

Anti-Dumping Commission  
Investigation No. 495  
Steel Reinforcing Bar

TER 495A Non-confidential Attachment 1  
Government of Turkey email submission



**REPUBLIC OF TURKEY  
MINISTRY OF TRADE  
Directorate General of Exports**

**CONSULTATION TEXT OF TURKEY CONDUCTED UNDER ARTICLE 13 (1) OF  
THE AGREEMENT ON SUBSIDIES AND COUNTERVAILING MEASURES, WITH  
RESPECT TO THE COUNTERVAILING DUTY PETITION FOR STEEL  
REINFORCING BAR IMPORTED FROM TURKEY**

First of all we would like to thank you on behalf of the Government of Turkey for giving us this opportunity to present our views and clarify certain points as regards the petition made by Liberty OneSteel (Newcastle) Pty Ltd.

Before we would like to make a few remarks regarding bilateral trade between Turkey and Australia as well as trade figures with respect to the steel reinforcing bar (rebar).

Bilateral trade between Turkey and the Australia was recorded as 2,7 billion dollars in 2017. Turkey exported 538 million dollars while Australia exported to Turkey 2,2 billion dollars. As such trade balance was in favour of Australia in 2017. Turkey has concerns that should Australia initiate an investigation this will have significant adverse effects on the bilateral trade to the detriment of Turkey.

According to TradeMap database, the share of Turkey in Australian total imports of rebar from the world is negligible for the last five years on 6 digit basis. Imports from Turkey corresponds to 0,01%, 0,08% and 0,19 % of total rebar imports of Australia from the world in the years 2015, 2016, 2017 respectively. In 2017, Turkey appears to be the 9<sup>th</sup> rebar supplier in Australia quantity-wise.

We would like to recall that according to Paragraph b of Article 27.10 of Agreement on Subsidies and Countervailing Measures, “*Any countervailing duty investigation of a product originating in a developing country Member shall be terminated as soon as the authorities concerned determine that: the volume of the subsidized imports represents less than 4 per cent of the total imports of the like product in the importing Member,...*”. We are aware that according to the domestic legislation of Australia, Turkey is considered as a developing country.

It is important to note that, Australian authorities terminated two anti-dumping investigations against Turkey's imports of "Steel Reinforcing Bar" and "Rod in Coils" in 2015, which was initiated by the request of the petitioner making allegations of subsidized import from Turkey this time. This is an indication that Turkish exports are fairly priced and the domestic industry is trying to seek ways to close the Australian market to fair competition.

Now we would like proceed with our remarks on the alleged programs mentioned in the compliant.

Subsidy allegation part of the petition is mainly established on the US countervailing duty proceeding against rebar imported from Turkey (rebar investigation). However, some of these programs examined in the investigations are repealed and do not exist anymore, some are not used by Turkish steel reinforcing bar exporters to Australia at all, some were found to be are non-countervailable, and the rest was found to confer negligible benefits to the companies exporting rebar to Australia.

**Inward Processing Regime (IPR):**

IPR is a system allowing Turkish manufacturers/exporters to obtain raw materials, intermediate unfinished goods that are used in the production of the exported goods without paying customs duty including Value Added Tax and without being subject to commercial policy measures, if any. Turkey has a system in place to confirm which inputs, and in what amounts are consumed in the production of the exported products under Inward Processing Regime (IPR). Decisions on acceptance or rejection are based on whether a set of legal conditions and economic criteria are fulfilled. Companies are subject to heavy sanctions in case of noncompliance with the relevant IPR legislation.

The US Department of Commerce (USDOC) has repeatedly investigated, verified and found that Turkey's IPR is not countervailable.<sup>1</sup> In the US' rebar investigation a margin of 14% was calculated by the USDOC by resorting to a punitive adverse facts available alleging this program as discovered during the verification. Yet the respondent companies have fully co-operated during this mentioned investigation however they simply did not felt the necessity to report the usage of this exemption based on USDOC's repeated past findings of non-countervailibility of the

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<sup>1</sup> Decision Memorandum for Final Results of Countervailing Duty Administrative Review of Steel Concrete Reinforcing Bar from the Republic of Turkey; 2015.

program. Likewise, USDOC continued to find this exemption non-countervailable on other subsequent subsidy investigation on “Carbon and Alloy Steel Wire Rod”<sup>2</sup>.

**Assistance to Offset Costs Related to Antidumping/CVD Investigations:**

This assistance is provided by Exporter’s Associations, which gather their revenue entirely from members, which are private companies. Based on its budget, which is composed of its members’ contributions, it is up to the relevant exporters’ association’s discretion to accept or reject a member’s application to receive any assistance. GOT does not entrust or direct exporters’ associations to make financial contributions to their members. Moreover, in the 2014 Administrative Review of Steel Concrete Reinforcing Bar<sup>3</sup> the Department determined that there is no financial contribution from the GOT to the respondent companies. The Department concluded that assistance to offset costs related to AD/CVD investigations by exporters’ associations is not a countervailable subsidy and stated that “*We thus preliminary determine that there is no financial contribution from the GOT to ... through the assistance that ... received from the TSEA. As such, we preliminarily conclude that assistance to offset costs related to AD/CVD investigations by the TSEA is not a countervailable subsidy under section 771(5) of the Act.*”

**Natural Gas for Less than Adequate Remuneration:**

There is no program as provision of natural gas for less than adequate remuneration. Until recently the reference made in the petitioners’ allegations to the US Department of Commerce erroneously relied on country-specific industrial natural gas prices published by the International Energy Agency (IEA) which consisted of the European countries’ gas prices even though there is no imports of natural gas from European countries into Turkey via pipeline. However, as it was explained in the Decision Memorandum for Final Results of Countervailing Duty 2015 Administrative Review of Steel Concrete Reinforcing Bar from the Republic of Turkey dated April 9, 2018 the Department stated that “*... evidence on the record of this review shows that, for imports of natural gas into Turkey, the requisite inflow pipeline connections are limited to Azerbaijan, Iran, and Russia. Consequently, we preliminarily determined that natural gas prices from the European countries that compose the IEA data would not be available to purchasers in Turkey via the existing pipelines...*” and finally the Department came to a conclusion with “*... Consequently, consistent with the Preliminary Results, we continue to find that no benefit was*

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<sup>2</sup> Countervailing Duty Investigation of Carbon and Alloy Steel Wire Rod from the Republic of Turkey: Issues and Decision Memorandum for the Final Affirmative Determination, March 19, 2018.

<sup>3</sup> Decision Memorandum for Preliminary Results of Countervailing Duty 2014 Administrative Review of Steel Concrete Reinforcing Bar from Turkey, December 5, 2016.

*provided by the GOT to ... during the POR through its purchases of natural gas from BOTAS.*"<sup>4</sup>. Similar decision was also taken by the USDOC in the Issues and Decision Memorandum for the Final Affirmative Determination on Countervailing Duty Investigation of Carbon Alloy Steel Wire Rod from the Republic of Turkey dated March 19, 2018. The Department again did not use the petitioners' submission of the IEA's benchmarks which were consisting of the European countries' natural gas prices, instead the Department used the Russian Eurostat data for the calculation of natural gas benchmark prices and calculated less than 0.005 % subsidy margin for this program.

**Deductions from Taxable Income for Export Revenue:**

Under this program taxpayers may have an additional deduction of a lump sum amount from their gross income but this amount may not exceed 0.5 % of the proceeds they earned in foreign exchange. To calculate the benefit from this program, deducted amount of taxpayers' earnings should be multiplied by the corporate tax rate. Taking into account the corporate tax rate in Turkey is 20 %, the maximum benefit from this program can only be 0.1 % (20 % \* 0.5 % = 0.1 %). Parallel with this USDOC calculated negligible rates for the companies in different proceedings<sup>5</sup>.

**Rediscount Program:**

Another program mentioned in the petition is Rediscount Program. In a recent US proceeding against Carbon and Alloy Steel Wire Rod from Turkey, Department again calculated less than 0,005 %<sup>6</sup>.

**Investment Encouragement Program VAT and Import Duty Exemptions, Regional and Large-Scale Investment Schemes:**

According to the Annex IV of the Decree No 2012/3305, the iron and steel products are excluded from all investment incentive schemes, with the exception of general investment scheme due to the obligations stemming from Free Trade Agreement between Turkey and European Coal and Steel Community (ECSC). Therefore the exporter companies do not hold regional and/or large-scale investment incentive certificates for their production of steel products, including rebar. On

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<sup>4</sup> Decision Memorandum for Final Results of Countervailing Duty 2015 Administrative Review of Steel Concrete Reinforcing Bar from the Republic of Turkey, April 9, 2018

<sup>5</sup> Decision Memorandum for Final Results of Countervailing Duty Administrative Review of Steel Concrete Reinforcing Bar from the Republic of Turkey; 2015

<sup>6</sup> Countervailing Duty Investigation of Carbon and Alloy Steel Wire Rod from the Republic of Turkey: Issues and Decision Memorandum for the Final Affirmative Determination, March 19, 2018

the other hand, although entitled, none of the rebar exporting companies to Australia hold general investment incentive certificate as well.

**Social Security Premium Support:**

Another program mentioned in the petition is Social Security Premium Support. This program is established by the Law No. 6486 and within this incentive; employer's social security premium share (11%) is undertaken by the Treasury if these employers are operating in the provinces determined by the Council of Ministers. Companies exporting rebar to Australia did not benefit from the Social Security Premium Support under Law No. 6486 in the year 2017 and 2017 according to our examination.

**Tax, Duty Land Benefits for Turkish Rebar Producers Located in Free Zones:**

None of the companies exporting rebar to Australia operate in a Free Zone.

**Turkish Development Bank Loans:**

None of the companies exporting rebar to Australia benefitted from loans provided by Development Bank of Turkey in 2017 and 2018.

**Purchase of lignite from Turkish Coal Enterprises (TKI)**

None of the companies exporting rebar to Australia have any purchases of lignite from Turkish Coal Enterprises (TKI) in 2017 and 2018.

**R&D Income Tax Deduction under Law No. 5746:**

None of the companies exporting rebar to Australia benefitted from R&D Income Tax Deduction under Law No. 5746 in 2017 and 2018.

**Terminated Programs:**

Some of the alleged programs mentioned by the petitioners were terminated and are not in force anymore. Law No 5048 is provided in Exhibit. Relevant Articles with regard to termination, which are explained below are also highlighted in Exhibit for your convenience.

**Energy support (Electricity for Less Than Adequate Remuneration):** According to Article 7/h of Law No. 5084 the last date for an investment to benefit from this support program was December 31, 2012.

**Provision of Land for Less Than Adequate Remuneration:** The implementation of the program was initiated on February 6, 2004, and remained in force until the end of the validity period mentioned in paragraph 4, Provisional Article 1 of the Law No. 5084. Therefore, the program has not been in force since February 6, 2010.

**Withholding of Income Tax in Wages and Salaries:** Article 7/h of the Law No. 5084 states that this program shall be applicable for any new investments for 5 years for the ones completed by December 31, 2007, for 4 years for the ones completed by December 31, 2008 and for 3 years for the ones completed by December 31, 2009. Hence, the last date which the investment can benefit from this tax incentive program is December 31, 2012.

**Employer's Share in Insurance Premiums Program:** Article 7/h of the Law No. 5084 states that this program shall be applicable for any new investments for 5 years for the ones completed by December 31, 2007; for 4 years for the ones completed by December 31, 2008 and for 3 years for the ones completed by December 31, 2009. Hence, the last date, which the investment can benefit from this support program was December 31, 2012.

Thank you.

EXHIBIT 1

ABOLISHED LAW NO. 5084



**LAW CONCERNING INCENTIVES ON INVESTMENTS AND EMPLOYMENT  
AND ON THE AMENDMENT  
OF CERTAIN LAWS**

Law Number: 5084

Official Gazette: Date: February 6, 2004 Issue No.: 25365

*Purpose*

Article 1 – The purpose of this Law is to increase the investment and employment opportunities through implementing incentives for tax and insurance premium in various provinces, to provide energy subsidies and to provide lands and plots free of charge for investments.

*Scope*

**Article 2** – (Amendment: 12/5/2005 – 5350/Art. 1)

This Law covers

a) in terms of tax and insurance premium incentives and energy subsidies the provinces where GDP per capita as determined by the State Institute of Statistics for 2001 is equal to or lower than USD 1,500.00 and other provinces where the index value based on the social-economic development ranking as determined by the State Planning Organization for 2003 is negative,

b) in terms of land and plot supply free of charge the provinces mentioned in subparagraph (a) and other provinces covered under the priority regions for development.

*Income tax withholding incentive <sup>(1)</sup>*

**Article 3** – (Amendment: 12/5/2005 – 5350/Art. 2)

In order to be valid and applicable until 31/12/2009, in the provinces covered subparagraph (a) of Article 2;

a) The income tax calculated on the wages of the employees of the taxpayers of income and corporate tax starting business as of 1.4.2005 provided that they employ at least ten employees at the related business place, <sup>(2)</sup>

b) (Amendment 28/3/2007-5615/Art. 24) on the wages of the employees actually working at the places of business of the taxpayers of income and corporate tax starting business before 1.4.2005 provided that they employ at least ten employees;

shall be cancelled in full for the business places located at organized industrial zones or regions, and eighty percent thereof shall be cancelled for business places in other locations and deducted from the tax accrued on the basis of the withholding tax return.

The total amount to be cancelled cannot exceed the sum determined on the basis of the above mentioned rates calculated on the value to be obtained by multiplying the number of employees and the income tax payable for the minimum wage.

The principles and procedures for the implementation of this article are set by the Ministry of Finance.

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(1) Article 32 of Law No. 5838 dated 18/2/2009; the date "31.12.2008" in paragraph 1 of this article was amended as "31/12/2009" and entered in the text.

(2) Article 24 of Law No. 5615 dated 28/3/2007, the expression "thirty" stated in this subparagraph was amended as "ten" and entered in the text.

*Incentive for employers' share in insurance premiums <sup>(1)(2)</sup>*

**Article 4 – (Amendment 12/5/2005 – 5350/Art. 3)**

In order to be valid and applicable until 31/12/2012, in the provinces covered subparagraph (a) of Article 2;

a) The employers' share in insurance premiums calculated on the average daily earning taken as basic to premium in conformity with Article 72 and 73 of the Social Security Law No. 506 of the employees of the taxpayers of income and corporate tax starting business as of 1.4.2005 provided that they employ at least ten employees at the related business place, <sup>(3)</sup>

b) (Amendment 28/3/2007-5615/Art. 24) of the employees actually working at the places of business of the taxpayers of income and corporate tax starting business before 1.4.2005 provided that they employ at least ten employees;

shall be met in full for the business places located at organized industrial zones or regions, and eighty percent thereof for business places in other locations by the Treasury.

The total amount to be met by the Treasury cannot exceed the sum determined on the basis of the above mentioned rates calculated on the value to be obtained by multiplying the number of employees and the employer's share based on the minimum daily earning taken as basic to premium fixed in conformity with Article 78 of the Social Security Law.

In order to be entitled to the payment of premiums of employers' share by the Treasury, the employers are required to submit monthly premium and service documents to the Institution within the statutory periods in conformity with the Social Security Law No. 506 and also affect the payments of the amounts corresponding to the

employees' share in the insurance premiums of all the insured and the employers' share unmet by the Treasury. In case of any late payment of the premiums required to be paid by the employer in conformity with this article, default interest to arise out of the late payments to be affected by the Treasury to the Institution shall be collected from the employer.

The principles and procedures related with the implementation of this article are jointly set by the Ministry of Finance, Ministry of Labor and Social Security and the Undersecretariat of Treasury.

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(1) *The title of this article "incentive for employers' share in insurance premiums" was amended as entered in the text through article 3 of Law No. 5350 dated 12/5/2005.*

(2) *Article 32 of Law No. 5838 dated 18/2/2009; the date "31.12.2008" in paragraph 1 of this article was amended as "31/12/2009" and entered in the text.*

(3) *Article 24 of Law No. 5615 dated 28/3/2007, the expression "thirty" stated in this subparagraph was amended as "ten" and entered in the text.*

#### *Allocation of investment sites free of charge*

**Article 5** - (Abolished: 18/2/2009-5838/Art. 32)

#### *Energy subsidies <sup>(1)</sup>*

**Article 6** - (Amendment: 12/5/2005 - 5350/Art. 5)

(Unified first and second paragraphs amendment: 28/3/2007-5615/Art. 24) In order to be valid and applicable until 31/12/2009, twenty percent of the electric power expenses of the enterprises located in the provinces covered under subparagraph (a) of article 2 and starting business as of 1.4.2005 and employing at least ten employees and the enterprises starting business before 1.4.2005 and employing at least ten employees and actually and continuously dealing with livestock (including fishery and poultry husbandry), organic and biotechnological agriculture, cultivated mushroom husbandry and compost, greenhouse cultivation, certificated seed growing, and cold storage depot and manufacturing industry, mining, tourism rest stops, and education and health sectors shall be met by the Treasury. 0.5 point shall be added to the said rate for each number of employees exceeding the minimum requirement in enterprises starting business after 1.4.2005, and in enterprises starting business before 1.4.2005, for each number of employees starting to work after this date and exceeding the minimum requirement. The rate to be met by the Treasury cannot exceed fifty percent for the enterprises in the organized industrial sites or regions, and forty percent for enterprises active in other fields.

Monthly premium and service documents shall be the bases for the calculation of the number of employees actually and continuously working.

The Ministry of Industry and Commerce and the Undersecretariat of Treasury are jointly authorized to define the minimum capacities related with the implementation of



this article, and the Ministry of Finance, the Ministry of Energy and Natural Resources and the Undersecretariat of Treasury are jointly authorized to define the periods for the refunding of electric power expenses, whether the refunding will be affected in cash or on account and defining the procedures and principles of the implementation.

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(1) Article 32 of Law No. 5838 dated 18/2/2009; the date "31.12.2008" in paragraph 1 of this article was amended as "31/12/2009" and entered in the text.

*Miscellaneous provisions <sup>(1)</sup>*

**Article 7-** In the implementation of this Law:

a) (Amendment: 12/5/2005 – 5350/Art. 6) The provisions of articles 3, 4 and 6 may not be applicable for the activities related with the realization of the services and construction works undertaken in conformity with the provisions of the State Bidding Law No. 2886 and the Public Procurement Law No. 4734 and the international agreements.

b) The related legislation provisions shall be applicable for the lands and plots allocated free of charge under the scope of the Law No. 4325 dated 21.1.1998 on Creating Employment and Investment Incentive in the Emergency Region and Priority Regions for Development, and the Law for the Amendment of Law No. 193 on Income Tax and the abolished article 8.

c) (Amendment: 12/5/2005 – 5350/Art. 6) Excluding the enterprises taken over after 1.10.2003 under privatization; transfer, merger, demerger or changes in type of corporations of the existing and active enterprises shall not be considered as starting a new business in terms of the implementation of articles 3, 4 and 6.

d) (Amendment: 12/5/2005 – 5350/Art. 6) If more than one monthly premium and service documents are issued for the business places in provinces covered hereunder, then the number of employees shall be considered as the total number of employees given in the payrolls of the enterprises active in the branch or industry related with the implementation of article 6. If any existing enterprise is closed and opened under a different name or title or another business unit, then the provisions of this Law shall not be applicable for such.

e) Any transaction which does not result with an additional capacity or employment increase but just undertaken for the purpose of benefiting from incentives like shifting employees among the companies with direct or indirect partnership relation and keeping the management and control thereof, and changing the ownership in single proprietorships shall not be entitled to the incentives granted by this Law.

f) The premium sums met by the Treasury in conformity with the provisions of article 4 cannot be considered as expenses or cost items in the enforcement of income and corporate tax; the electric power expenses met by the Treasury under article 6 shall be considered as income in terms of income or corporate tax assessments in the related refunding period.

g) The provisions of article 4 shall not be applicable for public enterprises.

h) (Supplementary: 16/7/2004 - 5228/Art. 55; Amendment: 26/12/2006 – 5568/Art. 5; Amendment: 05/02/2010 – 5921/Art. 10) The subsidies and incentives mentioned in articles 3, 4 and 6 of this Law shall be applicable for any new investments in any province subject to this Law, until 31/12/2012 for the ones completed by 31/12/2007 in terms of the implementation of article 4 exclusively, and applicable for 5 years for the ones completed by 31/12/2007, for 4 years for the ones completed by 31/12/2008 and for 3 years for the ones completed by 31/12/2009 regardless of the periods specified in the said articles.

i) (Supplementary: 12/5/2005 – 5350/Art. 6) The Ministry of Finance, the Ministry of Labor and Social Security, the Ministry of Industry and Commerce and the Undersecretariat of Treasury are jointly authorized to define the procedures and principles related with starting and completing any investment subject to this Law.

j) (Supplementary: 12/5/2005 – 5350/Art. 6) Any enterprise located in a province subject to this Law and benefiting from subsidies regulated hereby in conformity with other related regulations shall not be entitled to benefit also from the subsidies granted by this Law for the same period and repeatedly. Otherwise, considering the preferences of the enterprises, implementation shall be limited with just one subsidy.

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(1) Article 32 of Law No. 5838 dated 18/2/2009; “until 31/12/2009 for any new investment in any province subject to this Law and completed by 31/12/2004” is added and entered in the text just before the date of “31/12/2007” in subparagraph (h) of this article.

Article 8-9- (It is related with Free Zones Law No. 3218 dated 6.6.1985 and entered in the related text).

*Abolished provisions*

Article 10- The last paragraph of article 14 of Law on Organized Industrial Zones No. 4562 dated 12.4.2000 and article 8 of Law No. 4325 dated 21.1.1998 are abolished.

Provisional Article 1- The non-allocated parcels in the organized industry zones located in the provinces subject to subparagraph (b) of article 2 of this Law and using credits made available by the Ministry of Industry and Commerce can be allocated to real or legal entities free of charge provided that the competent bodies of the organized industrial zone decide accordingly and the value of such parcels shall be deducted from the credit given to the organized industry zone by the Ministry of Industry and Commerce.

Payments for the parcels allocated against a value before the publishing date of the Law shall be withheld and the balance thereof shall be deducted from the credits. Deductions shall be made on the basis of sqm. prices to be determined annually for each organized industrial zone by the Ministry of Industry and Commerce after obtaining the favorable opinion of the Undersecretariat of Treasury.

Also parcels in the organized industrial zones which have not used any credit made available by the Ministry of Industry and Commerce, or honored its credit debt may be allocated provided that the competent bodies decide accordingly. In such cases, the values of the allocated parcels shall be paid by the Treasury to the legal entity of the organized industrial zone. Such payments shall be made on the basis of sqm. prices to



be determined annually for each organized industrial zone by the Ministry of Industry and Commerce after obtaining the favorable opinion of the Undersecretariat of Treasury.

The implementation related with the allocation of parcels in the organized industrial zones shall be valid for three years as of the date of entry into force of this Law. The said term can be extended up to maximum three years through a cabinet decree.

Employment, starting and completion period of investments, allocation and transfer transactions and other issues related with the implementation of this article shall be regulated by a regulation to be issued by a cabinet decree.

Temporary Article 2 – (Supplementary: 28/3/2007-5615/Art. 24)

Enterprises located in Gokceada and Bozcaada can also benefit from the subsidies and incentives specified in articles 3, 4 and 6 of this Law for a period of 5 years as of the publishing date of the Law provided that the requirements stipulated in the said articles are met.

Temporary Article 3 – (Supplementary: 18/2/2009-5838/Art. 30)

The provisions of the abolished article 5 shall be applicable for immovable applied for establishing free right of easement or occupancy permit but not concluded on the date of entry into force of this article. The said provisions shall be continued to be applied for immovable on which free right of easement is established or occupancy permit is granted under the abolished article 5.

*Effective date*

Article 11- The articles 3, 4 and 6 of this Law become effective at the beginning of the month following the publishing thereof, and other articles on the publishing date.

*Execution*

Article 12- The Cabinet executes the provisions of this Law.

**PROVISIONS WHICH CANNOT BE ENTERED INTO LAW NO. 5084 DATED  
29/1/2004**

*1- The provision of Law on Making Amendments on Law No. 5350 dated 12/5/2005 Concerning Incentives on Investments and Employment and for the Amendment of Certain Laws:*

**Temporary Article 1** – a) Taxpayers dealing in provinces subject to subparagraph (a) of article 2 of Law No. 5084 dated 29.1.2004 before amended by this Law and the taxpayers entitled to benefit from subsidies and incentives mentioned in articles 3 and 4 of Law No. 5084 before amended by this Law, shall continue to benefit exactly from the said rights. However, taxpayers meeting the required conditions and applying for such may benefit from the provisions of articles 3 and 4 of Law No. 5084 as amended by this Law.

b) Transactions related with immovable of which transfer thereof are requested free of charge by the investors in conformity with article 5 of Law No. 5084 before amended by this Law shall be carried on in accordance with the provisions of the aforementioned article.

c) The implementation related with the enterprises eligible to benefit from energy subsidies in conformity with article 6 of Law No. 5084 before amended by this Law shall be based on monthly premium and service documents and the provisions of the same article shall be continued to be applied regardless of the minimum employment requirement of 3/4 of a calendar year. However, the new provisions shall be applicable for enterprises newly starting business in provinces subject to subparagraph (a) of article 2 of Law No. 5084 before amended by this Law provided that the said enterprises meet the requirements stipulated in paragraph 1 of article 6 of Law No. 5084 as amended by this Law, and for enterprises which have started business related with the fields mentioned in paragraph 1 of article 6 of Law No. 5084 before 1.10.2003 provided that the number of employees declared in the last four-month insurance premium lists submitted to the related authority after the date of entry into force of this article but before 1.10.2003 meet actually and constantly the conditions specified in paragraph 2 of article 6 of Law No. 5084 as amended by this Law.

Anti-Dumping Commission  
Investigation No. 495  
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TER 495A Non-confidential Attachment 2  
TAF(3) and TAF(4) Currency Calculation



TER 495A Non-confidential Attachment 2 - USD/TRY exchange rate analysis

Currency Conversion Calculations

Notes

[1] source: Turkish Central Bank - <http://www.tcmb.gov.tr/wps/wcm/connect/EN/TCMB+EN/Main+Menu/Statistics/Exchange+Rates/Indicative+Exchange+Rates>

[2] source: REQ - Australian sales (average rate used on Date of Sale)

Date	[1]	TAF(3) Calculations				TAF(4) Calculations				
	TRY/USD (Daily)	TRY/USD 8 week moving average	Daily variance rate to 8 week moving average	Short-term fluctuation? (<=-2.25% or >=2.25%)	TAF(3) TRY/USD	Beginning of week check	TRY/USD Weekly Average	TRY/USD 8 week moving average weekly average	Weekly variance to 8 week moving average weekly average	Sustained fluctuation? (<=-5% or >=5%)
1/08/2017	3.5258				3.5258	3				
2/08/2017	3.5201				3.5201	4				
3/08/2017	3.53235				3.53235	5				
4/08/2017	3.5407				3.5407	6				
5/08/2017	3.53185				3.53185	7				
6/08/2017	3.53185				3.53185	1	3.536121429			
7/08/2017	3.53185				3.53185	2				
8/08/2017	3.5327				3.5327	3				
9/08/2017	3.53065				3.53065	4				
10/08/2017	3.5416				3.5416	5				
11/08/2017	3.5375				3.5375	6				
12/08/2017	3.5467				3.5467	7				
13/08/2017	3.5467				3.5467	1	3.532842857			
14/08/2017	3.5467				3.5467	2				
15/08/2017	3.52845				3.52845	3				
16/08/2017	3.53065				3.53065	4				
17/08/2017	3.532				3.532	5				
18/08/2017	3.52095				3.52095	6				
19/08/2017	3.52445				3.52445	7				
20/08/2017	3.52445				3.52445	1	3.503528571			
21/08/2017	3.52445				3.52445	2				
22/08/2017	3.51405				3.51405	3				
23/08/2017	3.50045				3.50045	4				
24/08/2017	3.49875				3.49875	5				
25/08/2017	3.48125				3.48125	6				
26/08/2017	3.4813				3.4813	7				
27/08/2017	3.4813				3.4813	1	3.455242857			
28/08/2017	3.4813				3.4813	2				
29/08/2017	3.4477				3.4477	3				
30/08/2017	3.4441				3.4441	4				
31/08/2017	3.4441				3.4441	5				
1/09/2017	3.4441				3.4441	6				
2/09/2017	3.4441				3.4441	7				
3/09/2017	3.4441				3.4441	1	3.435742857			
4/09/2017	3.4441				3.4441	2				
5/09/2017	3.4441				3.4441	3				
6/09/2017	3.4423				3.4423	4				
7/09/2017	3.4429				3.4429	5				
8/09/2017	3.4235				3.4235	6				
9/09/2017	3.4092				3.4092	7				
10/09/2017	3.4092				3.4092	1	3.425335714			
11/09/2017	3.4092				3.4092	2				
12/09/2017	3.39955				3.39955	3				
13/09/2017	3.4295				3.4295	4				
14/09/2017	3.4371				3.4371	5				
15/09/2017	3.4575				3.4575	6				
16/09/2017	3.4353				3.4353	7				
17/09/2017	3.4353				3.4353	1	3.47155			
18/09/2017	3.4353				3.4353	2				
19/09/2017	3.4567				3.4567	3				
20/09/2017	3.4932				3.4932	4				
21/09/2017	3.47885				3.47885	5				
22/09/2017	3.51215				3.51215	6				
23/09/2017	3.48935				3.48935	7				
24/09/2017	3.48935				3.48935	1	3.533578571			
25/09/2017	3.48935	3.484858036	0.13%		3.48935	2				
26/09/2017	3.51935	3.484742857	0.98%		3.51935	3				
27/09/2017	3.5376	3.485055357	1.49%		3.5376	4				
28/09/2017	3.5689	3.485708036	2.33% Yes		3.485708036	5				
29/09/2017	3.5752	3.486324107	2.49% Yes		3.486324107	6				
30/09/2017	3.5553	3.486742857	1.93%		3.5553	7				
1/10/2017	3.5553	3.487161607	1.92%		3.5553	1	3.573785714	3.489147704	2.37%	
2/10/2017	3.5553	3.487580357	1.90%		3.5553	2				
3/10/2017	3.57895	3.48840625	2.53% Yes		3.48840625	3				
4/10/2017	3.58125	3.489309821	2.57% Yes		3.489309821	4				
5/10/2017	3.56665	3.489757143	2.16%		3.56665	5				
6/10/2017	3.5717	3.490367857	2.28% Yes		3.490367857	6				
7/10/2017	3.60735	3.491450893	3.21% Yes		3.491450893	7				
8/10/2017	3.60735	3.492533929	3.18% Yes		3.492533929	1	3.653735714	3.499303061	4.23%	
9/10/2017	3.60735	3.493616964	3.15% Yes		3.493616964	2				
10/10/2017	3.69925	3.496666964	5.48% Yes		3.496666964	3				
11/10/2017	3.68435	3.499411607	5.02% Yes		3.499411607	4				
12/10/2017	3.6786	3.502029464	4.80% Yes		3.502029464	5				
13/10/2017	3.6481	3.5043	3.94% Yes		3.5043	6				
14/10/2017	3.65115	3.5065625	3.96% Yes		3.5065625	7				
15/10/2017	3.65115	3.508825	3.90% Yes		3.508825	1	3.658264286	3.516785587	3.87%	
16/10/2017	3.65115	3.5110875	3.84% Yes		3.5110875	2				
17/10/2017	3.6434	3.513397321	3.57% Yes		3.513397321	3				
18/10/2017	3.6579	3.516208929	3.87% Yes		3.516208929	4				
19/10/2017	3.67815	3.5194125	4.32% Yes		3.5194125	5				
20/10/2017	3.6633	3.522663393	3.84% Yes		3.522663393	6				
21/10/2017	3.6628	3.525904464	3.74% Yes		3.525904464	7				
22/10/2017	3.6628	3.529145536	3.65% Yes		3.529145536	1	3.723778571	3.542765179	4.86%	
23/10/2017	3.6628	3.532386607	3.56% Yes		3.532386607	2				
24/10/2017	3.7018	3.536924107	4.45% Yes		3.536924107	3				
25/10/2017	3.71445	3.541751786	4.65% Yes		3.541751786	4				

TER 495A Non-confidential Attachment 2 - USD/TRY exchange rate analysis

Currency Conversion Calculations

Notes

[1] source: Turkish Central Bank - <http://www.tcmb.gov.tr/wps/wcm/connect/EN/TCMB+EN/Main+Menu/Statistics/Exchange+Rates/Indicative+Exchange+Rates>  
 [2] source: REQ - Australian sales (average rate used on Date of Sale)

Date	[1] TRY/USD (Daily)	TAF(3) Calculations				TAF(4) Calculations				
		TRY/USD 8 week moving average	Daily variance rate to 8 week moving average	Short-term fluctuation? (<=-2.25% or >=2.25%)	TAF(3) TRY/USD	Beginning of week check	TRY/USD Weekly Average	TRY/USD 8 week moving average weekly average	Weekly variance to 8 week moving average weekly average	Sustained fluctuation? (<=-5% or >=5%)
26/10/2017	3.73425	3.546933036	5.02%	Yes	3.546933036	5				
27/10/2017	3.7695	3.55274375	5.75%	Yes	3.55274375	6				
28/10/2017	3.82085	3.559471429	6.84%	Yes	3.559471429	7				
29/10/2017	3.82085	3.566199107	6.66%	Yes	3.566199107	1	3.805685714	3.585453061	5.79%	Yes
30/10/2017	3.82085	3.572926786	6.49%	Yes	3.572926786	2				
31/10/2017	3.7734	3.578807143	5.16%	Yes	3.578807143	3				
1/11/2017	3.7788	3.584816071	5.13%	Yes	3.584816071	4				
2/11/2017	3.81145	3.591397321	5.77%	Yes	3.591397321	5				
3/11/2017	3.81065	3.598310714	5.57%	Yes	3.598310714	6				
4/11/2017	3.8238	3.605714286	5.70%	Yes	3.605714286	7				
5/11/2017	3.8238	3.613117857	5.51%	Yes	3.613117857	1	3.8538	3.636297194	5.64%	Yes
6/11/2017	3.8238	3.620521429	5.32%	Yes	3.620521429	2				
7/11/2017	3.8625	3.628788393	6.05%	Yes	3.628788393	3				
8/11/2017	3.8567	3.636416964	5.71%	Yes	3.636416964	4				
9/11/2017	3.885	3.644415179	6.19%	Yes	3.644415179	5				
10/11/2017	3.85695	3.651548214	5.33%	Yes	3.651548214	6				
11/11/2017	3.86785	3.659272321	5.39%	Yes	3.659272321	7				
12/11/2017	3.86785	3.666996429	5.19%	Yes	3.666996429	1	3.8738	3.688687372	4.78%	
13/11/2017	3.86785	3.674720536	4.99%	Yes	3.674720536	2				
14/11/2017	3.86935	3.682089286	4.84%	Yes	3.682089286	3				
15/11/2017	3.8699	3.688816071	4.68%	Yes	3.688816071	4				
16/11/2017	3.8871	3.69610625	4.91%	Yes	3.69610625	5				
17/11/2017	3.87185	3.702529464	4.37%	Yes	3.702529464	6				
18/11/2017	3.8827	3.709553571	4.46%	Yes	3.709553571	7				
19/11/2017	3.8827	3.716577679	4.28%	Yes	3.716577679	1	3.919385714	3.737364031	4.64%	
20/11/2017	3.8827	3.723601786	4.10%	Yes	3.723601786	2				
21/11/2017	3.8907	3.730233036	4.12%	Yes	3.730233036	3				
22/11/2017	3.95605	3.737705357	5.52%	Yes	3.737705357	4				
23/11/2017	3.96295	3.744741964	5.51%	Yes	3.744741964	5				
24/11/2017	3.92055	3.750908929	4.33%	Yes	3.750908929	6				
25/11/2017	3.94005	3.757779464	4.63%	Yes	3.757779464	7				
26/11/2017	3.94005	3.76465	4.45%	Yes	3.76465	1	3.938521429	3.784245153	3.92%	
27/11/2017	3.94005	3.771520536	4.28%	Yes	3.771520536	2				
28/11/2017	3.93205	3.777825893	3.92%	Yes	3.777825893	3				
29/11/2017	3.92495	3.783963393	3.59%	Yes	3.783963393	4				
30/11/2017	3.95405	3.79088125	4.13%	Yes	3.79088125	5				
1/12/2017	3.94255	3.797503571	3.68%	Yes	3.797503571	6				
2/12/2017	3.93595	3.803371429	3.37%	Yes	3.803371429	7				
3/12/2017	3.93595	3.809239286	3.22%	Yes	3.809239286	1	3.891278571	3.821960077	1.78%	
4/12/2017	3.93595	3.815107143	3.07%	Yes	3.815107143	2				
5/12/2017	3.9226	3.819095536	2.64%	Yes	3.819095536	3				
6/12/2017	3.86585	3.822336607	1.13%		3.86585	4				
7/12/2017	3.85625	3.825508929	0.80%		3.85625	5				
8/12/2017	3.86425	3.82936875	0.90%		3.86425	6				
9/12/2017	3.8581	3.833064286	0.65%		3.8581	7				
10/12/2017	3.8581	3.836759821	0.55%		3.8581	1	3.845578571	3.846734311	-0.03%	
11/12/2017	3.8581	3.840455357	0.46%		3.8581	2				
12/12/2017	3.83095	3.843804464	-0.34%		3.83095	3				
13/12/2017	3.83115	3.846898214	-0.41%		3.83115	4				
14/12/2017	3.84245	3.849832143	-0.19%		3.84245	5				
15/12/2017	3.83575	3.852911607	-0.45%		3.83575	6				
16/12/2017	3.86255	3.856478571	0.16%		3.86255	7				
17/12/2017	3.86255	3.860045536	0.06%		3.86255	1	3.84225	3.867373214	-0.65%	
18/12/2017	3.86255	3.8636125	-0.03%		3.86255	2				
19/12/2017	3.85415	3.866333036	-0.32%		3.85415	3				
20/12/2017	3.83835	3.868545536	-0.79%		3.83835	4				
21/12/2017	3.83765	3.870391964	-0.85%		3.83765	5				
22/12/2017	3.82575	3.871396429	-1.19%		3.82575	6				
23/12/2017	3.81475	3.8712875	-1.48%		3.81475	7				
24/12/2017	3.81475	3.871178571	-1.48%		3.81475	1	3.8086	3.871841837	-1.66%	
25/12/2017	3.81475	3.871069643	-1.48%		3.81475	2				
26/12/2017	3.81215	3.871761607	-1.56%		3.81215	3				
27/12/2017	3.8063	3.872252679	-1.73%		3.8063	4				
28/12/2017	3.8231	3.872460714	-1.29%		3.8231	5				
29/12/2017	3.81385	3.872517857	-1.54%		3.81385	6				
30/12/2017	3.7753	3.871651786	-2.55%	Yes	3.871651786	7				
31/12/2017	3.7753	3.870785714	-2.53%	Yes	3.870785714	1	3.767414286	3.866333418	-2.63%	
1/01/2018	3.7753	3.869919643	-2.51%	Yes	3.869919643	2				
2/01/2018	3.7753	3.8683625	-2.47%	Yes	3.8683625	3				
3/01/2018	3.76855	3.866788393	-2.61%	Yes	3.866788393	4				
4/01/2018	3.7651	3.864647321	-2.64%	Yes	3.864647321	5				
5/01/2018	3.7634	3.862976786	-2.65%	Yes	3.862976786	6				
6/01/2018	3.74895	3.860853571	-2.98%	Yes	3.860853571	7				
7/01/2018	3.74895	3.858730357	-2.93%	Yes	3.858730357	1	3.764878571	3.852789031	-2.34%	
8/01/2018	3.74895	3.856607143	-2.87%	Yes	3.856607143	2				
9/01/2018	3.74875	3.854453571	-2.82%	Yes	3.854453571	3				
10/01/2018	3.75875	3.85246875	-2.49%	Yes	3.85246875	4				
11/01/2018	3.7878	3.850695536	-1.66%		3.7878	5				
12/01/2018	3.79535	3.849329464	-1.42%		3.79535	6				
13/01/2018	3.7656	3.847238393	-2.17%		3.7656	7				
14/01/2018	3.7656	3.845147321	-2.11%		3.7656	1	3.787335714	3.838187245	-1.34%	
15/01/2018	3.7656	3.84305625	-2.06%		3.7656	2				
16/01/2018	3.7627	3.840770536	-2.07%		3.7627	3				
17/01/2018	3.81845	3.838313393	-0.52%		3.81845	4				
18/01/2018	3.81775	3.835720536	-0.47%		3.81775	5				
19/01/2018	3.80015	3.833570536	-0.88%		3.80015	6				



TER 495A Non-confidential Attachment 2 - USD/TRY exchange rate analysis

Currency Conversion Calculations

Notes

[1] source: Turkish Central Bank - <http://www.tcmb.gov.tr/wps/wcm/connect/EN/TCMB+EN/Main+Menu/Statistics/Exchange+Rates/Indicative+Exchange+Rates>  
 [2] source: REQ - Australian sales (average rate used on Date of Sale)

Date	[1] TRY/USD (Daily)	TAF(3) Calculations				TAF(4) Calculations				
		TRY/USD 8 week moving average	Daily variance rate to 8 week moving average	Short-term fluctuation? (<=-2.25% or >=2.25%)	TAF(3) TRY/USD	Beginning of week check	TRY/USD Weekly Average	TRY/USD 8 week moving average weekly average	Weekly variance to 8 week moving average weekly average	Sustained fluctuation? (<=-5% or >=5%)
20/01/2018	3.7811	3.830732143	-1.31%		3.7811	7				
21/01/2018	3.7811	3.82789375	-1.24%		3.7811	1	3.77305	3.819580995	-1.23%	
22/01/2018	3.7811	3.825055357	-1.16%		3.7811	2				
23/01/2018	3.81325	3.822933929	-0.25%		3.81325	3				
24/01/2018	3.7908	3.820538393	-0.78%		3.7908	4				
25/01/2018	3.75915	3.817058036	-1.54%		3.75915	5				
26/01/2018	3.7455	3.813539286	-1.82%		3.7455	6				
27/01/2018	3.74045	3.810048214	-1.86%		3.74045	7				
28/01/2018	3.74045	3.806557143	-1.77%		3.74045	1	3.758035714	3.799284184	-1.10%	
29/01/2018	3.74045	3.803066071	-1.67%		3.74045	2				
30/01/2018	3.7762	3.800451786	-0.64%		3.7762	3				
31/01/2018	3.7829	3.798970536	-0.42%		3.7829	4				
1/02/2018	3.7574	3.797205357	-1.06%		3.7574	5				
2/02/2018	3.7601	3.795345536	-0.94%		3.7601	6				
3/02/2018	3.74875	3.793392857	-1.19%		3.74875	7				
4/02/2018	3.74875	3.791440179	-1.14%		3.74875	1	3.778142857	3.787678444	-0.25%	
5/02/2018	3.74875	3.7894875	-1.09%		3.74875	2				
6/02/2018	3.7666	3.788338393	-0.58%		3.7666	3				
7/02/2018	3.782	3.787460714	-0.14%		3.782	4				
8/02/2018	3.7748	3.786252679	-0.30%		3.7748	5				
9/02/2018	3.81075	3.78580625	0.65%		3.81075	6				
10/02/2018	3.81535	3.784963393	0.80%		3.81535	7				
11/02/2018	3.81535	3.784120536	0.82%		3.81535	1	3.796078571	3.781753954	0.38%	
12/02/2018	3.81535	3.783277679	0.84%		3.81535	2				
13/02/2018	3.81025	3.78249375	0.73%		3.81025	3				
14/02/2018	3.7997	3.781803571	0.47%		3.7997	4				
15/02/2018	3.8007	3.78114375	0.51%		3.8007	5				
16/02/2018	3.7755	3.780246429	-0.13%		3.7755	6				
17/02/2018	3.7557	3.779191964	-0.63%		3.7557	7				
18/02/2018	3.7557	3.7781375	-0.60%		3.7557	1	3.773828571	3.775885077	-0.05%	
19/02/2018	3.7557	3.777083036	-0.57%		3.7557	2				
20/02/2018	3.7565	3.776089286	-0.52%		3.7565	3				
21/02/2018	3.7732	3.775498214	-0.06%		3.7732	4				
22/02/2018	3.7879	3.774869643	0.34%		3.7879	5				
23/02/2018	3.8028	3.774672321	0.74%		3.8028	6				
24/02/2018	3.785	3.774845536	0.27%		3.785	7				
25/02/2018	3.785	3.77501875	0.26%		3.785	1	3.793914286	3.776082398	0.47%	
26/02/2018	3.785	3.775191964	0.26%		3.785	2				
27/02/2018	3.7788	3.775254464	0.09%		3.7788	3				
28/02/2018	3.7867	3.775578571	0.29%		3.7867	4				
1/03/2018	3.8031	3.776257143	0.71%		3.8031	5				
2/03/2018	3.8116	3.777117857	0.90%		3.8116	6				
3/03/2018	3.8072	3.778158036	0.76%		3.8072	7				
4/03/2018	3.8072	3.779198214	0.74%		3.8072	1	3.810014286	3.781771556	0.74%	
5/03/2018	3.8072	3.780238393	0.71%		3.8072	2				
6/03/2018	3.81955	3.781502679	1.00%		3.81955	3				
7/03/2018	3.8035	3.782301786	0.56%		3.8035	4				
8/03/2018	3.8005	3.782528571	0.47%		3.8005	5				
9/03/2018	3.8123	3.78283125	0.77%		3.8123	6				
10/03/2018	3.81985	3.7838	0.94%		3.81985	7				
11/03/2018	3.81985	3.78476875	0.92%		3.81985	1	3.854185714	3.787862883	1.72%	
12/03/2018	3.81985	3.7857375	0.89%		3.81985	2				
13/03/2018	3.8185	3.786733929	0.83%		3.8185	3				
14/03/2018	3.85945	3.787466071	1.87%		3.85945	4				
15/03/2018	3.8632	3.788277679	1.94%		3.8632	5				
16/03/2018	3.891	3.7899	2.60%	Yes	3.7899	6				
17/03/2018	3.90745	3.79215625	2.95%	Yes	3.79215625	7				
18/03/2018	3.90745	3.7944125	2.89%	Yes	3.7944125	1	3.928785714	3.802211735	3.22%	
19/03/2018	3.90745	3.79666875	2.84%	Yes	3.79666875	2				
20/03/2018	3.93975	3.798927679	3.57%	Yes	3.798927679	3				
21/03/2018	3.93915	3.801576786	3.49%	Yes	3.801576786	4				
22/03/2018	3.93115	3.804648214	3.22%	Yes	3.804648214	5				
23/03/2018	3.9122	3.807625	2.67%	Yes	3.807625	6				
24/03/2018	3.96435	3.811623214	3.85%	Yes	3.811623214	7				
25/03/2018	3.96435	3.815621429	3.75%	Yes	3.815621429	1	3.9762	3.827190944	3.75%	
26/03/2018	3.96435	3.819619643	3.65%	Yes	3.819619643	2				
27/03/2018	3.9778	3.823219643	3.89%	Yes	3.823219643	3				
28/03/2018	3.9793	3.826726786	3.83%	Yes	3.826726786	4				
29/03/2018	3.99665	3.830999107	4.14%	Yes	3.830999107	5				
30/03/2018	3.9985	3.83525625	4.08%	Yes	3.83525625	6				
31/03/2018	3.95245	3.83889375	2.87%	Yes	3.83889375	7				
1/04/2018	3.95245	3.84253125	2.78%	Yes	3.84253125	1	3.991978571	3.853693622	3.46%	
2/04/2018	3.95245	3.84616875	2.69%	Yes	3.84616875	2				
3/04/2018	3.96125	3.849644643	2.82%	Yes	3.849644643	3				
4/04/2018	3.9796	3.853173214	3.18%	Yes	3.853173214	4				
5/04/2018	4.0112	3.857394643	3.83%	Yes	3.857394643	5				
6/04/2018	4.03055	3.861319643	4.20%	Yes	3.861319643	6				
7/04/2018	4.05635	3.865623214	4.70%	Yes	3.865623214	7				
8/04/2018	4.05635	3.869926786	4.60%	Yes	3.869926786	1	4.087164286	3.88491875	4.95%	
9/04/2018	4.05635	3.874230357	4.49%	Yes	3.874230357	2				
10/04/2018	4.05975	3.878685714	4.46%	Yes	3.878685714	3				
11/04/2018	4.07435	3.883590179	4.68%	Yes	3.883590179	4				
12/04/2018	4.14905	3.889810714	6.25%	Yes	3.889810714	5				
13/04/2018	4.1321	3.896178571	5.71%	Yes	3.896178571	6				
14/04/2018	4.0822	3.902008929	4.41%	Yes	3.902008929	7				
15/04/2018	4.0822	3.907839286	4.27%	Yes	3.907839286	1	4.076235714	3.924761862	3.72%	

TER 495A Non-confidential Attachment 2 - USD/TRY exchange rate analysis

Currency Conversion Calculations

Notes

[1] source: Turkish Central Bank - <http://www.tcmb.gov.tr/wps/wcm/connect/EN/TCMB+EN/Main+Menu/Statistics/Exchange+Rates/Indicative+Exchange+Rates>  
 [2] source: REQ - Australian sales (average rate used on Date of Sale)

Date	[1] TRY/USD (Daily)	TAF(3) Calculations				TAF(4) Calculations				
		TRY/USD 8 week moving average	Daily variance rate to 8 week moving average	Short-term fluctuation? (<=-2.25% or >=2.25%)	TAF(3) TRY/USD	Beginning of week check	TRY/USD Weekly Average	TRY/USD 8 week moving average weekly average	Weekly variance to 8 week moving average weekly average	Sustained fluctuation? (<=-5% or >=5%)
16/04/2018	4.0822	3.913669643	4.13%	Yes	3.913669643	2				
17/04/2018	4.0997	3.919798214	4.39%	Yes	3.919798214	3				
18/04/2018	4.1017	3.925664286	4.29%	Yes	3.925664286	4				
19/04/2018	4.1001	3.931239286	4.12%	Yes	3.931239286	5				
20/04/2018	4.0309	3.9353125	2.37%	Yes	3.9353125	6				
21/04/2018	4.03685	3.939809821	2.40%	Yes	3.939809821	7				
22/04/2018	4.03685	3.944307143	2.29%	Yes	3.944307143	1	4.058028571	3.958606888	2.45%	
23/04/2018	4.03685	3.948804464	2.18%		4.03685	2				
24/04/2018	4.03685	3.9534125	2.07%		4.03685	3				
25/04/2018	4.0885	3.958801786	3.17%	Yes	3.958801786	4				
26/04/2018	4.0795	3.9637375	2.84%	Yes	3.9637375	5				
27/04/2018	4.0705	3.968360714	2.51%	Yes	3.968360714	6				
28/04/2018	4.05715	3.972824107	2.08%		4.05715	7				
29/04/2018	4.05715	3.9772875	1.97%		4.05715	1	4.111328571	3.99196977	2.90%	
30/04/2018	4.05715	3.981750893	1.86%		4.05715	2				
1/05/2018	4.04355	3.985750893	1.43%		4.04355	3				
2/05/2018	4.04355	3.9900375	1.32%		4.04355	4				
3/05/2018	4.1245	3.995823214	3.12%	Yes	3.995823214	5				
4/05/2018	4.1946	4.00265	4.58%	Yes	4.00265	6				
5/05/2018	4.2588	4.010488393	5.83%	Yes	4.010488393	7				
6/05/2018	4.2588	4.018326786	5.65%	Yes	4.018326786	1	4.269414286	4.041137117	5.35%	Yes
7/05/2018	4.2588	4.026165179	5.46%	Yes	4.026165179	2				
8/05/2018	4.25965	4.034042857	5.30%	Yes	4.034042857	3				
9/05/2018	4.28555	4.041651786	5.69%	Yes	4.041651786	4				
10/05/2018	4.29165	4.049302679	5.65%	Yes	4.049302679	5				
11/05/2018	4.27045	4.056078571	5.02%	Yes	4.056078571	6				
12/05/2018	4.261	4.062391964	4.66%	Yes	4.062391964	7				
13/05/2018	4.261	4.068705357	4.51%	Yes	4.068705357	1	4.374271429	4.091769388	6.46%	Yes
14/05/2018	4.261	4.07501875	4.36%	Yes	4.07501875	2				
15/05/2018	4.3239	4.081878571	5.60%	Yes	4.081878571	3				
16/05/2018	4.39845	4.090080357	7.01%	Yes	4.090080357	4				
17/05/2018	4.46215	4.0995625	8.13%	Yes	4.0995625	5				
18/05/2018	4.4442	4.1090625	7.54%	Yes	4.1090625	6				
19/05/2018	4.4692	4.118077679	7.86%	Yes	4.118077679	7				
20/05/2018	4.4692	4.127092857	7.65%	Yes	4.127092857	1	4.622971429	4.160488265	10.00%	Yes
21/05/2018	4.4692	4.136108036	7.45%	Yes	4.136108036	2				
22/05/2018	4.5575	4.146459821	9.02%	Yes	4.146459821	3				
23/05/2018	4.5822	4.157225893	9.27%	Yes	4.157225893	4				
24/05/2018	4.85075	4.172477679	13.98%	Yes	4.172477679	5				
25/05/2018	4.707	4.185129464	11.09%	Yes	4.185129464	6				
26/05/2018	4.72495	4.198924107	11.13%	Yes	4.198924107	7				
27/05/2018	4.72495	4.21271875	10.84%	Yes	4.21271875	1	4.602792857	4.246372959	7.74%	Yes
28/05/2018	4.72495	4.226513393	10.55%	Yes	4.226513393	2				
29/05/2018	4.6007	4.237932143	7.89%	Yes	4.237932143	3				
30/05/2018	4.60035	4.249016964	7.64%	Yes	4.249016964	4				
31/05/2018	4.4874	4.257520536	5.12%	Yes	4.257520536	5				
1/06/2018	4.48485	4.265633036	4.89%	Yes	4.265633036	6				
2/06/2018	4.59635	4.275275893	6.99%	Yes	4.275275893	7				
3/06/2018	4.59635	4.28491875	6.78%	Yes	4.28491875	1	4.587114286	4.312756122	5.98%	Yes
4/06/2018	4.59635	4.294561607	6.57%	Yes	4.294561607	2				
5/06/2018	4.63255	4.304790179	7.08%	Yes	4.304790179	3				
6/06/2018	4.61145	4.31438125	6.44%	Yes	4.31438125	4				
7/06/2018	4.61365	4.322677679	6.31%	Yes	4.322677679	5				
8/06/2018	4.553	4.33019375	4.89%	Yes	4.33019375	6				
9/06/2018	4.50645	4.337769643	3.74%	Yes	4.337769643	7				
10/06/2018	4.50645	4.345345536	3.57%	Yes	4.345345536	1	4.577364286	4.370748342	4.51%	
11/06/2018	4.50645	4.352921429	3.41%	Yes	4.352921429	2				
12/06/2018	4.51765	4.360384821	3.48%	Yes	4.360384821	3				
13/06/2018	4.5532	4.368447321	4.06%	Yes	4.368447321	4				
14/06/2018	4.6526	4.378313393	5.90%	Yes	4.378313393	5				
15/06/2018	4.6526	4.389415179	5.66%	Yes	4.389415179	6				
16/06/2018	4.6526	4.400410714	5.42%	Yes	4.400410714	7				
17/06/2018	4.6526	4.41140625	5.18%	Yes	4.41140625	1	4.714992857	4.446701531	5.69%	Yes
18/06/2018	4.6526	4.422401786	4.95%	Yes	4.422401786	2				
19/06/2018	4.71935	4.434589286	6.03%	Yes	4.434589286	3				
20/06/2018	4.75875	4.446558036	6.56%	Yes	4.446558036	4				
21/06/2018	4.75305	4.458585714	6.20%	Yes	4.458585714	5				
22/06/2018	4.75665	4.470838393	6.01%	Yes	4.470838393	6				
23/06/2018	4.71195	4.48253125	4.87%	Yes	4.48253125	7				
24/06/2018	4.71195	4.494224107	4.62%	Yes	4.494224107	1	4.651764286	4.525230357	2.72%	
25/06/2018	4.71195	4.505916964	4.37%	Yes	4.505916964	2				
26/06/2018	4.64385	4.516636607	2.74%	Yes	4.516636607	3				
27/06/2018	4.6782	4.527969643	3.21%	Yes	4.527969643	4				
28/06/2018	4.6391	4.537158929	2.20%		4.6391	5				
29/06/2018	4.61245	4.544620536	1.47%		4.61245	6				
30/06/2018	4.56485	4.550085714	0.32%		4.56485	7				
1/07/2018	4.56485	4.55550893	0.20%		4.56485	1	4.624407143	4.574683546	1.08%	
2/07/2018	4.56485	4.561016071	0.08%		4.56485	2				
3/07/2018	4.62665	4.567569643	1.28%		4.62665	3				
4/07/2018	4.6602	4.574259821	1.84%		4.6602	4				
5/07/2018	4.7029	4.581603571	2.58%	Yes	4.581603571	5				
6/07/2018	4.64685	4.588325	1.26%		4.64685	6				
7/07/2018	4.60455	4.594459821	0.22%		4.60455	7				
8/07/2018	4.60455	4.600594643	0.09%		4.60455	1	4.696307143	4.616825638	1.69%	
9/07/2018	4.60455	4.606729464	-0.05%		4.60455	2				
10/07/2018	4.53445	4.610489286	-1.68%		4.53445	3				



TER 495A Non-confidential Attachment 2 - USD/TRY exchange rate analysis

Currency Conversion Calculations

Notes

[1] source: Turkish Central Bank - <http://www.tcmb.gov.tr/wps/wcm/connect/EN/TCMB+EN/Main+Menu/Statistics/Exchange+Rates/Indicative+Exchange+Rates>  
 [2] source: REQ - Australian sales (average rate used on Date of Sale)

Date	[1] TRY/USD (Daily)	TAF(3) Calculations				TAF(4) Calculations				
		TRY/USD 8 week moving average	Daily variance rate to 8 week moving average	Short-term fluctuation? (<=-2.25% or >=2.25%)	TAF(3) TRY/USD	Beginning of week check	TRY/USD Weekly Average	TRY/USD 8 week moving average weekly average	Weekly variance to 8 week moving average weekly average	Sustained fluctuation? (<=-5% or >=5%)
11/07/2018	4.7092	4.616038393	1.98%		4.7092	4				
12/07/2018	4.7531	4.621233929	2.77%	Yes	4.621233929	5				
13/07/2018	4.82195	4.627979464	4.02%	Yes	4.627979464	6				
14/07/2018	4.84635	4.634714286	4.37%	Yes	4.634714286	7				
15/07/2018	4.84635	4.641449107	4.23%	Yes	4.641449107	1	4.828621429	4.653855612	3.62%	
16/07/2018	4.84635	4.648183929	4.09%	Yes	4.648183929	2				
17/07/2018	4.84005	4.653229464	3.86%	Yes	4.653229464	3				
18/07/2018	4.84085	4.657848214	3.78%	Yes	4.657848214	4				
19/07/2018	4.7951	4.656854464	2.88%	Yes	4.656854464	5				
20/07/2018	4.82735	4.659003571	3.49%	Yes	4.659003571	6				
21/07/2018	4.8043	4.660420536	2.99%	Yes	4.660420536	7				
22/07/2018	4.8043	4.6618375	2.97%	Yes	4.6618375	1	4.812957143	4.67214949	2.93%	
23/07/2018	4.8043	4.663254464	2.94%	Yes	4.663254464	2				
24/07/2018	4.7581	4.666065179	1.93%		4.7581	3				
25/07/2018	4.7818	4.669305357	2.35%	Yes	4.669305357	4				
26/07/2018	4.8584	4.675930357	3.76%	Yes	4.675930357	5				
27/07/2018	4.82265	4.6819625	2.92%	Yes	4.6819625	6				
28/07/2018	4.86115	4.686691071	3.59%	Yes	4.686691071	7				
29/07/2018	4.86115	4.691419643	3.49%	Yes	4.691419643	1	4.940014286	4.70816352	4.69%	
30/07/2018	4.86115	4.696148214	3.39%	Yes	4.696148214	2				
31/07/2018	4.8894	4.700734821	3.86%	Yes	4.700734821	3				
1/08/2018	4.9043	4.705964286	4.04%	Yes	4.705964286	4				
2/08/2018	4.92675	4.711555357	4.37%	Yes	4.711555357	5				
3/08/2018	5.05495	4.72051875	6.62%	Yes	4.72051875	6				
4/08/2018	5.0824	4.730803571	6.92%	Yes	4.730803571	7				
5/08/2018	5.0824	4.741088393	6.72%	Yes	4.741088393	1	5.31685	4.777253189	10.15%	Yes
6/08/2018	5.0824	4.751373214	6.51%	Yes	4.751373214	2				
7/08/2018	5.15105	4.762683929	7.54%	Yes	4.762683929	3				
8/08/2018	5.26815	4.775450893	9.35%	Yes	4.775450893	4				
9/08/2018	5.28605	4.7867625	9.45%	Yes	4.7867625	5				
10/08/2018	5.40365	4.800174107	11.17%	Yes	4.800174107	6				
11/08/2018	5.94425	4.823239286	18.86%	Yes	4.823239286	7				
12/08/2018	5.94425	4.846304464	18.47%	Yes	4.846304464	1	6.181671429	4.931265434	20.23%	Yes
13/08/2018	5.94425	4.869369643	18.08%	Yes	4.869369643	2				
14/08/2018	6.886	4.908059821	28.72%	Yes	4.908059821	3				
15/08/2018	6.5524	4.940089286	24.61%	Yes	4.940089286	4				
16/08/2018	6.14155	4.964883929	19.16%	Yes	4.964883929	5				
17/08/2018	5.80345	4.983576786	14.13%	Yes	4.983576786	6				
18/08/2018	5.9998	5.006574107	16.55%	Yes	5.006574107	7				
19/08/2018	5.9998	5.029571429	16.17%	Yes	5.029571429	1	5.9998	5.101216837	14.98%	Yes
20/08/2018	5.9998	5.05256875	15.79%	Yes	5.05256875	2				
21/08/2018	5.9998	5.076782143	15.38%	Yes	5.076782143	3				
22/08/2018	5.9998	5.100382143	14.99%	Yes	5.100382143	4				
23/08/2018	5.9998	5.124680357	14.59%	Yes	5.124680357	5				
24/08/2018	5.9998	5.149454464	14.17%	Yes	5.149454464	6				
25/08/2018	5.9998	5.175078571	13.75%	Yes	5.175078571	7				
26/08/2018	5.9998	5.200702679	13.32%	Yes	5.200702679	1	6.257035714	5.285701913	15.52%	Yes
27/08/2018	5.9998	5.226326786	12.89%	Yes	5.226326786	2				
28/08/2018	6.19565	5.254344643	15.19%	Yes	5.254344643	3				
29/08/2018	6.2242	5.282273214	15.13%	Yes	5.282273214	4				
30/08/2018	6.41205	5.31279375	17.14%	Yes	5.31279375	5				
31/08/2018	6.41205	5.344315179	16.65%	Yes	5.344315179	6				
1/09/2018	6.5557	5.379157143	17.95%	Yes	5.379157143	7				
2/09/2018	6.5557	5.413999107	17.42%	Yes	5.413999107	1	6.597128571	5.518724235	16.35%	Yes
3/09/2018	6.5557	5.448841071	16.88%	Yes	5.448841071	2				
4/09/2018	6.6273	5.486213393	17.22%	Yes	5.486213393	3				
5/09/2018	6.68575	5.521508929	17.41%	Yes	5.521508929	4				
6/09/2018	6.6884	5.556067857	16.93%	Yes	5.556067857	5				
7/09/2018	6.5922	5.587679464	15.24%	Yes	5.587679464	6				
8/09/2018	6.47485	5.616759821	13.25%	Yes	5.616759821	7				
9/09/2018	6.47485	5.645840179	12.80%	Yes	5.645840179	1	6.38605	5.731283418	10.25%	Yes
10/09/2018	6.47485	5.674920536	12.35%	Yes	5.674920536	2				
11/09/2018	6.4591	5.703832143	11.69%	Yes	5.703832143	3				
12/09/2018	6.4596	5.732738393	11.25%	Yes	5.732738393	4				
13/09/2018	6.40025	5.761401786	9.98%	Yes	5.761401786	5				
14/09/2018	6.36235	5.7888125	9.01%	Yes	5.7888125	6				
15/09/2018	6.07135	5.811438393	4.28%	Yes	5.811438393	7				
16/09/2018	6.07135	5.834064286	3.91%	Yes	5.834064286	1	6.234814286	5.911066964	5.19%	Yes
17/09/2018	6.07135	5.856690179	3.54%	Yes	5.856690179	2				
18/09/2018	6.2664	5.883624107	6.11%	Yes	5.883624107	3				
19/09/2018	6.36925	5.911971429	7.18%	Yes	5.911971429	4				
20/09/2018	6.31515	5.937984821	5.97%	Yes	5.937984821	5				
21/09/2018	6.27745	5.963963393	4.99%	Yes	5.963963393	6				
22/09/2018	6.27275	5.989170536	4.52%	Yes	5.989170536	7				
23/09/2018	6.27275	6.014377679	4.12%	Yes	6.014377679	1	6.159335714	6.082409821	1.25%	
24/09/2018	6.27275	6.039584821	3.72%	Yes	6.039584821	2				
25/09/2018	6.2343	6.063600893	2.74%	Yes	6.063600893	3				
26/09/2018	6.1295	6.085479464	0.72%		6.1295	4				
27/09/2018	6.12975	6.106961607	0.37%		6.12975	5				
28/09/2018	6.0807	6.125278571	-0.73%		6.0807	6				
29/09/2018	5.9956	6.141585714	-2.43%	Yes	6.141585714	7				
30/09/2018	5.9956	6.157892857	-2.71%	Yes	6.157892857	1	5.9956	6.157892857	-2.71%	

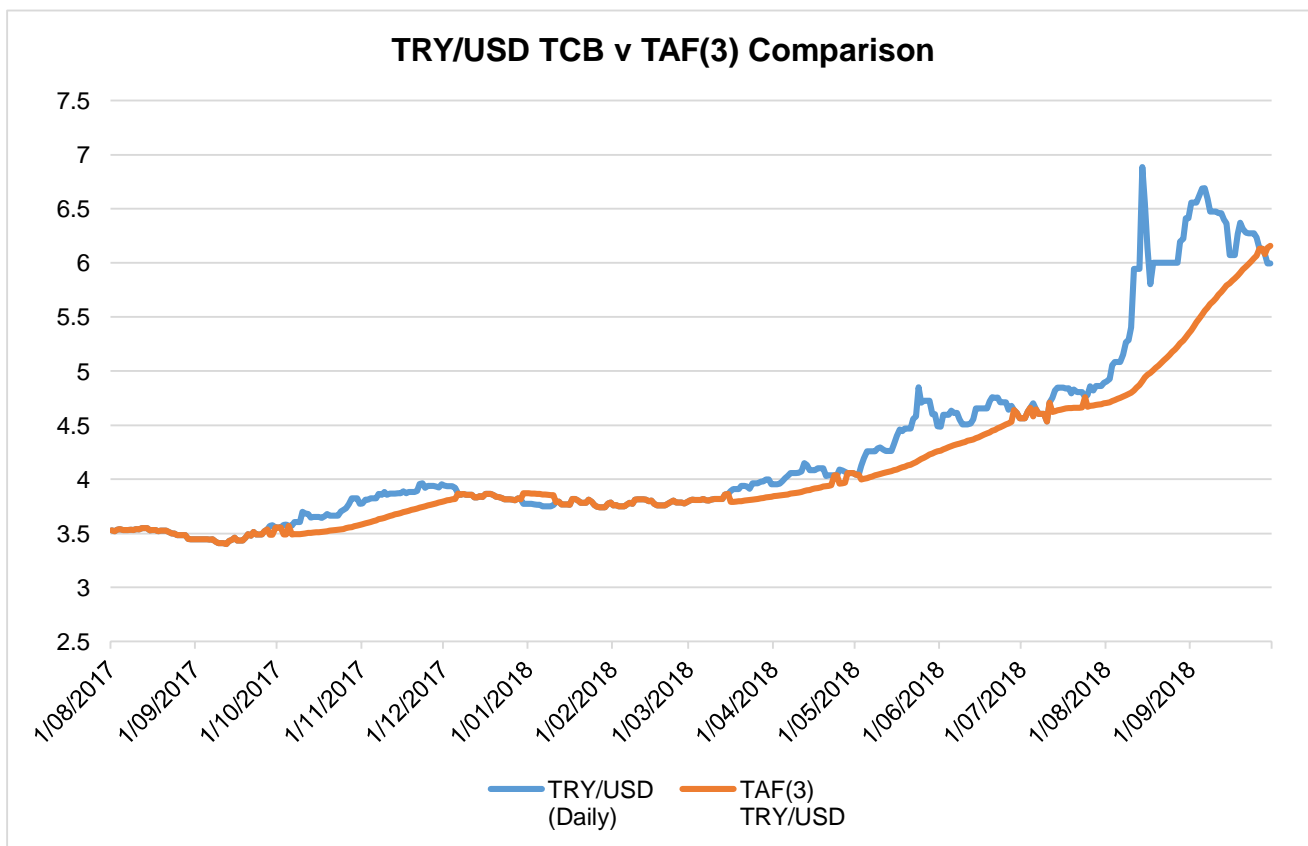
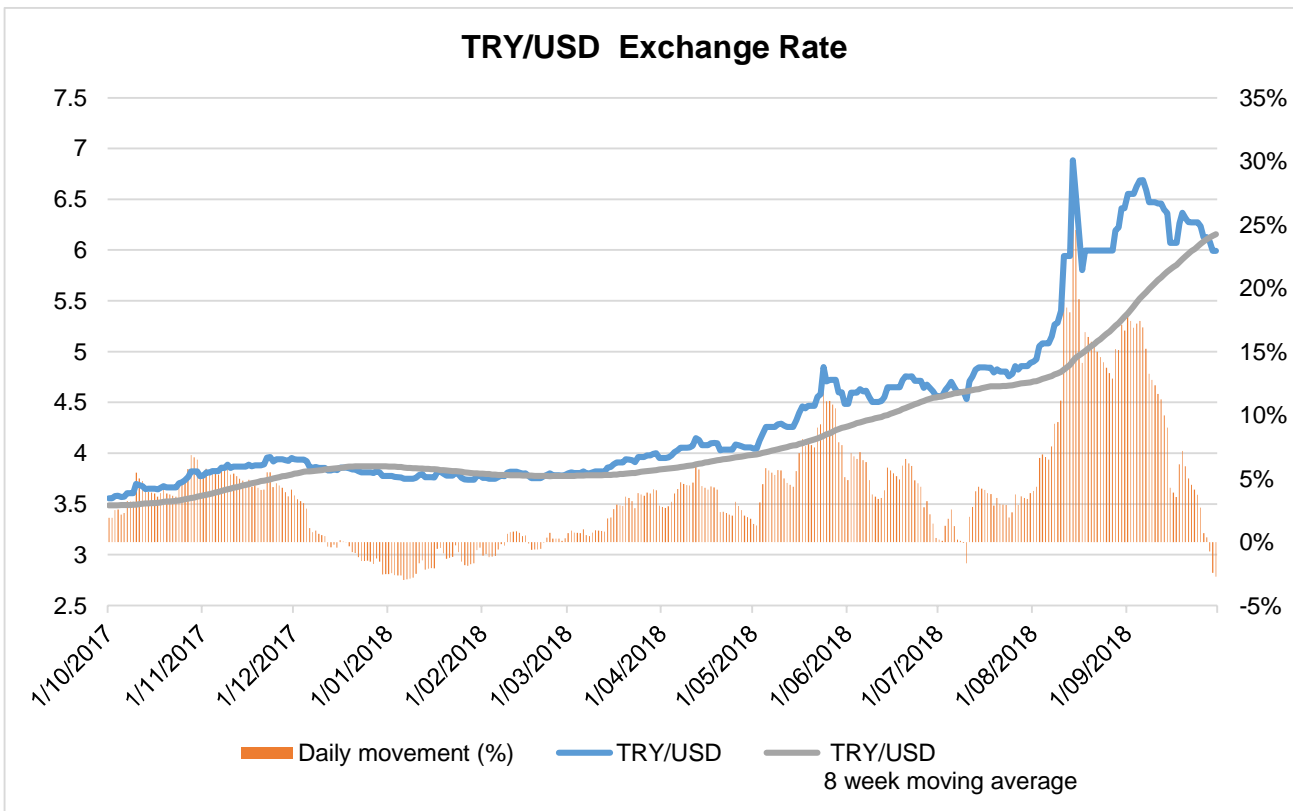
PUBLIC RECORD

Row Labels	Average of TRY/USD	Average of TAF(3)
<b>2017</b>		
Aug	3.514733871	3.514733871
Sep	3.465055	3.459319405
Oct	3.667162903	3.524732085
Nov	3.881491667	3.690183988
Dec	3.850572581	3.836480789
<b>2018</b>		
Jan	3.771401613	3.804105098
Feb	3.779932143	3.779932143
Mar	3.884070968	3.814862097
Apr	4.053605	3.92413256
May	4.408708065	4.107533122
Jun	4.626661667	4.41044994
Jul	4.753153226	4.646729176
Aug	5.796780645	4.97283053
Sep	6.339753333	5.808789048

## Currency Calculations

Monthly average exchange rate (used for plotting chart)

<b>Date</b>	<b>TCB</b>	<b>TAF(3)</b>
Oct-17	3.6672	3.5247
Nov-17	3.8815	3.6902
Dec-17	3.8506	3.8365
Jan-18	3.7714	3.8041
Feb-18	3.7799	3.7799
Mar-18	3.8841	3.8149
Apr-18	4.0536	3.9241
May-18	4.4087	4.1075
Jun-18	4.6267	4.4104
Jul-18	4.7532	4.6467
Aug-18	5.7968	4.9728
Sep-18	6.3398	5.8088





Anti-Dumping Commission  
Investigation No. 495  
Steel Reinforcing Bar

TER 495A Non-confidential Attachment 3  
Program 1 – BOTAS Natural Gas prices

**TER 495A**  
**Non-confidential Attachment 3 -**  
**Program 1 - BOTAS Natural Gas Sales Prices**

Jan-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.763615	0.0717683	0.8	0.075188
Step 2	0.8	0.075188	0.8	0.075188
OSB	0.796	0.074812	0.8	0.075188

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=1>

Feb-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.763615	0.0717683	0.8	0.075188
Step 2	0.8	0.075188	0.8	0.075188
OSB	0.796	0.074812	0.8	0.075188

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=2>

Mar-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.890014	0.0836479	1.55	0.1456767
Step 2	1.351527	0.1270232	1.55	0.1456767
OSB	1.34477	0.1263882	1.55	0.1456767

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2019&ay=3>

Apr-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.763615	0.0717683	0.8776	0.0824812
Step 2	0.8776	0.0824812	0.8776	0.0824812
OSB	0.873212	0.0820688	0.8776	0.0824812

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=4>

May-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh

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Level 1	0.763615	0.0717683	0.8776	0.0824812
Step 2	0.8776	0.0824812	0.8776	0.0824812
OSB	0.873212	0.0820688	0.8776	0.0824812

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=5>

Jun-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.763615	0.0717683	0.8776	0.0824812
Step 2	0.8776	0.0824812	0.8776	0.0824812
OSB	0.873212	0.0820688	0.8776	0.0824812

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=6>

Jul-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.763615	0.0717683	0.8776	0.0824812
Step 2	0.8776	0.0824812	0.8776	0.0824812
OSB	0.873212	0.0820688	0.8776	0.0824812

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=7>

Aug-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.83234	0.0782274	1.3122	0.1233271
Step 2	1.000464	0.0940286	1.3122	0.1233271
OSB	0.995462	0.0935585	1.3122	0.1233271

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=8>

Sep-18

Natural Gas Wholesale Prices for Free Consumers Who Buy Natural Gas from BOTAŞ				
	Use Outside of Electricity Generation		Use for Electricity Generation	
	TL / Sm <sup>3</sup>	TL / kWh	TL / Sm <sup>3</sup>	TL / kWh
Level 1	0.907251	0.085268	1.7	0.1597744
Step 2	1.140529	0.1071926	1.7	0.1597744
OSB	1.134827	0.1066567	1.7	0.1597744

<https://www.botas.gov.tr/index/tur/faaliyetler/dogalgaz/tarifeDetay.asp?yil=2018&ay=9>

**Stage 1:** The Annual Consumption of each Measurement System is 300,000 Sm<sup>3</sup> and below.

**Step 2:** The Annual Checks for each Measurement System means the Free Consumers with 3

OIZ: Organized Industrial Zone / User Union

Anti-Dumping Commission  
Investigation No.495  
Steel Reinforcing Bar

TER 495A Non-confidential Attachment 4  
Program 19 – Government of Turkey R&D expenditure

# PUBLIC RECORD

## TER 495A Non-confidential Attachment 4

### Program 19 - Government of Turkey expenditure on R&D by socio-economic objectives

<b>Investment sector</b>	<b>Percentage</b>	<b>Total</b>
Exploration and exploitation of the earth	25.9%	740 584 121
Environment	2.6%	74 265 941
Exploration and exploitation of space	1.4%	41 149 661
Transport, telecommunication and other infrastructures	11.8%	337 120 920
Energy	2.7%	78 098 527
Industrial production and technology	7.6%	216 103 339
Health	1.6%	45 603 869
Agriculture	16.0%	458 191 796
Education	2.2%	61 674 726
Culture, recreation, religion and mass media	0.1%	2 118 526
Political and social systems, structures and processes	0.7%	20 531 594
General advancement of knowledge: R&D financed from general university funds (GUF)	0.1%	1 578 392
General advancement of knowledge: R&D financed from other sources than GUF	7.5%	214 248 362
Defence	19.8%	567 165 277
<b>Total</b>	<b>100%</b>	<b>2 858 435 052</b>

TurkStat, Research and Development Activities Survey, 2017

# PUBLIC RECORD

**Sosyo-ekonomik amaç ve harcama grubuna göre genel devlet Ar-Ge harcaması, 2017**  
 General government expenditure on R&D by socio-economic objectives and type of costs, 2017

(TL)

Sosyo-ekonomik amaç Socio-economic objective	Harcama grubu - Type of costs								
	Cari harcama Current costs				Yatırım harcaması Capital costs				
	Toplam Total	Sub-total current cost	Personel Labour costs	Diğer cari Other current costs	Toplam Sub-total capital cost	Makine teçhizat Machinery and equipments	Sabit tesis Land and buildings	Bilgisayar yazılımları Capitalised computer software	Fikri mülkiyet Other intellectual property products
<b>Toplam</b>									
Total	2 858 435 052	2 292 429 834	1 218 108 005	1 074 321 829	566 005 218	414 775 850	135 777 054	13 740 690	1 711 624
<b>Yeryüzünün keşfi ve kullanımı</b>									
Exploration and exploitation of the earth	740 584 121	621 788 883	224 751 122	397 037 762	118 795 238	108 873 797	6 802 425	3 104 411	14 605
<b>Çevre</b>									
Environment	74 265 941	62 024 555	43 552 062	18 472 493	12 241 386	9 631 698	2 035 979	541 345	32 364
<b>Uzayın keşfi ve kullanımı</b>									
Exploration and exploitation of space	41 149 661	20 412 803	17 126 538	3 286 265	20 736 858	20 345 655	136 296	254 907	0
<b>Ulaşım, telekomünikasyon ve diğer altyapılar</b>									
Transport, telecommunication and other infrastructures	337 120 920	300 736 623	57 221 893	243 514 730	36 384 297	33 724 979	1 724 329	861 344	73 646
<b>Enerji</b>									
Energy	78 098 527	65 868 485	40 222 126	25 646 359	12 230 042	10 578 310	1 410 817	239 200	1 715
<b>Endüstriyel üretim ve teknoloji</b>									
Industrial production and technology	216 103 339	167 961 324	116 238 363	51 722 961	48 142 015	42 616 163	3 119 294	2 033 833	372 725
<b>Sağlık</b>									
Health	45 603 869	40 362 732	24 874 292	15 488 439	5 241 137	4 192 784	695 774	301 916	50 662
<b>Tarım</b>									
Agriculture	458 191 796	347 426 807	260 449 536	86 977 270	110 764 989	28 997 141	81 341 736	399 401	26 712
<b>Eğitim</b>									
Education	61 674 726	44 616 653	11 297 694	33 318 959	17 058 073	15 400 193	1 289 323	355 222	13 335
<b>Kültür, eğlence, din ve kitle iletişim</b>									
Culture, recreation, religion and mass media	2 118 526	1 793 715	992 760	800 956	324 811	175 025	123 498	25 335	953
<b>Siyasi ve sosyal sistemler, yapılar ve süreçler</b>									
Political and social systems, structures and processes	20 531 594	16 094 081	11 184 564	4 909 517	4 437 513	3 019 966	951 679	409 809	56 060
<b>Genel bilgi gelişimi: genel üniversite fonlarından finanse edilen Ar-Ge</b>									
General advancement of knowledge: R&D financed from general university funds (GUF)	1 578 392	1 428 993	1 187 705	241 288	149 399	52 207	91 668	5 333	191
<b>Genel bilgi gelişimi: Diğer kaynaklardan finanse edilen Ar-Ge</b>									
General advancement of knowledge: R&D financed from other sources than GUF	214 248 362	180 359 468	103 130 243	77 229 225	33 888 894	29 224 990	3 547 521	986 681	129 702
<b>Savunma</b>									
Defence	567 165 277	421 554 712	305 879 107	115 675 605	145 610 565	107 942 943	32 506 714	4 221 952	938 956

TÜİK, Araştırma Geliştirme Faaliyetleri Araştırması, 2017

TurkStat, Research and Development Activities Survey, 2017

Tablodaki rakamlar, yuvarlamadan dolayı toplamı vermeyebilir.

Total numbers may not be obtained due to rounding.

Kar amacı olmayan kuruluşlar da dahildir.

It includes private non-profit sector as well.

0 Gerçek sıfır

0 Real zero