUMMARY

[1] On February 28, 2025, the Canada Border Services Agency (CBSA) received a written complaint from Sivaco Wire Group 2004, LP (“Sivaco”) and ArcelorMittal Long Products Canada G.P. (“AMLPC”) (hereinafter, “the complainants”) alleging that imports of certain carbon and alloy steel wire (hereinafter, “steel wire”) originating in or exported from the People’s Republic of China (China), the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu (Chinese Taipei), the Republic of India (India), the Italian Republic (Italy), the Federation of Malaysia (Malaysia), the Portuguese Republic (Portugal), the Kingdom of Spain (Spain), the Kingdom of Thailand (Thailand), the Republic of Türkiye (Türkiye), and the Socialist Republic of Vietnam (Vietnam) (collectively, “the subject countries”), are being injuriously dumped.

[2] On March 21, 2025, pursuant to paragraph 32(1)(a) of the *Special Import Measures Act* (SIMA), the CBSA informed the complainants that the complaint was properly documented. On April 15, 2025, the CBSA informed the Governments of the subject countries that a properly documented complaint had been filed.

[3] The complainants provided evidence to support the allegations that steel wire from the subject countries have been dumped, as well as evidence that discloses a reasonable indication that the dumping has caused injury or is threatening to cause injury to the Canadian industry producing like goods.

[4] On April 22, 2025, pursuant to subsection 31(1) of SIMA, the CBSA initiated an investigation respecting the dumping of steel wire from the subject countries.

[5] Upon receiving notice of the initiation of the investigation, the Canadian International Trade Tribunal (CITT) commenced a preliminary injury inquiry, pursuant to subsection 34(2) of SIMA, into whether the evidence discloses a reasonable indication that the dumping of the above-mentioned goods have caused injury or are threatening to cause injury to the Canadian industry producing the like goods.

[6] On June 19, 2025, pursuant to subsection 37.1(1) of SIMA, the CITT made a preliminary determination that there is evidence that discloses a reasonable indication that the dumping of steel wire from the subject countries has caused injury to the domestic industry.

[7] On September 4, 2025, as a result of the CBSA’s preliminary investigation and pursuant to subsection 38(1) of SIMA, the CBSA made a preliminary determination of dumping of steel wire from the subject countries.

[8] On the same date, pursuant to subsection 8(1) of SIMA, provisional duties were imposed on imports of dumped goods that are of the same description as any goods to which the preliminary determination applies, and that are released during the period commencing on the day the preliminary determination was made and ending on the earlier of the day on which the CBSA causes the investigation in respect of any goods to be terminated pursuant to subsection 41(1) of SIMA or the day the CITT makes an order or finding pursuant to subsection 43(1) of SIMA.

[9] Based on the available evidence, the CBSA is satisfied that steel wire originating in or exported from the subject countries has been dumped. Therefore, on December 3, 2025, the CBSA made a final determination of dumping pursuant to paragraph 41(1)(b) of SIMA in respect of those goods.

[10] The CITT's inquiry into the question of injury to the Canadian industry is continuing, and the CITT will issue its decision by January 2, 2026. Provisional duties will continue to be imposed on the steel wire from the subject countries until the CITT renders its decision.

PERIOD OF INVESTIGATION

[11] The Period of Investigation (POI) and Profitability Analysis Period (PAP) for the investigation is January 1, 2024 to December 31, 2024.

INTERESTED PARTIES

[12] Refer to the Initiation [*Statement of Reasons*](#) for additional information on interested parties.

Exporters

[13] The following 12 exporters provided complete responses to the CBSA’s dumping Request for Information (RFI):

Table 1: Cooperative Exporters

Country	Exporter
China	Ningbo King Power Industry Co., Ltd. (“Ningbo King Power”) ¹
	Shanxi Yuci Broad Wire Products Co., Ltd. (“Yuci Broad”) ²
	Tianjin Huayuan Metal Wire Products Co., Ltd. (“Huayuan”) ³
	Tianjin Xuhua Plastic Products Co., Ltd. (“Xuhua”) ⁴
Türkiye	BMS Birleşik Metal Sanayi ve Ticaret A.S. (“BMS”) ⁵
	Özyaşar Tel Ve Galvanizleme Sanayi A.Ş. (“Özyaşar”) ⁶
Malaysia	Chin Herr Industries (M) Sdn Bhd (“Chin Herr”) ⁷
	Wei Dat Steel Wire Sdn Bhd (“Wei Dat”) ⁸
Portugal	Fapricela - Industria de Trefilaria, S.A. (“Fapricela”) ⁹
	Ibermetais - Industria de Trefilagem, S.A. (“Ibermetais”) ¹⁰
Thailand	TSN Wires Inc. (“TSN”) ¹¹
Vietnam	Hoa Phat Steel Wire Co., Ltd (“HPSW”) ¹²

[14] Three related input suppliers, Tata Steel Manufacturing (Thailand) Public Company Limited (“TSMT”)¹³, The Siam Industrial Wire Company Limited (“SIW”)¹⁴, and Hoa Phat Hai Duong Steel Joint Stock Company (“HPHD”)¹⁵ also provided a response to the dumping RFI.

¹ Exhibit 137 (PRO) & 138 (NC) – Response to Dumping RFI – Ningbo King Power.

² Exhibit 92 (PRO) & 93 (NC) – Response to Dumping RFI – Yuci Broad.

³ Exhibit 120 (PRO) & 121 (NC) – Response to Dumping RFI – Huayuan.

⁴ Exhibit 127 (PRO) & 128 (NC) – Response to Dumping RFI – Xuhua.

⁵ Exhibit 115 (PRO) & 116 (NC) – Response to Dumping RFI – BMS.

⁶ Exhibit 193 (PRO) & 194 (NC) – Response to Dumping RFI – Özyaşar.

⁷ Exhibit 79 (PRO) & 80 (NC) – Response to Dumping RFI – Chin Herr.

⁸ Exhibit 75 (PRO) & 76 (NC) – Response to Dumping RFI – Wei Dat.

⁹ Exhibit 97 (PRO) & 98 (NC) – Response to Dumping RFI – Fapricela.

¹⁰ Exhibit 102 (PRO) & 103 (NC) – Response to Dumping RFI – Ibermetais.

¹¹ Exhibit 83 (PRO) & 84 (NC) – Response to Dumping RFI – TSN.

¹² Exhibit 87 (PRO) & 88 (NC) – Response to Dumping RFI – HPSW.

¹³ Exhibit 81 (PRO) & 82 (NC) – Response to Dumping RFI – TSMT.

¹⁴ Exhibit 85 (PRO) & 86 (NC) – Response to Dumping RFI – SIW.

¹⁵ Exhibit 94 (PRO) & 95 (NC) – Response to Dumping RFI – HPHD.

[15] In addition, seven exporters provided deficient or late responses to the RFIs, or were unable to substantiate their information during verification:

Table 2: All Other Exporters

Country	Exporter
Türkiye	Çokyaşar Halat Makina Tel Galvanizleme Sanayi Tic. A.Ş. (“Çokyaşar Halat”) ¹⁶
	Çokyaşar Tel Orme Vr Dokuma Tel Gal. Civi San. Tic. A.Ş. (“Çokyaşar Tel Orme”) ¹⁷
	Köşkerler Çelik Halat ve Mak. San. Tic. A.Ş. (“Köşkerler”) ¹⁸
India	Usha Martin Limited (“Usha Martin”) ¹⁹
Italy	Trafileria F.lli Crotta S.R.L. (“Crotta”) ²⁰
Spain	Moreda Riviere Trefilería, S.A. (“Moreda”) ²¹
Vietnam	United Nail Products Co., Ltd. (“United Nail”) ²²

[16] Four Chinese exporters provided a response to the section 20 RFI: Yuci Broad²³, Ningbo King Power²⁴, Xuhua²⁵ and Huayuan²⁶.

Importers

[17] Four importers provided a response to the importer RFI: AMD Medicom Inc.²⁷; Ricova Châteauguay Inc.²⁸; Dollarama S.E.C./L.P.²⁹; and Structa Wire Corp.³⁰

Government

[18] The Government of China did not respond to the government section 20 RFI.

[19] The Government of Türkiye³¹ provided a response to the Particular Market Situation (PMS) RFI.

¹⁶ Exhibit 225 (PRO) & 226 (NC) – Response to Dumping RFI – Çokyaşar Halat.

¹⁷ Exhibit 269 (PRO) & 270 (NC) – Response to Dumping RFI – Çokyaşar Tel Orme.

¹⁸ Exhibit 163 (PRO) & 164 (NC) – Response to Dumping RFI – Köşkerler.

¹⁹ Exhibit 238 (PRO) & 239 (NC) – Response to Dumping RFI – Usha Martin.

²⁰ Exhibit 119 (NC) – Response to Dumping RFI – Crotta.

²¹ Exhibit 132 (PRO) & 133 (NC) – Response to Dumping RFI – Moreda.

²² Exhibit 72 (NC) – Response to Dumping RFI – United Nail.

²³ Exhibit 89 (PRO) & 90 (NC) – Response to Section 20 RFI – Yuci Broad.

²⁴ Exhibit 134 (PRO) & 135 (NC) – Response to Section 20 RFI – Ningbo King Power.

²⁵ Exhibit 145 (PRO) & 146 (NC) – Response to Section 20 RFI – Xuhua.

²⁶ Exhibit 148 (PRO) & 149 (NC) – Response to Section 20 RFI – Huayuan.

²⁷ Exhibit 55 (PRO) & 56 (NC) – Response to Importer RFI – AMD Medicom Inc.

²⁸ Exhibit 65 (NC) – Response to Importer RFI – Ricova Châteauguay Inc.

²⁹ Exhibit 69 (PRO) & 70 (NC) – Response to Importer RFI – Dollarama S.E.C./L.P.

³⁰ Exhibit 105 (PRO) & 106 (NC) – Response to Importer RFI – Structa Wire Corp.

³¹ Exhibit 77 (PRO) & 78 (NC) – Response to PMS RFI – Government of Türkiye.

[20] For the purposes of this investigation, the Government of China and Government of Türkiye refers to all levels of government, i.e., federal, central, provincial/state, regional, municipal, city, township, village, local, legislative, administrative or judicial, singular, collective, elected or appointed. It also includes any person, agency, enterprise, or institution acting for, on behalf of, or under the authority of, or under the authority of any law passed by, the government of that country or that provincial, state or municipal or other local or regional government.

Canadian Producers

[21] Three Canadian producers provided a response to the Canadian industry RFI: Sivaco³²; AMLPC³³; and Laurel Steel a Division of Nucor Steel ULC (“Laurel Steel”).³⁴

[22] The CBSA also received a response to the dumping RFI from Davis Wire Corporation (“Davis Wire”)³⁵ as a surrogate response.

PRODUCT INFORMATION

DEFINITION

[23] For the purpose of this investigation, subject goods are defined as:

Carbon or alloy steel wire, of round or other solid cross section, in nominal sizes up to and including 24.13 mm (0.950 inches) in diameter, whether or not coated or plated with zinc, zinc-aluminum alloy, or any other coating, including other base metals or polyvinyl chloride or other plastics, originating in or exported from the People’s Republic of China, the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu (Chinese Taipei), the Republic of India, the Italian Republic, the Federation of Malaysia, the Portuguese Republic, the Kingdom of Spain, the Kingdom of Thailand, the Republic of Türkiye, and the Socialist Republic of Vietnam, excluding the following:

- *stainless steel wire (i.e., alloy steel wire containing, by weight, 1.2 % or less carbon and 10.5 % or more chromium, with or without other elements);*
- *wire of high-speed steel; and*
- *welding wire of any type.*

[24] For additional product information, the production process, the classification of imports, and information on the Canadian industry, refer to the Initiation [*Statement of Reasons*](#).

³² Exhibit 45 (PRO) & 46 (NC) – Response to Canadian Industry RFI – Sivaco.

³³ Exhibit 48 (PRO) & 49 (NC) – Response to Canadian Industry RFI – AMLPC.

³⁴ Exhibit 53 (PRO) & 54 (NC) – Response to Canadian Industry RFI – Laurel Steel.

³⁵ Exhibit 253 (PRO) & 254 (NC) – Response to Dumping RFI – Davis Wire.

LIKE GOODS AND CLASS OF GOODS

[25] Subsection 2(1) of SIMA defines “like goods”, in relation to any other goods, as “(a) goods that are identical in all respects to the other goods, or (b) in the absence of any such goods described in paragraph (a), goods the uses and other characteristics of which closely resemble those of the other goods.” In identifying the like goods and determining whether there is more than one class of goods, the CITT considers a number of factors, including the physical characteristics of the goods and their market characteristics (such as whether the domestic goods fulfill the same customer needs as the subject goods).

[26] In its preliminary injury inquiry for this investigation, the CITT further reviewed the matter of like goods and classes of goods. On July 19, 2025 the CITT issued its preliminary inquiry *Statement of Reasons*, indicating that: “It is unable to conclude, at this preliminary stage, that there are two classes of goods, based on the existing record. ... However, the Tribunal is of the view that arguments made in support of two separate classes of goods merit further consideration.”³⁶

IMPORTS INTO CANADA

[27] During the final phase of the investigation, the CBSA refined the volume and value of imports based on information from CBSA import entry documentation and other information received from exporters and importers.

³⁶ Canadian International Trade Tribunal; Preliminary Injury Inquiry – Carbon and Alloy Steel Wire – *Statement of Reasons* (July 19, 2025), PI-2025-001, para. 34-35.

[28] The following table presents the CBSA’s analysis of imports of steel wire for the purposes of the final determination:

Table 3: Import Volume of Steel Wire
(January 1, 2024 to December 31, 2024)

Country of Origin or Export	% of Total Imports for POI (by volume)
Primary Countries	
China	51.4%
Türkiye	10.1%
Secondary Countries	
Chinese Taipei	0.6%
India	0.9%
Italy	1.3%
Malaysia	0.7%
Portugal	1.8%
Spain	1.6%
Thailand	0.5%
Vietnam	0.1%
Subtotal – Secondary Countries	7.4%
All Other Countries	31.0%
Total	100.0%

INVESTIGATION PROCESS

[29] Information was requested from all known and potential exporters, producers, vendors and importers, concerning shipments of steel wire released into Canada during the POI.

[30] Exporters/producers were also notified that failure to submit all required information and documentation, including non-confidential versions, failure to comply with all instructions contained in the RFI, failure to permit verification of any information or failure to provide documentation requested during the verification may result in the margin of dumping and the assessment of dumping duties on subject goods being based on facts available to the CBSA. Further, they were notified that a determination on the basis of facts available could be less favorable to them than if complete, verifiable information was made available.

[31] After reviewing the RFI responses, supplemental RFIs (SRFIs) were sent to responding parties, in order to clarify information provided in the responses and request additional information, where necessary.

[32] Details pertaining to the information submitted by the exporters in response to the Dumping RFI as well as the results of the CBSA's investigation are provided in the *Results of the Dumping Investigation* section of this document.

[33] As part of the final phase of the investigation, case briefs and reply submissions were provided by counsel representing the complainants, other Canadian producers, and exporters. A summary of the representations is provided in **Appendix 2**.

DUMPING INVESTIGATION

[34] The following section presents the final results of the investigation into the dumping of steel wire originating in or exported from the subject countries.

NORMAL VALUE

[35] Normal values are generally determined based on the domestic selling prices of like goods in the country of export, in accordance with section 15 of SIMA, or on the aggregate of the cost of production of the goods, a reasonable amount for administrative, selling and all other costs, plus a reasonable amount for profits, in accordance with paragraph 19(b) of SIMA.

[36] Where, in the opinion of the CBSA, sufficient information has not been furnished or is not available, normal values are determined pursuant to a ministerial specification in accordance with subsection 29(1) of SIMA.

EXPORT PRICE

[37] The export price of goods sold to importers in Canada is generally determined in accordance with section 24 of SIMA based on the lesser of the adjusted exporter's sale price for the goods or the adjusted importer's purchase price. These prices are adjusted where necessary by deducting the costs, charges, expenses, duties and taxes resulting from the exportation of the goods as provided for in subparagraphs 24(a)(i) to 24(a)(iii) of SIMA.

[38] Where there are sales between associated persons and/or a compensatory arrangement exists, the export price is based on the importer's resale price of the imported goods in Canada to unrelated purchasers, less deductions for all costs incurred in preparing, shipping and exporting the goods to Canada that are additional to those incurred on the sales of like goods for use in the country of export, all costs included in the resale price that are incurred in reselling the goods (including duties and taxes) or associated with the assembly of the goods in Canada and an amount representative of the average industry profit in Canada as provided for in paragraphs 25(1)(c) and 25(1)(d) of SIMA.

[39] Where, in the opinion of the CBSA, sufficient information has not been furnished or is not available, export prices are determined pursuant to a ministerial specification under subsection 29(1) of SIMA.

MARGIN OF DUMPING

[40] The margin of dumping by exporter is equal to the amount by which the total normal value exceeds the total export price of the goods, expressed as a percentage of the total export price. All subject goods imported into Canada during the POI are included in the calculation of the margins of dumping of the goods. Where the total normal value of the goods does not exceed the total export price of the goods, the margin of dumping is zero.

[41] Further information regarding each country and exporter is detailed below.

BACKGROUND OF SECTION 20 INQUIRY

[42] Section 20 is a provision of SIMA that may be applied to determine the normal value of goods in a dumping investigation where certain conditions prevail in the domestic market of the exporting country. In the case of a prescribed country under paragraph 20(1)(a) of SIMA, it is applied where, in the opinion of the CBSA, the government of that country substantially determines domestic prices and there is sufficient reason to believe that the domestic prices are not substantially the same as they would be in a competitive market.³⁷

[43] The complainants allege that the conditions described in section 20 of SIMA prevail in the steel wire and long products steel sector in China. That is, the complainants allege that these industry sectors in China do not operate under competitive market conditions and consequently, the domestic prices of steel wire established in China, would not be reliable for determining normal values.

[44] The complainants provided a variety of evidence to support the claim that the Government of China substantially determines domestic prices of steel wire and that the prices are substantially different than they would be in a competitive market. Specifically, the complainants cited specific policies implemented by the Government of China and provided evidence of state-ownership, subsidization, and government measures that may impact the cost of production in the long products steel sector.

[45] In the event that the CBSA forms an opinion that the domestic prices of steel wire in China are substantially determined by the government, and there is sufficient reason to believe that the domestic prices are not substantially the same as they would be if they were determined in a competitive market, the normal values of the goods under investigation will be determined, pursuant to paragraph 20(1)(c) of SIMA, where such information is available, on the basis of the domestic selling prices or the aggregate of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits of like goods sold by producers in any country designated by the CBSA and adjusted for price comparability; or, pursuant to paragraph 20(1)(d) of SIMA, where such information is available, on the basis of the selling price in Canada of like goods produced and imported from any country designated by the CBSA and adjusted for price comparability.

³⁷ China is a prescribed country under Section 17.1 of the *Special Import Measures Regulations*.

[46] For the preliminary determination, the CBSA did not form the opinion that section 20 conditions exist in China.

ANALYSIS OF SECTION 20 CONDITIONS

Government Control Analysis

[47] This section will present the CBSA's analysis of the extent of the Government of China's control over the long products steel sector in China, by examining the following:

- Government of China's control previously found in the long products steel sector;
- Steel plans, directives and other policy documents;
- Government of China's ownership and control of steel manufacturers;
- Government of China's provision of subsidies to steel wire manufacturers; and
- Government of China's influence over the cost of production of steel.

Government of China's Control Previously Found in the Long Products Steel Sector

[48] The CBSA has previously determined that section 20 conditions exist in the long products steel sector in China on four occasions in the following proceedings:

- the galvanized steel wire investigation³⁸ in 2013;
- the concrete reinforcing bar investigation³⁹ in 2014;
- the concrete reinforcing bar re-investigation⁴⁰ in 2018; and
- most recently in the wire rod investigation⁴¹ in 2024.

[49] The CBSA has previously found that a government can indirectly control the prices of the sector being investigated by controlling the prices of the primary inputs. Given that wire rod is the primary input material in the production of wire, the recent section 20 finding on the wire rod in China is highly relevant to the steel wire case.

[50] The substantial amount of information on the record for these previous findings supports the conclusion that the government substantially determines prices in China's long products steel sector.

Steel Plans, Directives and Other Policy Documents

[51] The steel industry is regarded as a key industry by the Government of China. As such, the steel industry in China, including the long products steel sector, is subject to a variety of plans, directives and other policy documents issued by all levels of the Government of China.

³⁸ Final determination *Statement of Reasons* for Galvanized Steel Wire – July 22, 2013.

³⁹ Final determination *Statement of Reasons* for Concrete Reinforcing Bar – December 10, 2014.

⁴⁰ *Notice of Conclusion* of Re-investigation for Re-Bar – May 4, 2018.

⁴¹ Final determination *Statement of Reasons* for Wire Rod – September 19, 2024.

[52] This regulatory oversight is constant and pervasive. For instance, the China Iron and Steel Association (CISA), a key industry association that works closely with the government, has explicitly described itself as “guided by the Party’s lines” and that it “participates in making the industrial development planning, and relevant policies, laws and regulations”.⁴² This guidance extends to specific market interventions, such as CISA urging mills “to be disciplined in restraining production” in October 2024 after government stimulus led to increased steel prices.⁴³

[53] Recent key policy documents include:

- **Work Plan for Stabilizing Growth (2025–2026):** In September 2025, a new work plan was issued to support the steady operation and structural upgrading of the steel industry. It sets the sector’s average annual value-added output growth target at around four percent for the two-year period.⁴⁴ This plan places a much stronger emphasis on quality, efficiency, and environmental compliance, notably mandating that over 80 percent of steel production capacity complete ultra-low emission upgrades by the end of 2025.⁴⁵
- **Suspension of Capacity Replacement (August 2024):** The Government of China issued “*Notice of the General Office of the Ministry of Industry and Information Technology on Suspending Steel Production Capacity Replacement Work*” requiring the suspension of new steel capacity replacement plans starting August 23, 2024.⁴⁶ This move was intended to address loopholes that allowed continued capacity expansion despite policy goals.
- **Work Plan for Stabilizing Growth (2023–2024):** Released in August 2023, this plan marked a formal focus on transitioning the steel sector from sheer volume to high-quality and sustainable development, while addressing oversupply and weak demand. The plan set annual industrial value-added growth targets of 3.5 percent for 2023 and approximately 4 percent for 2024. Key measures centered on strengthening capacity control by strictly limiting new projects, accelerating technological upgrades (including the promotion of Electric Arc Furnaces (EAF)), and enhancing raw material security.⁴⁷

⁴² Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 1 (NC) – China Iron and Steel Association, *About Us*.

⁴³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-53: *Bloomberg, China Steel Group Calls for Supply Restraint After Price Rally*.

⁴⁴ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 6 (NC) – State Council of PRC, *China to support steel sector’s steady operation, structural upgrading*.

⁴⁵ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 7 (NC) – SteelOrbis, *China releases Work Plan for steel industry in 2025-2026, supporting value-added and low emissions capacities*.

⁴⁶ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-54: MIIT, *Notice of the General Office of the Ministry of Industry and Information Technology on Suspending Steel Production Capacity Replacement Work*.

⁴⁷ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-39: *Work Plan for Stabilizing Growth in the Steel Industry*.

- **High-Quality Development Roadmap (March 2022):** The Government of China released the “*Roadmap for high-quality development of iron and steel industry*” to rationalize the industry’s structure, ensuring global competitiveness and technical advancement.⁴⁸
- **Consolidation Guidelines (February 2022):** The Government of China released guidelines urging the steel industry to consolidate through mergers and acquisitions (M&As) in order to “create world-class steel giants” and accelerate high-quality development.⁴⁹ Financial institutions were urged to provide comprehensive support for these M&As and structural adjustments.⁵⁰
- **Price Control Directive (May 2021):** Chinese Premier Li Keqiang addressed rising steel prices, stating that efforts were needed to “deal with the excessively rapid increase in commodity prices and its collateral effects” and to “keep the economy running smoothly”.⁵¹
- **14th Five Year Plan (2021-2025):** This plan identified the transformation of traditional industries and improvements to the “layout and structure of raw material industries including... steel” as a core part of “implementing the manufacturing powerhouse strategy”.⁵² It outlines the shift to innovation-driven growth and high-quality development, which requires the steel industry to improve product quality, increase the self-sufficiency rate of iron resources, and focus on supplying high-end, specialized steel materials.

[54] As shown by the above policies, the Government of China influences the steel industry, including the long products steel sector, by increasing M&A to create larger and more efficient steel companies to guide the growth of the industry. The Government of China also exerts control on steel capacity and supply, which impacts the price of steel in China.

[55] Based on the substantial amount of information on the record of previous findings related to steel products, including the long products steel sector, and evidence discussed above, the CBSA finds that the Government of China actively releases plans, directives, policies, and guidelines for its domestic steel producers to follow in order to control its steel industry, including steel wire producers.

⁴⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-40: National Development and Reform Commission, PRC, *China issues roadmap for high-quality development of iron and steel industry*.

⁴⁹ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 8 (NC) – Global Times, *China encourages steel industry consolidation through M&As among firms*.

⁵⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-46: Global Times, *China encourages steel industry consolidation through M&As among firms*.

⁵¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-52: CNN Business, *‘Without an inch of steel.’ Soaring metal prices spell trouble for China’s recovery*.

⁵² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-41: Chinese Communist Party, *14th Five Year Plan: Part III*.

[56] The CBSA finds that the Government of China’s steel plans and directives in place provide support for the conclusion that the government substantially determines prices in China’s long products steel sector.

Government of China’s Ownership and Control of Steel Manufacturers

[57] The steel industry in China remains heavily state-dominated with the Government of China exercising significant ownership and control over the sector, including manufacturers of downstream products like wire rod and steel wire.

[58] The majority of China’s largest steel manufacturers are State-Owned Enterprises (SOEs), providing the government with unparalleled leverage over the sector’s output and strategic direction. As illustrated below, of the top ten steel producers in China by volume in 2024, six were state-owned, accounting for approximately 30 percent of the country’s total steel production that year.

Table 4: Top 10 Steel Producers in China in 2024 by Volume

Company	2024 Production (MT) ⁵³	State-Owned
China Baowu Group	130.09	Yes
AnSteel Group	59.55	Yes
HBIS Group	42.28	Yes
Shagang Group	40.22	No
Jianlong Group	39.37	No
Shougang Group	31.57	Yes
Delong Steel	29.33	No
Hunan Steel Group	24.90	Yes
Jingye Group	22.72	No
Shandong Steel Group	19.45	Yes
Total Production of Top 10 Steel Producers in China	439.48	
Total Production of Top 6 State-Owned Steel Producers	307.84	
Total Steel Production in China 2024 ⁵⁴	1,005.1	
Top 6 State-Owned Steel Producers as a % of Total China Steel Production in 2024	30.63%	

⁵³ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 2 (NC) – World Steel, *Top Steel-Producing Companies in 2025/2024*.

⁵⁴ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 3 (NC) – World Steel, *2025 World Steel in Figures*, pg. 6.

[59] China Baowu Group, AnSteel Group and Shougang Group are directly owned by China's State-owned Assets Supervision and Administration Commission (SASAC), a special administration of the State Council of the People's Republic of China, while HBIS Group is wholly-owned by the Hebei provincial government.⁵⁵ This structure enables the Government of China to issue and enforce specific industrial plans, direct investment, and utilize these SOEs as instruments to meet national economic and policy objectives, overriding purely commercial considerations.

Consolidation and Indirect Control

[60] The Government of China is actively pursuing consolidation to increase its share of the steel market, directly fueling the rapid growth of China Baowu Group. This SOE's expansion is driven by key acquisitions, such as the acquisition of Shandong Iron and Steel Group and SD Steel Rizhao Co. Ltd. in late 2023, solidifying its leading role in the national industry.⁵⁶ While the top ten steel firms currently account for 44 percent of China's total steel production, this concerted consolidation effort is designed to meet the government's long-term goal of consolidating over 60 percent of the nation's steel capacity in the hands of its top ten steelmakers by the end of 2025.⁵⁷

[61] Furthermore, government influence extends beyond direct ownership. Other prominent Chinese steel manufacturers have significant indirect ties to the government or are subject to substantial government intervention. For example, while Shagang Group is generally considered a private company, its ownership structure includes historical sales of equity to the Jiangsu SASAC and a labour union which was controlled by the Government of China. Shagang has also acquired other entities with state ties⁵⁸ and has members of the Government of China in its senior management and board of directors.⁵⁹

Policy Compliance in Downstream Products

[62] State presence is equally significant in downstream markets. Many of the state-owned steel producers also produce downstream products such as wire rod and steel wire. For example, China Baowu Group, the largest steel producer in China, is a key producer of long steel products (including wire rod and steel wire).⁶⁰ State-owned status ensures compliance with policies and mandates.

⁵⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex A, para. 14-15.

⁵⁶ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 9 (NC) – China Daily, *Baowu signs agreements to acquire Shandong Iron and Steel Group*.

⁵⁷ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 10 (NC) – Wood Mackenzie, *China's steel industry at critical crossroads of overcapacity and green transition*.

⁵⁸ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 4 (NC) – Lexology, *Government Ownership of China's "Private" Steel Producers*.

⁵⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex A, para. 17.

⁶⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex A, para. 14; Public Exhibits A-08: Baosteel Group, *Product Manual – Wire Rod*; Public Exhibit A-09: World Steel, *Top steel-producing companies 2023*; and Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 5 (NC) – World Benchmarking Alliance, *China Baowu Steel Group*.

[63] Multiple wire rod and steel wire producers have also publicly announced their affiliations with the Government of China and their commitment to government policies.⁶¹

[64] The CBSA finds that the significant presence of state-owned and state-controlled enterprises in both the overall steel sector and long products steel sector, suggests that sales of steel products such as steel wire may be influenced by non-market factors, such as fulfilling the Government of China's policy objectives. The significant presence of SOEs supports the conclusion that the government substantially determines prices in China's long products steel sector.

Government of China's Provision of Subsidies to Steel Wire Manufacturers

[65] The Government of China continues to provide substantial market-distorting subsidies to its steel industry, including manufacturers of wire rod, a fact highlighted in international trade investigations and reports, including the United States (U.S.) Department of Commerce's sunset review for carbon and certain alloy steel wire rod from China in August 2025⁶² and the CBSA's final determination of dumping for certain wire rod from China in September 2024.⁶³

[66] The Organisation for Economic Cooperation and Development (OECD) found that the global steel market was "distorted by non-market forces, where producers which do not benefit from the subsidies cannot compete on an equal footing."⁶⁴ Based on the OECD's report entitled "The drivers and impacts of subsidies to steel firms", the Chinese government's financial support to its steel industry remains exceptionally high, distorting global markets and exacerbating overcapacity. This financial assistance, channeled primarily through cash grants, below-market borrowings, and corporate income tax concessions, is disproportionately directed toward SOEs, larger firms, and those with higher indebtedness.⁶⁵

⁶¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex A, para. 16.

⁶² Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 11 (NC) – U.S. Department of Commerce, *Carbon and Certain Alloy Steel Wire Rod From the People's Republic of China: Final Results of the Expedited Second Sunset Review of the Countervailing Duty Order*.

⁶³ Final determination *Statement of Reasons* for Wire Rod – September 19, 2024.

⁶⁴ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 12 (NC) – The Economic Times, *China steel subsidies 'distort' global market OECD*.

⁶⁵ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 13 (NC) – OECD, *The drivers and impacts of subsidies to steel firms*.

[67] The September 2021 subsidy notification from the Government of China was criticized by the World Trade Organization Secretariat for its lack of transparency.⁶⁶ Despite this, the available evidence shows that Chinese steel wire manufacturers have received state-support including:

- **State-Directed Mergers:** China Baowu Steel, the largest steel manufacturer in China, received significant government support during its creation in 2016 which resulted from the merger of Baosteel Group Corporation and Wuhan Iron and Steel Corporation (WISCO).⁶⁷ This support continued to subsequent, often free, equity transfers, including the acquisition of Sinosteel Group (2022)⁶⁸, Xinyu Iron & Steel Group Co., Ltd. (Xinyu Steel) (2022)⁶⁹, Taiyuan Iron & Steel (Group) Co., Ltd (TISCO) (2020)⁷⁰, and Magang (Group) Holding Company Limited (Maasteel) (2019).⁷¹
- **Direct Government Funds:** The government of Hebei established the Hebei Steel Industry Transformation and Upgrading Fund in order to support steel manufacturers. As an SOE of the Government of Hebei, HBIS benefitted from direct state support in 2020 to upgrade and improve its operations.⁷² The available evidence also shows that Chinese steel wire producers with public reporting requirements received direct subsidies worth approximately USD 198 million from the Government of China in 2023.⁷³ In addition, USD 120 million in subsidies was provided to Chinese steel wire rod producers in 2023.⁷⁴ Since the amounts are only reported by companies with public reporting requirements, the actual amount of subsidies received is likely significantly higher.

⁶⁶ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-59: WTO, *8th Trade Policy Review: China, Report by the Secretariat, WT/TPR/S/415*.

⁶⁷ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-25: FitchRatings, *Fitch Upgrades Baowu, Baosteel to 'A+'; Outlook Stable*.

⁶⁸ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 14 (NC) – Global Times, *China approves restructuring for Baowu, Sinosteel, accelerating consolidation*.

⁶⁹ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 15 (NC) – GMK Center, *China Baowu Steel acquired 51% shares of major steel producer XinSteel*.

⁷⁰ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 16 (NC) – Reuters, *China Baowu Steel to take control of stainless steelmaker TISCO*.

⁷¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-60: Reuters, *China Baowu Steel to take majority stake in rival Magang*.

⁷² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-61: FitchRatings, *Fitch Affirms HBIS at 'BBB+'; Outlook Stable*.

⁷³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-64: *Compilation of Direct Grants to Wire Producers Reported by Global Trade Alert*.

⁷⁴ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-66: *Compilation of Direct Grants to Wire Rod Producers Reported by Global Trade Alert*.

- **Strategic Policy Support:** Wholly-owned by the SASAC, Shougang has received direct funding from both the central and Beijing governments. The CBSA notes that Shougang is included as part of Beijing’s *14th Five-Year Plan* covering 2021-2025, necessitating significant financial support to achieve the city’s political and strategic objectives.⁷⁵

[68] The CBSA acknowledges that although the total amount of subsidies provided to Chinese exporters during the POI is unclear without a response to the RFI from the Government of China, there is a longstanding history of direct subsidies made available to SOEs in the steel industry, including the long products steel sector.

[69] Subsidization of steel production enables the Government of China to influence the price of downstream products such as steel wire, as producers can purchase input materials below fair market value and reduce their production costs. These subsidies may, therefore, distort the domestic selling price of steel wire in China. The widespread presence of subsidies in the steel industry, including in the long products steel sector, further supports the conclusion that the government substantially determines prices in the long products steel sector in China.

Government of China’s Influence over the Cost of Production of Steel

[70] The Government of China has implemented several measures that influence the cost of raw materials used in steelmaking. By influencing upstream raw material inputs, the government can substantially determine the prices of downstream products, including steel wire.

[71] The government exerts immense influence on iron ore pricing. It actively pursues policies designed to reduce the cost of this critical input for domestic steel manufacturers, enhancing resource security. To stabilize the market and maintain reasonable prices, the National Development and Reform Commission (NDRC), China’s central government agency responsible for national economic and social development plans, has continued its policy of strong market oversight throughout 2024 and 2025. Following its 2023 warning against hoarding and price inflation, the NDRC has consistently signaled that it would intervene to curb “unreasonable” iron ore price spikes and directed trading firms to avoid hoarding and inflating prices.⁷⁶

⁷⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-62: FitchRatings, *Shougang Group Co., Ltd.*

⁷⁶ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-74: Mining.com, *Iron ore price falls on China warning, production controls in Tangshan.*

[72] A major institutional development was the establishment of the China Mineral Resources Group (CMRG) in July 2022. This central SOE has become the dominant force in China's US\$130 billion iron ore import market. As of June 2025, it reportedly represents more than half of Chinese steelmakers in negotiations with global suppliers.⁷⁷ This central SOE was established with several key objectives:

- Consolidate iron-ore purchasing activities of approximately 20 of China's largest steel manufacturers;⁷⁸
- Strengthen the bargaining power of Chinese steel producers in sourcing iron ore globally;⁷⁹
- Centralize state-owned iron ore import rights under CMRG;⁸⁰ and
- Manage China's overseas mining investments, valued at approximately USD 4.3 billion.⁸¹

[73] By consolidating purchasing power, the CMRG exerts downward pressure on iron ore prices, thereby lowering production costs for Chinese steel mills.

[74] The CBSA finds that these measures demonstrate the Government of China's influence on iron ore. As a result of these measures, the Government of China creates an environment where domestic prices of steel may be artificially low, which benefit the producers of steel wire.

Summary of Government Control Analysis

[75] The CBSA has previously found that the Government of China substantially determines the prices of steel and long products steel in the domestic industry and that these prices are not substantially the same as if they were determined in a competitive market.

[76] Specifically, the CBSA has previously issued opinions in respect of three steel products in the long products steel sector, namely, galvanized steel wire, concrete reinforcing bar and wire rod.

⁷⁷ Exhibit 512 (PRO) – Final Determination Section 20 Report – Attachment 18 (NC) – GMK Center, *China's CMRG plays a prominent role in the country's iron ore market*.

⁷⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-75: GMK Center, *China's new state agency will become a powerful buyer of iron ore*.

⁷⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-76: Mining.com, *How and Why China is centralizing its billion-ton iron ore trade*.

⁸⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-78: SMM, *China Mineral Resources Group Purchases Iron Ore Intensively*.

⁸¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-79: Business Insider, *The Chinese Entity That Could Change the Iron Market Forever*.

[77] The Government of China exerts control on the steel industry in general but also on the long products steel sector specifically, through various plans, directives and other policy documents that impact steel wire producers. In making corporate decisions, Chinese steel wire producers must adhere to the Government of China's macro-economic policies including measures related to steel production capacity and M&As. As a result, corporate decisions based on market dynamics of supply and demand compete with the Government of China's directives and mandates.

[78] The Government of China has significant ownership and control of steel manufacturers, including wire rod and steel wire manufacturers, in China. The presence of state-owned and state-controlled enterprises that produce steel necessitate that private companies supplying steel would have to compete with these state-owned and state-controlled enterprises operating under non-market conditions.

[79] Furthermore, the subsidization of the steel industry in general, and the long products steel sector in particular, demonstrates the Government of China's intent to exert control to maintain domestic prices at a certain level. These subsidies allow steel manufacturers to sell their products at prices below fair market value to producers of steel wire, who in turn, are able to sell their products at distorted prices.

[80] Through various actions and measures, the Government of China also influences the price of iron ore, a key input in the production of steel.

[81] Overall, the cumulative impact of the Government of China's policies and actions indicate that the Government of China substantially determines prices in the long products steel sector in China.

Price Analysis

[82] For the purposes of the final determination, 12 exporters, including four exporters from China, provided complete and verified domestic sales databases. The CBSA also received U.S. pricing information from Davis Wire.

[83] The CBSA compared Chinese domestic steel wire prices with those of other countries. The CBSA conducted a price analysis by model, based on the key product characteristics, to account for differences in product mix in each country.

[84] The CBSA's price analysis demonstrated that there is a pattern of significantly lower Chinese domestic prices of steel wire compared to other countries. The complainants provided their own price analysis by model, which showed similar results as the CBSA's price analysis.

[85] The complainants also provided benchmark pricing for wire rod, the key input in the production of steel wire. The benchmark pricing showed the Chinese wire rod prices were consistently and significantly lower than all other markets compared.

[86] Overall, the price analysis shows that domestic prices in the long product steel sector in China are not substantially the same as they would be in a competitive market.

RESULTS OF THE SECTION 20 INQUIRY

[87] Based on the analysis as presented above, the cumulative impact of the Government of China's macro-economic policies and initiatives indicate that the Government of China substantially determines prices in the long product steel sector in China.

[146] For the purpose of the final determination, the CBSA has formed the opinion that the conditions of paragraph 20(1)(a) of SIMA exist in the long products steel sector in China:

- Domestic prices in the long products steel sector in China are substantially determined by the Government of China; and
- There is sufficient reason to believe that the domestic prices are not substantially the same as they would be in a competitive market.

BACKGROUND OF PARTICULAR MARKET SITUATION INQUIRY

[88] In accordance with paragraph 16(2)(c) of SIMA, and for the purpose of determining normal values under section 15, the CBSA will not consider any sales of like goods for use in the country of export that do not permit a proper comparison with the goods sold to Canada due to the existence of a PMS.

[89] Subsection 16(2.1) provides that, for the purposes of paragraph 16(2)(c), a PMS may be found to exist in respect of any goods of a particular exporter or of a particular country, as appropriate in the circumstances.

[90] In order to form an opinion that a PMS exists that impacts the subject goods, the CBSA must determine that there is a PMS and that it has caused a differentiated impact on the domestic and export prices that precludes a proper comparison.

[91] Where the CBSA is of the opinion that the domestic sales of like goods in the country of export do not permit a proper comparison with the sales of the goods to the importer in Canada because of a PMS, the normal value of those goods will be determined under section 19, where possible, or section 29.

[92] Further, data relied upon in the constructed normal values may not allow for a proper comparison between the subject goods and the sale of the subject goods to Canada due to distortions caused by the existence of a PMS. For instance, a PMS may be found where evidence shows that the acquisition cost of the distorted input in question represents a significant portion in the cost of production of the goods of a particular exporter or a particular country.

[93] In these circumstances, to disregard certain acquisition prices used in the cost of production, the CBSA has to form the opinion that in accordance with paragraph 16(2)(c) of SIMA, a PMS exists in the country of export that does not allow a proper comparison with the sale of like goods such that normal values cannot be determined in accordance with section 15 of SIMA and, when constructing a normal value in accordance with section 19 of SIMA, that this PMS distorts the costs of inputs used in the production of subject goods sold to the importer in Canada such that they do not allow for a proper comparison, as per subsection 11.2(2) of the *Special Import Measures Regulations* (SIMR).

ANALYSIS OF PMS

PMS Factors

[94] The primary PMS factors analysed were:

- Government purchases at established price ceilings;
- Volatile economic conditions;
- Distorted inputs due to imported Russian and Chinese wire rod in Türkiye; and
- Government support programs.

Government Purchases at Established Price Ceilings

[95] The evidence on the record shows that several ministries in Türkiye are required, pursuant to Presidential Decree, to provide price ceilings at which they will purchase inputs, including steel wire, for large infrastructure projects.⁸²

[96] Both the Ministry of National Defence and the Ministry of Environment, Urbanization, and Climate Change established a price ceiling of 28.50 Turkish lira (TRY) per kilogram for galvanized steel wire during 2024. Evidence was also provided that the Turkish government is planning several development projects that are expected to take place over the next few years for a total cost of over 1 trillion TRY (\$35 billion Canadian dollars). Of these projects, the aforementioned Ministry of Environment, Urbanization, and Climate Change will be a key player.⁸³

⁸² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment B-59: Government of Türkiye Presidential Decree No. 1, Article 97.

⁸³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 88-89 and Public Attachments B-60: Ministry of Environment, Urbanization and Climate Change, *2021 Construction and Installation Unit Prices*; B-61: Ministry of Environment, Urbanization and Climate Change, *2022 Construction and Installation Unit Prices*; B-62: Ministry of Environment, Urbanization and Climate Change, *2023 Construction and Installation Unit Prices*; B-63: Ministry of Environment, Urbanization and Climate Change, *2024 Construction and Installation Unit Prices*; B-64: Hurriyet Daily News, *Large-scale transformation project unveiled in Istanbul*; B-65: AGBI, *Turkey allocates \$35.5bn for new projects in 2024*; B-66: Business Wire, *Turkey Construction Industry Report 2024: Output to Grow by 3% this Year Before Recording a CAGR of 2.9% to 2028 - Growth Dynamics, Market Size & Forecasts - ResearchAndMarkets.com*; B-67: Presidency of Strategy and Budget, *Twelfth Development Plan (2024-2028)*; B-68: Ministry of National Defense, *2023 Construction Unit Prices*; and B-69: Ministry of National Defense, *2024 Construction Unit Prices*.

[97] A price ceiling could be a factor in a PMS analysis because by placing a price ceiling on certain products, producers may not be able to sell steel wire domestically to a large purchaser (the government) at a market rate and will be forced to settle for prices which are less than they would be able to obtain elsewhere. Alternatively, a price ceiling may also encourage a producer to sell at the posted price, even if it is above the current market rate.

[98] The Government of Türkiye estimates that public sector projects made up roughly 13.9% of all construction projects in Türkiye during 2024.⁸⁴ The CBSA analyzed the exporter responses and found no evidence that exporters sold steel wire at these prices or to government entities during the POI. Further, the selling prices realized by the exporters did not appear to be impacted by these ceiling prices.

[99] Due to the low volume of projects for which these price ceilings are applicable, and the fact that the price ceilings appear to have had no impact on the overall selling prices of steel wire in Türkiye, the CBSA finds that the established price ceilings are not contributing to a PMS in the steel wire sector in Türkiye.

Volatile Economic Conditions

[100] There is evidence on the record that a hyperinflationary situation existed in Türkiye during the POI. The complainants provided the general requirements that must exist for a country to be considered in a hyperinflationary environment and then provided supporting evidence as to how the Turkish economy meets these requirements, such as the inflationary rates in Türkiye.⁸⁵

[101] Further, several large accounting firms and banks considered Türkiye to be in a hyperinflationary situation that started in 2022 and continued during the POI.⁸⁶

[102] The Government of Türkiye took several actions in response to this situation, however the evidence shows that many of these actions had no effect or the opposite effect on eliminating the hyperinflationary situation. For example, the Government of Türkiye cut interest rates, underreported inflation, and prohibited companies from using the International Financial Reporting Standards' recommended hyperinflationary accounting practices.⁸⁷

⁸⁴ Exhibit 189 (NC) – Response to PMS SRFI #1 – Government of Türkiye.

⁸⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-03: IFRS, *IAS 29 – Financial Reporting in Hyperinflationary Economies*; B-04: KPMG, *How should companies account for hyperinflationary economies?*; B-05: CAQ, *IPTF Document for Discussion: Monitoring Inflation in Certain Countries*; B-06: Central Bank of the Republic of Türkiye, *Price Index (Consumer Prices)*; and B-09: Trading Economics, *Türkiye Inflation Rate: December 2022 Data - 1965-2021 Historical*.

⁸⁶ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-04: KPMG, *How should companies account for hyperinflationary economies?*; B-12: Ahval News, *Hyperinflation comes to Turkey for Citigroup, ING*; B-13: PwC Türkiye, *Inflation accounting – POSTPONED, Tax Bulletin 2022/03*; B-14: PWC, *Hyperinflation in Türkiye*; and B-17: PWC, *Hyperinflationary economies as at December 2024*.

⁸⁷ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-10: AP News, *Turkish central bank cuts rates again despite high inflation*; B-11: The Washington Post, *Turkish lira plunges to record low as Erdogan doubles down on economic policy his critics call 'insane'*; B-18: Turkish Minute, *Erdoğan, TurkStat under fire after release of data on record level of inflation*; B-19: BNN Bloomberg, *Turkish*

[103] During the POI, the inflation rate began to improve, but was still considered hyperinflationary. Further, the Government of Türkiye eased up its restrictions on using hyperinflationary accounting practices, where businesses earning less than 50 million TRY will not make inflation adjustments, but others will.⁸⁸

[104] The complainants alleged that the hyperinflation experienced in Türkiye has led to depreciation of the TRY and that this does not allow for a proper comparison to be made between the sales in Türkiye and Canada. Evidence on the record shows a sharp decline of the TRY versus the Canadian dollar in 2022, and a continued devaluation since then.⁸⁹

[105] The CBSA compared the decline of TRY during the POI versus other currencies used by other countries in the investigation⁹⁰ as well as the United States Dollar (USD). TRY was the only currency that depreciated as compared to the Canadian dollar during the POI. All other currencies either stayed relatively flat, or increased during the second half of the POI.

[106] To assess whether the currency depreciation had any impact on the selling price of steel wire in Türkiye, the CBSA compared the trend in the average monthly exchange rate to the average monthly selling prices in Türkiye by the Turkish exporters.

[107] Based on this analysis, the average domestic selling prices did not change significantly throughout the POI despite the downward trend in average exchange rates, including a few sharp declines. One reason for this is that the Turkish exporters did not typically sell goods domestically in TRY, instead all prices were quoted using USD or EUR, which mitigated impacts on the domestic selling prices.

[108] The CBSA compared the monthly average selling prices of steel wire in Türkiye with the selling prices in the markets of the other countries that are part of this investigation and where exporters responded. The CBSA found that the selling price of steel wire in Türkiye followed the same relatively stable trend as in the other markets during the POI. This is despite these other markets having very different currency fluctuation patterns during the POI.

Inflation Calculations Clash After State Data Overhaul; B-21: Bianet, 'Figures are a lie, poverty is real': Union members protest TurkStat after inflation announcement; B-22: Turkish Minute, Nearly half of AKP voters find TurkStat's inflation figures not credible; B-23: Turkish Minute, Majority of Turks believe TurkStat understates inflation figures; B-24: duvaR.english, Retired senior judge to sue Turkish stats institute TÜİK for underestimating inflation; B-27: EY, Türkiye enacts law to postpone inflation accounting and provides corporation tax exemption on gains related to conversions into Turkish Lira; B-28: BMS Steel, Annual Report (2023); and B-29: VergiPort, Law No. 7352 (The Law on Amending the Tax Procedure Law and the Corporate Income Tax Law)

⁸⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 103 and Public Attachments B-25: Trading Economics, *Türkiye Inflation Rate*; B-32: CottGroup, *General Communiqué on Inflation Adjustment Published*; B-33: SRP Legal, *Tax Inflation Adjustment will not be applied in the first quarter of 2024*; and B-34: SRP Legal, *Taxpayers, Whose Gross Sales Are Below 50 million TRY as of December 31, 2023, Will Not Make Inflation Adjustments During Provisional Tax Periods*.

⁸⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-31: *Bloomberg, Turkish Firms Say 85% Inflation is Obscuring Profitability*.

⁹⁰ Other currencies used were: CNY – Chinese renminbi; EUR – European Euro; INR – Indian rupee; MYR – Malaysian ringgit; THB – Thai baht; TRY – Turkish lira; TWD – Taiwanese dollar; and USD – United States dollar.

[109] Therefore, while it appears that hyperinflation is occurring, which is leading to currency depreciation that is particular to Türkiye, the CBSA finds that it does not have an impact on the domestic selling prices of steel wire in Türkiye.

Distorted Inputs Due to Imported Russian and Chinese Wire Rod in Türkiye

[110] The complainants alleged that the acquisition cost of wire rod used by Turkish exporters/producers in the production of steel wire does not reasonably reflect the actual cost of wire rod. Wire rod is the principal input into steel wire production and represents a large proportion of its cost of production, typically over half the cost of production of steel wire is due to wire rod. Therefore, it is reasonable to expect that imports of wire rod at distorted prices could impact the selling price of steel wire in Türkiye.

[111] Evidence on the record shows that, due to restrictions by several countries on exports from Russia, wire rod was entering Türkiye at a reduced price during the POI. The complainants supported this by providing evidence that Russian wire rod was decreasing in price and entering Türkiye during the POI.⁹¹

[112] Evidence on the record also shows that wire rod from China is being imported at cheaper prices compared to wire rod in other markets, and that the CBSA has previously found that the Chinese steel industry, including the wire rod sector, is not operating in accordance with market economy principles. It is alleged that because wire rod prices in China were previously found to be determined by the government and not the same as if they were determined in a competitive market, this is having an impact on the price of wire rod imported into Türkiye from China.⁹²

[113] Evidence on the record shows that a Turkish safeguard measure concerning wire rod came into force in June of 2024, midway through the POI. One of the reasons cited in the Government of Türkiye's decision for implementing a safeguard measure was that many countries put restrictions on Russian goods, but as Türkiye did not, Russian products freely entered the Turkish market and in 2022, 50% of all wire rod imports into Türkiye were from Russia. The safeguard measure placed a duty rate of \$175 USD/ton on imports of wire rod during the POI for all countries, except there is a quota where developing countries can export up to a total of 33,900 tons of wire rod to Türkiye duty free.⁹³

⁹¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment B-40: Ministry of Trade, *Türkiye Notice of Final Determination for Wire Rod Safeguard Investigation*.

⁹² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 125.

⁹³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-40: Ministry of Trade, *Türkiye Notice of Final Determination for Wire Rod Safeguard Investigation*; B-49: WTO, *Türkiye launches safeguard investigation on wire rods*; B-50: Republic of Türkiye Ministry of Trade, *Safeguard Measures in Force*; and B-51: Yieh Corp *Türkiye extends safeguard measures on wire rod imports for 3 years*.

[114] Despite the safeguard in place, many Turkish producers are still able to purchase wire rod and receive a refund on the duties paid because of Türkiye's Inward Processing Regime (IPR), where these duties are refunded if the finished steel wire is subsequently exported,⁹⁴ which could lead to a differentiated impact between the domestic and export selling prices as imported input materials are more likely to be used for export sales.

[115] The complainants provided an analysis showing the correlation between wire rod selling prices in Türkiye and Southern Europe (typically Italy, Spain, and Portugal), as well as between Türkiye and Northern Europe (typically Germany, Belgium, and Netherlands). The complainants showed that before the Russian invasion of Ukraine, prices between these markets were heavily correlated, but after that period they became uncorrelated.⁹⁵

[116] The evidence provided by the complainants show that wire rod prices in Türkiye are higher than in other European markets. However, despite a price increase and decrease during the fall of 2024, the prices in Türkiye appear to follow the same trend as the other European markets.

[117] The Government of Türkiye provided import statistics showing the volume and value of imports of wire rod into Türkiye during the POI. Imports of wire rod from China and Russia made up roughly 25% of all imports of wire rod into Türkiye during the POI. Further, imports of wire rod from Russia dropped to a negligible amount after the implementation of safeguards on imports of wire rod, which came into force on June 15, 2024.⁹⁶

[118] The CBSA used this data to compare the average import price of wire rod from different countries by carbon content and found that the Russian and Chinese wire rod was always lower priced than the average of all other countries, sometimes as much as 8% lower.

[119] The Government of Türkiye also provided information from the Turkish Steel Producers Association (TSPA) on the production and consumption of wire rod in Türkiye. However, they were unable to provide the same information on steel wire in Türkiye. This information shows that only 15.8% of wire rod consumed in Türkiye is from imported sources.⁹⁷ This means that Russian origin and Chinese origin wire rod only accounts for 1.0% and 3.1% of Turkish wire rod consumption respectively, for a total of 4.1%. However, Turkish exporter responses indicated that they use more Russian and Chinese wire rod than what the TSPA reported, albeit only of the low carbon variety.

⁹⁴ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-52: SteelOrbis, *Market tries to assess shifts in wire rod segment due to Türkiye's new safeguard measure* and B-53: Turkish Steel Producers Association, *Press Release*.

⁹⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 128-134.

⁹⁶ Exhibit 78 (NC) – Response to PMS RFI – Government of Türkiye.

⁹⁷ Exhibit 78 (NC) – Response to PMS RFI – Government of Türkiye

[120] The CBSA also analysed the Turkish exporters' purchases of wire rod from all countries and found that Chinese and Russian wire rod costs less than Turkish wire rod, but is not priced differently than wire rod imported from other countries. Purchases from these countries also only occurred during a few months of the POI. Further, given that the Turkish wire rod was higher priced than imports throughout the POI, it does not appear that Chinese wire rod imports have a significant impact on Turkish wire rod prices.

[121] When compared to the responding exporters in other countries, wire rod available in Türkiye (including imported wire rod) was priced no differently than wire rod in other countries, meaning that the low prices of Russian and Chinese wire rod did not have a significant impact on the selling price of wire rod as a whole in Türkiye.

[122] As discussed in the *Volatile Economic Conditions* section, the CBSA compared the selling price of steel wire in Türkiye with other countries, and found no substantial differences. This means that even if wire rod in Türkiye was cheaper than in other markets, the cost of wire rod does not appear to have an impact on the selling price of the like goods.

[123] To summarize, producers of steel wire in Türkiye are purchasing low carbon wire rod from China and Russia, but are not purchasing substantial quantities of wire rod of any other carbon content from those countries. Based on the Government of Türkiye's import data, there is evidence that wire rod from these countries is cheaper than that from other countries, but there is no evidence that this is the case for the cooperative Turkish exporters. Further, there is no evidence that these cheaper input costs have any impact on the selling price of wire rod in Türkiye as the selling prices of wire rod are not significantly different between Türkiye and other countries. Finally, even if wire rod in Türkiye was cheaper than in other markets, the cost of wire rod does not appear to have an impact on the selling price of the like goods.

Government Support Programs

[124] After the initiation of the investigation, the complainants provided evidence on the various government support programs available to the steel industry in Türkiye. This was primarily in the form of a list of various financial contributions that could be attributable to the subject goods.

[125] Most of the evidence concerned steel in general and not steel wire specifically. Some of the evidence did concern wire rod specifically, but as discussed earlier, the pricing of wire rod available in Türkiye was not substantially different than in other countries. Therefore, any financial contributions impacting wire rod in Türkiye do not appear to pass through to steel wire produced in Türkiye.

[126] The complainants also mentioned the Government of Türkiye's involvement in the production of wire, specifically through the existence of SOEs that constitute producers of inputs, energy producers, or trade associations. However, the information provided was primarily theoretical and did not provide evidence on how this actually impacts steel wire production in Türkiye. Further, the Turkish exporters did not report purchasing any inputs from an SOE.

[127] As there is no evidence on the record clearly linking these support programs to steel wire and the Turkish exporters, there is no support for the allegation that government support programs are leading to a PMS in the steel wire sector in Türkiye.

Other Factors

[128] Evidence on the record shows that the Government of Türkiye recently increased import duties on several types of steel wire ranging from 5% to 25%. The evidence provided shows that this change did not come into force until January 1, 2025, which is after the POI. This means that whatever prompted this change in rates was possibly in effect during the POI. From the information in the complaint, this change may have been caused by a large volume of Chinese steel wire imported into Türkiye at distorted prices during the POI as well as in the preceding years.⁹⁸ According to the Government of Türkiye's import statistics, 30.8% of steel wire imported into Türkiye during the POI was from China.⁹⁹ With the limited information on the record, there is insufficient evidence to show that these changes to steel wire duties are leading to a PMS.

[129] The complainants conducted a correlation analysis to show that a distortion in wire rod pricing occurred in Türkiye after the Russian invasion of Ukraine, using the pre-invasion period as a baseline.¹⁰⁰ This analysis did not show substantial changes in the prices between the period before Russia's invasion of Ukraine and the POI, nor did it explain why this would have an impact on Türkiye's correlation with China, nor did it cover steel wire itself.

RESULTS OF THE PMS INQUIRY

[130] Based on the analysis presented above, there is insufficient evidence to show that ceiling prices within the public construction sector set by the Government of Türkiye, volatile economic conditions, distorted input prices due to imports of wire rod from China and Russia, government support programs, or other factors are creating a PMS in Türkiye; nor is there any evidence that these factors are working together to create a PMS. Further, there is no evidence that there may be an exporter-specific PMS impacting one of the cooperative exporters.

[131] As the CBSA has found that there are no factors leading to a PMS in the steel wire sector in Türkiye, the CBSA will not continue the analysis by assessing whether the PMS is preventing a proper comparison between the Turkish domestic and export prices, or whether the PMS is having a differentiated impact on the goods sold in Türkiye as compared to Canada.

[132] Therefore, for the purpose of the final determination, the CBSA did not form the opinion that a PMS exists in regards to steel wire from Türkiye.

⁹⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 90.

⁹⁹ Exhibits 78 (NC) – Response to PMS RFI – Government of Türkiye

¹⁰⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B and Exhibit 292 (NC) – Comments on PMS and Section 20 – ArcelorMittal Long Products Canada, G.P.

FINAL RESULTS OF THE DUMPING INVESTIGATION

COOPERATIVE EXPORTERS

China

[133] Where section 20 conditions exist, the CBSA may determine normal values using the selling prices, or the total costs of production and profit, of like goods sold by producers in a surrogate country designated by the President, in accordance with the provisions of paragraph 20(1)(c) of SIMA.

[134] While the CBSA received information from producers of steel wire in Türkiye, Malaysia, Portugal, Thailand and Vietnam, the CBSA could not determine normal values from Thailand and Vietnam to avoid divulging confidential information of one producer. Additionally, the goods produced and sold by producers in Türkiye, Malaysia and Portugal were not like goods to the goods exported from China to Canada. Specifically, the physical characteristics of the goods exported to Canada from China differ from the goods from the surrogate countries such that they are not identical or similar goods, but rather fall in the same general category.

[135] Where normal values cannot be determined under paragraph 20(1)(c), SIMA provides an alternative methodology to calculate normal values under paragraph 20(1)(d), using re-sales in Canada of like goods imported from a third country. The CBSA determined that this provision could also not be used given that the importers did not provide sufficient re-sale information.

[136] As a result, and in the absence of sufficient information to determine normal values under section 20 of SIMA, normal values were determined pursuant to a ministerial specification in accordance with subsection 29(1) of SIMA, on the basis of facts available.

[137] In establishing the methodology for determining normal values, the CBSA analyzed all the information on the administrative record, including the complaint filed by the domestic industry, the CBSA's estimates at the initiation of the investigation, information submitted by interested parties and CBSA import documentation.

[138] The CBSA determined normal values for the subject goods from China using an approach that reflects the methodology of subparagraph 20(1)(c)(ii) of SIMA, based the aggregate of the cost of production of steel wire sold for domestic consumption, plus a reasonable amount for administrative, selling and all other costs and a reasonable amount for profits found for producers in a surrogate country, Türkiye.

[139] The CBSA finds Türkiye to be an appropriate surrogate country as it is a participant in this investigation with two or more exporters; has significant domestic production of steel wire; and produces a wide range of steel wire including categories of wire that are produced by the Chinese exporters. Furthermore, Türkiye is the second largest exporter of subject goods to Canada, after China. The information on the record suggests that prices and costs of steel wire in Türkiye are determined in a competitive market, allowing them to be considered as a reliable and fair source for purposes of the final determination.

[140] The CBSA determined normal values for steel wire based on the information available on the record, contained in the RFI responses provided by BMS and Özyaşar. The CBSA determined an amount per metric tonne (MT) normal value for each 60-day period during the period of investigation for exporters from China, calculated as the weighted-average constructed cost normal value determined for producers/exporters from Türkiye.

[141] As described above, for the purposes of the final determination, the normal values were determined by combining information of the exporters/producers in Türkiye.

All Other Countries

[142] For the 10 cooperative exporters from countries other than China, who submitted complete responses to the dumping RFI, normal values were either determined using the methodology of section 15 of SIMA based on domestic selling prices of like goods or paragraph 19(b) of SIMA, based on the aggregate of cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits. The costs of production were determined pursuant to paragraph 11(1)(a) of SIMR, based on the costs associated with the production of the subject goods.

[143] For two exporters, TSN and HPSW, the costs of production were adjusted pursuant to SIMR paragraph 11.2(1)(b), to account for the supply of raw materials from their associated supplier(s).

[144] The amounts for profit were determined in accordance with paragraph 11(1)(b) of the SIMR. The following table summarizes the cooperative exporters' determination of normal values.

Table 5: Summary of Determination of Normal Values for Cooperative Exporters

Country	Exporter	Domestic Sales	Normal Values (SIMA Section)	Profit (SIMR Section)
Türkiye	BMS	Yes	15 & 19(b)	11(1)(b)(ii)
	Özyaşar	Yes	15 & 19(b)	11(1)(b)(ii)
Malaysia	Chin Herr	Yes	15 & 19(b)	11(1)(b)(ii)
	Wei Dat	Yes	15 & 19(b)	11(1)(b)(ii)
Portugal	Fapricela	Yes	15 & 19(b)	11(1)(b)(ii)
	Ibermetais	Yes	15 & 19(b)	11(1)(b)(ii)
Thailand	TSN	Yes	19(b)	11(1)(b)(ii)
Vietnam	HPSW	Yes	15	N/A

[145] During the POI, all of the subject goods exported to Canada by the cooperative exporters were sold to unrelated importers. Export prices were determined using the methodology of section 24 of SIMA, as described in the *Export Price* section above.

ALL OTHER EXPORTERS

[146] In establishing the methodology for determining the normal values and export prices for all other exporters, the CBSA considered all of the information on the administrative record, including the complaint filed by the domestic industry, the CBSA's estimates at the preliminary determination, information submitted by parties who responded to the dumping RFI, and CBSA customs entry documentation.

[147] The CBSA decided that the normal values and export prices determined for the exporters from the subject countries whose submissions were complete for purposes of the final determination, rather than the information provided in the complaint or estimated at the preliminary determination, would be used to establish the methodology for determining normal values for all other exporters of subject goods from each subject country since it is more relevant and reflects the trading practices of an exporter of subject goods during the POI.

China, Türkiye, Malaysia, Portugal, and Thailand

[148] On a country basis, the CBSA examined the difference between the normal value and the export price for each individual transaction of the cooperative exporters, and considered that the highest amount (expressed as a percentage of the export price) found in each subject country, was an appropriate basis for estimating normal values. This methodology relies on information related to goods that originated in each subject country and in general, provides an incentive for exporters to participate by ensuring that exporters who have provided the necessary information requested in a dumping investigation will always have a more favourable outcome than those who have not participated.

[149] As a result, based on the facts available, for all other exporters from China, Türkiye, Malaysia, Portugal, and Thailand, normal values of subject goods were determined based on the highest amount by which a normal value exceeded the export price, on an individual transaction basis for the cooperative exporters in that country during the POI. The transactions were examined to ensure that no anomalies were considered, such as very low volume and value, effects of seasonality or other business factors. Two anomalies were removed from the all others rate for China as it was significantly higher than the rest.

Chinese Taipei, India, Italy, Spain, and Vietnam

[150] The CBSA did not receive timely and complete responses, or were unable to verify the information provided by exporters of steel wire located in Chinese Taipei, India, Italy, and Spain.

[151] While the CBSA received a complete dumping RFI response from HPSW from Vietnam, this exporter only had a limited number of transactions shipped to Canada during the POI. The CBSA determined that basing Vietnam's all other's rate on these limited transactions would not be representative.

[152] The CBSA examined the difference between the normal value and the export price for each individual transaction, and considered that the highest amount (expressed as a percentage of the export price) from the other countries, was an appropriate basis for determining normal values. This methodology relies on information related to goods that originated in the other subject countries and in general, provides an incentive for exporters to participate by ensuring that exporters who have provided the necessary information requested in a dumping investigation will always have a more favourable outcome than those who have not participated.

[153] As a result, based on the facts available, for all exporters from Chinese Taipei, India, Italy, and Spain and all other exporters from Vietnam, normal values of subject goods were determined based on the highest amount by which a normal value exceeded the export price, on an individual transaction basis for the cooperative exporters from other subject countries during the POI.

[154] The export prices were based on the declared selling prices on import documentation of steel wire. The CBSA considers this the best available information on which to base the export prices of goods for all other exporters as it reflects actual import data.

[155] Using the above methodologies, for the final determination, the margin of dumping for all other exporters is as follows:

Table 6: All Other Exporter's Margin of Dumping

Country	All Other Exporters Margin of Dumping (% of Export Price)
China	158.9%
Türkiye	45.0%
Chinese Taipei	158.9%
India	158.9%
Italy	158.9%
Malaysia	36.4%
Portugal	26.1%
Spain	158.9%
Thailand	38.0%
Vietnam	158.9%

[156] If the CITT finds that the dumped imports from the subject countries are causing injury, the CBSA will impose anti-dumping duty on these goods. Based on the methodology described above, in the event of a finding by the CITT, the normal value for all other exporters from the subject countries will be determined by advancing the export price by the percentages listed in *Table 6* above, pursuant to a ministerial specification under subsection 29(1) of SIMA.

SUMMARY OF RESULTS – DUMPING

[157] A summary of the results of the dumping investigation respecting all subject goods released into Canada during the POI are as follows:

Table 7: Summary of Results – Dumping
(January 1, 2024 to December 31, 2024)

Country of Origin or Export / Exporter	% of Total Imports (by volume)	Margins of Dumping (% of Export Price)
Primary Countries		
China		
Ningbo King Power Industry Co., Ltd.	5.8%	58.1%
Shanxi Yuci Broad Wire Products Co., Ltd.	4.1%	42.7%
Tianjin Huayuan Metal Wire Products Co., Ltd.	5.2%	45.2%
Tianjin Xuhua Plastic Products Co., Ltd.	1.5%	44.9%
All Other Exporters	34.9%	158.9%

Total – China	51.4%	
Türkiye		
BMS Birleşik Metal Sanayi ve Ticaret A.Ş.	4.6%	19.4%
Özyaşar Tel Ve Galvanizleme Sanayi A.Ş.	0.6%	9.4%
All Other Exporters	4.9%	45.0%
Total – Türkiye	10.1%	
Secondary Countries		
Chinese Taipei		
All Exporters	0.6%	158.9%
India		
All Exporters	0.9%	158.9%
Italy		
All Exporters	1.3%	158.9%
Malaysia		
Chin Herr Industries (M) Sdn Bhd	0.4%	19.8%
Wei Dat Steel Wire Sdn Bhd	0.3%	9.6%
All Other Exporters	0.0%	36.4%
Portugal		
Fapricela - Industria de Trefilaria, S.A	0.2%	12.9%
Ibermetais - Industria de Trefilagem, S.A.	1.6%	11.7%
All Other Exporters	0.0%	26.1%
Spain		
All Exporters	1.6%	158.9%
Thailand		
TSN Wires Co., Ltd.	0.3%	18.6%
All Other Exporters	0.2%	38.0%
Vietnam		
Hoa Phat Steel Wire Co., Ltd.	0.0%	5.7%
All Other Exporters	0.1%	158.9%
Subtotal – Secondary Countries	7.4%	
All Other Countries	31.0%	
Total	100.0%	

[158] In order to make a final determination of dumping, the CBSA must be satisfied that:

- i. the subject goods have been dumped; and
- ii. that the margin of dumping of a particular exporter is not insignificant.

[159] Under paragraph 41(1)(a) of SIMA, the CBSA is required to terminate an investigation in respect of any goods of an exporter if it is satisfied that the goods have not been dumped or the margin of dumping of the goods of that exporter is insignificant, meaning a margin of dumping that is less than 2% of the export price of the goods.

[160] The margin of dumping determined for all exporters of subject goods originating in or exported from the subject countries is greater than the threshold of 2% and are therefore not considered insignificant. As a result, the legislative requirements are satisfied for making a final determination of dumping respecting steel wire from the subject countries.

[161] A summary of the margins of dumping by exporter is presented in **Appendix 1**.

DECISION

[162] On December 3, 2025, pursuant to paragraph 41(1)(b) of SIMA, the CBSA made a final determination respecting the dumping of steel wire originating in or exported from China, Chinese Taipei, India, Italy, Malaysia, Portugal, Spain, Thailand, Türkiye, and Vietnam.

FUTURE ACTION

[163] The provisional period began on September 4, 2025, and will end on the date the CITT issues its finding. The CITT is expected to issue its decision by January 2, 2026. Provisional duties will continue to be imposed on the subject goods from the subject countries until the CITT renders its decision. For further details on the application of provisional duty, refer to the *Statement of Reasons* issued for the preliminary determination.

[164] If the CITT finds that the dumped goods have not caused injury and do not threaten to cause injury, all proceedings will be terminated. In this situation, all provisional duty paid or security posted by importers will be returned.

[165] If the CITT finds that the dumped goods have caused injury, the anti-dumping duty payable on subject goods released by the CBSA during the provisional period will be finalized pursuant to section 55 of SIMA. Imports released by the CBSA after the date of the CITT's finding will be subject to anti-dumping duty equal to the margin of dumping.

[166] The importer in Canada shall pay all applicable duties. If the importers of such goods do not indicate the required SIMA code or do not correctly describe the goods in the customs documents, an administrative monetary penalty could be imposed. The provisions of the *Customs Act* apply with respect to the payment, collection or refund of any duty collected under SIMA. As a result, failure to pay duty within the prescribed time will result in the application of interest.

RETROACTIVE DUTY ON MASSIVE IMPORTATIONS

[167] Under certain circumstances, anti-dumping duty can be imposed retroactively on subject goods imported into Canada. When the CITT conducts its inquiry on material injury to the Canadian industry, it may consider if dumped goods that were imported close to or after the initiation of the investigation constitute massive importations over a relatively short period of time and have caused injury to the Canadian industry. Should the CITT issue a finding that there were recent massive importations of dumped goods that caused injury, imports of subject goods released by the CBSA in the 90 days preceding the day of the preliminary determination could be subject to anti-dumping duty.

PUBLICATION

[168] A notice of this final determination of dumping will be published in the *Canada Gazette* pursuant to paragraph 41(3)(a) of SIMA.

CONTACT US

[169] This *Statement of Reasons* is available through the CBSA's website at the address below. For further information, please contact the email address identified below:

E-mail: simaregistry@cbsa-asfc.gc.ca

Web site: www.cbsa-asfc.gc.ca/sima-lmsi



Sean Borg
A/Executive Director
Trade and Anti-dumping Programs Directorate

ATTACHMENTS

Appendix 1: Summary of Margins of Dumping

Appendix 2: Representations

APPENDIX 1 – SUMMARY OF MARGINS OF DUMPING

Country of Origin or Export / Exporter	Margins of Dumping (% of Export Price)
China	
Ningbo King Power Industry Co., Ltd.	58.1%
Shanxi Yuci Broad Wire Products Co., Ltd.	42.7%
Tianjin Huayuan Metal Wire Products Co., Ltd.	45.2%
Tianjin Xuhua Plastic Products Co., Ltd.	44.9%
All Other Exporters	158.9%
Chinese Taipei	
All Exporters	158.9%
India	
All Exporters	158.9%
Italy	
All Exporters	158.9%
Malaysia	
Chin Herr Industries (M) Sdn Bhd	19.8%
Wei Dat Steel Wire Sdn Bhd	9.6%
All Other Exporters	36.4%
Portugal	
Fapricela - Industria de Trefilaria, S.A	12.9%
Ibermetais - Industria de Trefilagem, S.A.	11.7%
All Other Exporters	26.1%
Spain	
All Exporters	158.9%
Thailand	
TSN Wires Co., Ltd.	18.6%
All Other Exporters	38.0%
Türkiye	
BMS Birleşik Metal Sanayi ve Ticaret A.S.	19.4%
Özyaşar Tel Ve Galvanizleme Sanayi A.Ş.	9.4%
All Other Exporters	45.0%
Vietnam	
Hoa Phat Steel Wire Co., Ltd.	5.7%
All Other Exporters	158.9%

Note: The margins of dumping reported in the table above are the margins determined by the Canada Border Services Agency (CBSA) for purposes of the final determination of dumping. These margins do not reflect the anti-dumping duty to be levied on future importations of dumped goods. In the event of an injury finding by the Canadian International Trade Tribunal, normal values have been provided to the exporters which provided sufficient information for future shipments to Canada and these normal values would come into effect the day after the injury finding. Information regarding normal values of the subject goods should be obtained from the exporter. Imports of subject goods from exporters/producers that did not provide sufficient information to the CBSA during the dumping investigation and who are not listed in the table above will be subject to the All Other Exporters anti-dumping duty rate pursuant to a ministerial specification.

Normally, normal values will not be applied retroactively. However, normal values may be applied retroactively in cases where the exporter does not adjust export prices to account for increases in domestic prices and/or costs. Therefore, where substantial changes occur in prices, market conditions, costs associated with production and sales of the goods, the onus is on the concerned parties to increase the export price accordingly to ensure that any sale made to Canada is not only above the normal value but at or above selling prices and full costs and profit of the goods in the exporter's domestic market.

Please consult the *SIMA Self-Assessment Guide* at <https://www.cbsa-asfc.gc.ca/sima-lmsi/self-auto-eng.html>, for more detailed information explaining how to determine the amount of SIMA duties owing.

APPENDIX 2 – REPRESENTATIONS

During the investigation, representations were received on behalf of the complainants, ArcelorMittal Long Products Canada G.P. (“AMLPC”)¹⁰¹ and Sivaco Wire Group 2004, LP (“Sivaco”)¹⁰², (hereinafter, “the complainants”), Tree Island Ltd. (“Tree Island”)¹⁰³, Tianjin Huayuan Metal Wire Products Co., Ltd. (“Huayuan”) and Tianjin Xuhua Plastic Products Co., Ltd. (“Xuhua”)¹⁰⁴.

Following the closing of the record on October 14, 2025, case arguments were received on behalf of the following parties:

- AMLPC¹⁰⁵;
- Sivaco¹⁰⁶;
- Tree Island¹⁰⁷;
- Huayuan¹⁰⁸;
- TSN Wires Co., Ltd. (“TSN”)¹⁰⁹;
- Hoa Phat Steel Wire Co., Ltd. (“HPSW”)¹¹⁰;
- Fapricela – Industria de Trefilaria, S.A. (“Fapricela”) and Ibermetais – Indústria de Trefilagem S.A. (“Ibermetais”)¹¹¹

¹⁰¹ Exhibit 291 (PRO) & 292 (NC) – Comments regarding Section 20 in China and PMS in Türkiye – AMLPC; Exhibit 308 (PRO) & 309 (NC) – Comments regarding Fapricela’s and Ibermetais’s response to the Dumping RFI and Supplemental RFIs (SRFI) – AMLPC; Exhibit 313 (PRO) & 314 (NC) – Comments regarding TSN’s response to the Dumping RFI and Supplemental RFIs (SRFI) – AMLPC; and Exhibit 431 (PRO) & 432 (NC) – Additional Comments regarding TSN’s response to the Dumping RFI and SRFI – AMLPC.

¹⁰² Exhibit 130 (PRO) & 131 (NC) – Comments regarding the Government of Türkiye’s PMS RFI Response – Sivaco; Exhibit 169 (PRO) & 170 (NC) – Comments regarding Chin Herr’s response to the Dumping RFI – Sivaco; Exhibit 171 (PRO) & 172 (NC) – Comments regarding BMS Birleşik Metal Sanayi ve Ticaret A.S. (“BMS”)’s response to the Dumping RFI – Sivaco; Exhibit 176 (PRO) & 177 (NC) – Comments regarding Ibermetais’s response to the Dumping RFI – Sivaco; Exhibit 185 (PRO) & 186 (NC) – Comments regarding Fapricela’s response to the Dumping RFI – Sivaco; Exhibit 233 (PRO) & 234 (NC) – Comments regarding Huayuan’s response to the Dumping RFI – Sivaco; Exhibit 235 (PRO) & 236 (NC) – Comments regarding Chin Herr’s response to the Dumping RFI – Sivaco; Exhibit 248 (PRO) & 249 (NC) – Comments regarding Section 20 in China and PMS in Türkiye – Sivaco; Exhibit 277 (PRO) & 278 (NC) – Comments regarding BMS’s response to SRFI #1 – Sivaco; Exhibit 281 (PRO) & 282 (NC) – Comments regarding Cokyasar Tel Orme Ve Dokuma Tel Gal. Civi San. Tic. A.S.’s (“Cokyasar”) response to the Dumping RFI – Sivaco; Exhibit 306 (PRO) & 307 (NC) – Additional Comments regarding Section 20 in China – Sivaco; Exhibit 318 (PRO) & 319 (NC) – Comments regarding Özyaşar Tel Ve Galvanizleme Sanayi A.Ş.’s (“Ozyasar”) responses to the Dumping RFI and SRFI – Sivaco; Exhibit 327 (PRO) & 328 (NC) – Comments regarding Usha Martin Limited’s (“Usha Martin”) response to the Dumping RFI – Sivaco; and Exhibit 404 (PRO) & 405 (NC) – Comments regarding the Section 20 in China and PMS in Türkiye – Sivaco.

¹⁰³ Exhibit 275 (PRO) & 276 (NC) – Comments regarding responses to RFI and SRFI – Tree Island.

¹⁰⁴ Exhibit 273 (PRO) & 274 (NC) – Comments regarding the normal value methodology – Huayuan and Xuhua.

¹⁰⁵ Exhibit 468 (PRO) & 469 (NC) – Case Brief – AMLPC.

¹⁰⁶ Exhibit 470 (PRO) & 471 (NC) – Case Brief – Sivaco.

¹⁰⁷ Exhibit 477 (PRO) & 478 (NC) – Case Brief – Tree Island.

¹⁰⁸ Exhibit 464 (PRO) & 465 (NC) – Case Brief – Huayuan.

¹⁰⁹ Exhibit 466 (PRO) & 467 (NC) – Case Brief – TSN.

¹¹⁰ Exhibit 472 (PRO) & 473 (NC) – Case Brief – HPSW.

¹¹¹ Exhibit 474 (PRO) & 475 (NC) – Case Brief – Fapricela and Ibermetais.

- Wei Dat Steel Wire Sdn. Bhd. (“Wei Dat”)¹¹²; and
- Chin Herr Industries (M) Sdn Bhd (“Chin Herr”)¹¹³.

The CBSA also received reply submissions on behalf of the following parties:

- TSN¹¹⁴;
- Tree Island¹¹⁵;
- Sivaco¹¹⁶;
- Fapricela and Ibermetais¹¹⁷;
- Wei Dat¹¹⁸;
- Chin Herr¹¹⁹; and
- HPSW¹²⁰.

Certain details provided in the representations were designated as confidential information by the submitting counsel. This has restricted the ability of the CBSA to discuss all issues raised in these submissions. The material issues raised by the parties are summarized as follows:

Section 20 in China

In their case briefs and representations received during the investigation, counsel on behalf of AMLPC, Sivaco, and Tree Island argued that the CBSA should find that section 20 conditions exist in China.

AMLPC and Sivaco argued that the CBSA should apply a ministerial specification to find that section 20 conditions exist in the Chinese long products steel sector given the minimal participation from Chinese exporters and the lack of a response to the Request for Information (RFI) from the Government of China.

AMLPC and Tree Island stated that the CBSA has found section 20 conditions in previous steel cases involving China, including wire rod.

¹¹² Exhibit 478 (PRO) & 479 (NC) – Case Brief – Wei Dat.

¹¹³ Exhibit 480 (PRO) & 481 (NC) – Case Brief – Chin Herr.

¹¹⁴ Exhibit 482 (PRO) & 483 (NC) – Reply Submission – TSN.

¹¹⁵ Exhibit 484 (PRO) & 485 (NC) – Reply Submission – Tree Island.

¹¹⁶ Exhibit 486 (PRO) & 487 (NC) – Reply Submission – Sivaco.

¹¹⁷ Exhibit 488 (PRO) & 489 (NC) – Reply Submission – Fapricela and Ibermetais.

¹¹⁸ Exhibit 490 (PRO) & 491 (NC) – Reply Submission – Wei Dat.

¹¹⁹ Exhibit 492 (PRO) & 493 (NC) – Reply Submission – Chin Herr.

¹²⁰ Exhibit 494 (PRO) & 495 (NC) – Reply Submission – HPSW.

Sivaco submitted that the Chinese domestic prices are distorted when compared to the domestic prices in other subject countries and compared to other available data on the record. AMLPC, Sivaco, and Tree Island stated that domestic sales prices in Malaysia, Thailand, and Vietnam are distorted due to a Chinese overcapacity. They also noted that the price of wire rod in China is also distorted.

Sivaco submitted that the CBSA should select Portugal or the United States as surrogate countries given the relative size or their economies and well-developed steel industries.

Sivaco also submitted that if a section 20 is not found to exist, that the CBSA should consider whether a Particular Market Situation (PMS) exists in China.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel, as well as any representations filed during the investigation before the close of record. The CBSA formed an opinion that section 20 conditions exist in the long products steel sector in China. A detailed analysis of the reasons can be found in the *Analysis of Section 20 Conditions* section of this document.

Particular Market Situation in Türkiye

In their case briefs, counsel on behalf of AMLPC and Sivaco argued that the CBSA should find that a PMS exists in regard to steel wire in Türkiye. AMLPC simply stated that a PMS exists, while Sivaco emphasized the importation of distorted inputs and the existence of price ceilings on steel wire.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel, as well as any representations filed during the investigation before the close of record. The CBSA did not form the opinion that a PMS exists in regard to steel wire in Türkiye and a detailed analysis of the reasons can be found in the *Analysis of PMS* section of this document.

Calculation of Normal Values

Counsel on behalf of Sivaco and Tree Island submitted that Chin Herr's and TSN's reported data do not permit the calculation of normal values under section 15 due to a lack of comparable domestic sales and/or under section 19 of SIMA.

Counsel on behalf of Chin Herr and TSN submitted any issues were resolved in Supplemental Requests for Information (SRFI) or during verification. Counsel on behalf of the exporters reiterated in their reply submissions that the CBSA has sufficient information to calculate normal values.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel. For the purpose of the final determination, the CBSA determined the normal values based on the verified information as provided by the cooperative exporters.

Costing Deficiencies

In its case brief, counsel on behalf of Sivaco submitted that Fapricela and Ibermetais failed to provide costs in a manner that distinguishes all the characteristics of the products.

Counsel on behalf of Sivaco also argued Fapricela, Ibermetais, and Wei Dat did not calculate certain costs properly. In addition, counsel on behalf of Tree Island argued that TSN and its related supplier did not calculate costs correctly.

Counsel on behalf of Fapricela and Ibermetais argued that the product groups are based on how the goods are priced and sold and argued that the CBSA verified the accuracy of the costs.

Counsel on behalf of Fapricela, Ibermetas, Wei Dat, and TSN submitted that their costing information was complete and accurate. Counsel also argued that the CBSA verified the veracity of the information.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel. For the purpose of the final determination, the CBSA determined the normal values based on the verified information as provided by the cooperative exporters.

Price Deductions in the Domestic and Export Sales Databases

Counsel on behalf of Sivaco submitted that certain deductions made to selling prices in Fapricela's and Ibermetais' domestic market should not be granted.

Counsel on behalf of Tree Island and AMLPC argued that inconsistencies in TSN's and HSPW's domestic and/or export databases were present.

Counsel on behalf of Fapricela, Ibermetais, HPSW, and TSN maintained that their sales databases are accurate and complete, and submitted that the deductions reported in the sales database were reasonable and representative. Counsel also argued that the CBSA verified the veracity of the information provided.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel. For the purpose of the final determination, the CBSA determined the export prices and normal values based on the verified information as provided by the cooperative exporters.

Amount for Profits

In its case brief and reply submission, counsel on behalf of Sivaco argued that the CBSA should determine and apply different amounts of profits to account for the different types of steel wire exported to Canada by Fapricela and Ibermetais.

Counsel on behalf of Fapricela and Ibermetais argued that the CBSA should determine an amount for profit in accordance with the hierarchy in the SIMR and submitted that the correct approach is to calculate an amount for profit based on the weighted average profit of all of the exporters' profitable domestic sales of goods of the "same general category".

Counsel on behalf of Sivaco and Tree Island also argued that the CBSA cannot rely on Chin Herr's or TSN's reported domestic sales or that the CBSA has insufficient information to determine an amount for profit.

Counsel on behalf of Chin Herr argued that the CBSA resolved any issues with SRFIs or during verification. Counsel for Chin Herr and TSN also argued that information was complete and accurate, and that the CBSA verified the veracity of the information provided.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel. The CBSA determined amounts for profits based on verified information, following the hierarchy in accordance with paragraph 11(1)(b) of the SIMR.

Exporter's Costs in China

In its case brief, counsel on behalf of Huayuan argued that the CBSA has the information to match its costs with its products sold, so normal values can be determined under paragraph 19(b) of SIMA.

In its reply submission, counsel on behalf of Sivaco argued that the CBSA should determine normal values for Chinese exporters under section 20 of SIMA. Failing that, a Particular Market Situation should be found for steel wire in China, and failing that, Huayuan's normal values should be based on section 29 of SIMA.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel. The CBSA formed the opinion that the conditions of section 20 exist for the final determination. As such, normal values for Huayuan were determined under section 29, using a section 20 methodology.

Adjustments under SIMR

Counsel on behalf of TSN submitted that the CBSA should make a downward adjustment to the normal values pursuant to section 5 of SIMR on the basis of a difference in quality in the domestic and export markets.

Counsel for Tree Island argued in their reply submission that the CBSA does not have sufficient evidence to make a qualitative adjustment pursuant section 5 of SIMR.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel. The CBSA determined that an adjustment for TSN's normal values pursuant to section 5 of SIMR was unwarranted.

Deficient Exporter Submissions

Trafileria F.lli Crotta S.R.L.'s ("Crotta")

Counsel on behalf of Sivaco submitted that the accounting and costing methodologies applied by Crotta were not reasonable. Further, direct material costs were based on historical knowledge and market intelligence, rather than specific material purchases.

Counsel also argued that Crotta was unable to sufficiently verify its Appendices 4A, 4B, and 5. In addition to the significant delays and unexplained discrepancies in Crotta's export and domestic sales, counsel reasoned that Crotta's submissions were deficient and that sufficient information was not provided in order to make reasonable determinations of normal values and export prices.

United Nail Products Co., Ltd. ("United Nail")

Counsel on behalf of Tree Island and Sivaco submitted that United Nail's normal values should be determined through a ministerial specification due to deficiencies found during the CBSA's verification. Counsel on behalf of Tree Island also submitted that normal values for non-cooperative exporters in Vietnam should be based on the highest amount by which a normal value exceeded the export price on an individual transaction basis for the cooperative exporters from other subject countries during the POI.

CBSA's Response

The CBSA considered the case arguments and reply submissions provided by counsel regarding Crotta and United Nail. For the purpose of the final determination, the CBSA determined that the normal values and export prices for both exporters would be determined under ministerial specification pursuant to section 29 of the SIMA.