



**REPUBLIC OF TURKEY
MINISTRY OF TRADE**

**CIRCUMVENTION QUESTIONNAIRE
FOR TRADERS IN EXPORTING COUNTRY**

**DIRECTORATE GENERAL OF IMPORTS
Department of Circumvention Investigations
Ankara, June 2020**



Product(s) Under Circumvention Investigation :

Woven Fabrics of Synthetic Filament Yarn
Woven Fabrics of Synthetic and Artificial Stable Fibers

HS Code(s) (for information only) :

54.07
55.13, 55.14, 55.15, 55.16

Anti-Dumping Measure(s) in Force :

54.07
CHINA, P.R. ; MALAYSIA; CHINESE TAIPEI; KOREA, REP. OF; MALAYSIA; THAILAND
By the Communiqué 2015/3 (published in the Official Gazette 21/01/2015 – 29243)

55.13, 55.14, 55.15, 55.16
CHINA, PR
By the Communiqué 2019/4 (published in the Official Gazette 31/12/2018 –30642)

Country(ies) Subject to Circumvention Investigation :

KINGDOM OF SPAIN, ITALIAN REPUBLIC, FEDERAL REPUBLIC OF GERMANY

Period of Circumvention Investigation (POI):

01/01/2017-30/06/2020

Initiation Communiqué for Circumvention Investigation:

By the Communiqué 2020/14 (published in the Official Gazette 26/06/2020 – 31167)

Legislative References :

- Agreement on the Implementation of Article VI of GATT 1994 annexed to the Agreement Establishing World Trade Organization (Anti-Dumping Agreement)
- Law on the Prevention of Unfair Competition in Imports (Law No. 3577)
(Official Gazette, 01.07.1989 / 20212)
- Law on the Prevention of Unfair Competition in Imports (Law No. 4412 – Amendment)
(Official Gazette, 25.07.1999 / 23766)
- Decree on the Prevention of Unfair Competition in Imports
(Official Gazette, 30.10.1999 / 23861 with Amendment – Official Gazette, 31.12.2005 / 26040)
- Regulation on the Prevention of Unfair Competition in Imports
(Official Gazette, 30.10.1999 / 23861 with Amendment – Official Gazette, 26.01.2006 / 26061)

Competent Authority :

T.C. TICARET BAKANLIGI
ITHALAT GENEL MUDURLUGU
İthalat Politikalarını İzleme ve Değerlendirme Dairesi
Sogutozu Mah. 2176. Sk. 06530 CANKAYA
ANKARA – TURKEY

Phone: (+90) 312 204 99444/9955
Fax: (+90) 312 212 87 65
E-mail: oeksorusturma@ticaret.gov.tr
Web: www.ticaret.gov.tr



PLEASE NOTE THAT A NON-CONFIDENTIAL VERSION OF YOUR RESPONSE TO THIS QUESTIONNAIRE ALSO HAS TO BE FILED ALONG WITH THE RESPONSE

INTRODUCTION

The purpose of this questionnaire is to permit the Turkish Authorities to obtain the information it deems necessary for its investigation.

With a view to ensure transparency in the investigation and to provide maximum protection of the mutual interest of the parties, requests to be made for such purposes must contain the grounds for the confidentiality request and the non-confidential summary of the information, or in case the impossibility of presenting such a summary, a certificate evidencing the justification there of must be submitted. If the request for confidential treatment is not warranted or in the event supplier of the information advises that, partial or full disclosure of the information would be inconvenient, such information may be disregarded.”

This questionnaire is made up of the following Sections and Appendices:

Section A requests general information concerning your company, e.g. legal form and organization structure.

Section B requests statistical data, e.g. total quantities and values of sale, financial statements.

Section C requests some specific information on export selling prices and terms of sale together with lists of all sales of the product under investigation when sold from the exporting country to Turkey.

Section D contains an authentication and certification form for the data provided in the questionnaire.

Appendix A : Listing format for sales

Appendix B : Profit and loss of the trader company

Each of the Sections A to D should be submitted in separate files and each document in each file should be clearly marked with the appropriate letter, e.g. Section A.

When answering the questionnaire, please read all the instructions carefully. It is in your own interest to reply as accurately and completely as possible and to attach supporting documents. You may supplement your response with additional data. This information can only be in addition to the specific responses of questions addressed in this questionnaire. If a question does not apply to your company, please explain clearly why this is the case.



The Authorities will carry out on-the-spot visits to examine the records of your company and to verify the information provided in this questionnaire.

You should be aware that your reply to the questionnaire will constitute the body of information on the basis of which preliminary and final findings will be made with regard to your company and your supplier/producers company. In this respect, it is essential that your reply to the questionnaire and any significant correction to it, is submitted within the time limits.

You should also be aware that the non-submission of all relevant information or the submission of incomplete, false or misleading information within the specified time limits could have unfavorable consequences for your company. In any of this circumstances, the Turkish authorities would apply Article 26 of the Regulation on Prevention of Unfair Competition in Importation and disregard any late response, or any responses which are significantly incomplete, false or misleading to an extent that they would be likely to impede the investigation process.

Where the Authorities decide to disregard a reply to a questionnaire it will establish preliminary or final findings on the basis of any other facts available which may include the information set out in the complaint.

Please do not hesitate to contact the Department of Circumvention Investigations (In Turkish: Ithalat Politikalarini Izleme ve Degerlendirme Dairesi) with any questions you may have regarding your responses to the questions or any difficulties in completing the questionnaire.

Some general instructions:

1. Answer questions in the order presented in the questionnaire. Listed information and tables should conform to the requested formats and should be clearly labeled. If you encounter difficulties with this you should contact the Department of Circumvention Investigations to find an acceptable solution. If there is insufficient space in any Section of the questionnaire to provide the detail asked for, you should attach Annexes indicating clearly to which Sections they relate.
2. All worksheets used in answering the questionnaire; in particular those linking the information supplied with management and accounting records, must be retained for subsequent inspection during the on-the-spot investigation.
3. To facilitate verification, identify sources and specify where the source documents are maintained. During the verification, you should be prepared to substantiate all information you submitted. Every part of the response should be able to be traced to regular company documents in the ordinary course of business.
4. It is essential that information be submitted both on a computer media and in written format. The files should be in European or American versions of the relevant software. A lack of computerized response may be considered as non-cooperation. If you feel that you cannot present the information as requested please contact the Authorities forthwith.



5. Section D should be signed by an authorized official. Specify the position of the official in the company.
6. Although the questionnaire is addressed to your company please be acknowledged that all subsidiaries or other related companies are also party to the proceeding. Detailed questions about your corporate structure are included in Section A of the questionnaire. Your attention is drawn to the fact that in cases where a subsidiary or other related company is involved in the sales or marketing of the product under investigation to Turkey, some tables in several sections must be completed for each and every related company concerned.
7. Identify clearly all units of measurement and currencies used in tables, lists and calculations. Where quantity is requested in Kilograms (Kg) it must be reported in Kilograms. In cases where it is necessary to identify a product using two different units of measurement together (e.g. for definition of universal lathes Kg and Piece units are required) please do so.
8. In case your company does not sell the product under investigation to Turkey or you have any doubts whether this questionnaire is applicable please consult the Department of Circumvention Investigations (full name and the address of the competent authority is given on first page of this questionnaire).
9. Unless otherwise specified replies should relate to the investigation period as defined on page 1 of this questionnaire.
10. The Investigating Authority may request additional information in any stage of the investigation.
11. While answering the questions please quote the full question from the Questionnaire and provide your answer below it as in example:

Question A-1: Identity and Communication

Supply the following details of your company.

Answer A-1: Name: X Company, located in Betaland, etc.



SECTION A - GENERAL INFORMATION

A - 1 Identity and Communication

Supply the following details of your company:

Company Name :
Company Address :
Contact Person :
Telephone :
Fax :
E-mail :
Web Site Address :

A - 2 Corporate information

1. Specify the legal form along with the corporate finance and accounting period of your company.
2. List principal shareholders (who own more than 1% of the shares during the investigation period) of the company as known and indicate the activities of these shareholders.

TABLE A-2.2 : LIST OF SHAREHOLDERS

Name of Shareholder	Percentage of Share Holding	Responsibility of Shareholder

3. Outline your company's worldwide corporate structure and affiliations, including parent companies, subsidiaries or other related companies. For this purpose you may supply a chart. Provide the names and addresses of all subsidiaries or other related companies in all countries, which are involved with the product under investigation. In addition, please identify all related companies, who supply you with the product under investigation or on whose behalf you sell the product in this proceeding. Specify what percentage of stock your company owns in each of these entities and what



percentage of stock each of these entities owns in your company. For this purpose use the following table:

TABLE A-2.3 : LIST OF THE RELATED COMPANIES

Name, address, telephone, fax of related company	Please tick if involved with the product under investigation ✓	List activities	Please tick if manufacturer of product under investigation ✓	Please tick if supplier for manufacturing of product under investigation ✓	Percentage of share-holding in related company %	Percentage of share-holding of related company in your company %

4. In all cases, please describe the nature of your relationship. State whether you share any board members or senior executives with any of those entities. If so, identify these persons and the nature of their mutual affiliations. Attach copies of any arrangements between the parties.

SECTION B- OPERATING STATISTICS

All values in this section should be provided in the currency in which your accounts are kept and the currency should be indicated in each table.

Please describe the method used in the conversion of foreign currencies into your domestic currency, e.g. daily, monthly, yearly weighted, etc:

B - 1 Total Quantity and Value of Sales

1. State the **total quantity and value** of all sales made by your company of the product under investigation for the POI in the following format:

TABLE B-1.1: SALES

Sales Volume	2017	2018	2019	2020/6
For export to Turkey				



Sales Volume	2017	2018	2019	2020/6
For export to other countries				
Total sales volume				

Sales Value	2017	2018	2019	2020/6
For export to Turkey				
For export to other countries				
Total sales volume				

2. In the same format with the table above, state the **total quantity and value** of all sales made by your company of the product under investigation **to the related purchasers** for the POI.

B - 2 Financial Statement

1. Attach an Turkish or English version of the audited income statement for the POI for your company. In case your company's financial accounts have not been audited attach the financial statement and other financial reports which are required by your country's business law.

SECTION C - EXPORT SALES OF THE PRODUCT UNDER INVESTIGATION TO TURKEY

This Section asks for specific information on all of your sales of the product under investigation for **export to Turkey**. In particular you should provide sales prices and pricing methods for these sales.

In order to determine which sales fall within the investigation period the invoice date should normally be used as the date of sale.

1. Explain your company's channels of distribution to Turkey starting from the factory gate of the supplier until the first resale to independent customers. Include a detailed flow chart indicating terms of sale and pricing to each class of customer (e.g. distributor, consumer etc.) including related companies. In the listings below you are requested to report a control number for each channel.
2. If your sales are made pursuant to contracts (either long term or short term), describe in detail the process by which the contracts, and the prices and quantities herein, are agreed to. Describe each of the types of the contracts applicable to product under investigation, including the terms, the requirements for a price change or re negotiation by either side, etc. Explain any commitments on either, should the contract be terminated prematurely.



3. Complete the following table in the annex showing the names of the related companies, total sales and average prices of sales of product under investigation for export to Turkey. Explain the differences in the invoicing and payment processes between the unrelated and related customers if there exist. Name the file "RECUSTUR".

TABLE C-3: RECUSTUR

Product Codes	Name of supplier	Unit buying price	Name of the Related Company	Total Quantity Sold in Turkey	Total Net Invoice value	Net Invoice Value Per Unit ¹	Total CIF value	CIF value per unit

4. Complete the following table in the annex showing the totals and average prices of sales of the product under investigation for export to Turkey of your company in the investigation period:

TABLE C-4: USTUR

Product Codes	Name of supplier	Unit Buying Price	Total quantity sold in Turkey	Total Net invoice value	Net Invoice Value Per Unit ¹	Total CIF value	CIF value per unit

¹ The relevant net invoice value is the total net turnover of the product under investigation after all discounts, rebates, etc.

¹ Please note: The relevant net invoice value is the total net turnover of the product under investigation after all discounts, rebates, etc.



- Prepare a listing showing your export sales to Turkey in a diskette as in the table format given in the annex along with the print out of the listing (for details of the computer file see paragraph 5 of introduction). Name the file as SALESTUR.

TABLE C-5: SALESTUR

"SALESTUR_FIRM NAME"																							
No	Producer	Exporter	Trader	Purchaser	Relation	Level of Trade	Invoice Number	Invoice Date	Product Code	Production Type	Product	Invoice Volume	Invoice Value	Discounts and	Currency	FX Rate	Terms of Delivery	Domestic Transportation and	External Freight and Insurance	Packing	Handling	Bank Cost and Commission	
1																							
2																							
3																							

- Supply a clear copy of all invoices, including purchasing (in Turkish or English translation) related with your export sales to Turkey for the product under investigation in the investigation period.
- Provide copies of all price lists (in Turkish or English translation) issued or in use during the investigation period for all customer types in Turkish market including those used by related companies
- List all different kinds of discounts or rebates you granted, e.g. cash discount, quantity discounts, year-end rebates, etc. and describe their term including deferred discounts. If discounts or rebates vary by level or category of customer, explain separately the discounts and rebates given to each class. Report the adjustment in the transaction-by-transaction listing named SALESTUR.
- List all charges which are included in the export prices and report the adjustments in the transaction-by-transaction listing named SALESTUR.
- Where the commissions or other payments were received from producers or supplier, report the amount of commissions and explain the terms under which commissions are received. Report the commission in the transaction-by-transaction listing named SALESTUR.

SECTION D- AUTHENTICITY AND CERTIFICATION

- Note that all pages of your response and its annexes should be signed and stamped as to demonstrate their authenticity.
- Sign below statement.



I, the undersigned, certify that all information herein supplied in response to the questionnaire is complete and correct to the best of my knowledge and belief, and understand that the information submitted will be subject to audit and verification by the Ministry of Trade.

Signature of authorized official

Date

Name and title of authorized official