

June 30, 2022

SENT BY SECURED FILING

PUBLIC

SIMA Registry and Disclosure Unit
Anti-Dumping and Countervailing Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, ON K1A 0L8

Dear Sir/Madam:

**RE: Concrete Reinforcing Bar 1
Request for Normal Value Reviews – Turkey**

These submissions are filed on behalf of AltaSteel Inc. (“**AltaSteel**”), ArcelorMittal Long Products Canada G.P. (“**AMLPC**”), Gerdau Ameristeel Corporation (“**Gerdau**”), and Max Aicher (North America) Ltd. (“**MANA**”) (collectively, the “**Domestic Producers**”). These four companies are domestic producers of concrete reinforcing bar (“**rebar**”) and participants in the Canada Border Services Agency’s (the “**CBSA**”) six normal value reviews and three re-investigations into dumped rebar from Turkey.¹

The Domestic Producers hereby request that the CBSA urgently initiate normal value reviews (“**NVR**”) for four Turkish producers: Çolakoğlu Metalurji A.S. (“**Colakoglu**”), İçdas Çelik Enerji Tersane ve Ulaşım A.Ş. (“**Icdas**”), Kaptan Demir Celik Endustrisi ve Ticaret A.S. (“**Kaptan**”), and Kroman Çelik Sanayii A.Ş. (“**Kroman**”) (collectively, the “**Turkish Exporters**”). Further, the Domestic Producers request that the CBSA also initiate an investigation into whether a particular market situation (“**PMS**”) exists in the Turkish rebar sector and with respect to each Turkish Exporter.

The Turkish Exporters have normal values that were last updated during December 2021 to May 2022 period. However, these normal values are based on sales and cost data from March/April 2021² and no longer reflect current market pricing and costs. Indeed, prices and costs have increased by such a large amount that the price of Turkish *scrap* is currently higher than the price of Turkish *rebar* from March/April 2021. This has resulted in over 175,000 MT of Turkish rebar

¹ RB1 2018 UP COLAKOGLU, Concrete Reinforcing Bar, Notice of Conclusion of Normal Value Review (December 18, 2018); RB1 2018 UP ICDAS, Concrete Reinforcing Bar, Notice of Conclusion of Normal Value Review (December 18, 2018); RB1 2021 UP1 (for Colakoglu), Concrete reinforcing bar, Conclusion of normal value review (May 2, 2022); RB1 2021 UP2 (for Icdas), Concrete reinforcing bar, Conclusion of normal value review (December 9, 2021); RB1 2021 UP3 (for Kaptan), Concrete reinforcing bar, Conclusion of normal value review (December 1, 2021); RB1 2021 UP4 (for Kroman), Concrete reinforcing bar, Conclusion of normal value review (March 22, 2022).

² The period of investigation in the four NVRs was November 1, 2020 to April 30, 2021 so the 60-day period on which normal values are based is likely March/April 2021.

imports in March-May 2022 at outdated normal values.³ Global steel prices have increased during the past year. However, this situation has been fueled by the impact of the Russian invasion of Ukraine, which has resulted in further increased prices and costs for steel globally but, as discussed below, has also resulted in lower raw material costs for Turkish rebar producers.

The situation in Turkey is being exacerbated by the fact that Russian billet exports, which are subject to sanctions by major steel consuming countries around the world, are being sold in the Turkish market at a deep discount. As is discussed further below, these unprecedented circumstances are having a major impact on the Turkish rebar market. The pricing of Russian billet reflects a discount attributable to the wide-spread sanctions applied by other countries to Russian goods. Discounted Russian billet is being imported into Turkey for the production of rebar, and has resulted in consequential reductions in the price of both scrap purchased by Turkish rebar exporters, as well as the price of billet produced in Turkey. Turkish rebar exporters are leveraging the sanctions discount to obtain an artificially low cost of production. The Domestic Producers submit that the circumstances impacting the four Turkish rebar exporters constitute a particular market situation as defined in paragraph 16(2)(c) of the *Special Import Measures Act* (the “SIMA”).

There has been a fundamental change in circumstances in the prices and costs for Turkish rebar producers since the Turkish Exporters were last issued normal values. As a result, their normal values are stale, no longer reflect market prices and costs, and need to be updated.

1. Initiating Supports the Purpose of NVRs and SIMA

The Domestic Producers seek to have normal values for the Turkish Exporters updated to reflect current market conditions. Current normal values are outdated and do not reflect current prices and costs.

The purpose of NVRs is to keep normal values “up-to-date in order to ensure effective enforcement of the Canadian International Trade Tribunal’s (CITT) orders and findings.”⁴ Ensuring that exporters from countries subject to *Special Import Measures Act* (“SIMA”) findings have to sell into Canada at fairly traded prices is consistent with this purpose.

Indeed, pursuant to the CBSA’s D-memoranda on NVRs, this is a very “strong case” for conducting a NVR because Turkish costs and selling prices have risen significantly since then (rebar and scrap prices have more than doubled)⁵ and over 175,000 MT of Turkish rebar was imported into Canada in the past few months (with 133,000 MT in May 2022 alone)⁶ at prices that are lower than domestic pricing⁷:

³ Public Attachment 1: GAC permit data for rebar for 2022.

⁴ CBSA, *Re-investigation and Normal Value Review Policy – Special Import Measures Act (SIMA)*, Memorandum D14-1-8 (July 19, 2019), at para 1 [“Re-Investigation Policy”].

⁵ Confidential Attachment 2: MetalBulletin pricing for Turkish domestic rebar and scrap.

⁶ Public Attachment 1: GAC permit data for rebar for 2022.

⁷ Public Attachment 3: AMLPC letter of support; Public Attachment 4: Gerdau letter of support; Public Attachment 5: MANA letter of support.

13. Depending on the results of the CBSA's analysis, a decision will be made as to whether normal values, export prices and/or amounts of subsidy for a certain measure in force need to be updated. For example, if several years have elapsed since the values were last issued, the costs and domestic selling prices of the goods have risen considerably over the past two-year period, and a significant number of new products are currently being imported into the Canadian market, **the CBSA would consider this a strong case for conducting a re-investigation or normal value review.** [Emphasis added]

While the Re-investigation Policy notes that NVRs are “generally” done for three or less exporters⁸, the CBSA may nonetheless conduct a NVR for four exporters. Indeed, the CBSA previously initiated NVRs in respect of the four Turkish Exporters on May 17, 2021.⁹

Moreover, CBSA should also consider the substantive question of whether updated normal values are likely to be more or less representative of present and near-term market conditions. Conducting a NVR at this time will decrease the gap between prospective normal values and prospective Turkish prices and costs. In other words, if CBSA were to initiate a NVR, it would be addressing a distortion in the market by determining updated normal values based on current and forecasted prices and costs.

Lastly, updating normal values is also consistent with the purpose of SIMA which is to protect the domestic industry. Indeed, the Tribunal and the Federal Court have consistently held that “the object and purpose of SIMA is to protect domestic industries from injury caused or threatened by the dumping or subsidizing of foreign goods”.¹⁰ The evidence described in and attached to this letter demonstrates that updating normal values at this time would result in normal values reflecting prevailing market prices. This would protect the domestic industry from injury.

The Domestic Producers also request that updated normal values be applied retroactively to any Turkish rebar imports arriving after initiation of a NVR but before the conclusion of the NVR.

2. PMS investigations in NVRs and Re-investigations

The Domestic Producers request that the CBSA initiate a PMS investigation in each NVR involving the Turkish Exporters.

The *Re-investigation Policy* states that NVRs are limited to circumstances directly related to the exporter and not the entire country or market while a re-investigation is more appropriate if circumstances indicate a broader scope is necessary:

17. In a re-investigation or normal value review, the CBSA is not bound by methodologies used in a prior proceeding when determining normal values and export prices and may change methodologies based on the particular facts and circumstances of the re-investigation; **however, for normal value reviews, the scope would be limited to circumstances directly related to the exporter and not the**

⁸ Re-Investigation Policy, *supra*, at para. 14.

⁹ RB1 2021 UP1 (for Colakoglu), Concrete reinforcing bar, Notice of normal value review (May 17, 2021); RB1 2021 UP2 (for Icdas), Concrete reinforcing bar, Notice of normal value review (May 17, 2021); RB1 2021 UP3 (for Kaptan), Concrete reinforcing bar, Notice of normal value review (May 17, 2021); RB1 2021 UP4 (for Kroman), Concrete reinforcing bar, Notice of normal value review (May 17, 2021).

¹⁰ See e.g. *Gypsum Board*, GC-2016-001, Statement of Reasons (January 19, 2017), at para 37; *Caps, Lids and Jars*, PB-95-001, Statement of Reasons (February 26, 1996); *Prairies Tubulars (2015) Inc. v. Canada (Border Services Agency)*, 2018 FC 991 (CanLII) at para 6; *Canadian Steel Producers Assn. v. Canada (Commissioner of Customs and Revenue)*, 2003 FC 1311 (CanLII) at para 40; *GRK Fasteners v. Canada (Attorney General)*, 2011 FC 198 (CanLII) at para. 5.

country or market as a whole. If circumstances indicate a broader scope than would be found in a normal value review, a re-investigation would be more appropriate. The CBSA may issue supplemental questionnaires relating to any matter considered relevant by the CBSA that arises during the course of a re-investigation or normal value review.¹¹ [Emphasis added]

This suggests that a PMS investigation would be more appropriate in the context of a re-investigation than a NVR. However, NVRs and re-investigations are administrative proceedings that the CBSA conducts from time to time to update normal values, export prices and amounts of subsidy. These proceedings are not prescribed by SIMA. The CBSA therefore has wide discretion regarding how it conducts re-investigations and NVRs and to choose an administrative process that is appropriate in the circumstances.

The Domestic Producers submit the CBSA has discretion to initiate a PMS investigation in the context of a NVR despite paragraph 17 of the *Re-investigation Policy*. Further, subsection 16(2.1) of SIMA provides that a PMS may exist which respect to a particular *exporter*: "...a particular market situation may be found to exist in respect of any goods of a particular exporter or of a particular country, as is appropriate in the circumstances."

The circumstances also warrant the use of CBSA's discretion to initiate a PMS investigation in the context of a NVR rather than a re-investigation:

- There are no Chinese or Korean exporters that are active in the Canadian rebar market (rebar imports from these countries have been negligible since at least 2018)¹²;
- Turkish exporters are the only active participants from the Rebar 1 finding that are active in the Canadian rebar market, with Turkish rebar imports in March-May 2022 surging to 175,000 MT.¹³ This represents 13% of the entire Canadian rebar market (which is approximately 1.3 million MT¹⁴);
- There are no public representations from Chinese or Korean rebar exporters seeking to obtain normal values¹⁵;
- A PMS investigation impacts Turkish exporters only;
- The factors impacting domestic and export prices are limited to Turkish exporters;
- Information will likely be sought from Turkish participants only (i.e., a PMS RFI to Turkish exporters and the Government of Turkey); and
- The PMS may be impacting individual exporters differently if some are not sourcing Russian billets and therefore exporter-specific NVRs would be appropriate.

Further, the only reason for the CBSA to initiate a re-investigation (rather than four NVRs) is due to the PMS investigation. Otherwise, the CBSA could simply initiate NVRs in respect of the Turkish Exporters as it did last year.

¹¹ Re-Investigation Policy, *supra*, at para 17.

¹² Public Attachment 6: Statistics Canada import data for rebar through April 2022.

¹³ Public Attachment 1: GAC permit data for rebar for 2022.

¹⁴ Public Attachment 3: AMLPC letter of support.

¹⁵ See <https://www.cbsa-asfc.gc.ca/sima-lmsi/mos-sdm/rb1-re-eng.html>

The initiation of four NVRs against the Turkish Exporters would also reflect the most appropriate use of CBSA's available resources, which is a consideration in deciding whether or not to initiate a NVR/re-investigation.¹⁶

The Domestic Producers therefore request that the CBSA initiate a PMS investigation in each NVR initiated with respect to a Turkish Exporter.

3. Turkish Rebar and Scrap Prices have Increased Significantly

These submissions compare Turkish domestic rebar and scrap pricing from March/April 2021 (i.e., the 60-day period on which the normal values for the Turkish Exporters are likely based) with May 2022 (most recent). Scrap is the main raw material input in the production of rebar.

Table 1:
MetalBulletin Domestic Prices in Turkey¹⁷

Turkish price	Rebar (TRY/MT)	Scrap (TRY/MT)
March/April 2021	[]	[]
May-22	[]	[]
Increase since 60-day period:		
in TRY/MT	[]	[]
in %	[]	[]

Table 1 above demonstrates that Turkish scrap pricing has more than doubled (from TRY []/MT to TRY []/MT) since the period on which cost data for the Turkish Exporters' normal values are based. Similarly, Turkish rebar pricing has also more than doubled (from TRY []/MT to TRY []/MT) since the 60-day period on which the Turkish Exporters' domestic sales data is based.

These are significant increases that warrant updating the normal values for the Turkish Exporters. Further, rebar and scrap prices in Turkey would have been even higher - and Turkish Exporters should have had to price up even more - given the existence of the PMS described below.

Lastly, it appears that Turkish rebar producers are not pricing up enough and are exporting rebar to Canada at dumped prices:

¹⁶ Re-investigation Policy, *supra*, at para 12(o).

¹⁷ Confidential Attachment 2: MetalBulletin pricing for Turkish domestic rebar and scrap.

Table 2:
Estimated Dumping Margins: Turkish Domestic vs Export Price for Rebar¹⁸

Period	GAC Steel Import Permits			MetalBulletin Turkish Domestic Price			Dumping Margin	
	MT	C\$1000	C\$/MT	TRY/MT	Exchange Rate	CAD/MT	CAD/MT	%
Mar-22	19,225	17,456	908	[]	0.0866	[]		
Apr-22	22,771	21,608	949	[]	0.0858	[]		
May-22	133,353	129,836	974	[]	0.0825	[]		

4. A PMS Exists in the Turkish Rebar Market and with Respect to the Turkish Exporters

In the event that CBSA initiates NVRs, the Domestic Producers request that the CBSA also initiate investigations to determine whether a PMS exists with respect to the Turkish rebar industry and with respect to each Turkish Exporter.

Russia is exporting billets at very cheap prices since various countries imposed sanctions against Russian goods in response to its invasion of Ukraine in late February 2022.¹⁹ As a result of the sanctions, many countries are no longer importing Russian material and the price of Russian billets has declined steeply in recent months as Russia's export markets are limited.²⁰ However, Turkey (which did not impose sanctions against Russia) continues to import Russian steel such as billets and has become "one of the main outlets for Russian billets" since at least April 2022.²¹ The availability of inexpensive Russian billet in Turkey is also impacting scrap prices in Turkey as rebar producers have switched to purchasing billets instead of scrap. This has resulted in distorted input prices and lower domestic selling prices for Turkish rebar producers. As a result, the PMS is such that it does not permit a proper comparison with the sale of the goods to the importer in Canada.

Recent articles from *MetalBulletin Fastmarkets* characterized the situation as follows (emphasis added in bold below):

- April 28, 2022: "[

¹⁸ *Ibid.*; Public Attachment 1: GAC permit data for rebar for 2022. Calculations assume that the export prices were locked in one month before shipment, so the domestic Turkish price is lagged by 1-month so the normal values are based on the month prior to delivery month (e.g., compares the April export price reported by GAC to the March domestic price reported by MetalBulletin). For April, note that the shipment of 15 MT at \$888,371/MT into the Port of Toronto has been removed since this appears to be non-subject goods or an error in the permit data.

¹⁹ Confidential Attachment 7: Various MetalBulletin Fastmarket articles from April to June 2022 regarding Russian billets and/or Turkey; Confidential Attachment 8: Various SBB articles dated June 2022 regarding Russian billets and/or Turkey.

²⁰ *Ibid.*

²¹ Confidential Attachment 7: MB Fastmarkets, "Russian export steel billet prices continue to fall" (June 9, 2022); Confidential Attachment 7: MB Fastmarkets, "Russian billet prices keep softening under pressure of low demand, falling scrap costs" (April 28, 2022).

].”²²

- May 26, 2022: “[

].”²³

- June 6, 2022:

- o “[

].”²⁴

- o “[

].”²⁵

- June 9, 2022:

- o “[

].”²⁶

- o “[

].”²⁷

- o “[

].”²⁸

²² Confidential Attachment 7: MB Fastmarkets, “Russian billet prices keep softening under pressure of low demand, falling scrap costs” (April 28, 2022).

²³ Confidential Attachment 7: MB Fastmarkets, “Quick-thinking Chinese traders prosper in volatile steel semis markets” (May 26, 2022).

²⁴ Confidential Attachment 7: MB Fastmarkets, “Russian steel billet price falls, further sales to Turkey come to light” (June 6, 2022).

²⁵ Confidential Attachment 7: MB Fastmarkets, “Global steel scrap prices weak amid slow buying” (June 6, 2022).

²⁶ Confidential Attachment 7: MB Fastmarkets, “Turkish billet values weaken in tandem with Russian prices” (June 9, 2022).

²⁷ Confidential Attachment 7: MB Fastmarkets, “Turkish steel mills continue to shun deep-sea scrap” (June 9, 2022).

²⁸ Confidential Attachment 7: MB Fastmarkets, “Russian export steel billet prices continue to fall” (June 9, 2022).

- June 14, 2022: “[

]”.²⁹

- June 21, 2022: “[

]”.³⁰

- June 22, 2022:

o “[

]”.³¹

o “[

]”.³²

Furthermore, Russia is a very large supplier of heavy metal scrap used for the production of rebar in Turkey. As with billet, the sanctions discount on Russian scrap being sold into Turkey is driving down the price of scrap in Turkey, further contributing to the PMS.

Lastly, some Turkish producers may be using Russian billets to produce rebar more for domestic sales than export sales because if they use Russian billets to produce rebar for export sales to Canada such rebar would be considered Russian origin as opposed to Turkish origin. In such an instance, the exported rebar would not benefit from the MFN rate and would therefore be subject to a 35% duty upon importation into Canada. This further supports the existence of a PMS with respect to Turkey.

The Domestic Producers therefore request that the CBSA initiate a PMS investigation with respect to the Turkish rebar sector and each Turkish Exporter.

²⁹ Confidential Attachment 7: MB Fastmarkets, “Taiwan’s reliance on Russian steel jumps amid attractive prices” (June 14, 2022).

³⁰ Confidential Attachment 7: MB Fastmarkets, “Turkish mills continue to avoid deep-sea scrap bookings” (June 21, 2022).

³¹ Confidential Attachment 7: MB Fastmarkets, “Russian steel billet price falls on scrap downtrend, caution in demand” (June 22, 2022).

³² Confidential Attachment 7: MB Fastmarkets, “Fresh European cargo sale sends Turkish scrap prices further down” (June 22, 2022).

5. Recent Large Shipments and Future Shipments

The Domestic Producers' commercial intelligence is that two shipments or approximately 40,000 MT to 60,000 MT of Turkish rebar will arrive in Canada in the coming months. This is in addition to the 175,000 MT that arrived in March-May 2022. This information is summarized below:

Table 3:
Recent and Future Turkish Shipments³³

	Arrival in Canada	Volume (MT)	Exporter	Importer
Past shipments	Mar-22	19,225	n/a	n/a
	Apr-22	22,787	n/a	n/a
	May-22	133,353	n/a	n/a
	<i>Subtotal</i>	<i>175,365</i>		
Future shipments	Jul/Aug-22	20,000 - 30,000	Icdas	n/a
	Jul/Aug-22	20,000 - 30,000	Kaptan	IREPEX
	<i>Subtotal</i>	<i>40,000 – 60,000</i>		
Total		215,365 – 235,365		

Further, Turkish exporters are making low-priced offers for arrival in September and October 2022.³⁴ Turkish rebar is currently being offered at prices that are approximately \$[]/MT lower than domestic producer prices.³⁵

Indeed, a [

].³⁶ This significant excess capacity is due, in part, to the refusal of importers in various countries to purchase finished steel products from Turkey (including rebar) because of the use of Russian slab and billets as primary inputs.³⁷ As a result of low-priced offers from Turkey, []³⁸

6. Depreciation of the Turkish Lira

In the event that CBSA initiates a NVR, the Domestic Producers submit that any normal values for the Turkish Exporters should be calculated in U.S. dollars (rather than in Turkish lira) to reflect the significant depreciation and extreme volatility of the Turkish Lira. Indeed, in all six prior NVRs involving the Turkish Exporters, normal values were issued by the CBSA in U.S. dollar.³⁹

³³ Public Attachment 1: GAC permit data for rebar for 2022; Public Attachment 5 MANA letter of support. See also Confidential Attachment 3: AMLPC letter of support.

³⁴ Public Attachment 3: AMLPC letter of support.

³⁵ Confidential Attachment 3: AMLPC letter of support.

³⁶ Confidential Attachment 3: AMLPC letter of support.

³⁷ Public Attachment 3: AMLPC letter of support.

³⁸ Confidential Attachment 3: AMLPC letter of support.

³⁹ RB1 2018 UP COLAKOGLU, Concrete Reinforcing Bar, Notice of Conclusion of Normal Value Review (December 18, 2018); RB1 2018 UP ICDAS, Concrete Reinforcing Bar, Notice of Conclusion of Normal Value Review (December 18, 2018); RB1 2021 UP1 (for Colakoglu), Concrete reinforcing bar, Conclusion of normal value review (May 2, 2022); RB1 2021 UP2 (for Icdas), Concrete reinforcing bar, Conclusion of normal value

The Turkish lira depreciated rapidly and significantly in 2017 and 2018, as noted by the CITT in its Safeguard Inquiry.⁴⁰ In the NVRs that concluded in December 2021 to May 2022 (when the Turkish Exporters' normal values were last updated), the CBSA established normal values in U.S. dollars: "The information on the record for this normal value review demonstrates a volatile and depreciating exchange rate for the Turkish Lira. To address these factors the CBSA issued the normal values to {Colakoglu, Icdas, Kaptan and Kroman} in U.S. Dollars, as export transactions for subject goods sold to Canada are typically sold in U.S. Dollars in this industry."⁴¹

The Turkish Lira continued to depreciate in 2019, 2020, 2021 and 2022.⁴² From January 2019 to May 2022, the Turkish Lira depreciated a further 67%.

Table 4:
Average Foreign Exchange Rates: Turkish Lira to CAD⁴³

Period	FX	y-o-y % change
2017	0.3565	
2018	0.2759	-23%
2019	0.2340	-15%
2020	0.1930	-18%
2021	0.1450	-25%
Jan-May 2022	0.0882	-39%

The value of the Turkish Lira has continued to fall over the last 4 years.⁴⁴ The Turkish Exporters' normal values were last updated based on sales and cost data from March and April 2021. At that time, the value of the Turkish Lira was TRY 0.1585 to the Canadian dollar. In May 2022, the Turkish Lira is only 0.0825, a decrease of 48%.

For these reasons, any new normal values for the Turkish Exporters must be established in U.S. dollars (not Turkish Lira).

7. Conclusion

From time-to-time it is necessary to update prospective normal values. Domestic prices and costs have increased substantially since the Turkish Exporters' normal values were last updated and over

review (December 9, 2021), RB1 2021 UP3 (for Kaptan), Concrete reinforcing bar, Conclusion of normal value review (December 1, 2021); RB1 2021 UP4 (for Kroman), Concrete reinforcing bar, Conclusion of normal value review (March 22, 2022).

⁴⁰ *Certain Steel Goods*, Safeguard Inquiry No. GC-2018-001 (April 3, 2019) at p. 56, 57, 64. The Tribunal stated: "The information on the record indicates that the Turkish lira lost 7.2 percent of its value versus the Canadian dollar in 2016, followed by a further 23.3 percent decline in 2017 and finally another 32.3 percent decline in 2018."

⁴¹ RB1 2021 UP1 (for Colakoglu), Concrete reinforcing bar, Conclusion of normal value review (May 2, 2022); RB1 2021 UP2 (for Icdas), Concrete reinforcing bar, Conclusion of normal value review (December 9, 2021), RB1 2021 UP3 (for Kaptan), Concrete reinforcing bar, Conclusion of normal value review (December 1, 2021); RB1 2021 UP4 (for Kroman), Concrete reinforcing bar, Conclusion of normal value review (March 22, 2022).

⁴² Public Attachment 9: Bank of Canada annual and monthly average exchanges rates for 2017-present (2016 data not available).

⁴³ *Ibid.*

⁴⁴ *Ibid.*

175,000 MT of Turkish rebar was imported into Canada in March-May 2022 at outdated normal values. This situation is being driven by the combination of rising global steel prices and the availability of sanctions-discounted Russian billet being sold in the Turkish market. CBSA should urgently initiate normal value reviews to address this unfortunate by-product of the Russian invasion of Ukraine.

We request that the CBSA initiate NVRs for the four Turkish Exporters and that the NVRs include a PMS investigation with respect to the Turkish rebar sector and each Turkish Exporter.

Yours truly,



Anne-Marie Oatway
Conlin Bedard LLP
Encl.



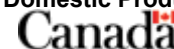
Andrew Lanouette
Cassidy Levy Kent (Canada) LLP



Jonathan O'Hara
McMillan LLP

List of Attachments

Attachment #	Description
Public Attachment 1	GAC permit data for rebar for 2022
Confidential Attachment 2	MetalBulletin pricing for Turkish domestic rebar and scrap
Confidential Attachment 3	AMLPC letter of support
Confidential Attachment 4	Gerdau letter of support
Public Attachment 5	MANA letter of support
Public Attachment 6	Statistics Canada import data for rebar through April 2022
Confidential Attachment 7	Various MetalBulletin Fastmarket articles from April to June 2022 regarding Russian billets and/or Turkey
Confidential Attachment 8	Various SBB articles dated June 2022 regarding Russian billets and/or Turkey
Public Attachment 9	Bank of Canada annual and monthly average exchanges rates for 2017-present (2016 data not available)
Public Attachment 10	AltaSteel letter of support

Global Affairs Canada / Affaires mondiales
Canada

A1

Date: 2022-06-25

CANADIAN STEEL IMPORTS INDUSTRY CLASS BY MONTH AND COUNTRY:
Period Start: 2022-01-01 Period Ending: 2022-06-25

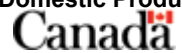
Industrial Classification	Industry Class Description	Month	Country of Origin	Tonnes	C\$1000	C\$/1000
1	CUT PLATE: CARBON & ALLOY(DISCRETE PLATE — EXCLUDING HGHR)	1	Austria	25	62	2,496\$
			Belgium	1	2	2,470\$
			Brazil	1	3	3,107\$
			China	0	0	
			Finland	37	81	2,159\$
			France	1,273	2,084	1,637\$
			Germany	41	74	1,809\$
			Indonesia	100	216	2,168\$
			Japan	32	66	2,066\$
			Korea, Republic of	1,434	2,673	1,864\$
			Mexico	9	22	2,513\$
			Netherlands	9	32	3,554\$
			Russian Federation	141	348	2,477\$
			Taiwan	1,676	2,456	1,465\$
			Ukraine	1	5	4,025\$
			United Kingdom	0	0	
			United States	18,095	39,947	2,208\$
		1		22,875	48,071\$	2,101\$
		2	Austria	314	762	2,428\$
			Brazil	46	122	2,657\$
			Finland	62	152	2,459\$
			France	237	444	1,875\$
			Germany	207	460	2,225\$
			Korea, Republic of	4,024	6,791	1,688\$
			Kuwait	0	0	1,000\$
			Mexico	9	23	2,660\$
			Netherlands	23	100	4,261\$
			Spain	4	11	2,917\$
			Sweden	2	7	4,157\$
			United States	13,014	29,484	2,265\$
		2		17,941	38,356\$	2,138\$
		3	Australia	0	0	
			Austria	204	403	1,972\$
			Brazil	2	6	2,976\$
			China	502	698	1,390\$
			Finland	42	96	2,265\$
			France	2,482	3,313	1,335\$

NON-CONFIDENTIAL

13
1/36

5	6	Luxembourg	22	48	2,135\$
		Mexico	397	871	2,192\$
		Mongolia	0	1	3,728\$
		Netherlands	199	464	2,325\$
		Pakistan	1,643	2,485	1,513\$
		Poland	12	42	3,600\$
		Portugal	323	765	2,370\$
		Qatar	26	30	1,148\$
		Switzerland	23	61	2,616\$
		Taiwan	4,957	8,909	1,797\$
		Thailand	7,600	10,176	1,339\$
		Turkey	4,423	8,140	1,841\$
		United Arab Emirates	4,478	8,557	1,911\$
		United Kingdom	14	52	3,711\$
		United States	13,110	40,890	3,119\$
		Vietnam	1,624	2,727	1,679\$
		5		55,298	112,403\$
6	6	Brazil	0	1	4,251\$
		China	1,112	1,955	1,759\$
		Germany	73	231	3,185\$
		India	1,463	2,719	1,859\$
		Indonesia	671	1,255	1,872\$
		Italy	568	1,921	3,382\$
		Japan	233	608	2,607\$
		Korea, Republic of	547	778	1,422\$
		Mexico	250	509	2,033\$
		Netherlands	18	68	3,695\$
		Pakistan	1,076	1,571	1,459\$
		Portugal	45	147	3,280\$
		Switzerland	0	2	4,461\$
		Taiwan	31	111	3,595\$
		Turkey	154	260	1,684\$
		United Arab Emirates	6,982	11,692	1,675\$
		United States	7,897	23,238	2,943\$
Vietnam	185	295	1,598\$		
6		21,305	47,361\$	2,223\$	
		220,291	479,379\$	2,176\$	
1	1	Germany	0	0	1,648\$
		Mexico	940	1,180	1,255\$
		United States	6,418	8,344	1,300\$
		Vietnam	28,253	25,628	907\$
1		35,611	35,153\$	987\$	
2	2	China	0	0	2,764\$
		Germany	36	110	3,079\$
		Mexico	6,544	7,796	1,191\$
		United States	8,371	11,236	1,342\$
2		14,951	19,142\$	1,280\$	

Concrete Reinforcing Bar																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
--------------------------	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--



Global Affairs Canada / Affaires mondiales
Canada

A1A

Date: 2022-06-25

A1A – Canadian Steel Imports Harmonized System by Month and Country:
Period Start: 2022-01-01---**Period Ending:** 2022-06-25

Industry Class	Industry Class Description	Month	Country Of Origin	Country Of Export	State Of Export	Port Of Entry	Tonnes	C\$1000	C\$/Tonne
1	CUT PLATE: CARBON & ALLOY(DISCRETE PLATE — EXCLUDING HGHR)	1	Austria			Sorel	25	62	\$2,496
			Belgium			Argentia	1	2	\$2,470
			Brazil			Emerson	1	3	\$3,107
			China			Pacific Highway	0	0	
			Finland			Emerson	2	9	\$4,772
						Halifax	36	72	\$2,024
			France			Sorel	726	1,276	\$1,757
						Trois-Rivieres	547	808	\$1,477
			Germany			Halifax	41	74	\$1,809
			Indonesia			Argentia	100	216	\$2,168
			Japan			Toronto (Port of Toronto)	32	66	\$2,066
			Korea, Republic of			Hamilton	614	1,180	\$1,923
						Montreal Main Long Room	95	131	\$1,385
						Toronto (Port of Toronto)	726	1,362	\$1,876
			Mexico			Edmonton	9	22	\$2,513
			Netherlands			Fort Erie	9	32	\$3,554
			Russian Federation			Edmonton	141	348	\$2,477
			Taiwan			Vancouver Commercial Operations West	1,676	2,456	\$1,465
			Ukraine			Emerson	1	5	\$4,025
			United Kingdom			Niagara Falls	0	0	
			United States			Aldergrove	76	207	\$2,710
						Calgary	264	691	\$2,620
						Coutts	2	8	\$4,171
						Edmonton	1,456	3,382	\$2,323
						Emerson	379	981	\$2,585
						Fort Erie	478	1,233	\$2,579
						Hamilton	2,629	5,810	\$2,210
						Huntingdon	126	342	\$2,725
						Kamloops	106	188	\$1,776
						Kingsgate	22	55	\$2,476
						Lansdowne	211	511	\$2,422
						Moncton	166	377	\$2,276
						Montreal Main Long Room	4,947	9,166	\$1,853
						Niagara Falls	268	750	\$2,798

PUBLIC Attachment 1

					Warehouse (Dixie)			
					Vancouver Commercial Operations West	35	87	\$2,471
					Windsor Ambassador Bridge	2,770	8,405	\$3,034
		Vietnam			Kingsgate	0	0	\$3,890
					Montreal Main Long Room	3	13	\$4,031
					Toronto (Port of Toronto)	30	57	\$1,892
					Vancouver Commercial Operations West	151	224	\$1,486
		6				21,305	\$47,361	\$2,223
13						220,291	\$479,379	\$2,176
14	REBAR	1	Germany		Windsor Ambassador Bridge	0	0	\$1,648
			Mexico		Lethbridge	169	215	\$1,277
					Saskatoon	343	431	\$1,257
					Winnipeg Main Long Room	429	534	\$1,246
			United States		Aldergrove	1,341	1,700	\$1,268
					Fort Erie	329	534	\$1,622
					Huntingdon	1,562	1,981	\$1,268
					Kingsgate	231	325	\$1,405
					Lansdowne	20	29	\$1,480
					Niagara Falls	215	301	\$1,401
					North Portal	78	114	\$1,453
					Pacific Highway	2,435	3,046	\$1,251
					Sarnia	105	166	\$1,575
					Vancouver Commercial Operations West	80	115	\$1,426
					Windsor Ambassador Bridge	1	3	\$2,308
					Woodstock Road	20	32	\$1,597
			Vietnam		Vancouver Commercial Operations West	28,253	25,628	\$907
		1				35,611	\$35,153	\$987
		2	China		Windsor Ambassador Bridge	0	0	\$2,764
			Germany		Vancouver Commercial Operations West	36	110	\$3,079
			Mexico		Edmonton	86	114	\$1,328
					Fort Frances	88	112	\$1,280
					Saskatoon	187	106	\$566
					Winnipeg Main Long Room	1,040	1,062	\$1,021
					Edmonton	373	495	\$1,327
					Lethbridge	256	336	\$1,311
					Toronto (Port of Toronto)	2,972	3,756	\$1,264
					Winnipeg Main Long Room	1,541	1,814	\$1,177

PUBLIC Attachment 1			A1A Room			
2	United States		Aldergrove	186	246	\$1,319
			Huntingdon	226	300	\$1,325
			Kingsgate	45	62	\$1,377
			Pacific Highway	488	635	\$1,302
			Sarnia	19	30	\$1,598
			Aldergrove	1,327	1,779	\$1,341
			Emerson	132	203	\$1,542
			Fort Erie	58	123	\$2,119
			Huntingdon	1,819	2,328	\$1,280
			Kingsgate	339	507	\$1,497
			Lansdowne	21	42	\$1,983
			Lethbridge	94	121	\$1,284
			North Portal	43	69	\$1,591
			Osoyoos	26	32	\$1,221
			Pacific Highway	3,237	4,237	\$1,309
			Sarnia	58	77	\$1,335
			Saskatoon	253	444	\$1,757
			Windsor Ambassador Bridge	0	0	\$2,755
				14,951	\$19,142	\$1,280
3	Germany		Fort Erie	0	0	\$4,098
	Korea, Republic of		St-Bernard de Lacolle	22	77	\$3,551
	Mexico		Calgary	519	649	\$1,250
			Edmonton	134	171	\$1,274
			Lethbridge	257	336	\$1,308
			Saskatoon	586	717	\$1,222
			Toronto (Port of Toronto)	67	75	\$1,127
			Winnipeg Main Long Room	1,921	2,312	\$1,203
			Calgary	1,115	1,395	\$1,251
			Edmonton	1,974	2,477	\$1,254
			Lethbridge	260	330	\$1,269
			Saskatoon	946	1,158	\$1,224
			Vancouver Commercial Operations West	85	104	\$1,229
			Winnipeg Main Long Room	852	1,025	\$1,203
	Taiwan		Toronto (Port of Toronto)	100	143	\$1,429
	Turkey		Trois-Rivieres	19,225	17,456	\$908
	United States		Aldergrove	1,061	1,399	\$1,318
			Edmonton	101	131	\$1,299
			Fort Erie	48	113	\$2,339
			Huntingdon	953	1,245	\$1,306
			Kingsgate	271	369	\$1,365
			North Portal	19	29	\$1,544
			Osoyoos	22	37	\$1,706
			Pacific Highway	2,676	3,528	\$1,318

PUBLIC Attachment 1

3				Paterson	16	21	\$1,286
				Sarnia	87	129	\$1,487
				Vancouver Commercial Operations West	83	113	\$1,355
				Windsor Ambassador Bridge	17	22	\$1,292
				Winnipeg Main Long Room	77	112	\$1,447
				Aldergrove	863	1,107	\$1,283
				Calgary	142	164	\$1,157
				Coutts	56	148	\$2,644
				Edmonton	254	366	\$1,440
				Fort Erie	133	215	\$1,626
				Huntingdon	998	1,302	\$1,304
				Kingsgate	55	73	\$1,323
				Lansdowne	22	40	\$1,830
				North Portal	18	30	\$1,654
				Pacific Highway	1,932	2,722	\$1,409
				Sarnia	62	96	\$1,557
				Windsor Ambassador Bridge	18	26	\$1,452
					38,046	\$41,960	\$1,103
4	Mexico			Calgary	172	211	\$1,226
				Edmonton	805	1,125	\$1,397
				Lethbridge	173	219	\$1,261
				Saskatoon	86	113	\$1,307
				Toronto (Port of Toronto)	86	95	\$1,114
				Vancouver Commercial Operations West	258	350	\$1,357
				Winnipeg Main Long Room	841	995	\$1,184
				Calgary	600	743	\$1,238
				Edmonton	258	328	\$1,269
				Lethbridge	602	748	\$1,242
				Saskatoon	343	432	\$1,260
				Toronto (Port of Toronto)	322	360	\$1,118
				Vancouver Commercial Operations West	168	234	\$1,389
				Winnipeg Main Long Room	166	200	\$1,203
	Taiwan			Toronto (Port of Toronto)	50	77	\$1,542
				Vancouver Commercial Operations West	50	77	\$1,542
	Thailand			Vancouver Commercial Operations West	9,661	10,625	\$1,100
	Turkey			Trois-Rivieres	8,470	8,308	\$981
				Toronto (Port of	15	13,516	\$888,371

PUBLIC Attachment 1			A1A (Toronto)			
			Trois-Rivieres	14,301	13,300	\$930
United Arab Emirates			Oshawa	16,717	15,483	\$926
			Sorel	6,992	6,432	\$920
United States			Aldergrove	1,888	2,534	\$1,342
			Calgary	92	116	\$1,262
			Edmonton	89	131	\$1,463
			Emerson	90	118	\$1,308
			Fort Erie	40	101	\$2,551
			Huntingdon	1,594	2,112	\$1,325
			Kingsgate	120	258	\$2,148
			North Portal	20	32	\$1,560
			Pacific Highway	2,710	3,656	\$1,349
			Sarnia	46	80	\$1,716
			Saskatoon	83	156	\$1,876
			Sudbury	82	143	\$1,739
			Aldergrove	1,179	1,616	\$1,371
			Coutts	39	68	\$1,728
			Fort Erie	21	38	\$1,782
			Huntingdon	1,384	1,941	\$1,402
			Kingsgate	113	286	\$2,541
			North Portal	76	168	\$2,218
			Osoyoos	28	40	\$1,425
			Pacific Highway	1,790	2,538	\$1,418
			Sarnia	37	58	\$1,599
			Windsor Ambassador Bridge	55	111	\$2,014
Vietnam			Vancouver Commercial Operations West	39,776	35,541	\$894
4				112,489	\$125,810	\$1,118
5	Australia		Pacific Highway	10	27	\$2,729
	China		Montreal Main Long Room	1	3	\$2,328
	Germany		Fort Erie	1	3	\$2,516
			Niagara Falls	0	0	\$824
			St-Bernard de Lacolle	0	1	\$3,385
	India		Montreal Main Long Room	22	37	\$1,687
	Mexico		Calgary	87	108	\$1,243
			Lethbridge	87	106	\$1,226
			Toronto (Port of Toronto)	2,795	3,702	\$1,325
			Winnipeg Main Long Room	166	220	\$1,320
			Calgary	650	893	\$1,373
			Edmonton	413	560	\$1,353
			Lethbridge	335	417	\$1,245
			Saskatoon	421	560	\$1,330
			Toronto (Port of Toronto)	1,212	1,612	\$1,330

PUBLIC Attachment 1				A1A	Submitted on behalf of the Domestic Producer		
			Vancouver Commercial Operations West	86	118	\$1,592	
			Winnipeg Main Long Room	1,192	1,687	\$1,415	
Taiwan			Vancouver Commercial Operations West	50	76	\$1,530	
Turkey			Port Colborne	15,019	14,710	\$979	
			Sorel	2,232	1,941	\$869	
			Trois-Rivieres	14,896	14,895	\$1,000	
			Oshawa	23,386	22,229	\$951	
			Port Colborne	18,355	18,365	\$1,001	
			Toronto (Port of Toronto)	38,268	36,683	\$959	
			Trois-Rivieres	21,196	21,014	\$991	
United States			Aldergrove	807	1,126	\$1,396	
			Calgary	93	129	\$1,382	
			Edmonton	167	259	\$1,555	
			Fort Erie	56	116	\$2,066	
			Huntingdon	1,040	1,452	\$1,396	
			Kingsgate	55	128	\$2,314	
			Lansdowne	20	39	\$1,932	
			Lethbridge	206	312	\$1,510	
			Pacific Highway	1,462	2,000	\$1,368	
			Sarnia	14	46	\$3,268	
					Aldergrove	2,188	3,146
	Calgary	143			189	\$1,319	
	Edmonton	181			241	\$1,336	
	Fort Erie	18			63	\$3,535	
	Huntingdon	1,821			2,568	\$1,411	
	Kingsgate	192			379	\$1,979	
	Lethbridge	162			239	\$1,472	
	North Portal	59			106	\$1,815	
	Osoyoos	93			143	\$1,540	
	Pacific Highway	5,154			7,296	\$1,416	
	Sarnia	35			72	\$2,039	
	Vancouver Commercial Operations West	1,276			2,401	\$1,881	
	Windsor Ambassador Bridge	52	135	\$2,579			
5				156,176	\$162,552	\$1,041	
6	Germany			North Portal	1	2	\$3,149
	India			Montreal Main Long Room	22	30	\$1,400
	Mexico			Calgary	346	468	\$1,353
				Edmonton	479	688	\$1,435
				Saskatoon	253	376	\$1,488
				Toronto (Port of Toronto)	1,638	2,130	\$1,300
				Winnipeg Main Long Room	2,131	2,948	\$1,383

Concrete Reinforcing Bar 1			United States			Aldergrove	1,488	2,137	\$1,430
						Calgary	270	401	\$1,485
						Coutts	3	12	\$4,001
						Emerson	87	123	\$1,416
						Fort Erie	345	472	\$1,370
						Huntingdon	2,067	2,961	\$1,433
						Kingsgate	150	273	\$1,822
						Lethbridge	363	556	\$1,533
						Pacific Highway	3,555	5,254	\$1,478
						Sarnia	111	192	\$1,736
						St. Stephen	0	1	\$2,808
						Vancouver Commercial Operations West	616	800	\$1,299
						Winnipeg Main Long Room	79	121	\$1,525
						6			
14							371,275	\$404,583	\$1,090
15	WIRE ROD: CARBON & ALLOY	1	Germany			Halifax	3,303	3,963	\$1,200
		1					3,303	\$3,963	\$1,200
		2	Germany			Halifax	3,397	4,314	\$1,270
			United States			Windsor Ambassador Bridge	0	1	\$2,578
		2					3,398	\$4,315	\$1,270
		3	China			Vancouver Commercial Operations West	99	243	\$2,456
			Germany			Halifax	1,849	2,708	\$1,464
						Halifax	251	381	\$1,515
			United States			Sarnia	0	1	\$2,567
		3					2,200	\$3,332	\$1,515
		4	Germany			Halifax	2,443	3,036	\$1,243
						Halifax	1,762	2,549	\$1,447
			United States			Windsor Ambassador Bridge	1	2	\$2,534
		4					4,206	\$5,587	\$1,328
		5	Germany			Halifax	1,800	2,768	\$1,538
						Halifax	2,802	4,235	\$1,512
			United States			Toronto Interport Sufferance Warehouse (Dixie)	0	1	\$4,436
		5					4,602	\$7,004	\$1,522
		6	Germany			Halifax	396	594	\$1,501
6					396	\$594	\$1,501		
15							18,104	\$24,795	\$1,370
16	H.R. STEEL BARS: CARBON	1	Brazil			Emerson	19	37	\$1,981
						Lansdowne	3	7	\$2,165
						Sarnia	59	123	\$2,076
		China			Edmonton	50	78	\$1,571	
					Kingsgate	0	0	\$3,404	
					Prince Rupert	41	157	\$3,806	
					NON-CONFIDENTIAL				

Concrete Reinforcing Bar I
Request for Normal Value Reviews -
Turkey

Public Summary of
Confidential Attachment 2
to the Request of the Domestic Producers

Confidential Attachment 2 contains MetalBulletin pricing for Turkish domestic rebar and scrap. This information is a subscription-based publication that is subject to copyright restrictions, the disclosure of which would cause financial harm to the Domestic Producers.



June 30, 2022

PUBLIC

SIMA Registry and Disclosure Unit
Anti-Dumping and Countervailing Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, ON K1A 0L8

Dear Sir/Madam:

**RE: Concrete Reinforcing Bar 1
Request for Normal Value Reviews – Turkey**

My name is Philippe Boulanger and I am the Vice-President and Chief Marketing Officer at ArcelorMittal Long Products Canada, G.P. (“**AMLPC**”). AMLPC is a Canadian rebar producer.

We are aware that at least two more vessels of approximately 25 000 MT each of Turkish rebar are expected to arrive in late August 2022. Several fabricators located in Eastern Canada confirmed they purchased several thousand tonnes of Turkish rebar rather than purchasing from AMLPC. As an example, one fabricator who usually purchases [

].

This is in addition to the 175,000 MT of low-priced Turkish rebar that arrived in March to May 2022. The entire Canadian rebar market is approximately 1.3 million MT. Such massive volumes of Turkish rebar cause significant price disruptions in the Canadian market and negatively impact AMLPC and the other Canadian rebar producers.

There are a small number of importers that account for the majority of offshore rebar imports in Canada, including from Turkey. These are InterMetal Rebar, Aciero KSE, and Jebsen & Jessen. These traders try to capture market share from the Canadian mills by offering Turkish rebar due to its low prices and Turkish producers’ high production capacity.

Turkish exporters are making new low-priced offers for arrival in September and October 2022. Turkish rebar is currently being offered at prices that are approximately \$[]/MT lower than us.

Further, a [

]. This significant excess capacity is due, in part, to the refusal of importers in various countries to purchase

ArcelorMittal Long Products Canada, g.p.
4000, route des Acières
Contrecoeur (Québec) J0L 1C0
Canada

Tel.: 450 587-8600
Fax: 450 587-8777
long-canada.arcelormittal.com

finished steel products from Turkey (including rebar) because of the use of Russian slab and billets as primary inputs. As a result of low-priced offers from Turkey, [

]. Similarly, our

[

].

AMLPC therefore requests that normal value reviews be initiated against Çolakoğlu Metalurji A.S., İçdas Çelik Enerji Tersane ve Ulaşım A.Ş., Kaptan Demir Çelik Endustrisi ve Ticaret A.S., and Kroman Çelik Sanayii A.Ş.

Yours truly,



Philippe Boulanger



June 30, 2022

NON-CONFIDENTIAL

SIMA Registry and Disclosure Unit
Anti-Dumping and Countervailing Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, ON K1A 0L8

Dear Sir/Madam:

**RE: Concrete Reinforcing Bar 1
Request for Normal Value Reviews – Turkey**

My name is Tom Sondgeroth and I am the Sales Manager for Rebar in the United States and Canada at Gerdau Ameristeel Corporation ("Gerdau"). Gerdau is a Canadian rebar producer with rebar production mills in Whitby, Ontario; Cambridge, Ontario; and Selkirk, Manitoba. We have been active supporters of antidumping action against dumped rebar from Turkey since the original investigation in 2014.

Over 2021 and the past few months, we have seen significant volumes of imports from Turkey arrive in Canada at prices far below our selling prices. We believe that these sales are being made using outdated normal values that are not keeping up with significant increases in prices in Turkey and raw material costs. Given this, we request that the CBSA initiate normal value reviews against Çolakoğlu Metalurji A.S., İçdas Çelik Enerji Tersane ve Ulaşım A.Ş., Kaptan Demir Celik Endustrisi ve Ticaret A.S., and Kroman Çelik Sanayii A.Ş.

Further, we are aware of several shipments of Turkish rebar that are expected to come in the next few months:

- [].
- [].

Yours truly,

A handwritten signature in blue ink, appearing to read 'Tom Sondgeroth'.

Tom Sondgeroth
Sales Manager



June 30, 2022

SIMA Registry and Disclosure Unit
Anti-Dumping and Countervailing Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, ON
K1A 0L8

Dear Sir/Madam:

RE: Concrete Reinforcing Bar 1
Request for Normal Value Reviews – Turkey

My name is Walter Sommerer and I am the CEO at Max Aicher North America (MANA). MANA is a Canadian rebar producer.

MANA requests that normal value reviews be initiated against Çolakoğlu Metalurji A.S., İçdas Çelik Enerji Tersane ve Ulaşım A.Ş., Kaptan Demir Çelik Endustrisi ve Ticaret A.S., and Kroman Çelik Sanayii A.Ş. Turkish rebar prices and costs have increased significantly since the 60-day period on which the normal values of these Turkish exporters were calculated and are therefore outdated.

Further, we are aware of two shipments of Turkish rebar, each between 20,000MT and 30,000MT, arriving in July and August of this year. We understand that the exporters are İçdas and Kaptan. The importer for the Kaptan shipment is IREPEX. We do not yet have visibility into the importer of the İçdas shipment. Turkish rebar continues to be offered at prices that significantly undercut our prices.

Yours truly,

A handwritten signature in blue ink, appearing to read "W. Sommerer", is written over a light blue grid background.

Walter Sommerer



Rebar imports into Canada

Source: Statistics Canada import data (data for 2022 is through April 2022)

Sum of Volume (MT)		Column Labels				
Row Labels	2018	2019	2020	2021	2022	Grand Total
Rebar 1	332,081	4,016	29,208	299,758	10,160	675,223
China	459	20	61	64	63	667
Korea, South	0	0	0	0	22	22
Turkey	331,621	3,997	29,146	299,694	10,075	674,534
Rebar 2	38,452	41,088	1,156	476	9,139	90,311
Belarus	25,574	0	0	0	0	25,574
Hong Kong	0	0	0	0	0	0
Japan	11	0	0	0	0	11
Portugal	0	30,272	0	0	0	30,272
Spain	12,093	10,265	109	0	8,939	31,405
Taiwan	775	550	1,047	476	200	3,048
Rebar 3	143,183	289,426	376,116	145,040	68,030	1,021,795
Algeria	0	26,147	44,551	0	0	70,698
Egypt	0	35,132	0	0	0	35,132
Indonesia	40,567	52,848	9,905	0	0	103,320
Italy	27	92,529	180,115	0	0	272,671
Malaysia	33,855	29,894	0	0	0	63,750
Singapore	40,576	52,876	41,627	0	0	135,078
Viet Nam	28,158	0	99,919	145,040	68,029	341,146
Rebar 4	0	0	43,618	20,192	0	63,810
Oman	0	0	25,049	20,192	0	45,241
Russian Federation	0	0	18,569	0	0	18,569
United States of America	242,580	89,761	173,552	174,323	42,999	723,215
Other countries	3,739	113,343	9,120	129,762	56,461	312,425
Australia	192	12	0	76	1	281
Belgium	0	1	1	0	0	2
Bulgaria	0	14	1	0	0	15
Canada	299	1,863	2,742	3,196	1,404	9,505
Czechia	0	0	0	2	0	2
Estonia	0	0	0	93	0	93
Finland	19	40	0	0	0	59
Germany	594	627	393	555	38	2,207

Sum of Unit value (\$/MT)		Column Labels				
Row Labels	2018	2019	2020	2021	2022	Grand Total
Rebar 1	\$763	\$3,607	\$647	\$881	\$975	\$830
China	\$987	\$1,726	\$2,648	\$2,653	\$612	\$1,284
Korea, South	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	\$3,551	\$3,551
Turkey	\$762	\$3,616	\$643	\$880	\$971	\$830
Rebar 2	\$739	\$813	\$1,276	\$1,464	\$1,077	\$817
Belarus	\$722	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	\$722
Hong Kong	#DIV/0!	\$3,000	\$2,563	\$3,000	#DIV/0!	\$2,682
Japan	\$786	#DIV/0!	#DIV/0!	\$392,818	#DIV/0!	\$4,372
Portugal	#DIV/0!	\$753	#DIV/0!	#DIV/0!	#DIV/0!	\$753
Spain	\$761	\$966	\$1,239	#DIV/0!	\$1,068	\$917
Taiwan	\$968	\$1,251	\$1,280	\$1,383	\$1,486	\$1,225
Rebar 3	\$780	\$737	\$693	\$891	\$899	\$760
Algeria	#DIV/0!	\$1,302	\$738	#DIV/0!	#DIV/0!	\$947
Egypt	#DIV/0!	\$736	#DIV/0!	#DIV/0!	#DIV/0!	\$736
Indonesia	\$742	\$670	\$578	#DIV/0!	#DIV/0!	\$690
Italy	\$1,183	\$647	\$701	#DIV/0!	\$6,986	\$682
Malaysia	\$789	\$670	#DIV/0!	#DIV/0!	#DIV/0!	\$733
Singapore	\$811	\$721	\$660	#DIV/0!	#DIV/0!	\$729
Viet Nam	\$780	\$674,500	\$686	\$891	\$899	\$823
Rebar 4	#DIV/0!	#DIV/0!	\$602	\$688	#DIV/0!	\$629
Oman	#DIV/0!	#DIV/0!	\$633	\$688	#DIV/0!	\$658
Russian Federation	#DIV/0!	#DIV/0!	\$560	#DIV/0!	#DIV/0!	\$560
United States of America	\$827	\$940	\$845	\$1,131	\$1,363	\$950
Other countries	\$985	\$1,200	\$894	\$1,081	\$1,072	\$1,116
Australia	\$1,082	\$5,401	#DIV/0!	\$1,805	\$5,357	\$1,475
Belgium	\$2,000	\$7,675	\$6,064	#DIV/0!	#DIV/0!	\$6,693
Bulgaria	#DIV/0!	\$1,331	\$1,359	#DIV/0!	#DIV/0!	\$1,332
Canada	\$853	\$731	\$699	\$813	\$733	\$754
Czechia	#DIV/0!	#DIV/0!	#DIV/0!	\$12,811	#DIV/0!	\$12,811
Estonia	#DIV/0!	#DIV/0!	#DIV/0!	\$1,389	#DIV/0!	\$1,389
Finland	\$1,156	\$1,146	#DIV/0!	\$1,282,632	#DIV/0!	\$1,563
Germany	\$983	\$1,919	\$1,806	\$1,944	\$4,731	\$1,701

India	0	86	81	0	0	167
Israel	0	23,934	0	0	0	23,934
Luxembourg	10	24	0	0	0	34
Mexico	2,559	76,443	4,805	16,290	21,627	121,724
Peru	37	11	0	10,005	0	10,053
Philippines	0	10,237	0	10,118	0	20,356
Poland	0	0	1,096	0	0	1,096
South Africa, Republic of	26	0	0	0	0	26
Sweden	0	0	0	0	21	21
Thailand	0	0	0	21,620	9,661	31,281
United Arab Emirates	0	0	0	67,766	23,708	91,475
United Kingdom	4	51	0	40	0	95
Grand Total	760,035	537,635	632,770	769,550	186,788	2,886,778

India	#DIV/0!	\$900	\$1,014	\$11,000	#DIV/0!	\$957
Israel	#DIV/0!	\$912	#DIV/0!	#DIV/0!	#DIV/0!	\$912
Luxembourg	\$1,236	\$3,042	#DIV/0!	#DIV/0!	#DIV/0!	\$2,517
Mexico	\$977	\$1,346	\$718	\$1,333	\$1,232	\$1,291
Peru	\$1,187	\$1,344	\$2,847	\$998	#DIV/0!	\$999
Philippines	#DIV/0!	\$800	#DIV/0!	\$1,021	#DIV/0!	\$910
Poland	#DIV/0!	#DIV/0!	\$1,812	#DIV/0!	#DIV/0!	\$1,812
South Africa, Republic of	\$1,928	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	\$1,928
Sweden	#DIV/0!	#DIV/0!	#DIV/0!	\$189,000	\$6,296	\$6,322
Thailand	#DIV/0!	#DIV/0!	#DIV/0!	\$939	\$1,100	\$989
United Arab Emirates	#DIV/0!	#DIV/0!	#DIV/0!	\$1,090	\$924	\$1,047
United Kingdom	\$1,832	\$4,398	#DIV/0!	\$2,883	#DIV/0!	\$3,650
Grand Total	\$786	\$896	\$730	\$968	\$1,071	\$861

HS codes for rebar

Current (as of Jan 1, 2022)	HS description
7213.10.00.11	Concrete reinforcing bars, of specification CSA G30.18: Of a diameter of 12 mm or less
7213.10.00.12	Concrete reinforcing bars, of specification CSA G30.18: Of a diameter of more than 12 mm but not exceeding 17 mm
7213.10.00.13	Concrete reinforcing bars, of specification CSA G30.18: Of a diameter exceeding 17 mm
7213.10.00.90	Concrete reinforcing bars, of specification CSA G30.18: Other
7214.20.00.11	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of 12 mm or less: With a maximum yield point of 400MPa
7214.20.00.12	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of 12 mm or less: With a minimum yield point greater than 400MPa but not exceeding 500MPa
7214.20.00.13	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of 12 mm or less: With a minimum yield point greater than 500MPa but not exceeding 600MPa
7214.20.00.14	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of 12 mm or less: With a minimum yield point greater than 600MPa
7214.20.00.21	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of more than 12 mm but not exceeding 39 mm: With a maximum yield point of 400MPa
7214.20.00.22	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of more than 12 mm but not exceeding 39 mm: With a minimum yield point greater than 400MPa but not exceeding 500MPa
7214.20.00.23	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of more than 12 mm but not exceeding 39 mm: With a minimum yield point greater than 500MPa but not exceeding 600MPa
7214.20.00.24	Concrete reinforcing bar, of specification CSA G30.18, with a diameter of more than 12 mm but not exceeding 39 mm: With a minimum yield point greater than 600MPa
7214.20.00.31	Concrete reinforcing bar, of specification CSA G30.18, with a diameter exceeding 39 mm: With a maximum yield point of 400MPa
7214.20.00.32	Concrete reinforcing bar, of specification CSA G30.18, with a diameter exceeding 39 mm: With a minimum yield point greater than 400MPa but not exceeding 500MPa
7214.20.00.33	Concrete reinforcing bar, of specification CSA G30.18, with a diameter exceeding 39 mm: With a minimum yield point greater than 500MPa but not exceeding 600MPa
7214.20.00.34	Concrete reinforcing bar, of specification CSA G30.18, with a diameter exceeding 39 mm: With a minimum yield point greater than 600MPa
7214.20.00.90	Containing indentations, ribs, grooves or other deformations produced during the rolling process or twisted after rolling: Other
7215.90.00.20	Corrosion-resistant rebar
7215.90.00.30	Other concrete reinforcing bars
7227.90.00.50	Other, containing indentations, ribs, grooves or other deformations produced during the rolling process
7228.30.00.51	Concrete reinforcing bars and rods: With a diameter of 12 mm or less
7228.30.00.52	Concrete reinforcing bars and rods: With a diameter of more than 12 mm but not exceeding 39 mm
7228.30.00.53	Concrete reinforcing bars and rods: With a diameter exceeding 39 mm
Feb 4, 2021 to Dec 31, 2021	
7213.10.00.11	Concrete reinforcing bars, of specification CSA G30.18: Of a diameter of 12 mm or less
7213.10.00.12	Concrete reinforcing bars, of specification CSA G30.18: Of a diameter of more than 12 mm but not exceeding 17 mm
7213.10.00.13	Concrete reinforcing bars, of specification CSA G30.18: Of a diameter exceeding 17 mm
7213.10.00.90	Concrete reinforcing bars, of specification CSA G30.18: Other
7215.90.00.20	Corrosion-resistant rebar
7215.90.00.30	Other concrete reinforcing bars
7227.90.00.50	Other, containing indentations, ribs, grooves or other deformations produced during the rolling process
Before Feb 4, 2021	
7213.10.00.00	Containing indentations, ribs, grooves or other deformations produced during the rolling process
7214.20.00.00	Containing indentations, ribs, grooves or other deformations produced during the rolling process or twisted after rolling

Concrete Reinforcing Bar I
Request for Normal Value Reviews -
Turkey

**Public Summary of
Confidential Attachment 7
to the Request of the Domestic Producers**

Confidential Attachment 7 contains various MetalBulletin Fastmarket articles from April to June 2022 regarding Russian billets and/or Turkey. This information is a subscription-based publication that is subject to copyright restrictions, the disclosure of which would cause financial harm to the Domestic Producers.

Concrete Reinforcing Bar I
Request for Normal Value Reviews -
Turkey

Public Summary of
Confidential Attachment 8
to the Request of the Domestic Producers

Confidential Attachment 8 contains various SBB articles dated June 2022 regarding Russian billets and/or Turkey. This information is a subscription-based publication that is subject to copyright restrictions, the disclosure of which would cause financial harm to the Domestic Producers.

Bank of Canada average monthly exchange rates

TERMS AND CONDITIONS

<https://www.bankofcanada.ca/terms/>

NAME

Monthly exchange rates

DESCRIPTION

Monthly average exchange rates - published by 16:30 ET on the last business day of each month. All Bank of Canada exchange rates are indicative rates only.

SERIES

id	label	description
FXMTRYCAD	TRY/CAD	Turkish lira to Canadian dollar monthly exchange rate
FXMUSDCAD	USD/CAD	US dollar to Canadian dollar monthly exchange rate

OBSERVATIONS

date	FXMTRYCAD	FXMUSDCAD
2017-01-01	0.3512	1.3193
2017-02-01	0.3577	1.3107
2017-03-01	0.3646	1.3386
2017-04-01	0.3681	1.3440
2017-05-01	0.3816	1.3607
2017-06-01	0.3778	1.3298
2017-07-01	0.3563	1.2689
2017-08-01	0.3596	1.2605
2017-09-01	0.3534	1.2283
2017-10-01	0.3427	1.2605
2017-11-01	0.3280	1.2769
2017-12-01	0.3325	1.2771
2018-01-01	0.3296	1.2427
2018-02-01	0.3324	1.2586
2018-03-01	0.3326	1.2932
2018-04-01	0.3133	1.2733
2018-05-01	0.2917	1.2873
2018-06-01	0.2836	1.3129
2018-07-01	0.2750	1.3130
2018-08-01	0.2203	1.3041
2018-09-01	0.2070	1.3037
2018-10-01	0.2244	1.3010
2018-11-01	0.2466	1.3200
2018-12-01	0.2524	1.3432
2019-01-01	0.2479	1.3301
2019-02-01	0.2503	1.3206
2019-03-01	0.2442	1.3368
2019-04-01	0.2323	1.3378

2019-05-01	0.2228	1.3459
2019-06-01	0.2289	1.3287
2019-07-01	0.2313	1.3101
2019-08-01	0.2349	1.3277
2019-09-01	0.2322	1.3241
2019-10-01	0.2280	1.3190
2019-11-01	0.2306	1.3239
2019-12-01	0.2251	1.3172
2020-01-01	0.2208	1.3087
2020-02-01	0.2189	1.3286
2020-03-01	0.2199	1.3953
2020-04-01	0.2048	1.4058
2020-05-01	0.2016	1.3970
2020-06-01	0.1987	1.3550
2020-07-01	0.1962	1.3499
2020-08-01	0.1813	1.3222
2020-09-01	0.1750	1.3228
2020-10-01	0.1661	1.3215
2020-11-01	0.1641	1.3068
2020-12-01	0.1661	1.2808
2021-01-01	0.1720	1.2724
2021-02-01	0.1789	1.2699
2021-03-01	0.1640	1.2574
2021-04-01	0.1529	1.2496
2021-05-01	0.1446	1.2126
2021-06-01	0.1417	1.2219
2021-07-01	0.1458	1.2529
2021-08-01	0.1486	1.2603
2021-09-01	0.1481	1.2671
2021-10-01	0.1350	1.2437
2021-11-01	0.1174	1.2570
2021-12-01	0.0939	1.2794
2022-01-01	0.0930	1.2616
2022-02-01	0.0932	1.2716
2022-03-01	0.0866	1.2658
2022-04-01	0.0858	1.2628
2022-05-01	0.0825	1.2852

Average FX	FXMTRYCAD
2017	0.3561
2018	0.2757
2019	0.2340
2020	0.1928
2021	0.1452
Jan-May 2022	0.0882

Bank of Canada average annual exchange rates

TERMS AND CONDITIONS

<https://www.bankofcanada.ca/terms/>

NAME

Annual exchange rates

DESCRIPTION

Annual average exchange rates - published by 16:30 ET on the last business day of each year. All Bank of Canada exchange rates are indicative rates only.

SERIES

id	label	description
FXATRYCAD	TRY/CAD	Turkish lira to Canadian dollar annual exchange rate
FXAUSDCAD	USD/CAD	US dollar to Canadian dollar annual exchange rate

OBSERVATIONS

date	FXATRYCAD	FXAUSDCAD
2017-01-01	0.3565	1.2986
2018-01-01	0.2759	1.2957
2019-01-01	0.2340	1.3269
2020-01-01	0.1930	1.3415
2021-01-01	0.1450	1.2535

% change

FXATRYCAD

2017	
2018	-23%
2019	-15%
2020	-18%
2021	-25%



June 30, 2022

SIMA Registry and Disclosure Unit
Anti-Dumping and Countervailing Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, ON K1A 0L8

Dear Sir/Madam:

RE: Concrete Reinforcing Bar 1
Request for Normal Value Reviews – Turkey

AltaSteel Inc. (“AltaSteel”) is a Canadian producer of concrete reinforcing bar.

AltaSteel hereby requests that the Canadian Border Services Agency initiate normal value reviews with respect to four Turkish rebar producers: Çolakoğlu Metalurji A.S., İçdas Çelik Enerji Tersane ve Ulaşım A.Ş., Kaptan Demir Çelik Endustrisi ve Ticaret A.S., and Kroman Çelik Sanayii A.Ş.

Turkish rebar prices and costs have increased significantly since the 60-day period on which the normal values of these Turkish exporters were calculated. Their normal values are therefore outdated and no longer reflect market pricing and costs. When this has occurred in the past, AltaSteel, along with other domestic rebar producers, have faced injury.

Yours truly,

A handwritten signature in blue ink, appearing to read "Zurbrigg".

Benjamin Zurbrigg
Vice President Sales & Procurement