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REPUBLIC OF TURKEY
MINISTRY OF TRADE



COUNTER- INVESTIGATION OF PRECAUTIONS

(GİZLİ ÖZEL MATERYAL İNCELEMESİ)

1. GİRİŞ
2. İZLENİMLER
3. SONUÇ

PART A – GENERAL DISCLOSURES AND INSTRUCTIONS

This application form consists of the following parts:

Part B – Explanations on the Ineffective Way of Precautions: (Page N03-6)

C Wintermi – Applicant Domestic Manufacturer: (Page No.:6)

Information about Part D-Es: (Page No. B)

Part E- Information on the Sector: (Page No.:8)

F KI-deathmsn.EvenantSword Ace Iddiaa: (Page No.:g)

G-Part Information on Cost and Sales: (Page No.: Io)

Part H – Communiqué: (Page No.:n)

A-L application, information and certification

Applications must be made by mail or electronically to the KEP address of <mailto:ticaretbakanligi@hs01.kep.tr> the Ministry of Commerce (Ministry) ticaretbakanligi@hs01.kep.tr

Both **confidential** and **non-secret abstracts of the application (as Word**, as well as a scanned copy of the company stamp and paraphrased copy as PDF) must be included in your application petition. The non-secret copy should contain an understandable holistic summary of the secret copy.

Information and documents submitted in the application subject to confidentiality are used for the purpose of obtaining. However, if requested by the local court or the World Trade Organisation within the scope of litigation mechanism, such information and documents shall be submitted to the relevant authorities.

In the case of the application phase and the opening of the investigation, make sure that the e-mails provided are up to date and work because some correspondence during the investigation may be carried out by e-mail. **Stamp every page of your application with company stamps and paraflata.**

A-2 COMPANY INSPECTION

With the consistency of the information and documents provided in the application form, the production process of the goods subject to the application can be examined with a visit to your company's facilities or online.

Specify in which city and address the company's production facility and management and accounting systems are kept for the review plan.

A-3 COMMITMENT

All information provided in the application form should be accurate and auditable. The example of the contract for this is in the last part of this Application Form.



A-4 OTHER ISSUES AND COMMUNICATION

You can contact the **Directorate General of Imports and Import Policies Monitoring and Evaluation Office** for any additional questions regarding the application.

Address T.C. Ministry of Commerce Söğütözü Campus (Central Building)

Söğütözü Neighborhood 2176. Street No.:63 06530 Çankaya, ANKARA

Internet address: www.ticaret.gov.tr/ithalat or www.tpsa.gov.tr

KeP Address [trade_Ministry\(a\)hs01.kep.tr](mailto:trade_Ministry(a)hs01.kep.tr)

E-mail [oeksorusturma\(a\)commerce.gov.tr](mailto:oeksorusturma(a)commerce.gov.tr)

Thephone: + 90 312 204 9587 – 9932 – 9947 – 9959 – 9294 – 9583

PART B: EXPLANATIONS ON THE IMPACT OF PREVENTION

Within the scope of German measures to prevent dumping imports, tax on dumping is imposed within the scope of measures taken to prevent subsidised imports.

Ineffectiveness of measures; actions by foreign exporters and/or importers based in Türkiye to reduce the curative price effect of dumping/compensating tax on domestic producers by completely/partially avoiding or lowering export prices by changing the way trade is carried out.

This application form includes activities intended to avoid all/partially avoid payment of dumping/compensatory tax by changing the way trade is carried out only.

Disabling the measure by changing the way trade is carried out:

As a result of an application, transaction or business that does not have a sufficient justification or economic justification for avoidance against dumping in force/compensatory tax avoidance, there is a change in the conduct of trade between Türkiye and a third country or Türkiye and companies in a preventive country or prevention country, and that the curative effect of the applicable dumping tax has been reduced or eliminated.

practices, procedures or operations to neutralise measures;

1. *Export of preventive goods through a third country*
2. *Consolidation or completion of the goods subject to prevention in the third country*
3. *Consolidation or completion of the goods subject to prevention in Türkiye*
4. *Differentiation of the goods subject to prevention by making simple changes*
5. *Export of goods subject to prevention through the company subject to low rate prevention*

it can happen in their shape.

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it's a I. Export of goods from a third country

The co-existence of the following conditions is considered to be the neutralisation of the measures by **sending the goods through the third country**:

- Export of preventive goods to a third country which is not subject to prevention

Exporting goods to Türkiye without prevention by providing false or misleading information and documents from the third country

Case of **Example: Fabric imports from country A** are subject to dumping prevention. Fabrics produced in country A are imported by companies located in country B that are not subject to prevention. Then, by the company based in country B, the fabrics are produced in country B and false or misleading information and documents are exported to Türkiye in such a way that they are not subject to prevention.

2. Merging or Completion of Items in Third Country

The co-existence of the following conditions is considered to be ineffective by **combining or completing the goods in the third country**:

- Export of goods from the country subject to prevention in parts and parts to the third country
- Consolidation or completion of parts for the purpose of neutralising the measure in the third country
- Export of unified or completed goods in the third country to Türkiye in a manner that is not subject to prevention

The following three elements must be combined to determine that the merging or completion has been carried out for the purpose of neutralising the measure:

- a) Transactions in the third country do not involve one or more of the basic stages of production of the item
- b) The parts and parts value imported from the country subject to prevention has an important share in all parts and parts value used in the production process
- c) By combining or completing, the added value placed on the component and part has an insufficient share in the industrial (production) cost of the item

Case of **Example: Yarn imports from country A** are subject to dumping prevention. Unpainted yarns produced in country A are imported by the company located in country B which is not subject to prevention. Imported yarns are subject to dyeing in country B and then exported to Türkiye without prevention. Yarns exported to Türkiye have been obtained from country A, which is largely preventable, and the added value generated by the dyeing process is quite low.

3. Merging or Completion of Goods in Türkiye

The coexistence of the following conditions, the **unification of the goods in Türkiye is considered to neutralise the measures** by means of taming the vcia:

- Export of goods to Türkiye in parts and parts from the country subject to prevention
- Consolidation or completion of parts with the aim of neutralising the measure in Türkiye

The following three elements must be combined to determine that the merging or completion has been carried out for the purpose of neutralising the measure:

- a) Transactions carried out in Türkiye do not include one or more of the basic production stages
- b) The parts and parts value imported from the country subject to prevention has an important share in all parts and parts value used in the production process
- c) By combining or completing, the added value placed on the parts and parts has an insufficient share of the industrial (production) cost of the item

Case of Example: Yarn imports from country A are subject to dumping prevention. In terms of the production process of yarn, the previous phase is partly drawn yarns and partly drawn yarns are not covered by the measure. After taking precautions on yarn imports from country A, the import of partially drawn yarns from country A has increased significantly, yarns are produced in Türkiye using imported partially drawn yarns. The added value formed as a result of the processes made for the production of yarns from partially drawn yarns is quite low.

Another example of prevention is the import of the product in parts. The import of chairs from country A is subject to dumping prevention. From country A, chair feet, back support part, seating part and fasteners are imported separately. From imported parts, chairs are produced in Türkiye with a simple assembly process. The added value generated by the assembly process is quite low.

4. Distinguishing Items by Making Simple Changes

The coexistence of the following conditions is considered to be the neutralisation of measures by differentiating the basic properties of the item by making simple changes:

- Differentiation of the item in such a way that the object does not fall into the definition of the precaution with simple changes
- The main characteristics of the differentiated goods are the same as the preventive goods.
- Exporting differentiated goods from a preventive country to Türkiye in such a way that no measures are applied

In the process of evaluation of the basic characteristics; preventive goods and differentiated goods are compared in terms of physical and chemical properties, substituteability, production processes, areas of use, price and cost of production, distribution channels, consumer preference and expectation, form of marketing, etc.

Case of Example: Chemical X-matter imports from country A are subject to dumping prevention. After taking precautions on chemical X-matter imports from country A, chemical Y-matter imports from country A showed a significant increase. Chemical Y is a differentiated form of chemical X by making simple changes in its content in order not to be subject to prevention. The basic properties of chemical X and Y substances are the same and are used for the same purpose.

5. Export of goods from low-proportion prevention natural company

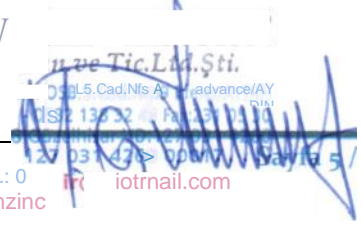
The coexistence of the following conditions is ineffective by deflection of exporters or producers

it is considered to be done:

The measure varies on the basis of the manufacturer

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3 Assets
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iotrmail.com

- Production of goods in the company subject to high rate prevention
- Exporting the goods produced in the company subject to high-rate prevention by the company subject to low-rate prevention or exemption from the low measure rate or exemption to Türkiye

Case of **Example: Cigarette lighter imports from A** are subject to dumping prevention, anti-dumping measures vary on the basis of the company and 3 % of imports from X company and Y company against dumping measures are applied. The lighters produced entirely in the company X or the basic production phases carried out by the company X have been declared as manufactured in Y company and have been exported to Türkiye by taking advantage of the low measure rate.

PART OF C: APPLICATION OWNER LOCAL MANUFACTURER

it's a I. Company information:

Company title **YOU THINK IT'S A CHAIN. AND TİC.LTD.ŞTİ.**

Address **It's Ata Mah. Astim O.S.B.Ş. Street No.:9
EFELER/AYDIN**

The phone **0(256) 231 0210**

Kep Address : **ayzinzincir@hsoi.kep.tr**

E-mail : **ayzinzincir@hotmail.com**

Internet address : **www.ayzinzincir.com.tr**

2. Information of the authorised person in the company:

His name is **MUSTAFA ÖZDEMİR**

surname

Title **Director General**

Address **It's Ata Mah. Astim O.S.B. 5-Street No.:9
EFELER/AYDIN**

The phone **0(5-)**

E-mail *** . . .**

3. If your company is working with a representative in these matters, information about the person in question (representation or authorisation certificate must be added):

His name is surname

Title

Address

The phone

E-mail



4. Where your company operates and manufactures and/or trades:

Since 2005, our company has been producing in 8000 ma area including 5 000 mi closed areas in Aydın, is a domestic manufacturer that performs all standard custom chain productions.

PART OF D: INFORMATION ABOUT THE GOODS

The goods subject to dumping or subsidy measures may be the same or different. For example;

expulsion of goods from the third country,

consolidation or completion in the third country,

in case of *exports through the company subject to low rate prevention*, the goods subject to the application are the same while the goods subject to the application are the same;

In the case of unification or completion in Türkiye, differentiation by making simple changes, the items in question are different.

Similarly, the country subject to dumping or subsidy measures may be the same or different. For example;

exporting goods from the third country, combining or completing the goods in the third country, where the

country subject to prevention and the countries subject to application are different;

In case of unification or completion in Türkiye, exports through the company subject to low-rate prevention and differentiation by making simple changes, the countries in question are the same countries.

In this context, please answer the following questions in light of these explanations.

1. The name of the goods subject to dumping or subsidies and the position of customs tariff statistics:

7315.11.90.00.11, 7315.11.90.00.19, 7315.12.00.00.11,7315.12.00.00.19,7315.19.00.00.00

2. If the goods subject to prevention and the subject of application are different, the name of the goods subject to application and the customs tariff statistical position:

It's the same stuff.

3. Preventive measures and prevention against dumping or subsidies that are being implemented:

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itmail.com



Anti-dumping measures are currently being implemented against China. This measure has also been applied to South Korea, Malaysia, Taiwan, India, Sri Lanka, Thailand and Spain at different times.

4. Country of application(s):

The European Union

5. Description of the item, technical characteristics and usage areas (if the subject matter is different, please answer for both:

Transmission chains used for the purpose of power and motion transmission are a system consisting of inner pod, outer pod, inner reel, outer reel and pin which are jointly connected to each other. In these, the joint joints can be bent in only one plane. It transmits power and movement between the two cogs (chain gears) which they are placed upon.

Chain is able to operate in any environment where there is movement and power transmission, work in closed areas that require little maintenance, and can carry loads thanks to the ears mounted on it as well as motion and power transmission. Transmission chains are used in many different industries and machines today.

6. If possible, provide an introductory sample, catalog, technical book, illustrated brochure etc.

Relevant introductory documents are presented.

7. Please provide information about the raw materials and basic inputs used in the production of goods and which companies and countries in question are supplied.

Relevant information is presented specifically to the Ministry's work.

8. **EXPLAIN THE PRODUCTION TECHNIQUE OF THE WIFE IN DETAIL AND THE PROCESS OF PRODUCTION WITH THE SCHEMA. UNDERSTAND ALL PRODUCTION FACILITIES OF THE WIFE; EXPLAIN THEM IN DETAIL WHAT THEY ARE.**

Relevant information is presented specifically to the Ministry's work.

9. **IF POSSIBLE, PROVIDE VIDEO VISIONS DESCRIBING THE PRODUCTION TECHNIQUE AND DURATION OF THE SPOUSE IN A CD OR GRAPHIC MEMORY ENVIRONMENT, OR SHARE A RELEVANT LINK MARKET.**

Relevant information is presented specifically to the Ministry's work.

10. If there is a difference between the production technology used by your company and the production technology used in the country(s) of application, please explain to the extent that it is known.

Our company's production plant and technology are at the same and advanced level than the production technology used in the world countries of anti-dumping issue. In terms of quality, our company is one of these companies

despite being of superior quality and I competition due to unfair competition at its annual price

sale of your agm sales

edilebilirliği a remembrance

Sarand AALtd.Şi

Oh, uh, yeah. Besides the price criteria for importing the goods subject to application, are there other reasons such as quality, termin, product type, etc.? Explain it to me.

Despite the extremely high quality structure of our production and no problem of term, the operations that lead to ineffective activities in the market are due to unfair price pressure.

PART OF E: INFORMATION ABOUT THE SECTOR

it's a I. Please specify the titles and addresses of other domestic producers and professional organisations (manufacture association, association, etc.) and contact information.

Relevant information is presented specifically to the Ministry's work.

2. Please provide information about the size and structure of the Turkish market of goods subject to prevention within your knowledge.

We do not have any studies on market size or information based on objective data.

3. Please indicate the countries that are the largest exporters/manufacturers in the world by quantity/value in preventive goods. Tell us why these countries are in the foreground. (Production volume, product quality, price, technologies, etc.)

Relevant information is presented specifically to the Ministry's work.

4. Please provide information about the important importers of the goods, the countries they import and for what purpose they import.

Relevant information is presented specifically to the Ministry's work.

5. Please provide information about the users of the goods and where it is used.

Transmission chains are used in many different industries and machines today. Some of them are listed below:

- **Automotive and motorcycle industry**
- **Iron and steel manufacturing industry**
- **Chemical manufacturing industry**
- **Sugar factory industry**
- **Cement manufacturing industry**
- **Mining manufacturing industry**
- **Ceramic and glass manufacturing industry**
- **Food and canned manufacturing industry**
- **Textile industry**
- **Papermaking and processing industry**
- **Plastic processing manufacturing industry**
- **Woodworking and manufacturing industry**
- **Agricultural tools and soil processing machines**
- **In the packaging industry machinery**
- **Construction sector transport systems**

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**Machine maintenance and apparatus
In all kinds of conveyors and belt systems
Tube and metal box industry**

PART OF F: IMPEACHMENT OF UNEFFECTUAL USE OF PRECAUTIONS

it's a I. Please indicate which country, exporters and importers have been neutralised.

- Show the course of the increase in imports allegedly rendered the measure ineffective in the table below. You can access the import data from the Turkish Statistical Authority, (<https://biruni.tuik.gov.tr/disticaretapp/menu.zul>). For detailed information, see the "TUIC Foreign Trade Data Acquisition Guide" in the annex.

Customs Tariff Position:	731511900011, 731511900019, 731512000011, 731512000019, 731519000000	2020	2021	2022	2023 (January- August)*
Total imports	The dollar's worth	32.284.243	39.106.886	43.441.124	37.381.714
Import from Germany	The dollar's worth	7.033.725	8.173.535	11.648.480	9.725.965
Import from France	The dollar's worth	691.608	861.594	986.964	1.362.640
Import from Italy	The dollar's worth	5.125.565	5.836.387	4.667.807	4.941.061
Import from Czechia	The dollar's worth	561.979	1.502.353	998.043	1.633.404

* The last TÜİK data described covers the first 8 months period.

- Please read the descriptions of the application form "Explanations on the Ineffective Case of Measures". Specify which or which of the business, transactions or practices described in the statements mentioned in your company's complaint.

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C
:** Export of goods through a third country
Consolidation or completion of the item in the third country
Consolidation or completion of goods in Türkiye
Differentiation of things by making simple changes

4. Explain your claim to neutralise the measures in light of these explanations.

For example, if the item is exported through a third country, your descriptions:

In the third country that is not subject to prevention, the production of the alleged goods in the third country, the third country has no significant exports outside of Türkiye, the company exporting to Türkiye is not a producer, the third country's exports to Türkiye has a serious and continuous increase in export prices, export unit prices from the country subject to original prevention and pressure on the prices of the domestic producer should contain concrete information and documents if possible.

Relevant information is presented specifically to the Ministry's work.

PART OF G: INFORMATION ON COST AND SALES

1. Present your company's detailed balance sheet (b) for the last three fiscal years.
2. Please fill out the table below for the final current year and the current period that is produced in your company separately.

Table 2: Product Unit Cost Chart				
Product Type and Definition:				
Cost Pens (one unit to produce product)		Input Quantity	You have entered Unit Price	Unit Cost
Direct first materials and materials	Raw material 1			
	The raw material...			
Direct workmanship				
General production expenses	Auxiliary substance			
	Indirect workmanship			
	The energy			
	Packing			
	The amortisation			
	Other General Production Expenses			
Total production cost (industrial)				
Sales and General Administrative Expenses		% OF		
Financing expenses (net = expense-income)		% OF		
Total production cost (commercial)				
The profit				
Factory Exit Sales Price				

Relevant information is presented specifically to the Ministry's work.

3. Specify the reasonable rate of profit in the production of preventive goods.

PART OF H: THE COMMITMENT

I guarantee that the answers and information/documents provided by our company to the application form are accurate and reliable and may be subject to on-site review.

My Company's Seal:



The Authority of the Company:

Name of name: **MUSTAFA
ÖZDEMİR**

The title is: **Director General**

The signature is:

The date: **16.10.2023**

If there is,

The legal representative:

Name of name:

The title is:

The signature is:

The date:



T.C. MINISTRY OF TRADE SUPPORT
SERVICES, FACILITATION WORKS AND
ROTATING CAPITAL GENERAL
THE DIRECTORATE
The date: 17/05/2024

The number: E-00096920510

IT'S T.C.
Ministry of Trade
General Directorate of Imports
Monitoring and Evaluating Import Policies
The Department

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