

PROTECTION PRODUCTION CAPITAL PRODUCTS

The queue	THE GTIP	ADDITIONAL FINANCIAL LIABILITY		
		1. Period (15/06/2024-06/01/2025)	2. Period (07/01/2025-06/01/2026)	3. Period (07/01/2026-06/01/2027)
1	7213.10.00.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
2	7213.91.10.00.00	175 U.S. Dolan/Ton	170 US Dollars/Ton	165 US Dollars/Ton
3	7213.91.41.00.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
4	7213.91.41.00.12	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
5	7213.91.41.00.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
6	7213.91.41.00.19	\$175 USD/Ton	170 U.S. Dolan/Ton	165 US Dollars/Ton
7	7213.91.49.00.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
8	7213.91.49.00.12	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
9	7213.91.49.00.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
10	7213.91.49.00.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
11	7213.91.70.10.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
12	7213.91.70.10.12	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
13	7213.91.70.10.13	\$175 USD/Ton	170 U.S. Dolan/Ton	165 US Dollars/Ton
14	7213.91.70.10.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
15	7213.91.70.90.00	\$175 USD/Ton	170 U.S. Dolan/Ton	165 US Dollars/Ton
16	7213.91.90.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
17	7213.99.10.00.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
18	7213.99.10.00.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
19	7213.99.10.00.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
20	7213.99.90.10.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
21	7213.99.90.10.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
22	7213.99.90.10.19	175 U.S. Dolan/Ton	170 US Dollars/Ton	165 US Dollars/Ton
23	7213.99.90.90.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
24	7227.10.00.00.00	175 U.S. Dolan/Ton	170 U.S. Dolan/Ton	165 US Dollars/Ton
25	7227.20.00.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
26	7227.90.10.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
27	7227.90.50.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
28	7227.90.95.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton

**QUESTIONING THE PREVENTION OF PROTECTION AGAINST THE IMPORT OF THE
FILM**

CONCLUSION REPORT OF THE RELATIONSHIP

1. INFORMATION ABOUT THE INVESTIGATION

1.1. The Applicant

In the application sent to our Ministry by the Turkish Steel Manufacturers Association (TÇÜD) on behalf of the producers producing in Türkiye, it was requested to implement protection measures in the import of the product mentioned with the claim that the importation of the film has increased in absolute and relative

terms and that this situation caused serious damage to the domestic producers of the film. Applicant firms, Habaş Industrial and Medical Gases Employment Industry Inc., İçdaş Çelik Enerji Shipyard and Transportation San. A.Ş., Iskenderun Demir ve Çelik A.Ş., Tosyalı Filmaşın and Construction Iron Production Industry Inc. and Diler Iron and Steel End. As A.Ş.; KROMAN Çelik Sanayi A.Ş. and Karabük Demir Çelik Sanayi ve Ticaret A.Ş. are listed as the companies supporting the application.

1.2. Status of Representation of the Application and Information on Domestic Producers

The applicant companies carry out an important part of the product's production in Türkiye. In this case, it is evaluated that the applicant firms meet the definition of "domestic manufacturer" as "producers operating at home and producing all or a significant portion of similar or directly competing goods" in Article 2 of the Regulation on Import Protection Measures.

1.3. Opening an Investigation

In the preliminary examination of the application file, the findings regarding the increase of imports, the threat of damage or harm in the economic indicators of domestic production, and the risk of illicit link between the two were presented to the Board of Measures of Protection in Imports and the Board decided to open the Prevention of Protection Investigation for the product subject to application.

Within this framework, Communiqué No. 2023/6 on Import Protection Measures, published in the Official Gazette numbered 32358 dated 3/11/2023, and the Board decision was announced and the investigation of protection against the imports of goods referred to was opened. Furthermore, the notification of the opening of the investigation was published on the World Trade Organisation (WTO) website on 8/11/2023 and code G/SG/N/6/TUR/29.

1.4. Taking Temporary Precautions

In the light of the preliminary findings reached during the investigation process, the provisional protection measure was started in the form of additional financial obligation of \$175/ton for 200 days with the President's Decision published in the Official Gazette dated 31/12/2023 and dated 31/12/2023. The decision of the President came into force on 7/1/2024. In addition, notification of the provisional measure in question has been published on the WTO website, dated 5/1/2024 and G/SG/N/7/TUR/14 G/SG/N/11/TUR/29.

1.5. Listening Meeting of the Parties and the Parties

In the opening notice of the investigation, the relevant parties are given a period of 30 days from the opening date of the investigation to submit the requested information and documents and, if any, verbal listening requests. However, requests for extension of time have been met within the framework of the provisions of the relevant legislation.

Within this framework, a total of 28 related party applications, including 4 as an importer company based in Türkiye, 10 as an overseas exporter and 14 in the form of foreign government/diplomatic representative/sector organisations, and a public listening meeting was held on 24/1/2024 for the purpose of listening to the opinions of the interested parties. The list of interested parties is presented in Annex 2a.

1.6. On-site Inspection

In order to confirm the accuracy of the economic indicators transmitted to our Ministry by the applicant companies within the scope of the investigation and to examine the production process on site on 6 and 7 March 2024, Iskenderun Demir and Çelik A.Ş. and Tosyalı Filmaşın and Construction Iron Production Industry Inc. on 13 March 2024. A.Ş.'s, on 27 March 2024, İçdaş Çelik Enerji Shipyard and Transportation San. A.Ş.'s built-in production facilities were examined at the production site. Since Habaş Industrial and Medical Gases Employment Industry A.Ş. carried out the production process with the same production process as other companies, it was not necessary to examine the production facility of the company in question. On the other hand, at the online meeting on 5 April 2024, data on the economic indicators of Habaş Industrial and Medical Gases Employment Industry A.Ş. were examined and correctness was confirmed.

1.7. Period of Investigation

As the investigation period 1/1/2019 – 31/12/2023 is based on the 5-year period.

2. SUBJECT OF INQUIRY PRODUCT

2.1. Subject to Investigation Product Description, Customs Tariff Statistical Position and Use Areas

The products of the inquiry are listed under the customs tariff positions 72.13 and 72.27 in the Turkish Customs Tariff Schedule (GTP). The table on 12 Ti Customs Tariff Statistical Positions (GTIP) of the goods classified under these GTPs is shown in **Annex- 2b**.

Steel products, called wire rod, kangal or wire rod on the market, are a semi-finished product that has a round cross section produced by hot rolling. Wire rod products are used in the production of the following products:

- Wire fence, barbed wire, nails, staple wire, cable armor wire, lacing wire and galvanised wire,
- Bearing spring, steel rope, spring wire and industrial spring,
- Bolt, screw, nut, washer and stud,
- Welding wire and electrode,
- Pre-stressed concrete wire, pre-stressed concrete bundle and agricultural spring,
- Railway tension clamp

2.2. Enquiry Coverage Requests for Exemption on Products

During the investigation process, importer domestic manufacturer companies have 7213.20 (Automatic steels), 7213.91.20.00.00 (Tyre Wire), 7227.90.10.00.00, 722790.95.00.00 (Alloy fizzhins) GTP/GTIP

code, some special quality and technical characteristics were requested to remove the mentioned products from the scope of the investigation and not apply protection measures.

As a result of the evaluation, certain quality and technical characteristics are specified by importing domestic manufacturers and 7213.91.20.00.00 GTIP code coded “Wheel external tire steel cord” defined product defined as 7213.20 GTP code which does not have enough domestic production, were excluded from the scope of investigation.

2.2.10. Since there is domestic production of alloy steel classified in the code 00.00 and 722790.95.00.00 GTIP, it is not excluded from the scope of the investigation.

2.3. Inquiry Subject Product Production Process and Similar/Direct Competitive Product Detection

The production of the product is carried out in two methods in our country and in the world in general. In the first method, production is carried out by melting iron ore with coke in integrated iron and steel plants, and in the second method, production is carried out from scrap in electric arc furnaces.

As a result of the melting of iron ore or scrap, slabs or logs are produced from these products which are semi-finished, flat steel products with slab rolling, long steel products are produced by rolling the log. In the production process of long steel products, the production of rebar, wire rod, profile and wire is achieved by processing the log.

The production process of wire rod begins with the annealing of steel logs in the annealing furnace at the appropriate temperature. Annealed logs are made into semi-finished wire rods in desired diameters by passing through the spin machine at the end of the process. The necessary quality control process is carried out during and after production. The products produced are transferred to the stock area after the binding and labeling process. It is shipped from the stock site to the end users.

There is no difference in terms of production process, technical characteristics, distribution channels and user/consumer preferences between domestic and imported products. Imported and domestic products can be used interchangeably and physical-chemical properties and technologies are similar. Given these factors, those imported with domestic-produced filmasins are treated as similar and directly competing products.

2.4. The Legislation Implemented on the Import of the Product

Imports of the products subject to investigation from third countries are subject to customs duties ranging from 3 % to 40 % within the scope of the Import Regime Decision of 2023. The European Union (EU) countries and the Free Trade Agreement (STA) imports (excluding Venezuela and the UAE) apply 0 % customs duty in line with mutually provided concessions resulting from bilateral agreements. The German VAT rate in imports is 20 %.

Detailed information on the taxes applied to import products subject to investigation is shown in the table in Annex 2c.

3. CONDITIONS OF IMPORTATION AND REALISATION OF IMPORT

The course of absolute and relative imports for the product subject of investigation, the share of imports from the domestic market and the distribution of imports by country by country is given below. In this part of the report, 2019-2023 full year import data is used. 7213.91.20.00.00 GTIP-coded vending machine wire with 7213.20 GTP coded vending machine wires are excluded in the final investigation report, unlike the provisional measure report.

3.1. Absolute Import

IMPORT	Total Quantity (Ton)	Total Value (Thousand \$)	B.F. (\$/Ton)	Quantity (Ton)	Share (%)	Change %		
						Quantity (Ton)	(Thousands of dollars)	IT'S B.F. (\$/Ton)
2019	289.644	178.796	617	187.055	65 %			
2020	241.770	145.468	602	120.793	50 %	—17 %	—19 %	—3 %
2021	377.599	308.121	816	246.216	65 %	56 %	112 %	36 %
2022	344.281	314.169	913	264.765	77 %	—9 %	2 %	12 %
2023	753.289	532.886	707	325.685	43 %	119 %	70 %	—22 %

Total imports of the product groups subject to investigation as of 2019-2023 are shown in the table above.

Accordingly, imports of filmaşın in 2019 were about 289.6 thousand tons, with a 17 % reduction in 2020 to 241.8 thousand tons, increased by 56 % in 2021 to 377.6 thousand tons, and in 2022 it was 344 thousand tons with a decrease of 9 %. In 2023, it increased by 119 % compared to the previous year to 753.3 thousand tons. The amount of imports increased by 160 % compared to 2019, which is the first year of the investigation period.

The share of the imports made within the scope of Included Processing Regime (YA) in terms of quantity in total imports was realised as an average of 60 % during the investigation period. The share of DİR fell from 77 % in 2022 to 43 % in 2023.

The import value decreased by 19 % to \$145.5 million in 2020 from 178.8 million dollars in 2019 and increased steadily after this year to 314.2 million dollars with 2 % increase in 2022 compared to the previous year. In 2023, it increased by 70 % compared to the previous year to \$532.9 million. In the same year, import value increased by 198 % compared to 2019. During the investigation period, the imports showed absolute shot on the basis of quantity and value.

During the period of the investigation, import unit prices followed a fluctuating course. Import unit prices decreased by 3 % compared to 2019 in 2020, but unit prices increased in 2021 and 2022. In 2023, import unit prices decreased by 22 % compared to the previous year, and well below the 2021 level.

3.2. Relative Import (Import to Domestic Production)

Relative imports correspond to the ratio of imports to domestic production, and the data in question is shown with index values in the table below. The ratio of imports to domestic production is obtained as a result of the ratio of imports to total Turkish production on a quantitative basis.

Relative Import	2019	2020	2021	2022	2023
The index	100	85	128	126	336

As shown in the table above, the index of the ratio of imports to domestic production, which was 100 in 2019 to 85 points in 2020, increased to 128 in 2021 and was realised at 126 levels with a slight decrease in 2022. In 2023, it increased significantly to 336 points.

3.3. Market Share of Imports

In the market share account of imports, domestic market (consumption) data was reached using the data provided by the applicant companies regarding domestic sales and import statistics.

Market Share of	2019	2020	2021	2022	2023
The index	100	76	101	103	212

The market share index of imports decreased from 100 in 2019 to 76 points in 2020 and rose in 2021 and 2022 and reached 101 and 103 points respectively. In 2023, it rose to the highest level during the investigation period with 212 points.

3.4. Import with Reputation of Countries

COUNTRIES OF EXPORTERS	Quantity (Ton)			Value (million dollars)			Amount of Pay (%)		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
The Russian Federation	111.643	173.433	211.904	79	125	129	30 %	50 %	28 %
In Malaysia	—	—	177.599	—	—	111	0 %	0 %	24 %
In Egypt	9.580	24	136.459	6	0	91	3 %	0 %	18 %
South Korea	23.817	31.161	72.935	22	37	65	6 %	9 %	10 %
In Spain	99.000	52.547	48.977	86	54	45	26 %	15 %	7 %
In China	13.751	13.137	35.015	10	14	24	4 %	4 %	5 %
Germany	38.375	26.514	17.944	34	29	19	10 %	8 %	2 %
It's Italy	18.259	10.208	11.903	16	13	12	5 %	3 %	2 %
From Austria	16.407	17.718	10.548	17	22	14	4 %	5 %	1 %
From Kazakhstan	—	—	9.038	—	—	5	0 %	0 %	1 %
Bosnia and Herzegovina	17.399	1.532	8.568	12	1	7	5 %	0 %	1 %
The Swiss	6.185	7.539	8.522	6	10	10	2 %	2 %	1 %
From Azerbaijan	1.945	5.554	1.743	1	4	1	1 %	2 %	0 %
THE UAE	338	—	1.105	0	—	1	0 %	0 %	0 %
Of Oman	—	—	499	—	—	0	0 %	0 %	0 %
The other	20.902	4.913	531	16	4	1	6 %	1 %	0 %
Overall total	377.599	344.281	753.289	308	314	533	100 %	100 %	100 %

The table above contains the import quantities, import values and share of total imports of the top 15 countries as of 2021-2023. Detailed data on imports based on countries are included in Annex- 2d.

In the light of these data, it is seen that as of 2023, Russia ranks first in imports of filmwork, followed by Malaysia, Egypt, South Korea and Spain. The share of the imports of the countries in question was 86 % on the basis of quantity.

From 2021 to 2023, there have been significant changes in the share of countries from total imports.

Although Malaysia and Egypt are not traditional supplier countries, imports from these countries have increased significantly in the last year of the investigation period. Considering the amount share of the countries in total imports as of the mentioned period; Russia's share fell from 30 % to 28 %, while Malaysia's share increased from 0 % to 24 %, Egypt's share from 3 % to 18 %, and South Korea's share from 6 % to 10 %.

3.5. Countries on the Way of Development (GYU) Import with their reputation

Article 9 of the Convention on Protection Measures states that "Protection measures will not be applied against a product originating from a Member State on the road to development, unless it exceeds 3 % of the total importation of the relevant product, unless it exceeds 9 per cent of the total importation of the relevant product in the development of developing countries with a share of imports of the relevant product".

Within this framework, the import shares of countries with the status of developing countries (GYU) and other countries in 2023 were examined and the list of countries to be granted exemption in **Annex- 2f** was determined. The exemption shall be applied in the form of tariff quota to be determined at the level of 3 % (22.599 tons) of total imports for each exempt country in 2023 and 9 % (67.796 tons) of total imports for all exempt countries.

3.6. The Unforeseen Development

In recent years, many countries, especially the United States and the European Union, have taken restrictive measures to protect domestic producers. As a matter of fact, within the scope of the U.S. Section 232 measure, it imposes 25 % tariffs on imports of iron and steel products, while the EU also implements protection measures for imports of products including the products included in the film. In terms of iron and steel sector, which is one of the world's largest markets, the U.S. and EU market, the high capacity of exporting countries has been directed towards the Turkish market and this has led to an increase in imports in Türkiye's product.

However, due to the Ukraine-Russia war, many countries, especially the EU, the United States and Canada, have imposed a ban/restriction on imports from Russia, and the market of our country, which does not impose any restrictions, has become the target market for Russian products. As a matter of fact, in 2023, imports of film products from Russia rose to the highest level during the investigation period as 211.9 thousand tons.

Another unforeseen development is the problem of overcapacity in steel products worldwide. As a matter of fact, the OECD report on the issue states that governments participating in the OECD Steel Committee view overcapacity as one of the main challenges facing the global steel sector.

4. SERIOUS DAMAGE OR SERIOUS HARM

The economic indicators of the domestic production of the product under investigation in this section are based on the data provided by the applicant companies and the import statistics.

4.1. Consumption

Consumption	2019	2020	2021	2022	2023
The index	100	110	129	115	123

Consumption data has been reached by consolidating domestic sales data and import data of the applicant companies. The consumption index, which was 100 in 2019, steadily increased to 129 until 2021, falling to 115 points in 2022 and increased to 123 points in 2023.

4.1. Production of

Production of	2019	2020	2021	2022	2023
The index	100	99	102	94	77

The subject of investigation of product production has followed a fluctuating course during the investigation period. The production index, which was 100 in 2019, fell to 99 points in 2020 and increased to 102 points in 2021. After this date, production has steadily decreased to 77 points.

4.3. Domestic sales

Domestic sales	2019	2020	2021	2022	2023
The index	100	115	128	114	99

Domestic sales of the film have increased steadily from 2019 to 2021. However, the domestic sales index has steadily decreased after this date to 114 points in 2022 and 99 points in 2023.

4.4. Overseas sales

Overseas sales	2019	2020	2021	2022	2023
The index	100	84	62	66	47

During the period of the investigation, the foreign sales index of the applicant companies showed a decrease.

4.5. Capacity of

Capacity of	2019	2020	2021	2022	2023
Capacity (Endex)	100	100	100	100	100
KKO (Endex)	100	99	102	94	77

The production capacity of the domestic producers of the applicant did not change during the investigation period. The capacity utilisation rate (KKO), which shows how much of its existing capacity is used in production, has not changed significantly between 2019 and 2021 in parallel with the changes in production. With the decline in production in 2022 and 2023, the KKO index has fallen significantly. The Index fell to 94 points in 2022 and 77 points in 2023.

4.6. The stocks

The stocks	2019	2020	2021	2022	2023
The index	100	260	82	90	92

The stock index, which was 100 in 2019, increased significantly in 2020 to 260 points, fell to 88 points in 2021 and 90 points in 2022. End-of-term stocks increased to 92 points in the same period with a slight increase in 2023.

4.7. Employment

Employment	2019	2020	2021	2022	2023
The index	100	104	115	99	100

The employment appears to be following a fluctuating course during the investigation period. As an index, employment rose to 115 in 2022 when it was adopted in 2019 and fell to 100 points in 2023.

4.8. Efficiency

Efficiency	2019	2020	2021	2022	2023
The index	100	95	89	95	77

The productivity, calculated as the amount of production per person employed, followed a fluctuating course during the investigation period. The employment index, which was 100 in 2019, fell to 95 points in 2020 and 89 points in 2021. It rose to 95 points in 2022 and decreased significantly in 2023 to 77 points.

4.9. Profitability

Profitability	2019	2020	2021	2022	2023
The index	100	408	915	306	-46

While the profitability rate achieved by the ratio of operating profit to net turnover was at its highest level in 2021, a downward trend has dominated since this year. The profitability index, which was 100 in 2019, increased to 408 points in 2020 and 915 points in 2021. It reached 306 points in 2022. In 2023, a negative trend was detected in the profitability index. In 2023, the profitability index declined to -46 points during the same period.

4.10. Evaluation of Economic Indicators of Domestic Production

Absolute imports of the product under investigation have shown a sudden and sharp increase in quantity and value in the last year. In 2023, the rate of increase was 18.8 %, reaching the highest level during the investigation period on the basis of import quantity.

Although some economic indicators of the applicant firms, such as production, domestic sales and employment, have followed a positive or horizontal course until 2021, there are significant disruptions in economic indicators in 2022 and 2023. In addition, positive profitability rates have recently decreased at negative levels. In the same year, production, domestic sales, employment, efficiency and capacity utilisation rates were found to be low compared to the base year 2019.

In this context, when the economic indicators of domestic production as a whole are evaluated as a whole, it is understood that the economic indicators of domestic producers such as production, domestic sales, capacity utilisation rate, employment, profitability and efficiency are significantly deteriorated. The applicant contains the index values of domestic producers on economic indicators in **Annex- 2e**.

5. CONNECTION OF NECESSITY

5.1. Price Breaking and Pressure

The subject of investigation was compared with imported unit prices and domestic sales unit prices, and during the investigation period, domestic prices were seen below the import unit prices, and in this context, the import unit prices did not break the domestic sales unit prices. However, in 2023, the import prices of the scissors between unit import prices and the domestic unit sales price began to contract as a result of significantly falling.

On the other hand, the domestic sales price created by adding a reasonable profit rate determined as 10 % to commercial costs has been achieved. Similarly compared to the domestic sales price created according to this, it was found that imported products did not put pressure on domestic prices of the applicant companies between 2019-2022, although it was determined that X % price pressure was formed in 2023.

As a result, domestic production has been severely damaged by increasing imports and there is a threat that this loss will continue and increase in the coming period.

5.2. Factors other than price

there are no non-price factors such as quality, technical characteristics, design, consumer preference, etc. that complicate the competitive conditions against the product produced by the domestic production branch of Ithal products.

5.3. Impact of Other Factors

In this section, the subject of investigation is examined whether factors other than the increase in imports of the product cause damage to domestic production.

It is evaluated that the damage caused by the sudden and sharp increase of imports in 2023 caused by unforeseen developments in domestic production is not due to other factors. Assessments of these possible factors are presented below.

Decline in exports: exports do not have a high share in the total sales of the domestic production branch to cause losses within the domestic production branch. As a matter of fact, Türkiye's domestic film market is a wide market where consumption is live and export is not the priority of domestic production. As such, the cause of the loss is not a possible loss caused by a reduction in export sales.

Constriction in consumption: Türkiye's total consumption is not shrinking; on the contrary, demand in the market.

production capacity exceeding demand in the internal market: Although the production capacity of domestic production branch exceeds domestic market demand, it has been operating without damage with reasonable capacity utilisation rates until the last period of import increase. In addition, capacity has not changed during the investigation period and no capacity increases have been achieved. Therefore, the damage seen is not due to the production capacity that exceeds demand in the domestic market.

The development of alternative products/not able to keep up with emerging technologies: Domestic production branch can produce products that can compete with imports, and no alternative products or technologies have been introduced during this period. On the other hand, products that are not produced by domestic production branch in terms of quality and technical characteristics have been excluded from the scope of the investigation.

Increase in financing expenses, depreciation costs, or other expenses: There is no such thing as an increase in expenses. Because the share of the total of financing, depreciation and operating expenses in the commercial cost remained stable during the period subject to the complaint.

6. OPINIONS AND EVALUATION OF INTERESTED PARTIES

In this section, the opinions expressed by the interested parties within the scope of the investigation are classified. In order to prevent recurrence due to the overlap of such views on many points, it is presented below, not according to the parties expressing opinions, but by classifying them according to the subject of the opinions put forward. In addition, assessments of such views are also included under the views.

- **Given the situation of domestic industry, there are no necessary conditions for the implementation of a protection measure. In general, the domestic industry seems to be in pretty good shape. However, the industry claims that although profits tend to increase, it is still in a difficult situation. The report also maintained a steady course of production volume, capacity utilisation rate, domestic sales and employment between 2019 and 2022, excluding 2023.**

In the fourth part of the investigation report, “The Serious Damage and Serious Damage Threat” contains assessments of the economic indicators of the domestic producer and the import data of the domestic production branch as well as the market data consolidated.

Although some economic indicators of the applicant firms, such as production, domestic sales and employment, have followed a positive or horizontal course until 2021, there are significant disruptions in economic indicators in 2022 and 2023. Accordingly, in 2023, production decreased by 18 % to 2.21 million tons, domestic sales decreased by 14 % to 1.63 million tons and capacity utilisation rates decreased to 54 % with a decrease in production. In addition, it is seen that positive profitability rates occur at negative levels with a decrease in the recent period.

Recently, production, domestic sales, overseas sales data, employment, efficiency data and capacity utilisation rates have been found to be low compared to the base year 2019.

- **The increase in imports in the first half of 2023 was not due to unforeseen developments. Russia’s invasion of Ukraine, overcapacity in the steel sector worldwide and protectionist measures of the EU and the United States, the General Agreement on Customs Recipes and Trade (“GATT”) XIX. It is not possible to qualify as “unpredictable developments” within the scope of the article. On the other hand, the unforeseen developments offered by the domestic production branch have existed in past years, and therefore none of these developments can be considered unforeseen development. For example, Section 232 was introduced in March 2018 and similarly implemented by the EU for six years.**

Section 3 of the investigation report contains assessments on unforeseen developments under the heading “Import Increase and Conditions of Importation”.

On the other hand, although these developments mentioned in the complaint are not recent developments; its effects combined with other unforeseen developments have led to a recent increase in imports. It is not possible to foresee these developments during our WTO membership.

- **The damage claimed to be subjected to domestic production was not due to the increase in imports. The increase in imports was largely due to the increase in demand resulting from an exceptional situation such as the closing of factories due to the earthquake in February 2023 and the resulting reduction in production. This is accompanied by the declining competitiveness of domestic industry due to rising energy costs and wages. The challenges faced by domestic industry stemmed from other factors. Any damage caused by these other factors cannot be attributed to imports and cannot be used to justify the implementation of protection measures.**

Earthquakes affecting the southern and southeastern provinces of Türkiye in February 2023 caused the short-term disruption of the production of only 2 filmaşın producers (Iskenderun Demir ve Çelik A.Ş. and Tosyah Filmaşın and Construction Iron Production Industry Inc.) in this region (Iskenderun and Osmaniye). On the other hand, according to the information received from domestic producers Isdemir on April 24, 2023, the Tosyah Group started production again a week after the earthquake, and the negative effect of the earthquake caused only 100 thousand tons reduction in production.

However, considering that Türkiye's total production capacity (7.5 million tonnes) is at a level to meet domestic consumption despite the earthquake, besides the two companies in question and other companies that support the application and have significant production shares in the market together with other companies that are not included in the application, it is considered that the reason for the increase of imports is not the increase in consumption caused by the earthquake or the production of 2 companies in domestic production. In addition, the data of the domestic production branch belonging to the first half of 2023, when the earthquake was effective during the investigation period, but the data of the whole year of 2023 were examined.

On the other hand, in section 5.3 of the Report, it is examined whether other factors other than the increase in imports of the product under investigation have caused damage to domestic production and the damage caused by the sudden and sharp increase of imports caused by unforeseen developments of domestic production is not due to other factors. In addition, the average unit prices of imports, which have recently decreased by 22 %, suppress the sales prices of the domestic producer by 7 %, confirming that the negative profitability of the domestic producer in the recent period is due to increased imports.

When the energy costs and the impact of worker wages on the total production cost, the product cost table transmitted by the applicant firms and on-site inspections concluded that the share of energy cost and worker wages in total production cost is quite low compared to other cost items, and the increase in these items is not high enough to affect the total cost of production.

The products within the scope of the investigation included 7213.20, 7213.91.20.00.00, 7227.90.10.00.00, 722790.95.00.00 GTP/GTIP code are very specific and quality products that are not produced in Türkiye. There is not enough domestic production in these products and the order requests of the user companies cannot be met by domestic producers. The implementation of protection measures on the films classified under the tariff number in question will lead to industrialists in Türkiye using these products in final production to halt production and the loss of existing markets. In order to increase the competitiveness of the companies using these products as inputs in international markets and to monitor the benefit of the country's economy, it is necessary to remove the mentioned products from the scope of the investigation or exemption from a possible protection measure.

Within the scope of the investigation, in order to confirm the accuracy of the economic indicators transmitted to our Ministry by the applicant companies and to determine the domestic production and capacity status of the products specified by the GTIP code, description and technical characteristics requested by the companies to be removed from the scope of the investigation, the domestic production and capacity status was conducted in the production facilities of domestic manufacturers. As a result of the examination, it was determined that the domestic production branch could produce the vast majority of imported products. However, in this context, it has been concluded that the products mentioned by importer domestic producers are not produced or inadequate in Türkiye, the exemption requests for the products in question have been evaluated in ensuring that the production of the user sectors does not fail. Our assessments on this subject are included in section 2.3 of the investigation report under the heading "Exemption Requests for Exemption in Products Coverage of Inquiry".

- **As of the investigation period, Egypt's share from imports of filmwork in 2022 was well below the 3 % required to obtain exemption from imports, and as a result of analysis of import figures, Egypt must be exempted from the provisional protection measure in accordance with Article 9.1 of the Agreement and a possible final protection measure.**

Article 9 of the Convention on Preservation Measures: *"With respect to a product originating from a Member State on the road to development, protection measures shall not be applied unless it exceeds 3 % of the total importation of the product concerned by the Member States, which has a*

share of imports of less than 3 %, and the total share of imports of the relevant product does not exceed 9 percent of the total import of the product concerned” In this context, according to the import data of 2023, which is the last year of the investigation period, the GYU list to be granted exemption from protection measure has been determined and country-based import data and the share of the countries are included in Annex-2d.

7. PLAN TO ADAPT TO THE COMPETITION

It is aimed at facilitating the compliance of domestic producers to market conditions with protection measures. In this context, during the implementation of a possible protection measure within the scope of the structural adaptation program offered by domestic producers,

- the domestic production branch has a production capacity higher than the amount of consumption in the market,
- with strategic investments planned to be realised, the domestic film users will focus on the production of the featured products that they have had to import for many years,
- It is stated that the product quality will be further improved with R & D projects.

With these activities, it is stated that if the overall performance of the applicant firms improves and the economic indicators that have started to deteriorate in the recent period, it is expected to achieve a more competitive structure in the coming years,

8. EVALUATION AND CONSEQUENCE

As a result of the evaluation of the import course of the goods and the economic indicators of domestic producers and market conditions, the findings were made that there was an absolute and relative increase in imports and that domestic producers suffered serious damage from these imports.

On the other hand, when unforeseen developments are evaluated, measures restricting imports in iron and steel products in order to protect domestic producers in many countries, especially the United States and the European Union, restrict access to the market to these countries, which are among the largest markets in the world, causing the gradual capacity formed in exporting countries to the Turkish market.

However, because of the Ukrainian-Russian war, the EU, the United States and Canada prohibition/restriction of imports of iron-steel products from Russia have made Russian-origin products into the target market of our country. It is also known throughout the world that the problem of overcapacity in steel products is one of the main challenges facing the industry. Products that could not be sold due to overcapacity and commercial measures implemented by other countries have resulted in sudden, sharp and significant import increases in imports, as there are no other commercial measures other than ordinary customs duties on the products within the scope of the investigation, resulting in unforeseen trade deviations towards our country.

Within this framework, it is understood that these developments that increase imports around the world will continue to have an effect in the coming periods and that there is already significant evidence that there is serious damage to the producers of the fission and that if the provisional protection measure does not continue as the final measure, it is highly likely that the import increase will continue to increase and continue to increase in domestic production due to the unforeseen import increase.

In addition, it has been found that other factors that may affect the state of domestic production have no effect on serious harm. Within this framework, causality link between the increase of imports and serious damage and the necessary conditions are formed within the scope of the legislation on the Measures of Protection in Imports for the implementation of protection measures against imports of products subject to investigation.

In this context, it was evaluated that it would be appropriate to implement protection measures in the form of additional financial obligations per ton for 3 years in the import of products subject to investigation and to determine the additional financial obligation as shown in the table below.

The queue	THE GTIP	ADDITIONAL FINANCIAL LIABILITY		
		1. Period (15/06/2024-06/01/2025)	2. Period (07/01/2025-06/01/2026)	3. Period (07/01/2026-06/01/2027)
1	7213.10.00.00.00	175 U.S. Dolan/Ton	170 US Dollars/Ton	165 US Dollars/Ton
2	7213.91.10.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
3	7213.91.41.00.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
4	7213.91.41.00.12	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
5	7213.91.41.00.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton

6	7213.91.41.00.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
7	7213.91.49.00.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
8	7213.91.49.00.12	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
9	7213.91.49.00.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
10	7213.91.49.00.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
11	7213.91.70.10.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
12	7213.91.70.10.12	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
13	7213.91.70.10.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
14	7213.91.70.10.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
15	7213.91.70.90.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
16	7213.91.90.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
17	7213.99.10.00.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
18	7213.99.10.00.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
19	7213.99.10.00.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
20	7213.99.90.10.11	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
21	7213.99.90.10.13	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
22	7213.99.90.10.19	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
23	7213.99.90.90.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
24	7227.10.00.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
25	7227.20.00.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
26	7227.90.10.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
27	7227.90.50.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton
28	7227.90.95.00.00	\$175 USD/Ton	170 US Dollars/Ton	165 US Dollars/Ton

Annex-2a: List of interested parties

	INTERESTED PARTIES/INTERESTED PARTIES	BUSINESS/FIELD OF ACTIVITY	COUNTRY/COUNTRY
1	Korea Ministry of Trade Industry and Energy	Foreign Government/Foreign Government	Republic of Korea/Republic of Korea
2	Trade representative of the Russian Federation	Foreign Government/Foreign Government	Federation of Russia/Russian Federation
3	European Union Delegation to Türkiye	Foreign Government/Foreign Government	EU/EU
4	Egyptian Ministry of Industry and Trade	Foreign Government/Foreign Government	Egypt/Egypt
5	Taipei Economics and Culture Mission	Foreign Government/Foreign Government	Chinese Thai/Chinese Taipei
6	UK Ministry of Business and Trade	Foreign Government/Foreign Government	United Kingdom/United Kingdom
7	Malaysia Ministry of Investment, Trade and Industry	Foreign Government/Foreign Government	Malaysia/Malaysia
8	Spanish Embassy Undersecretariat for Economy and Trade	Foreign Government/Foreign Government	Spain/Spain
9	Turkish Steel Producers	Industry Organisation/Industry Organisation	Türkiye/Türkiye
10	Istanbul Mines and Metals Exporters' Associations	Industry Organisation/Industry Organisation	Türkiye/Türkiye
11	Chinese Iron and Steel Butterfly	Industry Organisation/Industry Organisation	People's Republic of China/People's Republic of China
12	Spanish Iron and Steel Butterfly	Industry Organisation/Industry Organisation	Spain/Spain
13	Korean Iron & Steel Association	Industry Organisation/Industry Organisation	Republic of Korea/Republic of Korea
14	Association of German Iron and Steel Manufacturers	Industry Organisation/Industry Organisation	Germany/Germany
15	Akçelik Iron and Steel Industry and Trade Inc.	Importer/Importer	Türkiye/Türkiye
16	Bekaert Izmit Steel Cord Industry and Trade Inc.	Importer/Importer	Türkiye/Türkiye
17	Hasçelik Industry and Trade Inc.	Importer/Importer	Türkiye/Türkiye
18	Oerlikon Welding Electrodes and Industry Inc.	Importer/Importer	Türkiye/Türkiye
19	JFE Steel Corporation	Exporter/Exporter	Japan/Japan
20	Jiangsu Shagang International Trade Co.	Exporter/Exporter	People's Republic of China/People's Republic of China
21	Kobe Steel, Ltd.	Exporter/Exporter	Japan/Japan
22	Nippon Steel Corporation	Exporter/Exporter	Japan/Japan
23	POSCO Holdings Inc.	Exporter/Exporter	Republic of Korea/Republic of Korea
24	Qingdao Special Iron & Steel Co., Ltd.	Exporter/Exporter	People's Republic of China
25	The Elmarakbysteel	Exporter/Exporter	Egypt/Egypt
26	Suez Steel Company	Exporter/Exporter.	Egypt/Egypt
27	Al-Ezz Dekheila Steel Company (EZDK) – Alexandria S.A.E.	Exporter/Exporter	Egypt/Egypt
28	Alliance Steel (M) Sdn Bhd	Exporter/Exporter	Malaysia/Malaysia

Annex-2b: Subject of Inquiry Products

The	THE GTIP	Product Term Definition
1	72131000000	Those with notches, grooves, grooves, grooves or other deformities on them during the rolling process
2	72139110000	The kind used in the reinforcement of concrete
3	721391410011	Film for the manufacture of bolts and nuts
4	721391410012	Wire rod for electrode fabrication
5	721391410013	Fizzhin for the fabrication of wires and nails
6	721391410019	The Others
7	721391490011	Film for the manufacture of bolts and nuts
8	721391490012	Fizzhin for electrode fabrication
9	721391490013	Fizzhin for the fabrication of wires and nails
10	721391490019	The Others
11	721391701011	Film for the manufacture of bolts and nuts
12	721391701012	Fizzhin for electrode fabrication
13	721391701013	Fizzhin for the fabrication of wires and nails
14	721391701019	The Others
15	721391709000	The Others
16	721391900000	Those containing more than 0.75 % carbon by weight
17	721399100011	Film for the manufacture of bolts and nuts
18	721399100013	Fizzhin for the fabrication of wires and nails
19	721399100019	The Others
20	721399901011	Wire rod for the manufacture of bolts and nuts
21	721399901013	Fizzhin for the fabrication of wires and nails
22	721399901019	The Others
23	721399909000	The Others
24	722710000000	High speed steel
25	72272000000	Silico manganese steel
26	722790100000	Containing 0.0008 % or more boron by weight and any element less than the minimum amounts specified in this chapter 1(f)
27	722790500000	At least 0.9 % by weight, at least 1.15 % carbon, at least 0.5 %, at most 2 % chromium and, if any, contain no more than 0.5 % molybdenum
28	722790950000	The Others

Annex-2c: The Legislation Implemented on Import of Items

The queue	THE GTIP	THE VAT	Customs duties (%)								
			THE AB-STA	BY G.KORE	IN MALAYSIA	IT'S A SINGAPUR	FROM VENEZUELA	GTS EAGÜ	GTS HAS SUNG	GTS GYÜ	IT'S D.U.
1	72131000000	20	0	0	0	0	6	30	30	30	30
2	721391100000	20	0	0	0	0	6	30	30	30	30
3	721391410011	20	0	0	0	0	6	30	30	30	30
4	721391410012	20	0	0	0	0	6	30	30	30	30
5	721391410013	20	0	0	0	0	6	30	30	30	30
6	721391410019	20	0	0	0	0	6	30	30	30	30
7	721391490011	20	0	0	0	0	6	30	30	30	30
8	721391490012	20	0	0	0	0	6	30	30	30	30
9	721391490013	20	0	0	0	0	6	30	30	30	30
10	721391490019	20	0	0	0	0	6	30	30	30	30
11	721391701011	20	0	0	0	0	6	30	30	30	30
12	721391701012	20	0	0	0	0	6	30	30	30	30
13	721391701013	20	0	0	0	0	6	30	30	30	30
14	721391701019	20	0	0	0	0	6	30	30	30	30
15	721391709000	20	0	0	0	0	8	40	40	40	40
16	721391900000	20	0	0	0	0	8	40	40	40	40
17	721399100011	20	0	0	0	0	6	30	30	30	30
18	721399100013	20	0	0	0	0	6	30	30	30	30
19	721399100019	20	0	0	0	0	6	30	30	30	30
20	721399901011	20	0	0	0	0	6	30	30	30	30
21	721399901013	20	0	0	0	0	6	30	30	30	30
22	721399901019	20	0	0	0	0	6	30	30	30	30
23	721399909000	20	0	0	0	0	8	40	40	40	40
24	72271000000	20	0	0	0	0	1,2	6	6	6	6
25	72272000000	20	0	0	0	0	1,6	8	8	8	8
26	722790100000	20	0	0	0	0	8	40	40	40	40
TL	722790500000	20	0	0	0	0	0,6	3	3	3	3
28	722790950000	20	0	0	0	0	6	30	30	30	30

Annex-2d: Import with Reputation of Countries

COUNTRIES OF EXPORTERS	Mlktar (Ton)					2023 Quantity of Pay	Value (millions of \$)					B.F. (dollar/ton)				
	2019	2020	2021	2022	2023		2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
	From Russia	90.758	29.342	111.643			173.433	211.904	28 %	43	13	79	125	129	474	
The In Malaysia	—	—	—	—	177.599	24 %	—	—	—	—	111	—	—	—	—	625
In Egypt	—	—	9.580	24	136.459	18 %	—	—	6	0	91	—	—	608	1107	664
South Korea	7.370	15.600	23.817	31.161	72.935	10 %	5	10	22	37	65	682	655	927	1192	894
In Spain	130.76	117.886	99.000	52.547	48.977	7 %	84	70	86	54	45	646	596	872	1023	915
In China	6.424	8.096	13.751	13.137	35.015	5 %	4	5	10	14	24	655	569	735	1048	676
Germany	16.253	31.243	38.375	26.514	17.944	2 %	13	20	34	29	19	829	655	897	1107	1073
It's Italy	6.448	10.802	18.259	10.208	11.903	2 %	5	7	16	13	12	720	651	892	1226	971
From Austria	14.493	13.110	16.407	17.718	10.548	1 %	14	12	17	22	14	944	880	1058	1256	1321
From Bosnia and	—	—	—	—	9.038	1 %	—	—	—	—	5	—	—	—	—	526
The Swiss	—	47	17.399	1.532	8.568	1 %	—	0	12	1	7	—	587	718	963	764
From The Swiss	2.922	3.757	6.185	7.539	8.522	1 %	3	3	6	10	10	867	758	980	1339	1164
From THE UAE	—	93	1.945	5.554	1.743	0 %	—	0	1	4	1	—	450	750	795	561
Of Oman	—	25	338	—	1.105	0 %	—	0	0	—	1	—	672	702	—	839
The other	—	—	—	—	499	0 %	—	—	—	—	0	—	—	—	—	605
The other	14.213	11.771	20.902	4.913	531	0 %	8	5	16	4	1	541	466	784	887	1026
Overall total	289.644	241.770	377.599	344.281	753.289	100 %	179	145	308	314	533	617	602	816	913	707

Annex-2c: Economic indicators of domestic production

ECONOMIC INDICATORS	The unit	2019	2020	2021	2022	2023
Import	The tone	289.644	241.770	377.599	344.281	753.289
Consumption	The index	100	110	129	115	123
Production of	The index	100	99	102	94	77
Import/Domestic Production rate	The index	100	85	128	126	336
Market share of imports	The index	100	76	101	103	212
General Import B.F.	\$/Ton	617	602	816	913	707
Domestic sales	The index	100	115	128	114	99
Overseas sales	The index	100	84	62	66	47
Capacity of	The index	100	100	100	100	100
KKO	The index	100	99	102	94	77
The stocks	The index	100	260	82	90	92
Employment	The index	100	104	115	99	100
Efficiency	The index	100	95	89	95	77
Profitability	The index	100	408	915	306	—46

Annex-2f: GYÜ List to be Exempted from Prevention

Afganistan İslam Cumhuriyeti, Angola Cumhuriyeti, Arjantin Cumhuriyeti, Arnavutluk Cumhuriyeti, Azerbaycan Cumhuriyeti, Belize, Benin Cumhuriyeti, Belarus Cumhuriyeti, Bütan Krallığı, Bolivya Çok Uluslu Devleti, Bosna Hersek, Botswana Cumhuriyeti, Burkina Faso, Myanmar Birliđi Cumhuriyeti, Burundi Cumhuriyeti, Cabo Verde Cumhuriyeti, Cezayir Demokratik Halk Cumhuriyeti, Cibuti Cumhuriyeti, Cook Adaları, Çad Cumhuriyeti, Dođu Timor Demokratik Cumhuriyeti, Dominik Cumhuriyeti, Dominika, Ekvator Cumhuriyeti, Ekvator Ginesi Cumhuriyeti, El Salvador Cumhuriyeti, Eritre Devleti, Esvatini Krallığı, Etiyopya Federal Demokratik Cumhuriyeti, Fiji Cumhuriyeti, Kotdivuar Cumhuriyeti, Filipinler Cumhuriyeti, Filistin Devleti, Gabon Cumhuriyeti, Gambiya Cumhuriyeti, Gana Cumhuriyeti, Gine Cumhuriyeti, Gine-Bissau Cumhuriyeti, Grenada, Guatemala Cumhuriyeti, Güney Sudan Cumhuriyeti, Haiti Cumhuriyeti, Honduras Cumhuriyeti, Irak Cumhuriyeti, İnan İslam Cumhuriyeti, Jamaika, Kamboçya Krallığı, Kamerun Cumhuriyeti, Kazakistan Cumhuriyeti, Kenya Cumhuriyeti, Kırgız Cumhuriyeti, Kiribati Cumhuriyeti, Kolombiya Cumhuriyeti, Komorlar Birliđi, Kongo Cumhuriyeti, Kongo Demokratik Cumhuriyeti, Kosova Cumhuriyeti, Kosta Rika Cumhuriyeti, Kore Demokratik Halk Cumhuriyeti, Küba Cumhuriyeti, Laos Demokratik Halk Cumhuriyeti, Lesotho Krallığı, Liberya Cumhuriyeti, Libya Devleti, Lübnan Cumhuriyeti, Madagaskar Cumhuriyeti, Malavi Cumhuriyeti, Maldivler Cumhuriyeti, Mali Cumhuriyeti, Marşal Adaları Cumhuriyeti, Mikronezya Federe Devletleri, Mođolistan, Moldova Cumhuriyeti, Moritanya İslam Cumhuriyeti, Morityus Cumhuriyeti, Mozambik Cumhuriyeti, Namibya Cumhuriyeti, Nepal Federal Demokratik Cumhuriyeti, Nijer Cumhuriyeti, Nijerya Federal Cumhuriyeti, Nikaragua Cumhuriyeti, Niue, Orta Afrika Cumhuriyeti, Özbekistan Cumhuriyeti, Pakistan İslam Cumhuriyeti, Palau Cumhuriyeti, Papua Yeni Gine Bađımsız Devleti, Paraguay Cumhuriyeti, Peru Cumhuriyeti, Ruanda Cumhuriyeti, Samoa Bađımsız Devleti, Sao Tome Ve Prinsipe Demokratik Cumhuriyeti, Senegal Cumhuriyeti, Sierra Leone Cumhuriyeti, Solomon Adaları, Somali Federal Cumhuriyeti, Sri Lanka Demokratik Sosyalist Cumhuriyeti, Saint Lucia, Saint Vincent ve Grenadinler, Sudan Cumhuriyeti, Surinam Cumhuriyeti, Tacikistan Cumhuriyeti, Tanzanya Birleşik Cumhuriyeti, Togo Cumhuriyeti, Tonga Krallığı, Tuvalu, Türkmenistan, Uganda Cumhuriyeti, Ürdün Haşimi Krallığı, Vanuatu Cumhuriyeti, Bolıvarcı Venezuela Cumhuriyeti, Yemen Cumhuriyeti, Zambiya Cumhuriyeti, Zimbabve Cumhuriyeti