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May 2, 2025

NON CONFIDENTIAL

SIMA Registry and Disclosure Unit
Trade and Anti-dumping Programs Directorate
Canada Border Services Agency (CBSA)
100 Metcalfe Street, 11th Floor
Ottawa, ON K1A 0L8
Canada

**Re: Certain Concrete Reinforcing Bar Originating in or Exported from Bulgaria:
Request for Normal Value Review**

Dear Sir/Madam:

On behalf of Promet Steel JSC, a producer and manufacturer of reinforcing bar in Bulgaria, we hereby request a company-specific review of the normal values (NVR) for Promet. Promet was a cooperative respondent in NQ-2024-03.

As the CBSA is well aware, the only Bulgarian respondent in this proceeding is Promet, which has been owned by the Metinvest Group of Ukraine since 2010. The rebar produced and exported by Promet to Canada is made entirely from steel billets melted and poured in Ukraine (as Promet has no own steel melting capacity in Bulgaria). These steel billets are produced at Promet's affiliate – PJSC "Kamet-Steel" (Kamet), an integrated long steel producer located in Kamianske, in the Dnipropetrovsk region, which is duly confirmed by Mill Test Certificates issued for rebars. The close supplier relationship between Promet and Kamet was established before the full-scale Russian invasion that started in February 2022.

The level of antidumping duties, both in percentage terms and in terms of the normal value applied by the CBSA, has been artificially distorted by the negative impacts of the Russian invasion. Notably, the CBSA inflated the costs of Kamet-supplied Ukrainian billets to Promet:

The costs of production were adjusted pursuant to paragraph 11.2(1)(b) of SIMR, to account for the supply of steel billet from the associated supplier Kamet being acquired at less than the associated cost of production of those input goods. This resulted in an upwards adjustment to Promet's reported steel billet costs.

Statement of reasons—Final determination: Certain concrete reinforcing bar 5 (RB5 2024 IN), para 65 (27 December 2024). The CBSA made this adjustment because Kamet was deemed to be unprofitable during the Profitability Analysis Period (PAP) of 1 January 2023 to 31 March 2024. Because of that adjustment, the CBSA accordingly increased the normal value, and thusly, the dumping rate applied to Promet in the final determination.

The normal values for Promet were based on data which are more than one year old. Promet thus requests an NVR for the following reasons:

First, during the PAP, Kamet's billet costs exceeded its billet sales prices to Promet by [], so the CBSA increased the billet costs at Promet by [] (as Kamet supplied [] of Promet's billets). During the period of January to March 2025, Kamet's billet costs exceeded its billet prices to Promet by only []. Please see Exhibit 1. Moreover, all of Promet's billet inputs were from Kamet, which was not the case during the PAP. Again, Promet disputes the reasonableness of adjusting the billet prices when they are directly caused by the Russian invasion of Ukraine, but Exhibit 1 demonstrates that the billet costs and prices have changed, which would affect the calculated normal values.

Second, the normal values calculated for Promet were based on Promet's cost of production during the month of March 2024. As noted above, these normal values incorporated an upward adjustment of []. The normal values incorporated a profit rate of []. The resulting normal values calculated by CBSA its final determination ranged from [] Bulgarian Lev/MT. However, since that time, Promet's monthly costs have decreased substantially by []% from March 2024 to March 2025, including the billet costs. Moreover, Promet's domestic profit rate during July 2024 to March 2025 was only []%. When updated, the normal values for Canadian products would range from [] Bulgarian Lev/MT, a decline of []. If no adjustment is made to the costs of Kamet billet used by Promet, the decline in normal value is [] (as the CBSA calculated a dumping rate of [] for Promet, the [] decline establishes that almost all of the dumping was attributable to the Russian invasion, as Promet and Kamet have been claiming since the beginning of this investigation). Please see Exhibit 2.

The foregoing changes to production costs (in both Bulgaria and Ukraine) and profitability in the Bulgarian home market thus warrant an NVR. Promet is aware of the recent changes made to Memorandum D-14-1-8, which states that "3. The CBSA will review SIMA values annually, monitoring market dynamics to identify changes that may necessitate updates." Given the unique circumstances regarding the dumping rate calculated for Promet's Bulgarian rebar exports produced from Ukrainian billet, and the Canadian government's continuing support of Ukraine as articulated by the Ukraine Goods Remission Order (UGRO), Promet asks that an NVR be conducted based on passage of one year since the end of the PAP. The sooner the CBSA

undertakes to change the normal values, the sooner the CBSA can bring the antidumping duties into alignment with the rest of Canadian government policy with regard to Ukraine.

Please let us know if you have any questions regarding this submission.

Respectfully submitted,

/s/ Edmund W. Sim
Edmund W. Sim

DESIGNATION OF CONFIDENTIAL INFORMATION

I, Dmytro Zakharchenko,
(Print name)

Executive Director_ of
(Print Position / Title)

PROMET STEEL JSC
(Print name of company)

request to designate the information contained in my submission to the CBSA in response to the Request for Normal Values for certain reinforcing bars originating in or exported from Bulgaria and identified in section A of this statement as confidential.

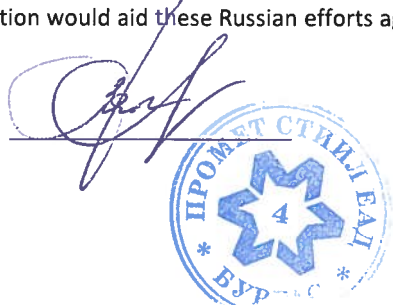
Section A - Briefly list the nature of the information you wish to designate as confidential

Corporate ownership of Promet and its affiliates, sales prices, costs of production, customer identities, sales volumes, production volumes and related information that would allow the general public to determine the above.

Section B - Provide reasons why you request that the information be treated confidential

This information is not publicly available; disclosure of this information would cause irreparable commercial harm to Promet and its affiliates. Moreover, as the ultimate owner of Promet and its affiliates is the Metinvest group of companies based in Ukraine, one of the largest companies in Ukraine and a primary supporter of the effort against the Russian invasion, public disclosure would also impair Metinvest's defense efforts and thereby also impair Ukraine's defense efforts against the Russian invasion. We note that Metinvest and its companies have been subjected to repeated Russian disinformation and economic sabotage efforts (and indeed one of its Ukrainian facilities in Mariupol was completely destroyed by the Russian invaders), such that public disclosure of this information would aid these Russian efforts against Metinvest and Ukraine.

Signed: _____



Date: _____

30.04.2015