



**REPUBLIC OF TURKEY
MINISTRY OF TRADE**

**CIRCUMVENTION QUESTIONNAIRE
FOR PRODUCERS/EXPORTERS 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 9944/9955

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

When answering the questionnaire please read all the instructions carefully.

The purpose of this questionnaire is to permit the Turkish Authorities to obtain the information deemed necessary for this 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 a meaningful non-confidential summary of all information submitted, or in case the impossibility of presenting such a summary, a certificate evidencing the justification thereof must be submitted. If the request for confidential treatment is not warranted or the meaningful non-confidential summary of the information is not submitted or in the event the supplier of the information advises that, partial or full disclosure of the information would be inconvenient, such information may be disregarded.

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 to the questions addressed in this questionnaire. If any 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 final findings will be made with regard to your company. In this respect, it is essential that your reply to the questionnaire and any material corrections are submitted within the time limits provided for this purpose, since considerable amount of preparatory work and analysis of replies have to be carried out prior to verification visits.

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 might have unfavorable consequences for your company. In any of these 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. In other words, in cases where the authority finds out at a certain stage of proceedings that the respondents have supplied falsified or misleading information deliberately, adverse facts available method will be resorted.



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

All information and documents which have not been submitted in electronic form must be submitted in scanned files saved in pdf format.

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

Some general instructions:

1. All producers/exporters in the exporting country should complete this questionnaire. (a) If you are just a trader of the product under investigation you must pass this questionnaire onto your supplier producer, and you must complete export sales information to Turkey (Section A&D) individually or together with your supplier producer. (b) If you are just a producer of the product under investigation and you export to Turkey via a trader company you must complete this questionnaire together with your trader or individually. Both producers and traders are responsible for coordinating the submission of all the information requested.
2. Although the questionnaire is addressed to your company it is understood that all subsidiaries or other related companies are also parties 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 subsidiaries or other related companies are involved in the sales or marketing of the product under investigation to Turkey, some tables in several sections have to be completed for each and every related company concerned.
3. 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. *If a question is not applicable to your company you must explain the reason(s) for it, i.e. please do not just put "not applicable" as the answer to a question.*
4. Each of the **Sections A to F** should be submitted in separate files and each document in each file should be clearly marked with the appropriate letter, e.g. Section A and stapled or binded.
5. Section F should be signed by an authorized official. Specify the position of the official in the company.
6. 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. Please note that such information might be required for the period of circumvention investigation.



7. To facilitate verification, identify sources of information 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.

8. 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.

9. Identify clearly all units of measurement and currencies used in tables, lists and calculations. Where it's requested that any unit of measurement be used as the unit of measurement for the response, you must report in that unit. 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.

10. Unless otherwise specified by the investigating authority, the reply should relate to the investigation period as defined on page 1 of this questionnaire.

11. The Investigating Authority may request additional information in any stage of the investigation.

12. 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 about 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 and indicate the responsibilities of these shareholders.

TABLE A-2.2 : LIST OF SHAREHOLDERS

As of 01/01/2017

Name of Shareholder	Percentage of Share Holding	Responsibility of Shareholder

As of 30/6/2020

Name of Shareholder	Percentage of Share Holding	Responsibility of Shareholder

3. Supply a diagram outlining the internal hierarchical and organizational structure of your company. The diagram should show all units involved in the production, sales, marketing and distribution of the product under investigation in both the domestic and export markets. Please indicate the units established after the imposition of the measure.



4. List all the products produced and/or sold by your company. Please indicate all product groups, if these products are classified in different groups.
5. Provide the following information for your company.
 - 5.1 City and address of the factory(ies) at where product under investigation is produced.
 - 5.2 Address of the unit at where, accounting, sales and production records are kept.
 - 5.3 Distance between each unit and means of transportation and durations.
6. 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. Please indicate and explain any changes happened after imposition of the measure.
7. Provide names and addresses of persons, agents, distributors and marketing companies in Turkey involved in sales/after sales of all products of your company. Add a code list of your all buyers including those in Turkey.
8. Provide the names and addresses, telephone and facsimile numbers of all subsidiaries or other related companies in all countries, which are involved with the product under investigation. Specify the activities of each related company. In addition, please identify all related companies, who supply you with inputs used in the manufacture of 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-2.8 : 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 %

9. 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 arrangement between the parties.
10. Specify in detail any financial or contractual links and joint ventures with any other company concerning R&D, production, sales, licensing, technical and patent or any other agreements for the product under investigation.
11. Specify the list of the companies which provide your company with the outsource services in production of the product under investigation and the activities of those companies. Add a code list of your all local and international suppliers.



12. Provide any printed matter introducing your company, production facilities and products such as catalogues, leaflets etc.
13. Narrate essential historical developments (changes in ownership, activity, production capability, buyouts, etc) in your company,
14. Provide annual audited financial reports and statements for the POI.
15. Provide the chart of accounts in all details.

A - 3 General Information on the Management Information System (MIS) of Your Company

1. Provide general information on your computer system (hardware and software, such as SAP or company developed one) used for your MIS and an organization chart of it, e.g. links between different locations/segments/activities like between headquarters and factories. Explain how different segments of the system are integrated if so.
2. List activities that can be controlled from the factory and headquarters (production orders, product planning, production lines, sales orders, stock control, loading, etc.)
3. List the databases kept and give brief information about their contents.
4. Explain for the possibility of verification of the information provided for the purposes of this investigation from headquarters or from the factory.

SECTION B - PRODUCT DESCRIPTION

1. Provide detailed description for the products manufactured by your company falling within the scope of investigation, in the format given below.

TABLE B-1: PRODUCTS UNDER INVESTIGATION

Product Code	CN Code	Name of the product	Detailed Technical definition of the product	Application Field of the Product (Where to Use)	Destination (Domestic/Turkey /Third Country)

2. Describe in detail your company's product coding system. Provide a key to your product codes, including all prefixes, suffixes, or other notation, which identify special product specifications. Explain whether identical types are listed under different product codes in the export and domestic market.



3. Provide a key to all codes used in your documents (invoices) indicating supplier (supplier code), design or license number (if any), and order/delivery information. Provide a key to these codes as well.

SECTION C - 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:

C - 1 Turnover

1. State your company's net turnover (after all discounts), free of taxes in the format of the following table for the POI.

TABLE C-1.1 : TURNOVER

	2017	2018	2019	2020/6
Total Company Turnover				
Domestic market				
Turkey				
Other countries				
Turnover of the product under investigation				
Domestic market				
Turkey				
Other countries				

2. In case the accounts of your company have been consolidated with related companies, prepare a table showing the consolidated turnover (after all discounts), free of taxes in the following format for the POI.

TABLE C-1.2 : CONSOLIDATED TURNOVER

	2017	2018	2019	2020/6
Total company group turnover				
-Domestic market				
-Turkey				
-Other Countries				



	2017	2018	2019	2020/6
Turnover of the product under investigation				
-Domestic market				
-Turkey				
-Other Countries				

2.1 Please explain in detail how the consolidation has been done.

C - 2 Total Quantity and Value of Sales

1. State the total quantity along with the unit of measurement and the value in local currency of all sales made by your company of the product under investigation in the following format for the POI.

TABLE C-2.1: SALES

		2017	2018	2019	2020/6
Sales Volume	Domestic Market				
	Export to Turkey				
	Export to Other Countries				
	Total Sales Volume				
Sales Value	Domestic Market				
	Export to Turkey				
	Export to Other Countries				
	Total Sales Value				
Unit Price	Domestic Market				
	Export to Turkey				
	Export to Other Countries				
	Unit Price for all Sales				

2. In a separate table at the format above, state the total quantity along with the unit of measurement and the value in local currency of all sales made by your company **to the related customers** of the product under investigation for the POI. The label of the table should be **TABLE C-2.2: SALES to RELATED**

C - 3 Production and Capacity Statistics

1. Describe the manufacturing process for the product under investigation. Your description should include, but not limited to the following:



- 1.1 A description of your company's production facility. If production or any one process takes place at more than one facility, list all facilities and provide brief descriptions of the production activities that take place at the major facilities.
- 1.2 Explain the production process of the product under investigation produced and sold by your firm from the beginning of the customer order to the shipment and attach a complete flowchart of the production cycle, including descriptions of each stage in the process and the documents produced.
- 1.3 State any difference of production process carried out by your company between Turkish market and domestic/third country markets.
- 1.4 Explain all changes in the production process of product under investigation during the POI.
- 1.5 If outsource services are provided in any production stage, list all those stages together with outsource service provider companies whether related or unrelated.
2. Provide a complete list of your purchases of Raw materials used for the production of the product under investigation and suppliers' name, for each year during the investigation period. Attached the Detailed Raw Material Ledger with English transaction of the main titles.
3. Give detailed explanations regarding your manufacturing overheads. Provide the Detailed Manufacturing Overhead Ledger with English transaction of the main titles.
4. Please provide the capacity report of your company for the product under investigation as given in the table below together with the explanation for the calculating methodology. Prepare the table given below separately for all products subject to the investigation

TABLE C-3.4: CAPACITY AND PRODUCTION

	2017	2018	2019	2020/6
Maximum production capacity *				
Actual production in quantity				
Capacity utilisation (%)**				
Company calculated capacity ***				
*Quantity of material produced taking into account 24 hours for each working day, 100% efficiency levels, speed of each production line and characteristics of final product. **Take into account the effective usage time, and characteristics of the material produced. *** Using your own standard methodology to calculate the capacity of your company to manufacture the product under investigation				



5. Give detailed information about number and type of machines in general and that are used for the production of product under investigation separately for the POI.

C - 4 Purchases

1. Provide the table in the following format, showing in summary your purchases of raw materials, semi-finished goods and finished goods for the POI. By semi-finished products we mean purchases of an article that can be made into finished products by an assembly or completion operation. This does not include manufacturing of a finished product from a commodity raw material, which can be traded in its raw form and used for many varied applications.

If you have any doubt as to whether you are purchasing a semi-finished product you should contact the Investigation Authority.

TABLE C-4.1: PURCHASES

		2017			2018			2019			2020/6		
		Value	Quantity	Unit sales price	Value	Quantity	Unit sales price	Value	Quantity	Unit sales price	Value	Quantity	Unit sales price
Total purchases of raw materials	From the country(ies) subject to antidumping measure												
	From the domestic market												
	From other countries												
Total purchases of semi-finished products	From the country(ies) subject to antidumping measure												
	From the domestic market												
	From other countries												
Total purchases of finished products	From the country(ies) subject to antidumping measure												
	From the domestic market												



		2017			2018			2019			2020/6		
		Value	Quantity	Unit sales price	Value	Quantity	Unit sales price	Value	Quantity	Unit sales price	Value	Quantity	Unit sales price
	From other countries												

- In a separate table at the format above, state all purchases made by your company **from the related suppliers** of the product under investigation for the POI.
- Provide the tables in the following format, showing **your purchases of raw materials and semi-finished goods from the country(ies) subject to antidumping measure** for POI.

TABLE C-4.2: PURCHASE OF SEMI-FINISHED PRODUCTS AND RAW MATERIALS

PURCHASES OF SEMI-FINISHED PRODUCTS											
Sequence number	Type of semi-finished products	Country of origin	Supplier name	Country of supplier	Related or unrelated ?	Invoice number	Date of purchase	Value of invoice	Invoice currency	Weight in metric tones	Delivery Term
1											
2											
3											
PURCHASES OF RAW MATERIALS											
Sequence number	Type of raw material	Country of origin	Supplier name	Country of supplier	Related or unrelated ?	Invoice number	Date of purchase	Value of invoice	Invoice currency	Weight in metric tones	Delivery Term
1											
2											
3											

C - 5 Stocks

- Complete the following table, showing the values and quantity of stocks of the product under investigation of your company and each related production company, separately.

TABLE C-5.1: STOCKS



<i>Period</i>	Stocks of product produced by the company		Stocks of purchased goods	
	Product in value	Product in quantity (metric tons)	Product in value	Product in quantity (metric tons)
Beginning of 2017				
End of 2017				
Beginning of 2018				
End of 2018				
Beginning of 2019				
End of 2019				
Beginning of 2020/6				
End of 2020/6				

C - 6 Investments

1. Provide the following table, showing your investments related to the product under investigation for the POI.

TABLE C-6.1: INVESTMENTS

	2017	2018	2019	2020/6
Buildings				
Production equipment and machinery				
Others (specify)				

C - 7 Employment

1. Provide the following table for the POI.

TABLE C-7.1: EMPLOYMENT

	2017	2018	2019	2020/6
Total personnel employed				



	2017	2018	2019	2020/6
Personnel employed in the production of the product under investigation				
Personnel employed in sales and administration of the product under investigation				

SECTION D - EXPORT SALES OF THE PRODUCT TO TURKEY

1. Regarding your all export sales to Turkey of the product under investigation for the POI.

1.1 Supply clear copies of **all** (i) proforma invoices or sales contracts (ii) invoices of direct export sales to Turkey (iii) local export invoices of indirect sales to trader (iv) invoices of export sales of traders to Turkey (v) certificates of origin (vi) all related transport documents including bill of lading and (vi) bank documents of payment (L/C or swift messages).

1.2 Provide a list showing all your export sales of the product under investigation to Turkey in "SALESTUR" table as shown below. Name the file "SALESTUR-short name of the company". Also submit the printout of the table.

TABLE D-1.1.2: SALESTUR

TABLE D-1.1.2: SALESTUR																												
"SALESTUR_FIRM NAME"																												
No	Producer	Exporter	Trader	Purchaser	Relation	Level of Trade	Invoice Number	Invoice Date	Product Code	Product Type*	For lining or not (Yes or no)**	Unit weight above 110 gr/m2? (Yes or no)**	Production Stages*****	Invoice Volume	Invoice Value	Discounts and Rebates	Currency	FX Rate	Terms of Delivery	Domestic Transportation and Insurance	External Freight and Insurance	Packing	Handling	Bank Cost and Commission	Direct Material Used in Production*****	Name of the Supplier of Direct Materials Used in Production	Country of Origin of the Supplier of Direct Materials Used in Production	
1																												
2																												
3																												

2. Fill in the below table for **all types** of the product under investigation **sold to Turkey** in the POI. The data given in this table is expected to be consistent with what you have used for your internal reports and what you report in the COPTUR table given below.

TABLE D-2: COP OF PRODUCT CODES



Unit Costs (Accounting Currency/Unit)		2017	2018	2019	2020/6
1.	DIRECT MATERIALS				
	a)				
	b)				
	c)				
2.	DIRECT LABOUR				
3.	MANUFACTURING OVERHEADS				
4.	COM (COST OF MANUFACTURING) (1+2+3)				
5.	SELLING, GENERAL & ADMINISTRATIVE EXPENSES				
6.	FINANCIAL EXPENSES				
7.	OTHER COSTS/EXPENSES				
8.	TOTAL COST OF PRODUCTION/SALES (4+5+6+7)				

3. For each year of the POI, by using “COP of Product Types” table, please fill out the following table for all types (codes) of the product under investigation sold to Turkey. Make sure that Product Code must be exactly same as those used in SALESTUR table.

TABLE D-3: COPTUR

Unit: Accounting Currency									
Product Code	Category	Direct Material	Direct Labor	Manufacturing Overheads	Unit COM	SG&A	Financial Expenses	Others	Unit COP

4. Provide lists of your suppliers/buyers and codes thereof. Provide a key to your suppliers/buyers codes, which identify specifications thereof.

SECTION E - IMPORT OF THE PRODUCT FROM THE COUNTRY SUBJECT TO ANTIDUMPING MEASURE

1. Regarding **your all imports** from China of the product under investigation for the POI:
- 1.1 Supply clear copies of **all** (i) invoices of direct imports from China (ii) import invoices of indirect sales to traders (iii) invoices of export sales of traders to Turkey (iv) certificates of origin (v) all transport documents including bill of lading.



1.2 Provide a list showing all your imports of the product under investigation from China in “CHINAIMPORTS” as shown below and in the annex. Name the file “IMPORTCHINA-short name of the company”. Also submit the printout of the table.

TABLE E.1.1.2: IMPORTS FROM CHINA

Sequence number	Country of origin	Supplier name	Country of supplier	Related or unrelated?	Invoice number	Date of purchase	Value of invoice	Invoice currency	Weight in metric tones	Delivery Term
1										
2										
3										

SECTION F- 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