



OTTAWA, September 19, 2025

SW 2025 IN

STATEMENT OF REASONS

Concerning the preliminary determination with respect to the dumping of

**CERTAIN CARBON AND ALLOY STEEL WIRE
ORIGINATING IN OR EXPORTED FROM
CHINA, CHINESE TAIPEI, INDIA, ITALY, MALAYSIA,
PORTUGAL, SPAIN, THAILAND, TÜRKIYE, AND VIETNAM**

DECISION

Pursuant to subsection 38(1) of the *Special Import Measures Act*, the Canada Border Services Agency made a preliminary determination on September 4, 2025, respecting the dumping of certain carbon and alloy steel wire originating in or exported from the People's Republic of China, the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu, the Republic of India, the Italian Republic, the Federation of Malaysia, the Portuguese Republic, the Kingdom of Spain, the Kingdom of Thailand, the Republic of Türkiye, and the Socialist Republic of Vietnam.

Cet *Énoncé des motifs* est également disponible en français.
This *Statement of Reasons* is also available in French.

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SUMMARY

[1] As a result of a written complaint from Sivaco Wire Group 2004, LP (“Sivaco”) and ArcelorMittal Long Products Canada G.P. (“AMLPC”) (hereinafter, “the complainants”), on April 22, 2025, pursuant to subsection 31(1) of the *Special Import Measures Act* (SIMA), the CBSA initiated an investigation respecting the dumping of certain carbon and alloy steel wire (hereinafter, “steel wire”) originating in or exported from the People’s Republic of China (China), the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu (Chinese Taipei), the Republic of India (India), the Italian Republic (Italy), the Federation of Malaysia (Malaysia), the Portuguese Republic (Portugal), the Kingdom of Spain (Spain), the Kingdom of Thailand (Thailand), the Republic of Türkiye (Türkiye), and the Socialist Republic of Vietnam (Vietnam) (collectively, “the subject countries”).

[2] Upon receiving notice of the initiation of the investigation, the Canadian International Trade Tribunal (CITT) commenced a preliminary injury inquiry, pursuant to subsection 34(2) of SIMA, into whether the evidence discloses a reasonable indication that the dumping of the above-mentioned goods have caused injury or are threatening to cause injury to the Canadian industry producing the like goods.

[3] On June 19, 2025, pursuant to subsection 37.1(1) of SIMA, the CITT made a preliminary determination that there is evidence that discloses a reasonable indication that the alleged dumping of steel wire originating in or exported from the subject countries has caused injury to the domestic industry.

[4] On September 4, 2025, as a result of the CBSA’s preliminary investigation and pursuant to subsection 38(1) of SIMA, the CBSA made a preliminary determination of dumping of steel wire originating in or exported from the subject countries.

[5] On the same date, pursuant to subsection 8(1) of SIMA, provisional duties were imposed on imports of dumped goods that are of the same description as any goods to which the preliminary determination applies, and that are released during the period commencing on the day the preliminary determination was made and ending on the earlier of the day on which the CBSA causes the investigation in respect of any goods to be terminated pursuant to subsection 41(1) of SIMA or the day the CITT makes an order or finding pursuant to subsection 43(1) of SIMA.

PERIOD OF INVESTIGATION

[6] The Period of Investigation (POI) and Profitability Analysis Period (PAP) for the investigation is January 1, 2024 to December 31, 2024.

INTERESTED PARTIES

[7] Interested parties were notified at the initiation of the investigation and were sent Requests for Information (RFI). Refer to the Initiation [*Statement of Reasons*](#) for additional information on interested parties.

Exporters

[8] The following ten exporters provided complete responses to the CBSA's dumping RFI in sufficient time to be considered for the preliminary determination:

Table 1

Country	Exporter
China	Shanxi Yuci Broad Wire Products Co., Ltd. ("Yuci Broad") ¹
	Tianjin Huayuan Metal Wire Products Co., Ltd. ("Huayuan") ²
Türkiye	BMS Birleşik Metal Sanayi ve Ticaret A.S. ("BMS") ³
Malaysia	Chin Herr Industries (M) Sdn Bhd ("Chin Herr") ⁴
	Wei Dat Steel Wire Sdn Bhd ("Wei Dat") ⁵
Portugal	Fapricela - Industria de Trefilaria, S.A. ("Fapricela") ⁶
	Ibermetais - Industria de Trefilagem, S.A. ("Ibermetais") ⁷
Thailand	TSN Wires Inc. ("TSN") ⁸
Vietnam	Hoa Phat Steel Wire Co., Ltd ("HPSW") ⁹
	United Nail Products Co., Ltd. ("United Nail") ¹⁰

¹ Exhibit 92 (PRO) & 93 (NC) – Response to Dumping RFI – Yuci Broad.

² Exhibit 120 (PRO) & 121 (NC) – Response to Dumping RFI – Huayuan.

³ Exhibit 115 (PRO) & 116 (NC) – Response to Dumping RFI – BMS.

⁴ Exhibit 79 (PRO) & 80 (NC) – Response to Dumping RFI – Chin Herr.

⁵ Exhibit 75 (PRO) & 76 (NC) – Response to Dumping RFI – Wei Dat.

⁶ Exhibit 97 (PRO) & 98 (NC) – Response to Dumping RFI – Fapricela.

⁷ Exhibit 102 (PRO) & 103 (NC) – Response to Dumping RFI – Ibermetais.

⁸ Exhibit 83 (PRO) & 84 (NC) – Response to Dumping RFI – TSN.

⁹ Exhibit 87 (PRO) & 88 (NC) – Response to Dumping RFI – HPSW.

¹⁰ Exhibit 72 (NC) – Response to Dumping RFI – United Nail.

[9] In addition, the following nine exporters provided deficient or late responses to the RFIs:

Table 2

Country	Exporter
China	Ningbo King Power Industry Co., Ltd. (“Ningbo King Power”) ¹¹
	Tianjin Xuhua Plastic Products Co., Ltd. (“Xuhua”) ¹²
Türkiye	Çokyaşar Halat Makina Tel Galvanizleme Sanayi Tic. A.Ş. (“Çokyaşar Halat”) ¹³
	Çokyaşar Tel Orme Vr Dokuma Tel Gal. Civi San. Tic. A.Ş. (“Çokyaşar Tel Orme”) ¹⁴
	Köşkerler Çelik Halat ve Mak. San. Tic. A.Ş. (“Köşkerler”) ¹⁵
	Özyaşar Tel Ve Galvanizleme Sanayi A.Ş. (“Özyaşar”) ¹⁶
India	Usha Martin Limited (“Usha Martin”) ¹⁷
Italy	Trafilieria F.lli Crotta S.R.L. (“Crotta”) ¹⁸
Spain	Moreda Riviere Trefilería, S.A. (“Moreda”) ¹⁹

[10] In addition, four Chinese exporters provided a response to the section 20 RFI: Yuci Broad²⁰, Ningbo King Power²¹, Xuhua²² and Huayuan²³.

Importers

[11] Four importers provided a response to the importer RFI: AMD Medicom Inc.²⁴; Ricova Châteauguay Inc.²⁵; Dollarama S.E.C./L.P.²⁶; and Structa Wire Corp.²⁷

Government

[12] The Government of China did not respond to the government section 20 RFI.

¹¹ Exhibit 137 (PRO) & 138 (NC) – Response to Dumping RFI – Ningbo King Power.

¹² Exhibit 127 (PRO) & 128 (NC) – Response to Dumping RFI – Xuhua.

¹³ Exhibit 225 (PRO) & 226 (NC) – Response to Dumping RFI – Çokyaşar Halat.

¹⁴ Exhibit 269 (PRO) & 270 (NC) – Response to Dumping RFI – Çokyaşar Tel Orme.

¹⁵ Exhibit 163 (PRO) & 164 (NC) – Response to Dumping RFI – Köşkerler.

¹⁶ Exhibit 193 (PRO) & 194 (NC) – Response to Dumping RFI – Özyaşar.

¹⁷ Exhibit 238 (PRO) & 239 (NC) – Response to Dumping RFI – Usha Martin.

¹⁸ Exhibit 119 (NC) – Response to Dumping RFI – Crotta.

¹⁹ Exhibit 132 (PRO) & 133 (NC) – Response to Dumping RFI – Moreda.

²⁰ Exhibit 89 (PRO) & 90 (NC) – Response to Section 20 RFI – Yuci Broad.

²¹ Exhibit 134 (PRO) & 135 (NC) – Response to Section 20 RFI – Ningbo King Power.

²² Exhibit 145 (PRO) & 146 (NC) – Response to Section 20 RFI – Xuhua.

²³ Exhibit 148 (PRO) & 149 (NC) – Response to Section 20 RFI – Huayuan.

²⁴ Exhibit 55 (PRO) & 56 (NC) – Response to Importer RFI – AMD Medicom Inc.

²⁵ Exhibit 65 (NC) – Response to Importer RFI – Ricova Châteauguay Inc.

²⁶ Exhibit 69 (PRO) & 70 (NC) – Response to Importer RFI – Dollarama S.E.C./L.P.

²⁷ Exhibit 105 (PRO) & 106 (NC) – Response to Importer RFI – Structa Wire Corp.

[13] The Government of Türkiye²⁸ provided a response to the Particular Market Situation (PMS) RFI.

Canadian Producers

[14] Three Canadian producers provided a response to the Canadian industry RFI: Sivaco²⁹; AMLPC³⁰; and Laurel Steel a Division of Nucor Steel ULC (“Laurel Steel”).³¹

PRODUCT INFORMATION

DEFINITION

[15] For the purpose of this investigation, subject goods are defined as:

Carbon or alloy steel wire, of round or other solid cross section, in nominal sizes up to and including 24.13 mm (0.950 inches) in diameter, whether or not coated or plated with zinc, zinc-aluminum alloy, or any other coating, including other base metals or polyvinyl chloride or other plastics, originating in or exported from the People’s Republic of China, the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu (Chinese Taipei), the Republic of India, the Italian Republic, the Federation of Malaysia, the Portuguese Republic, the Kingdom of Spain, the Kingdom of Thailand, the Republic of Türkiye, and the Socialist Republic of Vietnam, excluding the following:

- stainless steel wire (i.e., alloy steel wire containing, by weight, 1.2 % or less carbon and 10.5 % or more chromium, with or without other elements);
- wire of high-speed steel; and
- welding wire of any type.

[16] For additional product information, the production process, the classification of imports, like goods and classes of goods, and information on the Canadian industry, refer to the Initiation [*Statement of Reasons*](#).

IMPORTS INTO CANADA

[17] During the preliminary phase of the investigation, the CBSA refined the estimated volume and value of imports based on information from CBSA import entry documentation and other information received from exporters and importers.

²⁸ Exhibit 77 (PRO) & 78 (NC) – Response to PMS RFI – Government of Türkiye.

²⁹ Exhibit 45 (PRO) & 46 (NC) – Response to Canadian Industry RFI – Sivaco.

³⁰ Exhibit 48 (PRO) & 49 (NC) – Response to Canadian Industry RFI – AMLPC.

³¹ Exhibit 53 (PRO) & 54 (NC) – Response to Canadian Industry RFI – Laurel Steel.

[18] The following table presents the CBSA's analysis of imports of steel wire for the purposes of the preliminary determination:

Table 3: Import volume of Steel Wire
(January 1, 2024 to December 31, 2024)

Country of Origin or Export	Estimated % of Total Imports for POI (by volume)
Primary Countries	
China	51.2%
Türkiye	10.1%
Secondary Countries	
Chinese Taipei	0.6%
India	1.1%
Italy	1.3%
Malaysia	0.7%
Portugal	1.7%
Spain	2.0%
Thailand	0.5%
Vietnam	0.3%
Subtotal – Secondary Countries	8.2%
All Other Countries	30.5%
Total	100.0%

INVESTIGATION PROCESS

[19] Information was requested from all known and potential exporters, producers, vendors and importers, concerning shipments of steel wire released into Canada during the POI.

[20] Exporters/producers were also notified that failure to submit all required information and documentation, including non-confidential versions, failure to comply with all instructions contained in the RFI, failure to permit verification of any information or failure to provide documentation requested during the verification may result in the margin of dumping and the assessment of dumping duties on subject goods being based on facts available to the CBSA. Further, they were notified that a determination on the basis of facts available could be less favorable to them than if complete, verifiable information was made available.

[21] After reviewing the RFI responses, supplemental RFIs (SRFIs) were sent to responding parties, in order to clarify information provided in the responses and request additional information, where necessary.

[22] For the responding parties that did not provide complete information, deficiency letters were sent, in order to notify them that information was missing and that without the missing information, a preliminary determination would be made on the basis of facts available.

[23] The preliminary determination is based on the information available to the CBSA at the time of the preliminary determination. During the final phase of the investigation, the CBSA will continue to collect and verify information, the results of which will be incorporated into the CBSA's final decision, which must be made by December 3, 2025.

REPRESENTATIONS

[24] During the preliminary phase of the investigation, counsel for the complainants made representations concerning various exhibits on the administrative records, including certain RFI responses. These representations concern topics including the accuracy and completeness of information provided, and other missing or unclear information provided in the RFI responses. The complainants argue that certain exporter submissions should be considered deficient due to these concerns.

[25] Counsel for the complainants also made representations regarding section 20 and PMS.³²

[26] Counsel for the complainants made representations that section 20 conditions exist for steel wire in China. The representations provided evidence for arguments submitted at initiation; stated that as the Government of China failed to provide a response, the CBSA should apply a ministerial specification to find a section 20 exists; and stated that domestic prices in Chinese Taipei, India, Malaysia, Thailand, Türkiye, and Vietnam are not appropriate to compare to Chinese domestic prices due to distortions caused by Chinese imports.

[27] Counsel for the complainants made representations that a PMS exists for steel wire in Türkiye. The representations reiterated and provided evidence for arguments submitted at initiation; included new evidence on government support programs; and argued how an appropriate PMS analysis would compare the conditions in Türkiye during the POI to a previous undistorted period.

[28] The CBSA has noted the arguments submitted in these representations and will take them into consideration in the course of analyzing and verifying information for the purposes of the final decision.

³² Exhibit 130 (NC) – Comments Submitted by Counsel for Sivaco regarding the PMS RFI from the Government of Türkiye; Exhibit 248 (PRO) & 249 (NC) – Comments Submitted by Counsel for Sivaco regarding Section 20 in China and PMS in Türkiye; Exhibit 291 (PRO) & 292 (NC) – Commented Submitted by Counsel for AMLPC regarding Section 20 in China and PMS in Türkiye; Exhibit 306 (PRO) & 307 (NC) – Comments Submitted by Counsel for Sivaco regarding Section 20 in China.

DUMPING INVESTIGATION

NORMAL VALUE

[29] Normal values are generally estimated based on the domestic selling prices of like goods in the country of export, in accordance with the methodology of section 15 of SIMA, or on the aggregate of the cost of production of the goods, a reasonable amount for administrative, selling and all other costs, plus a reasonable amount for profits, in accordance with the methodology of paragraph 19(b) of SIMA.

EXPORT PRICE

[30] The export price of goods sold to importers in Canada is generally estimated in accordance with the methodology of section 24 of SIMA based on the lesser of the adjusted exporter's sale price for the goods or the adjusted importer's purchase price. These prices are adjusted where necessary by deducting the costs, charges, expenses, duties and taxes resulting from the exportation of the goods as provided for in subparagraphs 24(a)(i) to 24(a)(iii) of SIMA.

MARGIN OF DUMPING

[31] The estimated margin of dumping by exporter is equal to the amount by which the total estimated normal value exceeds the total estimated export price of the goods, expressed as a percentage of the total estimated export price. All subject goods imported into Canada during the POI are included in the estimation of the margins of dumping of the goods. Where the total estimated normal value of the goods does not exceed the total estimated export price of the goods, the margin of dumping is zero.

BACKGROUND OF SECTION 20 INQUIRY

[32] Section 20 is a provision of SIMA that may be applied to determine the normal value of goods in a dumping investigation where certain conditions prevail in the domestic market of the exporting country. In the case of a prescribed country under paragraph 20(1)(a) of SIMA, it is applied where, in the opinion of the CBSA, the government of that country substantially determines domestic prices and there is sufficient reason to believe that the domestic prices are not substantially the same as they would be in a competitive market.³³

[33] The provisions of section 20 are applied on a sector basis rather than on the country as a whole. The sector reviewed will normally only include the industry producing and exporting the goods under investigation.

³³ China is a prescribed country under Section 17.1 of the *Special Import Measures Regulations*.

[34] The complainant alleges that the conditions described in section 20 of SIMA prevail in the steel wire and long products steel sector in China. That is, the complainant alleges that this industry sector in China does not operate under competitive market conditions and consequently, the domestic prices of steel wire established in China, would not be reliable for determining normal values.

[35] In the event that the CBSA forms an opinion that domestic prices of steel wire in China are substantially determined by the government, and there is sufficient reason to believe that the domestic prices are not substantially the same as they would be if they were determined in a competitive market, the normal values of the goods under investigation will be determined, pursuant to paragraph 20(1)(c) of SIMA, where such information is available, on the basis of the domestic selling prices or the aggregate of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits of like goods sold by producers in any country designated by the CBSA and adjusted for price comparability; or, pursuant to paragraph 20(1)(d) of SIMA, where such information is available, on the basis of the selling price in Canada of like goods produced and imported from any country designated by the CBSA and adjusted for price comparability.

ANALYSIS OF SECTION 20 CONDITIONS

Government Control Analysis

[36] This section will present the CBSA's analysis of the extent the Government of China exerts control over the long products steel sector in China, by examining the following:

- Government of China's control over the long products steel sector;
- Steel plans, directives and other policy documents;
- Government of China's ownership and control of steel manufacturers;
- Government of China's provision of subsidies to steel wire manufacturers; and
- Government of China's intervention in the cost of production of steel.

Government of China's Control Over the Long Products Steel Sector

[37] The CBSA has previously determined that section 20 conditions exist in the long products steel sector in China on four occasions in the following proceedings:

- the galvanized steel wire investigation³⁴ in 2013;
- the concrete reinforcing bar investigation³⁵ in 2014;
- the concrete reinforcing bar re-investigation³⁶ in 2018; and
- most recently in the wire rod investigation³⁷ in 2024.

³⁴ Final determination *Statement of Reasons* for Galvanized Steel Wire – July 22, 2013.

³⁵ Final determination *Statement of Reasons* for Concrete Reinforcing Bar – December 10, 2014.

³⁶ *Notice of Conclusion* of Re-investigation for Re-Bar – May 4, 2018.

³⁷ Final determination *Statement of Reasons* for Wire Rod – September 19, 2024.

[38] The CBSA has previously found that a government can indirectly control the prices of the sector being investigated by controlling the prices of the primary inputs. Given that wire rod is the primary input material in the production of wire, the recent section 20 finding on the wire rod in China is highly relevant to the steel wire case.

[39] The substantial amount of information on the record for these previous findings supports the conclusion that the government may substantially determine prices in China's long products steel sector.

Steel Plans, Directives and Other Policy Documents

[40] The steel industry is regarded as a key industry by the Government of China. As such, the steel industry in China, including the long products steel sector, is subject to a variety of plans, directives and other policy documents issued by all levels of the Government of China, including the following:

- In August 2024, the Government of China issued "Notice of the General Office of the Ministry of Industry and Information Technology on Suspending Steel Production Capacity Replacement Work" requiring the suspension of new steel capacity replacement plans starting August 23, 2024.³⁸
- In August 2023, the Government of China released the "*Work Plan for Stabilizing Growth in the Steel Industry*" to guide and support the enhancement of supply and demand of steel in China.³⁹
- In March 2022, the Government of China released the "*Roadmap for high-quality development of iron and steel industry*" to guide the development of the iron and steel industry and aiming to rationalize the structure of the industry, ensuring global competitiveness, and technical advancement.⁴⁰
- In February 2022, the Government of China released guidelines for its steel industry to consolidate through mergers and acquisitions in order to "create world-class steel giants and accelerate the sector's high-quality development." In addition, financial institutions are urged to provide "comprehensive financial services to iron and steel enterprises pursuing M&As, structural adjustments, transformations and upgrading."⁴¹

³⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-54: MIIT, *Notice of the General Office of the Ministry of Industry and Information Technology on Suspending Steel Production Capacity Replacement Work*.

³⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-39: *Work Plan for Stabilizing Growth in the Steel Industry*.

⁴⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-40: National Development and Reform Commission, PRC, *China issues roadmap for high-quality development of iron and steel industry*.

⁴¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-46: Global Times, *China encourages steel industry consolidation through M&As among firms*.

- In May 2021, Chinese Premier Li Keqiang addressed the State Council at its executive meeting on the topic of rising steel prices, stating that “we must... deal with the excessively rapid increase in commodity prices and its collateral effects” and that such efforts were needed to “keep the economy running smoothly.”⁴²
- In March 2021, the Government of China released the “*14th Five Year Plan: Part III*” which is a directive identifying the transformation of traditional industries and improvements to the “layout and structure of raw material industries including... steel” as part of “implementing the manufacturing powerhouse strategy.”⁴³

[41] Based on evidence available on the record, as it relates specifically to the Chinese steel industry, government directives appear to be explicitly followed. The China Iron and Steel Association (CISA), a key industry association in China that works closely with the Government of China, has explicitly described itself as “guided by the Party’s lines” and that it “participates in making the industrial development planning, and relevant policies, laws and regulations”.⁴⁴ In October 2024, CISA urged steel mills “to be disciplined in restraining production” after Government of China stimulus led to increased steel prices.⁴⁵

[42] As shown by the above policies, the Government of China intervenes in the steel industry, including the long products steel sector, by increasing mergers and acquisitions to create larger and more efficient steel companies to guide the growth of the industry. The Government of China also exerts control on steel capacity and supply, which may impact the price of steel in China.

[43] Based on the substantial amount of information on the record of previous findings related to steel products, including the long products steel sector, and evidence discussed above, the CBSA finds that the Government of China actively releases plans, directives, policies, and guidelines for its domestic steel producers to follow in order to control its steel industry, including steel wire producers.

[44] The CBSA finds that the Government of China’s control over steel capacity and supply may result in distorted selling prices of these goods. The steel plans and directives in place provide support for the conclusion that the government may substantially determine prices in China’s long products steel sector.

⁴² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-52: CNN Business, ‘*Without an inch of steel.*’ Soaring metal prices spell trouble for China’s recovery.

⁴³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-41: Chinese Communist Party, *14th Five Year Plan: Part III*.

⁴⁴ Exhibit 383 (PRO) – Attachment 1 (NC) – China Iron and Steel Association, *About Us*.

⁴⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment A-53: Bloomberg, *China Steel Group Calls for Supply Restraint After Price Rally*.

Government of China's Ownership and Control of Steel Manufacturers

[45] Many of the largest steel manufacturers in China are State-Owned Enterprises (SOEs).

Table 4: Top 10 Steel Producers in China in 2023 by Volume

Company	2023 Production (MT)⁴⁶	State-Owned
China Baowu Group	130.8	Yes
AnSteel Group	55.9	Yes
HBIS Group	41.3	Yes
Shagang Group	40.5	No
Jianlong Group	37.0	No
Shougang Group	33.6	Yes
DeLong Steel	28.3	No
Hunan Steel Group	24.8	Yes
Fangda Steel	19.6	No
Shandong Steel Group	19.5	Yes
Total Production of Top 10 Steel Producers in China	431.2	
Total Production of Top 6 State-Owned Steel Producers	305.8	
Total Steel Production in China 2023 ⁴⁷	1,019.0	
Top 6 State-Owned Steel Producers as a % of Total China Steel Production in 2023	30.0%	

[46] As shown in the table above, of the top ten steel producers in China, six producers are state-owned. Many of these state-owned steel producers also produce downstream products such as wire rod and steel wire. For example, China Baowu Group, the largest steel producer in China, produces wire rod and steel wire.⁴⁸

[47] The CBSA finds that the significant presence of state-owned and state-controlled enterprises in both the steel sector and long products steel sector, suggests that sales of steel products may be influenced by non-market factors, such as fulfilling the Government of China's policy objectives. Consequently, domestic selling prices for steel wire in China may not be substantially the same as they would be if they were determined in a competitive market. This significant presence of SOEs supports the conclusion that the government may substantially determine prices in China's long products steel sector.

⁴⁶ Exhibit 383 (PRO) – Attachment 2 (NC) – World Steel, *Top Steel-Producing Companies in 2023/2022*.

⁴⁷ Exhibit 383 (PRO) – Attachment 3 (NC) – World Steel, *2024 World Steel in Figures*, pg. 6.

⁴⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-09: World Steel, *Top steel-producing companies 2023*; and Exhibit 383 (PRO) – Attachment 5 (NC) – World Benchmarking Alliance, *China Baowu Steel Group*.

Government of China's Provision of Subsidies to Steel Wire Manufacturers

[48] The recent subsidy notification submitted by the Government of China was criticized by the World Trade Organization Secretariat as lacking transparency.⁴⁹ Nevertheless, the available evidence indicates that steel wire manufacturers have received benefits and support from the Government of China.

[49] Chinese steel wire producers with public reporting requirements received direct subsidies worth approximately USD 198 million from the Government of China in 2023.⁵⁰ In addition, USD 120 million in subsidies was provided to Chinese steel wire rod producers in 2023.⁵¹ The complainants argue that since the amounts are only reported by companies with public reporting requirements, the actual amount of subsidies received is likely significantly higher.

[50] Subsidization of steel production enables the Government of China to influence the price of downstream products such as steel wire, as producers can purchase input materials below fair market value and reduce their production costs. These subsidies may, therefore, distort the domestic selling price of steel wire in China. The widespread presence of subsidies in the steel industry, including steel wire, further supports the conclusion that the government may substantially determine prices in the long products steel sector in China.

Government of China's Intervention in the Cost of Production of Steel

[51] The Government of China has taken several measures that may control costs with respect to raw materials for steelmaking. By intervening in upstream raw material inputs, the Government of China can substantially determine the prices of downstream products.

[52] Based on evidence available on the record, the Government of China maintains controls on raw materials for steel products, including steel billets, steel scrap, and iron ore.

[53] In 2021, amid concerns over tax evasion, the Government of China eliminated the VAT rebate for export that was available to exporters of certain steel goods including wire rod. At the same time, in May of 2021, the Government of China eliminated import duties on scrap and billet, allowing for an even greater supply of cheaper steel billet in China.⁵² These measures result in an increased supply in the Chinese domestic market causing downward pressure on domestic prices.

⁴⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-59: WTO, 8th Trade Policy Review: China, Report by the Secretariat, WT/TPR/S/415.

⁵⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-64: *Compilation of Direct Grants to Wire Producers Reported by Global Trade Alert*.

⁵¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-66: *Compilation of Direct Grants to Wire Rod Producers Reported by Global Trade Alert*.

⁵² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-73: *Steel Orbis, China cuts billet, scrap, pig iron import tax to zero*.

[54] The Government of China also actively takes measures to lower the price of iron ore, a key input in the manufacture of steel. In March 2023, the National Development and Reform Commission (NDRC) issued a warning that it would take measures to curb “unreasonable” iron ore prices and directed trading firms to avoid hoarding and inflating prices.⁵³

[55] In July 2022, the Government of China created the China Mineral Resources Group (CMRG) in order to achieve the following main objectives:

- consolidate the iron-ore purchasing activities of approximately 20 of China’s largest steel manufacturers;⁵⁴
- provide greater buying power to Chinese steel producers when sourcing their iron ore from global mining companies;⁵⁵
- entrust all state-owned iron ore import rights to CMRG;⁵⁶ and
- manage China’s overseas investments in mining, worth approximately USD 4.3 billion.⁵⁷

[56] The CBSA finds that these measures demonstrate the Government of China’s influence on steel production, including long products steel, particularly by distorting the prices of iron ore.

[57] The CBSA finds that as a result of these measures, the Government of China creates an environment where domestic prices of steel, may be artificially low, which benefit the producers of steel wire. As a result, the domestic selling prices of steel wire in China may not be substantially the same as they would be if they were determined in a competitive market.

Summary of Government Control Analysis

[58] The CBSA has previously found that the Government of China’s measures, policies and vested interest in the steel industry substantially determine the prices of steel and long products steel in the domestic industry and that these prices are substantially different than if they were determined in a competitive market.

[59] Specifically, the CBSA has previously issued opinions in respect of three steel products in the long products steel sector, namely, galvanized steel wire, concrete reinforcing bar and wire rod.

⁵³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-74: Mining.com, *Iron ore price falls on China warning, production controls in Tangshan*.

⁵⁴ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-75: GMK Center, *China’s new state agency will become a powerful buyer of iron ore*.

⁵⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-76: Mining.com, *How and Why China is centralizing its billion-ton iron ore trade*.

⁵⁶ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-78: SMM, *China Mineral Resources Group Purchases Iron Ore Intensively*.

⁵⁷ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Exhibit A-79: Business Insider, *The Chinese Entity That Could Change the Iron Market Forever*.

[60] The Government of China exerts control on the steel industry in general but also on the long products steel sector specifically, through various plans, directives and other policy documents that impact steel wire producers. In making corporate decisions, Chinese steel wire producers must adhere to the Government of China's macro-economic policies including measures related to steel production capacity and mergers and acquisitions. As a result, corporate decisions based on market dynamics of supply and demand compete with the Government of China's directives and mandates.

[61] The Government of China has significant ownership and control of steel manufacturers, including wire rod and steel wire manufacturers, in China. The presence of state-owned and state-controlled enterprises that produce steel necessitate that private companies supplying steel would have to compete with these state-owned and state-controlled enterprises operating under non-market conditions.

[62] Furthermore, the subsidization of the steel industry in general, and the long products steel sector in particular, demonstrates the Government of China's intent to exert control to maintain domestic prices at a certain level. These subsidies allow steel manufacturers to sell their products at prices below fair market value to producers of steel wire, who in turn, are able to sell their products at distorted prices. This may contribute to section 20 conditions in the long products steel sector.

[63] Through various actions and measures, the Government of China also influences the prices of the inputs of steel wire including steel billets, steel scrap, and iron ore.

[64] Overall, the cumulative impact of the Government of China's policies and actions indicate that the Government of China indirectly influences prices in the long products steel sector in China.

Price Analysis

[65] For the purposes of the preliminary determination, ten exporters, including two exporters from China, provided domestic sales databases.

[66] The CBSA compared Chinese domestic steel wire prices with those of other subject countries. The comparison showed that Chinese domestic prices of steel wire were generally comparable to those in Malaysia and Thailand. In addition, Vietnam largely had the lowest domestic prices of steel wire.

[67] Based on this price analysis, Chinese prices do not appear to be substantially different as they would be in a competitive market.

[68] The complainants made representations including providing their own price analysis and asserting that wire prices in Malaysia, Thailand, and Vietnam are distorted due to significant volumes of imports from China. Due to the confidentiality of the information provided, the CBSA cannot provide further details. These representations are currently under analysis and consideration. During the final phase of the investigation, the CBSA will continue to examine the pricing data.

PRELIMINARY RESULTS OF THE SECTION 20 INQUIRY

[69] Based on the analysis presented in this report, while the scope of the Government of China's macroeconomic policies and initiatives provides a compelling factual basis to suggest potential influence over the Chinese long product steel sector, the domestic prices of steel wire in China do not appear to be substantially different from what would be expected in a competitive market.

[70] For the purposes of the preliminary determination of dumping, the CBSA has not formed the opinion that domestic prices in the long product steel sector in China are substantially determined by the Government of China and that domestic prices are not substantially the same as they would be in a competitive market.

[71] During the final phase of the investigation, the CBSA will collect additional information and continue the section 20 inquiry.

BACKGROUND OF PARTICULAR MARKET SITUATION INQUIRY

[72] In accordance with paragraph 16(2)(c) of SIMA, and for purposes of determining normal values under section 15, the CBSA will not consider any sales of like goods for use in the country of export that do not permit a proper comparison with the goods sold to Canada due to the existence of a PMS. Further, for the purposes of constructing normal values pursuant to paragraph 19(b), the CBSA will not take into consideration the acquisition price of an input that does not allow a proper comparison as it does not reasonably reflect the actual costs of that input due to a PMS.

[73] Subsection 16(2.1) provides that, for the purposes of paragraph 16(2)(c), a PMS may be found to exist in respect of any goods of a particular exporter or of a particular country, as appropriate in the circumstances.

[74] In order to form an opinion that a PMS exists that impacts the subject goods, the CBSA must determine that there is a PMS and that it has caused a differentiated impact on the domestic and export prices that precludes a proper comparison.

[75] Where the CBSA is of the opinion that the domestic sales of like goods in the country of export do not permit a proper comparison with the sales of the goods to the importer in Canada because of a PMS, the normal value of those goods will be determined under section 19, where possible, or section 29.

[76] Further, data relied upon in the constructed normal values may not allow for a proper comparison between the subject goods and the sale of the subject goods to Canada due to distortions caused by the existence of a PMS. For instance, a PMS may be found where evidence shows that the acquisition cost of the distorted input in question represents a significant portion in the cost of production of the goods of a particular exporter or a particular country.

[77] In these circumstances, to disregard certain acquisition prices used in the cost of production, the CBSA has to form the opinion that in accordance with paragraph 16(2)(c) of SIMA, a PMS exists in the country of export that does not allow a proper comparison with the sale of like goods such that normal values cannot be determined in accordance with section 15 of SIMA and, when constructing a normal value in accordance with section 19 of SIMA, that this PMS distorts the costs of inputs used in the production of subject goods sold to the importer in Canada such that they do not allow for a proper comparison, as per subsection 11.2(2) of the *Special Import Measures Regulations* (SIMR).

ANALYSIS OF PMS

PMS Factors

[78] The primary PMS conditions, as provided by the complainants, were:

- Government purchases at established price ceilings;
- Volatile economic conditions; and
- Distorted inputs due to imported Russian and Chinese wire rod in Türkiye.

Government Purchases at Established Price Ceilings

[79] The evidence on the record shows that several ministries in Türkiye are required pursuant to Presidential Decree to provide price ceilings at which they will purchase inputs, including steel wire, for large infrastructure projects.⁵⁸

[80] Both the Ministry of National Defence and the Ministry of Environment, Urbanization, and Climate Change established a price ceiling of 28.50 Turkish lira (TRY) per kilogram for galvanized steel wire during 2024. Evidence was also provided that the Turkish government is planning several development projects that are expected to take place over the next few years for a total cost of over 1 trillion TRY (\$35 billion Canadian dollars). Of these projects, the aforementioned Ministry of Environment, Urbanization, and Climate Change will be a key player.⁵⁹

⁵⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment B-59: Government of Türkiye Presidential Decree No. 1, Article 97.

⁵⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 88-89 and Public Attachments B-60: Ministry of Environment, Urbanization and Climate Change, *2021 Construction and Installation Unit Prices*; B-61: Ministry of Environment, Urbanization and Climate Change, *2022 Construction and Installation Unit Prices*; B-62: Ministry of Environment, Urbanization and Climate Change, *2023 Construction and Installation Unit Prices*; B-63: Ministry of Environment, Urbanization and Climate Change, *2024 Construction and Installation Unit Prices*; B-64: Hurriyet Daily News, *Large-scale transformation project unveiled in Istanbul*; B-65: AGBI, *Turkey allocates \$35.5bn for new projects in 2024*; B-66: Business Wire, *Turkey Construction Industry Report 2024: Output to Grow by 3% this Year Before Recording a CAGR of 2.9% to 2028 - Growth Dynamics, Market Size & Forecasts - ResearchAndMarkets.com*; B-67: Presidency of Strategy and Budget, *Twelfth Development Plan (2024-2028)*; B-68: Ministry of National Defense, *2023 Construction Unit Prices*; and B-69: Ministry of National Defense, *2024 Construction Unit Prices*.

[81] It is the CBSA's position that a price ceiling could be a factor in a PMS because by placing a price ceiling on certain products, producers may not be able to sell steel wire domestically to a large purchaser (the government) at a market rate and will be forced to settle for prices which are less than they would be able to obtain elsewhere. Alternatively, a price ceiling may also encourage a producer to sell at the posted price, even if it is above the current market rate.

[82] The Government of Türkiye estimates that public sector projects made up roughly 13.9% of all construction projects in Türkiye during 2024.⁶⁰ However, the CBSA is of the opinion that even if the price ceilings are not valid for private construction projects, a large purchaser of a product may have an impact on the purchase prices of other purchasers in the same market as selling prices will reach an equilibrium as purchasers and sellers will attempt to maximize profit.

[83] The CBSA analyzed the exporter responses and found no evidence that exporters sold steel wire at these prices or to government entities during the POI. Further, the selling prices realized by the exporters did not appear to be impacted by these ceiling prices.

[84] Due to the trend comparison coupled with the low volume of projects for which these price ceilings are applicable, the CBSA finds that the established price ceilings are not contributing to a PMS in the steel wire sector for Türkiye.

Volatile Economic Conditions

[85] There is evidence on the record that a hyperinflationary situation existed in Türkiye during the POI. The complainants provided the general requirements that must exist for a country to be considered in a hyperinflationary environment and then provided supporting evidence as to how the Turkish economy meets these requirements, such as the inflationary rates in Türkiye.⁶¹

[86] Further, several large accounting firms and banks considered Türkiye to be in a hyperinflationary situation that started in 2022 and continued during the POI.⁶²

⁶⁰ Exhibit 189 (NC) – Response to PMS SRFI #1 – Government of Türkiye.

⁶¹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-03: IFRS, *IAS 29 – Financial Reporting in Hyperinflationary Economies*; B-04: KPMG, *How should companies account for hyperinflationary economies?*; B-05: CAQ, *IPTF Document for Discussion: Monitoring Inflation in Certain Countries*; B-06: Central Bank of the Republic of Türkiye, *Price Index (Consumer Prices)*; and B-09: Trading Economics, *Türkiye Inflation Rate: December 2022 Data - 1965-2021 Historical*.

⁶² Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-04: KPMG, *How should companies account for hyperinflationary economies?*; B-12: Ahval News, *Hyperinflation comes to Turkey for Citigroup, ING*; B-13: PwC Türkiye, *Inflation accounting – POSTPONED, Tax Bulletin 2022/03*; B-14: PWC, *Hyperinflation in Türkiye*; and B-17: PWC, *Hyperinflationary economies as at December 2024*.

[87] The Government of Türkiye took several actions in response to this situation, however the evidence shows that many of these actions had no, or the opposite, effect on eliminating the hyperinflationary situation. For example, the Government of Türkiye cut interest rates, underreported inflation, and prohibited companies from using the International Financial Reporting Standards' recommended hyperinflationary accounting practices.⁶³

[88] During the POI, the inflation rate began to improve, but was still considered hyperinflationary. Further, the Government of Türkiye eased up its restrictions on using hyperinflationary accounting practices, where businesses earning less than 50 million TRY will not make inflation adjustments, but others will.⁶⁴

[89] The complainants alleged that the hyperinflation experienced in Türkiye has led to depreciation of the TRY and that this does not allow for a proper comparison to be made between the sales in Türkiye and Canada. Evidence on the record shows a sharp decline of the TRY versus the Canadian dollar in 2022, and a continued devaluation since then.⁶⁵

[90] The CBSA compared the decline of TRY during the POI versus other currencies used by other countries in the investigation⁶⁶ as well as the United States Dollar (USD). TRY was the only currency that depreciated as compared to the Canadian dollar during the POI. All other currencies either stayed relatively flat, or increased during the second half of the POI.

[91] To assess whether the currency depreciation had any impact on the selling price of steel wire in Türkiye, the CBSA compared the trend in the average monthly exchange rate to the average monthly selling prices in Türkiye by the Turkish exporters.

⁶³ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-10: AP News, *Turkish central bank cuts rates again despite high inflation*; B-11: The Washington Post, *Turkish lira plunges to record low as Erdogan doubles down on economic policy his critics call 'insane'*; B-18: Turkish Minute, *Erdoğan, TurkStat under fire after release of data on record level of inflation*; B-19: BNN Bloomberg, *Turkish Inflation Calculations Clash After State Data Overhaul*; B-21: Bianet, *'Figures are a lie, poverty is real': Union members protest TurkStat after inflation announcement*; B-22: Turkish Minute, *Nearly half of AKP voters find TurkStat's inflation figures not credible*; B-23: Turkish Minute, *Majority of Turks believe TurkStat understates inflation figures*; B-24: duvaR.english, *Retired senior judge to sue Turkish stats institute TÜİK for underestimating inflation*; B-27: EY, *Türkiye enacts law to postpone inflation accounting and provides corporation tax exemption on gains related to conversions into Turkish Lira*; B-28: BMS Steel, *Annual Report (2023)*; and B-29: VergiPort, *Law No. 7352 (The Law on Amending the Tax Procedure Law and the Corporate Income Tax Law)*

⁶⁴ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 103 and Public Attachments B-25: Trading Economics, *Türkiye Inflation Rate*; B-32: CottGroup, *General Communiqué on Inflation Adjustment Published*; B-33: SRP Legal, *Tax Inflation Adjustment will not be applied in the first quarter of 2024*; and B-34: SRP Legal, *Taxpayers, Whose Gross Sales Are Below 50 million TRY as of December 31, 2023, Will Not Make Inflation Adjustments During Provisional Tax Periods*.

⁶⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-31: Bloomberg, *Turkish Firms Say 85% Inflation is Obscuring Profitability*.

⁶⁶ Other currencies used were: CNY – Chinese renminbi; EUR – European Euro; INR – Indian rupee; MYR – Malaysian ringgit; THB – Thai baht; TRY – Turkish lira; TWD – Taiwanese dollar; and USD – United States dollar.

[92] From this, the average domestic selling prices did not change significantly throughout the POI despite the downward trend in average exchange rates, including a few sharp declines. One reason for this is that the Turkish exporters did not typically sell goods domestically in TRY, instead all prices were quoted using USD or EUR. This likely mitigated impacts on the domestic selling prices.

[93] The CBSA compared the monthly average selling prices of steel wire in Türkiye with the selling prices in the markets of the other countries that are part of this investigation and where exporters responded. The CBSA found that the selling price of steel wire in Türkiye followed the same relatively stable trend as in the other markets during the POI. This is despite these other markets having very different currency fluctuation patterns during the POI.

[94] Therefore, while it appears that hyperinflation is occurring, which is leading to currency depreciation that is particular to Türkiye, it is the CBSA opinion that it does not have an impact on the domestic selling prices of steel wire in Türkiye.

Distorted Inputs Due to Imported Russian and Chinese Wire Rod in Türkiye

[95] The complainants alleged that the acquisition cost by Turkish exporters of wire rod used in the production of steel wire does not reasonably reflect the actual cost of wire rod. Evidence at the initiation of the investigation showed that due to restrictions by several countries on exports from Russia, wire rod, the principal input in steel wire, was entering Türkiye at a reduced price. This was supported by evidence that Russian wire rod has decreased in price and that it is entering Türkiye.⁶⁷

[96] It is the CBSA's opinion that imports of wire rod at distorted prices may have an impact on the selling price of steel wire in Türkiye because a large portion of the cost of steel wire is due to the cost of wire rod, the primary input. So any fluctuations in wire rod prices will likely cause changes in the price of steel wire. This can occur through lower input costs that result in lower selling prices of steel wire.

[97] Evidence on the record shows that a Turkish safeguard measure concerning wire rod came into force in June of 2024, midway through the POI. One of the reasons cited in the Government of Türkiye's decision for implementing a safeguard measure was that many countries put restrictions on Russian goods, but as Türkiye did not, Russian products freely entered the Turkish market and in 2022, 50% of all wire rod imports into Türkiye were from Russia. The safeguard measure placed a duty rate of \$175 USD/ton on imports of wire rod during the POI for all countries, except there is a quota where developing countries can export up to a total of 33,900 tons of wire rod to Türkiye duty free.⁶⁸

⁶⁷ Exhibit 1 (PRO) – Carbon and Alloy Steel Wire Complaint – Confidential Attachment B-39 and Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachment B-40: Ministry of Trade, *Türkiye Notice of Final Determination for Wire Rod Safeguard Investigation*.

⁶⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-40: Ministry of Trade, *Türkiye Notice of Final Determination for Wire Rod Safeguard Investigation*; B-49: WTO, *Türkiye launches safeguard investigation on wire rods*; B-50: Republic of Türkiye Ministry of Trade, *Safeguard Measures in Force*; and B-51: Yieh Corp *Türkiye extends safeguard measures on wire rod imports for 3 years*.

[98] Despite the safeguard in place, many Turkish producers are still able to purchase Russian wire rod and receive a refund on the duties paid because of Türkiye's Inward Processing Regime (IPR), where these duties are refunded if the finished steel wire is subsequently exported.⁶⁹ This can lead to a differentiated impact between the domestic and export selling prices as imported input materials are more likely to be used for export sales. As such, this will be discussed in more detail in the section on differentiated impacts.

[99] There is also evidence that Chinese wire rod is being imported at cheaper prices compared to wire rod in other markets, is also subject to safeguard measures in Türkiye, and importers may be getting a refund on duties through Türkiye's Inward Processing Regime.

[100] The complainants provided an analysis showing the correlation between wire rod selling prices in Türkiye and Southern Europe (typically Italy, Spain, and Portugal), as well as between Türkiye and Northern Europe (typically Germany, Belgium, and Netherlands). The complainants showed that before the Russian invasion of Ukraine, prices between these markets were heavily correlated, but after that period they became unrelated.⁷⁰

[101] The evidence provided by the complainants show that wire rod prices in Türkiye are higher than in other European markets. However, despite a price increase and decrease during the fall of 2024, the prices in Türkiye appear to follow the same trend as the other European markets. The evidence submitted by the complainants shows that wire rod prices in Türkiye may be distorted as they are higher than in other markets.

[102] The Government of Türkiye provided import statistics showing the volume and value of imports of wire rod into Türkiye during the POI. Imports of wire rod from China and Russia made up roughly 25% of all imports of wire rod into Türkiye during the POI. Further, imports of wire rod from Russia dropped to a negligible amount after the implementation of safeguards on imports of wire rod, which came into force on June 15, 2024.⁷¹

[103] The Government of Türkiye provided import volumes and prices on Türkiye's top 10 sources of wire rod imports. Comparing the average price of these sources, imports of Chinese and Russian wire rod are amongst the lowest, and the only countries with similar or lower average prices are Malaysia, Kazakhstan, and Iran, all of which have very low import volumes. The Government of Türkiye has also provided evidence that, while imports of wire rod from China are at a lower price than many other countries, they are also of a lower quality grade, which can also explain the difference.⁷²

⁶⁹ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Public Attachments B-52: SteelOrbis, *Market tries to assess shifts in wire rod segment due to Türkiye's new safeguard measure* and B-53: Turkish Steel Producers Association, *Press Release*.

⁷⁰ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 128-134.

⁷¹ Exhibit 78 (NC) – Response to PMS RFI – Government of Türkiye.

⁷² Exhibit 189 (NC) – Response to SRFI #1 – Government of Türkiye.

[104] The Government of Türkiye also provided information from the Turkish Steel Producers Association on the production and consumption of wire rod in Türkiye. However, they were unable to provide the same information on steel wire in Türkiye. This information shows that only 15.8% of wire rod consumed in Türkiye is from imported sources.⁷³ This means that Russian origin wire rod is only used in 1.0% of Turkish wire rod consumption and Chinese origin wire rod is only used in 3.1% of Turkish wire rod consumption, for a total of 4.1%.

[105] Distorted inputs accounting for only 4.1% of consumption is not a significant amount. However, this represents the consumption of all wire rod, not just for the production of steel wire. In contrast, responding exporters reported on average, a higher purchase volume of Chinese origin wire rod.

[106] From the above, it does not appear that imports of Russian wire rod are in significant enough volumes to have an impact on steel wire production costs in Türkiye. However, the CBSA is of the opinion that imports of Chinese wire rod may be at significant volumes. Next the CBSA will focus on whether the prices of these imports are distorted.

[107] Looking at the responding exporters' purchases of imported wire rod, Chinese wire rod was generally less expensive than wire rod produced in Türkiye, however its prices were no different than wire rod imported from other countries.

[108] The CBSA also compared the purchase price of wire rod by all responding exporters in the investigation. The price to purchase wire rod in Türkiye was in the middle, it was the cheapest wire rod in Europe (although not by much), but the most expensive wire rod in Asia. Türkiye is located in both continents.

[109] As mentioned previously, the Government of Türkiye provided evidence that differing grades of wire rod may be causing these differences in price, the CBSA did not have the information to do an analysis by grade of wire rod at this stage, but will endeavor to gather this information for the final determination.

[110] To summarize, there is no evidence that distorted Russian wire rod is having an impact on the selling price of steel wire in Türkiye, due to the negligible volume of Russian wire rod imports. Wire rod from China is being used in large quantities by the Turkish exporters. However, these imports of Chinese wire rod do not appear to have an impact on the price of wire rod in Türkiye as can be seen by the fact that Turkish wire rod prices are not out of line with the other countries analyzed. Further, any difference in price could be explained by differences in quality rather than distortions in price. Therefore, the CBSA is of the opinion that distorted wire rod from China and Russia is not leading to a PMS for steel wire in Türkiye.

⁷³ Exhibit 78 (NC) – Response to PMS RFI – Government of Türkiye

Other Factors

[111] The evidence on the record shows that the Government of Türkiye recently increased import duties on several types of steel wire ranging from 5% to 25%.⁷⁴ Limited information was provided on this change, but it appears to impact all steel wire from all countries.

[112] The evidence shows that this change did not come into force until January 1, 2025, which is after the POI. This means that whatever prompted this change in rates was possibly in effect during the POI. From the information in the complaint, this change may have been caused by a large volume of Chinese steel wire imported into Türkiye at distorted prices during the POI as well as the preceding years.⁷⁵ According to the Government of Türkiye's import statistics, 30.8% of steel wire imported into Türkiye during the POI was from China.⁷⁶

[113] If imports of Chinese steel wire into Türkiye distort the selling prices of all steel wire sold in Türkiye as the complainants allege, this will show a lower domestic selling price of all steel wire in Türkiye. This will be considered as part of the impact on domestic selling prices as discussed in the next section.

Summary

[114] From the information available, there is insufficient evidence to show that ceiling prices within the construction industry set by the Government of Türkiye, hyperinflation and currency fluctuation, or distorted input prices due to imports of wire rod from China and Russia are creating a PMS in Türkiye. Nor is there any evidence that these factors are working together to create a PMS.

Impact on Domestic Selling Prices

[115] Despite the fact that it does not appear that there are any factors leading to a PMS in the steel wire sector in Türkiye, the CBSA still did a pricing analysis to see if the selling price of steel wire in Türkiye is different than in another country.

[116] The complainants alleged that Southern Europe is an appropriate benchmark for a pricing comparison.⁷⁷ Southern Europe typically consists of Portugal, Spain, and Italy. All three of these countries are named in this investigation and have exporters that responded to the CBSA's RFI, however, only two responses from exporters in Portugal were considered substantially complete for the preliminary determination.

[117] Further, Türkiye is primarily located in Asia, with only a small portion in Europe. The majority of the responding Turkish exporters are located in Asia. This investigation is also looking at exports from several Asian countries and there are responses of several exporters from Asia on the record that include selling prices of steel wire.

⁷⁴ Exhibit 1 (PRO) – Carbon and Alloy Steel Wire Complaint – Confidential Attachment B-56.

⁷⁵ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 90.

⁷⁶ Exhibit 78 (NC) – Response to PMS RFI – Government of Türkiye.

⁷⁷ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 128-134.

[118] The CBSA compared the selling prices of steel wire in each country named in the investigation. This is the most appropriate information as the complainants were only able to provide selling prices of wire rod and not steel wire. From this, Türkiye has the highest domestic selling prices of steel wire.

[119] The CBSA observed that steel wire pricing varies based on a variety of factors, such as carbon content, coating, size, etc. Therefore the CBSA also looked at the selling price of different benchmark products. From this, the CBSA observed that some types of wire sell for nearly the same price in Türkiye as in other markets, while other types of wire are more expensive in Türkiye compared to other markets. In no case was steel wire less expensive in Türkiye.

[120] From the information available, there is sufficient evidence to show that the selling price of some types of steel wire in Türkiye is higher than in other markets. However, as indicated earlier, there is no evidence that there is a PMS that is causing this difference in prices.

Existence of PMS that Precludes Proper Comparison

[121] Despite the fact that there does not appear to be a PMS in the steel wire sector in Türkiye, the CBSA still considered what it would analyse to form an opinion that there is not a proper comparison with the sales in Türkiye and the sales of the goods to the importer in Canada.

[122] The hyperinflationary situation described previously has led to significant depreciation of the Turkish lira versus the Canadian dollar. In particular, the complainants have argued that the domestic selling price in Türkiye of a product would not be comparable to the selling price to Canada, even during the same 60 day period as the currency can fluctuate greatly during this short time.⁷⁸

[123] It can also be seen that the CAD/TRY exchange rate did fluctuate, but it is primarily due to a large dip in March 2024 and a second one in August 2024, otherwise the fluctuations are similar to other countries. The complainants' analysis for depreciation of the TRY focused on a very large period, and by focusing on just the POI the depreciation is not as significant.

[124] In addition, Turkish exporters typically do not sell in Turkish lira, which reduces the impact that currency fluctuations will have on selling prices, and ensures there is no difference between how goods are sold between markets.

⁷⁸ Exhibit 2 (NC) – Carbon and Alloy Steel Wire Complaint – Annex B, para. 115-117.

[125] With the introduction of safeguard measures on wire rod, imported wire rod now faces duties when they are imported. However, these duties can be refunded through Türkiye's Inward Processing Regime (IPR) if the imported wire rod is used in exported steel wire. During the POI, safeguard duties were equal to 175 USD / Ton.⁷⁹ If an exporter in Türkiye imports distorted inputs, they are more likely to use them in production of export goods to recover these costs, making export sales to Canada more impacted by distorted prices than domestic sales. Therefore, a proper comparison may not exist between goods exported to Canada and goods sold domestically due to the disproportionate use of distorted-priced inputs in exported goods.

[126] However for purposes of the preliminary determination, there is no evidence on the record that an exporter made use of Türkiye's IPR program to avoid safeguard duties on goods destined for Canada.

PRELIMINARY RESULTS OF THE PMS INQUIRY

[127] While the selling prices in Türkiye may be higher than in other countries, there is no evidence that this is caused by a PMS, nor is there evidence that the PMS is impacting differently the selling price to Canada and Türkiye. Therefore, the CBSA did not form the opinion that a PMS exists in regards to steel wire from Türkiye for the preliminary determination.

[128] During the final phase of the investigation, the CBSA will collect additional information and continue the PMS analysis.

PRELIMINARY RESULTS OF THE DUMPING INVESTIGATION

COOPERATIVE EXPORTERS

[129] For the ten exporters who submitted substantially complete responses to the dumping RFI, normal values were either estimated using the methodology of section 15 of SIMA based on domestic selling prices of like goods or paragraph 19(b) of SIMA, based on the aggregate of cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits. The costs of production were estimated pursuant to paragraph 11(1)(a) of *Special Import Measures Regulation* (SIMR), based on the costs associated with the production of the subject goods.

[130] For two exporters, TSN and HPSW, the costs of production were adjusted pursuant to SIMR paragraph 11.2(1)(b), to account for the supply of raw materials from their associated supplier(s).

[131] The amounts for profit were estimated in accordance with paragraph 11(1)(b) of the SIMR. The following table summarizes the cooperative exporters' estimation of normal values.

⁷⁹ Exhibit 78 (NC) – Response to PMS RFI – Government of Türkiye

Table 5: Summary of Estimation of Normal Values for Cooperative Exporters

Country	Exporter	Domestic Sales	Normal Values (SIMA Section)	Profit (SIMR Section)	Margin of Dumping (% of Export Price)
China	Yuci Broad	Yes	15 and 19(b)	11(1)(b)(ii)	3.5%
	Huayuan	Yes	15, 19(b), and 29 ⁸⁰	11(1)(b)(ii)	25.1%
Türkiye	BMS	Yes	15 & 19(b)	11(1)(b)(ii)	24.3%
Malaysia	Chin Herr	Yes	19(b)	11(1)(b)(ii)	3.7%
	Wei Dat	Yes	19(b)	11(1)(b)(ii)	9.4%
Portugal	Fapricela	Yes	15 and 19(b)	11(1)(b)(ii)	5.1%
	Ibermetais	Yes	19(b)	11(1)(b)(ii)	29.4%
Thailand	TSN	Yes	19(b)	11(1)(b)(ii)	15.9%
Vietnam	United Nail	Yes	19(b)	11(1)(b)(ii)	71.8%
	HPSW	Yes	15	N/A	13.4%

[132] During the POI, all of the subject goods exported to Canada by the cooperative exporters were sold to unrelated importers. Export prices were estimated using the methodology of section 24 of SIMA, as described in the “*Export Price*” section above.

ALL OTHER EXPORTERS

[133] In establishing the methodology for estimating the normal values and export prices for all other exporters, the CBSA considered all of the information on the administrative record, including the complaint filed by the domestic industry, the CBSA’s estimates at the initiation of the investigation, information submitted by parties who responded to the dumping RFI, and CBSA customs entry documentation.

[134] The CBSA decided that the normal values and export prices estimated for the exporters from the subject countries whose submissions were complete for purposes of the preliminary determination, rather than the information provided in the complaint or estimated at initiation, would be used to establish the methodology for estimating normal values for all other exporters of subject goods from each subject country since it is more relevant and reflects the trading practices of an exporter of subject goods during the POI.

⁸⁰ Some normal values for Huayuan were determined under section 29, as the sales could not be matched to the costs of production.

China, Türkiye, Malaysia, Portugal, Thailand and Vietnam

[135] On a country basis, the CBSA examined the difference between the estimated normal value and the estimated export price for each individual transaction of the cooperative exporters, and considered that the highest amount (expressed as a percentage of the export price), was an appropriate basis for estimating normal values. This methodology relies on information related to goods that originated in each subject country and in general, provides an incentive for exporters to participate by ensuring that exporters who have provided the necessary information requested in a dumping investigation will always have a more favourable outcome than those who have not participated.

[136] As a result, based on the facts available, for all other exporters that did not provide a response to the dumping RFI, normal values of subject goods originating in or exported from China, Türkiye, Malaysia, Portugal, Thailand and Vietnam were estimated based on the highest amount by which an estimated normal value exceeded the estimated export price, on an individual transaction basis for the cooperative exporters in the same country during the POI. The transactions were examined to ensure that no anomalies were considered, such as very low volume and value, effects of seasonality or other business factors. One anomaly was removed from the all others rate for China as it was significantly higher than the rest.

[137] The CBSA considered that the information submitted on the CBSA customs entry documentation was the best information on which to estimate the export price of the goods as it reflects actual import data.

Chinese Taipei, India, Italy, and Spain

[138] The CBSA did not receive any timely and substantially complete responses from exporters of steel wire located in Chinese Taipei, India, Italy, and Spain.

[139] The CBSA examined the difference between the estimated normal value and the estimated export price for each individual transaction of the cooperative exporters from other subject countries, and considered that the highest amount (expressed as a percentage of the export price), was an appropriate basis for estimating normal values. This methodology relies on information related to goods that originated in the other subject countries and in general, provides an incentive for exporters to participate by ensuring that exporters who have provided the necessary information requested in a dumping investigation will always have a more favourable outcome than those who have not participated.

[140] As a result, based on the facts available, for all exporters, normal values of subject goods originating in or exported from Chinese Taipei, India, Italy, and Spain were estimated based on the highest amount by which an estimated normal value exceeded the estimated export price, on an individual transaction basis for the cooperative exporters from other subject countries during the POI.

[141] Using the above methodologies, for the preliminary determination, the estimated margin of dumping for all other exporters is as follows:

Table 6: All Other Exporter's Margin of Dumping

Country	All Other Exporters Margin of Dumping (% of Export Price)
China	114.2%
Türkiye	79.6%
Chinese Taipei	138.6%
India	138.6%
Italy	138.6%
Malaysia	16.6%
Portugal	43.5%
Spain	138.6%
Thailand	29.6%
Vietnam	138.6%

SUMMARY OF PRELIMINARY RESULTS – DUMPING

[142] A summary of the preliminary results of the dumping investigation respecting all subject goods released into Canada during the POI are as follows:

Table 7: Summary of Preliminary Results - Dumping
(January 1, 2024 to December 31, 2024)

Country of Origin or Export / Exporter	Estimated % of Total Imports for POI (by volume)	Estimated Margin of Dumping (% of export price)
Primary Countries		
China	51.2%	
Shanxi Yuci Broad Wire Products Co., Ltd.	4.0%	3.5%
Tianjin Huayuan Metal Wire Products Co., Ltd.	5.5%	25.1%
All Other Exporters	41.7%	114.2%
Türkiye	10.1%	
BMS Birleşik Metal Sanayi ve Ticaret A.S.	4.6%	24.3%
All Other Exporters	5.5%	79.6%
Secondary Countries		
Chinese Taipei	0.6%	
All Exporters	0.6%	138.6%
India	1.1%	
All Exporters	1.1%	138.6%
Italy	1.3%	
All Exporters	1.3%	138.6%

Malaysia	0.7%	
Chin Herr Industries (M) Sdn Bhd	0.4%	3.7%
Wei Dat Steel Wire Sdn Bhd	0.3%	9.4%
All Other Exporters	0.0%	16.6%
Portugal	1.7%	
Fapricela - Industria de Trefilaria, S.A	0.2%	5.1%
Ibermetais - Industria de Trefilagem, S.A.	1.6%	29.4%
All Other Exporters	0.0%	43.5%
Spain	2.0%	
All Exporters	2.0%	138.6%
Thailand	0.5%	
TSN Wires Inc.	0.3%	15.9%
All Other Exporters	0.2%	29.6%
Vietnam	0.3%	
United Nail Products Co., Ltd.	0.2%	71.8%
Hoa Phat Steel Wire Co., Ltd.	0.0%	13.4%
All Other Exporters	0.1%	138.6%
Subtotal – Secondary Countries	8.2%	
All Other Countries	30.5%	
Total	100.0%	

NEGLIGIBILITY

[143] Under section 35 of SIMA, the CBSA is required to terminate an investigation prior to the preliminary determination if the volume of goods of a country is negligible.

[144] Pursuant to subsection 2(1) of SIMA, the volume of goods of a country is considered negligible if it accounts for less than 3% of the total volume of all goods of the same description that are released into Canada from all countries.

[145] However, if the total volume of imports of three or more countries, each of whose exports is less than 3% of the total volume of imported goods that are released into Canada from all countries and that are of the same description, is more than 7% of the total volume of imports that are released into Canada from all countries and that are of the same description, the volume of such goods from each country would not be considered negligible, pursuant to subsection 2(1) of SIMA.

[146] The table above confirms that the volume of imports from China and Türkiye are above 3% of the total volume of goods released into Canada.

[147] Furthermore, the volumes of imports from Chinese Taipei, India, Italy, Malaysia, Portugal, Spain, Thailand, and Vietnam are each less than 3% of the total volume of goods. However, the total volume of dumped imports from these countries is above 7% of the total volume of goods released into Canada from all countries.

[148] Based on the definition above, the volume of imports from the subject countries are not negligible.

INSIGNIFICANCE

[149] If, in making a preliminary determination, the CBSA determines that the margin of dumping of the goods of an exporter is insignificant pursuant to section 38 of SIMA, the investigation will continue in respect of those goods but provisional anti-dumping duties will not be imposed on goods of the same description imported during the provisional period. Pursuant to subsection 2(1) of SIMA, a margin of dumping of less than 2% of the export price of the goods is defined as insignificant.

[150] For all exporters, the estimated margin of dumping, expressed as a percentage of the export price, is above 2% and is, therefore, not insignificant. In respect of these goods, provisional anti-dumping duties will be imposed on goods of the same description imported during the provisional period.

[151] A summary of the estimated margins of dumping and provisional duties by exporter is presented in **Appendix 1**.

DECISION

[152] On September 4, 2025, pursuant to subsection 38(1) of SIMA, the CBSA made a preliminary determination of dumping respecting steel wire from China, Chinese Taipei, India, Italy, Malaysia, Portugal, Spain, Thailand, Türkiye, and Vietnam.

PROVISIONAL DUTY

[153] Pursuant to subsection 8(1) of SIMA, provisional duties payable by the importer in Canada will be applied to dumped imports of steel wire that are released from the CBSA during the period commencing on the day the preliminary determination is made and ending on the earlier of the day on which the CBSA causes the investigation in respect of any goods to be terminated, in accordance with subsection 41(1), or the day on which the CITT makes an order or finding. The CBSA considers that the imposition of provisional duties is needed to prevent injury. As noted in the CITT's preliminary determination, there is evidence that discloses a reasonable indication that the dumping of steel wire has caused injury to the domestic industry.

[154] Imports of steel wire originating in or exported from the subject countries, and released by the CBSA on or after September 4, 2025, will be subject to provisional duties equal to the estimated margin of dumping, expressed as a percentage of the export price of the goods. **Appendix 1** contains the estimated margins of dumping and rates of provisional duties.

[155] Importers are required to pay provisional duties in cash or by certified cheque. Alternatively, they may post security equal to the amount payable. Importers should contact their CBSA regional office if they require further information on the payment of provisional duties or the posting of security. If the importers of such goods do not indicate the required SIMA code or do not correctly describe the goods in the import documents, an administrative monetary penalty could be imposed. The imported goods are also subject to the *Customs Act*. As a result, failure to pay duties within the specified time will result in the application of the provisions of the *Customs Act* regarding interest.

FUTURE ACTION

THE CANADA BORDER SERVICES AGENCY

[156] The CBSA will continue its dumping investigation and will make a final decision by December 3, 2025.

[157] If the margin of dumping of any exporter is found to be insignificant, the CBSA will terminate the investigation in respect of goods of that exporter and any provisional duties paid or security posted will be refunded to importers, as appropriate. If the CBSA is satisfied that the goods were dumped, a final determination will be made.

THE CANADIAN INTERNATIONAL TRADE TRIBUNAL

[158] The CITT has begun its inquiry into the question of injury to the Canadian industry. The CITT is expected to issue its finding by January 2, 2026.

[159] If the CITT finds that the dumping has not caused injury, retardation or is not threatening to cause injury, the proceedings will be terminated and all provisional anti-dumping duty collected or security posted will be refunded.

[160] If the CITT makes a finding that the dumping has caused injury, retardation or is threatening to cause injury, anti-dumping duty in an amount equal to the margin of dumping will be levied, collected and paid on imports of steel wire that are of the same description as goods described in the CITT's finding.

[161] For purposes of the preliminary determination of dumping, the CBSA has responsibility for determining whether the actual and potential volume of goods is negligible. After a preliminary determination of dumping, the CITT assumes this responsibility. In accordance with subsection 42(4.1) of SIMA, the CITT is required to terminate its inquiry in respect of any goods if the CITT determines that the volume of dumped or subsidized goods from a country is negligible.

RETROACTIVE DUTY ON MASSIVE IMPORTATIONS

[162] Under certain circumstances, anti-dumping duty can be imposed retroactively on subject goods imported into Canada. When the CITT conducts its inquiry on material injury to the Canadian industry, it may consider if dumped goods that were imported close to or after the initiation of the investigation constitute massive importations over a relatively short period of time and have caused injury to the Canadian industry. Should the CITT issue a finding that there were recent massive importations of dumped goods that caused injury, imports of subject goods released by the CBSA in the 90 days preceding the day of the preliminary determination could be subject to anti-dumping duty.

UNDERTAKINGS

[163] After a preliminary determination of dumping by the CBSA, other than a preliminary determination in which a determination was made that the margin of dumping of the goods is insignificant, an exporter may submit a written undertaking to revise selling prices to Canada so that the margin of dumping or the injury caused by the dumping is eliminated.

[164] In view of the time needed for consideration of undertakings, written undertaking proposals should be made as early as possible, and no later than 60 days after the preliminary determination of dumping. Further details regarding undertakings can be found in the [CBSA's Memorandum D14-1-9](#).

[165] Interested parties may provide comments regarding the acceptability of undertakings within nine days of the receipt of an undertaking by the CBSA. The CBSA will maintain a list of parties who wish to be notified should an undertaking proposal be received. Those who are interested in being notified should provide their name, telephone, mailing address and email address to one of the officers identified in the “*Information*” section of this document.

[166] If undertakings were to be accepted, the investigation and the collection of provisional duties would be suspended. Notwithstanding the acceptance of an undertaking, an exporter may request that the CBSA's investigation be completed and that the CITT complete its injury inquiry.

PUBLICATION

[167] A notice of this preliminary determination of dumping will be published in the *Canada Gazette* pursuant to paragraph 38(3)(a) of SIMA.

INFORMATION

[168] This *Statement of Reasons* is available through the CBSA's website at the address below. For further information, please contact the email address identified below:

Email: simaregistry-depotlmsi@cbsa-asfc.gc.ca

Website: www.cbsa-asfc.gc.ca/sima-lmsi



Sean Borg

A/Executive Director
Trade and Anti-dumping Programs Directorate

ATTACHMENTS

Appendix 1: Summary of Estimated Margins of Dumping and Provisional Duty Payable

**APPENDIX 1 – SUMMARY OF ESTIMATED MARGINS OF DUMPING AND
PROVISIONAL DUTIES PAYABLE**

The following table lists the estimated margin of dumping and the provisional duty by exporter as a result of the decision mentioned above. Imports of subject goods released from the Canada Border Services Agency on or after September 4, 2025, will be subject to provisional duty at the rate specified below.

Country of Origin/Export or Exporter	Estimated Margin of Dumping (% of export price)	Provisional Duties (% of export price)
China		
Shanxi Yuci Broad Wire Products Co., Ltd.	3.5%	3.5%
Tianjin Huayuan Metal Wire Products Co., Ltd.	25.1%	25.1%
All Other Exporters		114.2%
Türkiye		
BMS Birleşik Metal Sanayi ve Ticaret A.S.	24.3%	24.3%
All Other Exporters		79.6%
Chinese Taipei		
All Exporters		138.6%
India		
All Exporters		138.6%
Italy		
All Exporters		138.6%
Malaysia		
Chin Herr Industries (M) Sdn Bhd	3.7%	3.7%
Wei Dat Steel Wire Sdn Bhd	9.4%	9.4%
All Other Exporters		16.6%
Portugal		
Fapricela - Industria de Trefilaria, S.A	5.1%	5.1%
Ibermetais - Industria de Trefilagem, S.A.	29.4%	29.4%
All Other Exporters		43.5%
Spain		
All Exporters		138.6%
Thailand		
TSN Wires Inc.	15.9%	15.9%
All Other Exporters		29.6%
Vietnam		
United Nail Products Co., Ltd.	71.8%	71.8%
Hoa Phat Steel Wire Co., Ltd.	13.4%	13.4%
All Other Exporters		138.6%