

PROLONGING PREVENTION PREVENTION TO GRINDING EQUIPMENT EXPORT SUMMARY CONCLUSION REPORT ON THE QUESTION

1. INFORMATION ABOUT THE INVESTIGATION

1.1 The Application

Within the scope of the Decision on the Implementation of Protection Prevention in the Import of Grinder Balls, which was put into effect by the President's Decision dated 26/7/2022 and numbered 5880, the protection measure in the Turkish Customs Tariff Schedule (TGTC) 7325.91.00.00.00 and 7326.11.00.00.00 Customs Tariff Statistical Positions (GTIP) will apply protection measure in the form of additional financial obligation and the protection measure will be applied on 25/8/2025.25.

Within this framework, Grindballs Bilya Çelik Sanayi ve Ticaret A.Ş. and Çemaş Döküm Sanayi A.Ş. have been applied to the extension of the protection measure in question. Candidate Casting Machinery Industry and Trade Ltd. is registered as a manufacturer supporting the application. Other domestic producers not included in the application are Altın Bilya San. ve Tic. Ltd. Şti and Bifa Steel Forging Industry. ve Tic. Ltd. Ltd. carries out the rest of the domestic production. In this context, the applicant companies carry out a significant portion of domestic production as the largest domestic producers of the product subject of investigation. In this context, it is evaluated that the applicant companies meet the definition of "domestic manufacturer" and the representation condition for the opening of a protection measure investigation specified in Article 2 of the Regulation on Protection Measures on Import Protection Measures.

1.2 Opening an Investigation

In the preliminary examination following the receipt of the application, it was revealed that there was an absolute and relative increase in the importation of the product subject to the complaint, the economic indicators of domestic producers such as production, domestic sales, profitability and productivity, and that the negative trend continued in the last period of 2024, and that imported product prices constitute a price pressure on the domestic producer as of the period subject of examination except 2020.

As a result of its evaluation, the Board decided to open an investigation on protection measures against imports of the product subject to the application and Communiqué on Import Protection Measures (Communiqué No: With 2025/1) the1 Board's decision was announced and an investigation on protection measures was opened. The inauguration of the investigation was announced to the member states of the World Trade Organisation (WTO) on 13/3/2025.2

1.3 Period of Investigation

The investigation period is based on January 2020 – December 2024. The assessments included in the investigation report are based on the economic indicators of the domestic production branch and the annual data on imports of the product subject to the investigation between 2020-2024.

1.4 Hearing of the Parties and Parties concerned

In the opening notification of the investigation, 30 days from the opening date of the investigation are given to the parties to submit the requested information and documents and, if any, to submit requests for oral rest. On the other hand, additional time requests were met within the framework of the legislation. Within this framework, a total of 4 related parties applications, including 1 and 3 foreign government/diplomatic representative/sector institutions with the capacity of importing company based in Türkiye within the foreseen period, and the list of interested parties is presented in Annex-I. A public listening meeting was held on 7/5/2025 in order to listen to the opinions of the interested parties, and individual listening requests of the parties were also met.

1.5 On-site Review

Within the scope of the investigation, on-site examinations were made in the production facilities of domestic manufacturers of the applicants on 26/5/2025-27/5/2025 and 3/6/2025-4/6/2025. During these examinations, documents to confirm the information previously provided by the companies were collected and information about general production activities and processes and market conditions were obtained.

2. PRODUCT SUBJECT OF INQUIRY

2.1 General information

Grinder balls, which are subject to investigation, are classified as shown in the following table with the definition of “Gritter balls and grinding” in the current TGTC 7325.91.00.00 and 7326.11.00.00 GTİP.

POSITION NO.	DESCRIPTION OF THE WIFE
73.25	Other bulk goods of iron and steel:
	— <i>The others</i>
7325.91.00.00.00	— Grinding balls and grinding-like items
73.26	Other articles of iron or steel:
	— <i>Forged or printed on mold but not further processing:</i>
7326.11.00.00.00	— Paddler balls and other grinding items

The product subject of application is commercially defined as “graver ball” and is used to grind ore to fine dimensions in grinding environments (ball mills or SAG mills). The aforementioned GTİP codes are classified according to their non-forging (iron casting) and forged qualities of the products in question. Steel grinder balls are produced in different sizes from 15 mm to 125 mm. Grinder balls are mainly used as consumables in mining and cement industries.

2.2 The Production Process

In the production process of forging grinder balls, raw materials to enter production are accepted by firstly subject to input control. Then steel bars heated up to 1.200 °C with induction heating system are made ready for rolling with homogeneous and fully controlled heat dissipation. With precision ball rolling method, continuous and homogeneous fiber flow is ensured in the product. Then the related heat treatment process is applied to increase the strength of the products. After the final control, the product is prepared by packing. In the casting ball production process, iron induction furnaces are melted by melting at temperatures

of 1 500 °C and above, and the ball stage is completed by pouring into casting molds in sand molds. After that, it is cleaned with the walker-anch removal processes on the mold and hardening is ensured in the heat treatment furnaces, which is the latest stage, and the product is ready by packing with tension removal and the product is ready for enthusiasm.

2.3 Similar or Direct Competitor Product

Although there are some differences in production methods, casting and forging balls are substitute products. When one product improves its performance, the other can buy markets from each other when it lowers its price and can be substituted directly.

imported and domestic grinder ball product can be used interchangeably and is similar in terms of its physical-chemical properties and production technologies. Considering these factors, the domestically produced product and the imported product is considered as a similar and directly competing product.

2.4 The Legislation

2.4.1. Customs Taxes and Other Taxes

The rates of the Customs Tax, additional Customs Tax and Value Added Tax, which are currently being applied in the import of the product subject to the application are shown below and we do not have a WTO commitment to the said products.

G.T.I.P.-MADE NAME	VAT(%)	THE S.T.T.	CUSTOMS TAX RATE (%)					THE IGV **
			THE AB—	COUNTRIES OF GTS			THE U.S.	
				EAGU	HE	GYU		
7325.91.00.00- Lunch balls and grinding-like goods	20		0	0	0	0	2,7	0
7326.11.00.00- Grinder balls and other grinding goods	20		0	0	0	0	2,7	0

*Sta countries: EU countries, EFTA countries, Israel, Macedonia, Bosnia and Herzegovina, Morocco, Palestine, Tunisia, Egypt, Georgia, Albania, Chile, Serbia, Montenegro, Kosovo, Morityus, Moldova, Faroe Islands, South Korea, Malaysia, Singapore. *15 % applies to non-WTO countries (excluding the Republic of Azerbaijan) (as of 1.1.2025).

2.4.2. Current Prevention of Protection

Grindballs Steel Ball Industry & Tic. A.Ş. and Çemaş Döküm Sanayi A.Ş. companies, 7325.91.00.00.00 and 7326.11.00.00 Customs Tariff Statistical Position in the claim that the import of grinder balls and similar goods for grinding and related products are applied to the import measures related to the application of protection measures of the related product for 3 years as a result of the investigation on the application of protection measures in the import of the related product (additional obligation) it was decided to determine the additional financial obligation in the first year in the form of \$200/Tons, the second year 195 USD/Tons, and the third year 190 USD/Ton, and with the “Decision on the Implementation of Protection Prevention in the Import of Grinder Balls (2022/5080)” entered into force.

The level of the current protection measure which is currently in force until 25/08/2025 of the articles of heading 7325.91.00.00.00 and 7326.11.00.00 is shown in the table below.

THE GTIP	DESCRIPTION OF GOODS	Additional MATERIAL LANGUAGE (US Dollar/Ton)
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		1. Period (26.08.2022- 25.08.2023)	2. Period (26.08.2023- 25.08.2024)	3. Period (26.08.2024- 25.08.2025)
7325.91.00.00.00	Grinding balls and grinding- like items	200	195	190
7326.11.00.00.00	Grinder balls and other grinding items			

2.4.3. Tariff Quotas Opened within the Scope of Prevention of Protection

In accordance with the provisions of the agreement, countries on the path of development (GYU), which are below the individual 3 % of import shares and collectively below 9 % , are exempt from the protection measures applied and the exemption rule is applied in the form of opening tariff quotas by our country. Within this framework, within the framework of the provisions of the Decision Regarding the Implementation of Prevention Prevention in Grinder Ball Import, the tariff quota of the countries and customs zones originating in the list of countries and customs zones has been opened with a total of 1.040 tons of tariff quota for all goods originating in each country or customs zone, and the tariff quota to be given for goods originating in each country or customs zone has been limited to 347 tons.

3. INDICATION OF IMPORT AND CONDITIONS OF REALISATION

In this section, statistics on the course of imports, market share and ratio of domestic production are included for the product subject of investigation, as well as import data on the basis of country and unit prices of domestic and imported products are compared. In the data presented and calculations, foreign trade statistics provided by the Turkish Statistical Institute and the information obtained from domestic producers were used. The course of absolute and relative imports for the product subject to application, the share of imports from the domestic market and the distribution of imports according to the countries as of the years are given below.

3.1 Quantity and Proportional Change of Imports

THE IMPORT	Quantity (Ton)	Value (Million S)	IT'S B.F. (S/Ton)	% Of change		
				Quantity (Ton)	Value of S	B.F. (\$/ton)
2020	6.439	6,5	1.006	—	—	—
2021	11.557	13,2	1.140	80 %	103 %	13 %
2022	22.914	31,7	1.383	98 %	140 %	21 %
2023	23.118	28,1	1.213	1 %	—11 %	—12 %
2024	13.331	14,7	1.102	—42 %	48 %	— 9 %

The source: HISTORY OF TÜİK

Import data of the product subject to inquiry between 2020-2024 are shown in the table above on the basis of quantity, value and unit price.

In 2020, the import amount of 6.439 tons was realised at a total value of \$6.5 million and an average unit price of \$1,066 per ton.

In the following year 2021, the amount of imports increased by 80 % to 11.557 tons, and the value of imports increased by 103 % to 13.2 million dollars; in parallel with this increase, the unit price increased by 13 % to \$1,140.

In 2022, imports increased by 98 % to 22.914 tons; on the basis of import value, it increased by 140 % to \$31.7 million. During the same period, the average unit price per ton rose 21 % to \$1,383.

In 2023, the rate of increase in imports slowed; It increased by 1 % to 23.118 tons. During this period, the value of imports decreased by 11 % to \$28.1 million, and the unit price fell 12 % to \$1,213.

Finally, imports decreased by 42 % to 13.331 tons in 2024; on the basis of value, imports decreased by 48 % to \$14.7 million, while the unit price decreased by 9 % to \$1,012.

3.2 Relative Import

3.2.1. Rate of Import to Domestic Production

The course of relative imports calculated by the ratio of imports to domestic production is shown in the table below with index and exchange rates.

Relative Import	The Unit	2020	2021	2022	2023	2024
Import/Domestic Production*		100	224	521	654	448

* The applicant is based on the production figures of domestic producers.

While the ratio of imports to domestic production index is 100 in 2020, this rate has steadily increased in the following years to 224 in 2 021,521 in 2022 and 654 in 2023. In 2024, however, the figure decreased to 448. On the other hand, it was understood that relative imports in 2024 were higher than in 2020 and 2021.

3.2.2. Market share of imports

In the market share account of imports, the domestic market data was reached by using the total domestic sales of domestic production and import statistics calculated using the data provided by the applicant companies, and the market share of imports was obtained with the rate of imports to consumption.

Import/Consumption	The Unit	2020	2021	2022	2023	2024
The Index		100	161	268	276	227

The market share index of imports increased from 100 in 2020 to 161 in 2 021,268 in 2022 and 276 in 2023. In 2024, however, the market share of imports decreased to 227. However, by 2024, more than half of the market was made up of imported products.

3.3 imports in the Reputation of Countries

The quantity, value and unit price distribution of imports from the top 10 major supplier countries between 2020-2024 are shown in the table in Annex-2. In this context, as of 2024, it is seen that the countries that stand out in the rankings based on the amount of imports are Iran, China, Thailand, Italy, Bulgaria.

In particular, it is understood that shipments from China played a decisive role in the increase in imports in the period 2020-2024. As a matter of fact, imports from China were at a very low level in 2020, at 102 tons; It

was 95 tons in 2021 and 89 tons in 2022. In contrast, imports reached 5.732 tons by 6340 % compared to 2 022 in 2023 and decreased to 3.752 tons in 2024. In addition, the top 10 countries that export the most to the world within the scope of grinder ball goods are listed in Annex-5, sorted according to the quantity data of 2024.

3.4 Comparison of price

Below are the tables where the average unit costs of the domestic and imported products are compared. In the preparation of the data presented in the tables, the average commercial cost of domestic products, domestic sales prices, tariff prices of imported products added tariffs and the average exchange rate in the related period were used, according to these data, price breakage and price pressure rates were calculated.

The “price breakout” shows how much the price of imported products is below the price of domestic products, and the “price pressure” shows how much the price is suppressed by the average imported unit price by adding a reasonable rate of profit to the average unit cost of domestic products. The cost of the imported unit is determined by adding the applicable customs duty and 1 % other costs to the CIF import price of the product subject to the investigation. In these calculations, the formula [(Domestic Price-Imported Price) is used. In the calculation of price wear, domestic product sales prices have been realised using the annual PPI index. The price comparison of the product subject to inquiry is listed below.

Prices (\$/ton)	The Unit	2020	2021	2022	2023	2024
Domestic sales price	TL/Ton	X	X	X	X	X
	\$/Ton	X	X	X	X	X
Domestic Sales Price Created (Commercial cost + 5 % profit)	TL/Ton	X	X	X	X	X
	\$/Ton	X	X	X	X	X
It's heavy ort. Cost of Imported Unit*	\$/Ton	1.043	1.182	1.434	1.258	1.143
Breaking the price	% OF	— X	— X	X	X	X
The Price Printing	% OF	— X	X	X	X	X
Price wear (Domestic Sale Real Price)	TL/Ton	X	X	X	X	X

The source: Grindballs, Fountain, TUIK

In the table above, the unit industrial and commercial costs of the goods sold, as well as domestic and imported unit prices are included; in this context, the pressure of imported unit cost on domestic sales prices created by the breaking effect on domestic sales prices is calculated.

When comparing the domestic sales prices of the product subject to the import cost of the product subject to the unit import and generated, there has been no breaking and suppression of domestic prices since the imported unit cost in 2020 is above domestic prices; on the contrary, the price difference occurred in a negative direction. In 2021, there was no ‘price break’ due to the fact that imported product costs remain X % higher than the domestic sales price; however, imported unit costs, which fall below the domestic sales price created, created a ‘price pressure’ of X % as of the same year. In the following years, with imported unit costs falling below the domestic prices realised and created, price breakage and pressure became even more apparent. Accordingly, price breakouts occurred at X %X in 2022, X % in 2023 and %X in 2024. In the same years, the price pressure effect of imports reached significant levels such as X % in 2022, X % in 2023 and X % in 2024.

All these data reveal that imported unit costs directly break domestic sales prices and create an increasing pressure on the price levels determined by domestic producers on the basis of cost plus profit margin.

4. ECONOMIC DISPLAYS OF LOCAL PRODUCTION BRANCH

The indicators in this section are prepared using data from the two domestic producers Grindballs and Çemaş companies covering 2020-2024. The data in the tables are indexed according to the 2020 figures on an annual basis.

4.1 Category: Consumption

Consumption figures were obtained by combining the total domestic sales data of the applicant companies and the general import data, and the course of consumption according to the years is below.

Category: Consumption	The Index	2020	2021	2022	2023	2024
The Index		100	111	133	130	91

In the period subject of investigation, the domestic consumption index increased between 2020 and 2023. Since 2023, consumption from 100 in 2020 increased to 111 in 2021 and 133 in 2022. In 2023, the consumption index fell slightly to 130. As of 2024, the consumption index decreased to 91 compared to the previous year.

4.2 Production

The Manufacture	The Index	2020	2021	2022	2023	2024
The Index		100	80	68	55	46

When the production data of the applicant companies are examined, it is seen that the production quantity index is constantly decreasing as of the years of investigation. In 2020, the index fell from 100 to 80 in 2021; It fell to 68 in 2022 and dropped to 55 in 2023. As of 2024, the downward trend continued, and production decreased compared to the previous year at 46 levels.

4.3 Domestic sales

Domestic sales	2020	2021	2022	2023	2024
The Index	100	91	68	63	57

The amount of domestic sales of the product subject to inquiry showed a trend that is constantly decreasing during the investigation period. Domestic sales with an index of 100 in 2020 decreased to 91 in 2021; In 2022, this decline trend accelerated, with sales falling to 68. The sales index, which was 63 with an additional decline in 2023, decreased to 57 as of 2024.

4.4 Overseas sales

Overseas sales	2020	2021	2022	2023	2024
The Index	100	83	67	59	31

The foreign sales quantity index of the product subject of investigation has decreased continuously during the period of the investigation. Exports, which are at the level of 100 in 2020, fell to 83 in 2021; It fell to 67 in 2022. In 2023, the foreign sales index decreased to 59, while in 2024 this decrease accelerated and decreased to 31.

4.5 Capacity and Capacity Usage Rate

Capacity and KKO	2020	2021	2022	2023	2024
The Capacity Index	100	135	135	160	160
The KKO Index	100	59	50	34	29

The total production capacity index of the applicant domestic producers has tended to increase during the investigation period. The index, which was 100 in 2020, reached 135 in 2021; this level was maintained in 2022. In 2023, the capacity index was increased to 160 and remained stable in 2024.

The capacity utilisation rate index (KKO) decreased significantly during the investigation period. The index, which was 100 in 2020, fell to 59 in 2021; In 2022, it fell to 50. It fell to 34 in 2023 and 29 in 2024.

4.6 Employment

Category: Employment	2020	2021	2022	2023	2024
The Index	100	93	114	88	99

The direct number of workers employed by domestic producers in the production of the product subject of investigation followed a fluctuating course during the investigation period. The index fell from 100 in 2020 to 93 in 2021. In 2022, it increased to 114, and in 2023 this number decreased to 88. By 2024, the increase was recorded and increased to 99.

4.7 Stocks at the end of the semester

The Stocks	2020	2021	2022	2023	2024
The Index	100	80	109	87	96

During the investigation period, the stock quantity index of domestic producers at the end of the period followed a fluctuating course. Stocks, which were 100 in 2020, decreased to 80 in 2021. In 2022, it increased to 109. It fell to 87 in 2023. As of 2024, the index increased from the previous year to 96.

4.8 Efficiencies

The Productivity	2020	2021	2022	2023	2024
The Index	100	87	60	62	47

The employment productivity index (tons/person) indicating the amount of production per worker decreased except in 2023 during the investigation period. The index fell from 100 in 2020 to 87 in 2021. In 2022, it fell to 60. however, this decline temporarily stalled in 2023, and the productivity index increased to 62 due to a larger reduction in the employment index compared to the decrease in the production index. In contrast, as of 2024, it fell again to 47.

4.9 Profitability

Profitability	2020	2021	2022	2023	2024
The Index	100	BY 147	267	51	BY 587

The profitability indicator index, calculated based on the ratio of operating profit to net turnover, followed a fluctuating course in the period of investigation. The profitability index, which was 100 in 2020, turned negative in 2021 to -147. In 2022, it reached 267 with a significant increase, reaching the highest level in the investigation period. However, this increase was not permanent; it fell to 51 in 2023 and fell seriously in 2024 to -587.

4.10 Evaluation of Economic Indicators

The main economic indicators regarding the domestic production of the product subject are included in Annex-3. According to these data, the economic developments faced by domestic producers during the period of investigation were examined.

There was an increase in domestic consumption between 2020-2023, but there was a contraction in the

domestic market in 2024. Imports also increased until 2023 and the market share index rose to 276 in 2023. In 2024 it was 227.

The total production quantity index of the domestic manufacturer decreased during the period of investigation; domestic and international sales decreased during the period in parallel with this trend. During the investigation period, capacity was increased in 2021 and 2023. The capacity utilisation rate index has also declined during the investigation period; The index fell from 100 in 2020 to 29 in 2024.

Domestic production branch employment followed a fluctuating course and productivity was increased in 2021 and 2023. The increase in productivity in 2023 was due to a larger reduction in employment compared to the decrease in production in the same year.

The profitability index has followed a fluctuating course and has fallen to negative levels in the last year to -587. As of 2021, imported unit costs remained below domestic product prices, leading to increasingly price breaking and pressure each year. This indicates that the competition conditions in the domestic market have developed against the domestic producer.

However, while production and domestic sales have continued to decline in the recent period, the pace of this decline has slowed to some extent thanks to hedging measures in 2023 and 2024.

5. OPINIONS AND EVALUATION OF INTERESTED PARTIES

The views expressed by the interested parties overlap in many points. Therefore, the opinions expressed in order to prevent repetition are classified according to the subject and presented below. In addition, assessments of the opinions in question are also included below the opinions.

- High Chrome Cast Balls (7325.91) and Steel Balls (7326.11) are different products. These two categories of grinding balls are technologically, economically and functionally different and serve different industries.

Even if the production methods are different, the two products can buy markets from each other when it comes to price competition in the market and when one product increases its performance, the other lowers its price. As a result of the investment and R & D studies of X company after 2017, there are consumers who stop using casting ball and use forging ball in the domestic market, which shows that forging and casting balls are direct competitors and substitute products.

- High Chrome Cast Balls (7325.91) and Steel Balls (7326.11) cannot be used interchangeably in factories. When used together, harder cast balls cause forged steel balls to break early, resulting in operational failure. Accordingly, combining these two products for price analysis leads to flawed and misleading results.

In practice, some factories can use casting and forged steel balls together for reasons such as cost, ease of supply or technical flexibility, or prefer one as the equivalent of the other. Both products, with certain differences, can perform similar functions and can be considered as alternative products in the market.

In this context, considering the overlap in the usage areas, it is evaluated that casting and forged steel balls together in price analysis are compatible with competition conditions.

- Although the production technologies and costing calculations of the two products are different, it is very few to be used interchangeably in the same mill without mixing because the high chrome casting ball will break the steel ball in a very short time. In addition, there is no use of Steel

Ball number 7326.11 GTİP in the cement sector.

Domestic manufacturer applicant X sells cement factories, mining sector, aerated concrete factories and thermal power plants respectively. In this context, it has been informed that copper mine, aerated concrete and thermal power plant sectors use the ball types defined under both GTİP codes subject to application, and that these balls are alternative to each other for these three sectors and can be used interchangeably in the applications needed.

- There are also other important manufacturers in Türkiye that actively produce steel ball product number 7326.11 named below. In the tables prepared by the applicants firms, domestic production tonnages were shown smaller than they were in the tables and the indexes calculated against imports were misleading due to the fact that the production tonnages of other producers were not included.

Within the scope of the investigation, data not only of the applicant companies but also other companies producing the same product in Türkiye were included in the calculation of the domestic market size. On the other hand, the data of the companies performing an important part of domestic production has been used in the economic indicators tables. The analysis carried out within this framework is considered to be in accordance with the provisions of the Agreement.

- It is not enough to explain the products imported from abroad only with a “low price policy”. The products produced by the applicant companies are known to lose their competitiveness due to their low quality and low performance compared to some imported products.

The products of domestic manufacturers meet national and internationally accepted quality requirements. In this context, products offered to the market by domestic producers in terms of the articles subject to application; it has been evaluated to be able to compete with its imported counterparts in terms of durability, performance and technical competence.

6. COMPLIANCE OF LOCAL PRODUCERS WITH COMPETITION CONDITIONS

In this section, the activities carried out by domestic producers in order to adapt to the competitive conditions in the sector are discussed during the investigation period, and the evidence shows that the domestic industry is adapting to the conditions in which the measure will not be in force in the future.

Within the scope of the application plan and strategies of domestic producers to adapt to the competition; For ball production between 20-50 mm and 30-90 mm, it increased its annual production capacity by commissioning new production lines (including machine park, auxiliary equipment, molds, heat treatment and packaging units) with natural gas furnaces. In addition, R & D and machine investment production centers have been reduced.

In addition, solar power plant (GES) site investment was made in order to reduce energy costs and contribute to environmental sustainability, it was informed that the process was planned to be completed at the end of the year.

In summary, as a result of the investments made, the production capacity was significantly increased by commissioning new production lines with natural gas furnaces; in addition, with its new investment, cost advantage has been provided in production processes and product quality and durability has been increased. Qualitative improvements have been made for product performance and wear resistance with the test equipment brought to the R & D infrastructure; efficiency in operating costs has been achieved thanks to the collection of production activities in two centers. In this context, evidence has been determined that the domestic industry branch is adapting to competition conditions by starting to increase its competitive power in the domestic market during the period of application of protection measures.

With the investments made between 2020-2024 in order to reduce the costs of domestic producers in ball production and increase production capacity, it is understood that both production capacity has been significantly increased and production costs have been reduced. In addition, as a result of the integration of these investments into production processes, it has been determined that ball quality has reached high levels.

As a result, in the period of implementation of the protection measure, the evidence that the domestic industry branch started to increase its competitiveness in the domestic market and adapts to the competitive conditions has been determined.

7. IT IS STILL NECESSARY TO PREVENT PROTECTION. EVALUATION OF WHAT IT DOES NOT

This section includes assessments to determine whether the current protection measure remains necessary to prevent or eliminate serious harm.

Despite the investments of domestic producers, domestic production in the period of 2022; there have been significant declines in terms of production quantity, domestic sales, capacity utilisation rate and profitability indicators. The production index fell from 68 in 2022 to 55 in 2023 and reached 46 in 2024. The domestic sales index fell from 68 in 2022 to 63 in 2023 and decreased to 57 in 2024. The capacity utilisation rate has decreased significantly during the investigation period. The index fell from 50 in 2022 to 34 in 2023 and fell to 29 in 2024.

In terms of domestic production indicators, there was an increase in domestic consumption between 2020-2023, but contraction occurred in 2024. In the same period, there was a steady decrease in domestic and international sales with the total production amount of domestic producers. However, thanks to the hedging measures implemented in 2023 and 2024, the decline trend in production and domestic sales continued, but the pace of the decline has slowed to some extent.

During the period when protection measure is in force, domestic manufacturers have commissioned new production lines, purchased additional machines and it is planned that investment plans will be put into operation in the coming period in order to adapt to the competitive market. In this context, if the duration of the protection measure is not extended, it is evaluated that the investments made by domestic producers are at risk of being disrupted.

In addition, unit prices for imported products after 2022 continued to be below domestic products; In 2024, imports broke domestic sales prices by X % and created X % pressure compared to the domestic price created. This shows that price competition continues to develop against the domestic producer.

Profitability was realised as 267 in 2022 as a direct reflection of this pressure, while in 2024 it reached -587 level and revealed serious risks in the economic sustainability of the domestic production branch.

As a result, it has been determined that the current protection measure continues to be necessary to prevent or eliminate serious damage due to the recent introduction of cheaper imported products compared to previous periods, and the need for time to produce results in the investments and activities undertaken by domestic producers to increase their competitiveness levels.

8. THE RESULT

During the investigation period, it was determined that imports increased in absolute and relative terms and there was a decrease in imports in 2024 due to the effect of the measure. During the investigation period, economic indicators of domestic producers such as production, domestic sales, profitability, capacity utilisation rates have been deteriorated, but some of the indicators have slowed down due to protection measures recently.

The continuation of limited recovery and capacity investments in productivity in 2023 shows that domestic production has taken concrete steps towards adapting to market conditions.

As of 2021, with imported unit costs falling below domestic prices, price breakage and pressure has become apparent.

These developments reveal that the competition conditions in the domestic market continue to work against domestic producers. This negative course in the economic indicators and the continuation of the import pressure shows that the continuation of the protection measure is still necessary for the sustainability of domestic production.

In this context, it is important to strengthen the partial improvements observed through the protection measure, to find the complementary investments of domestic producers and to extend the duration of the current measure in terms of permanent construction of the international competitiveness of domestic producers.

As a result, it is evaluated that the necessary conditions have been established within the scope of the Agreement and legislation in order to extend the protection measure applied against imports of the product subject to the investigation.

In this context, it is evaluated that the duration of the protection measure applied in grinder ball imports will be extended by another 3 years and that the current protection measure in accordance with the Agreement will be liberalised and implemented as specified in the table below.

THE GTIP	DESCRIPTION OF GOODS	Additional financial capital (US Dollar/Ton)		
		1. Period (26.08.2025- 25.08.2026)	2. Period (26.08.2026- 25.08.2027)	3. Period (26.08.2027- 25.08.2028)
7325.91.00.00.00	Refrigerant balls and grinding-like items	185	180	175
7326.11.00.00.00	Grinder balls and other grinding items			

the Related Parties

S.	RELATED PARTY TYPE	THE COUNTRY	TITLE
1	LOCAL MANUFACTURER	THE TURKISH REPUBLIC OF TURKEY	Grindballs Steel Bilya San. ve Tic. IT'S AN A.S.
2	LOCAL MANUFACTURER	THE TURKISH REPUBLIC OF TURKEY	ÇEMAŞ Casting Industry Inc.
3	LOCAL MANUFACTURER	THE TURKISH REPUBLIC OF TURKEY	Candidate Casting Machinery San. It's a Tic. Ltd. Ltd.
4	THE OTHER	REPUBLIC OF THAILAND	Ministry of Trade Department of Foreign Trade
5	THE OTHER	REPUBLIC OF TAIWAN	Taipei Economic and Cultural Mission
6	THE IMPORTER	THE TURKISH REPUBLIC OF TURKEY	FTR Makina Kimya Metallurgy San. ve Tic. IT'S AN A.S.
7	THE OTHER	HISTORY OF EGYPT	Ministry of Investment and Foreign Trade

Annex – 2 Countries Import

Name of Country	Quantity (tons)					Value (\$)					B.F. (\$/ton)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Republic of Iran	841	2.556	8.027	6.188	4.156	538.282	2.230.568	10.115.760	5.833.284	3.797.520	640	873	1.260	943	914
The Chinese Republic of China	102	95	89	5.732	3.752	130.998	152.533	145.325	5.762.885	3.619.716	1.285	1.614	1.624	1.005	965
Republic of Thailand	3.077	2.697	3.907	3.193	2.047	3.343.723	4.002.652	7.372.134	5.005.007	3.102.771	1.087	1.484	1.887	1.567	1.516
Italy	5	304	6.590	4.729	1.084	19.195	331.642	7.607.718	5.923.014	1.148.977	3.593	1.093	1.154	1.252	1.060
Republic of Bulgaria	190	426	594	945	792	141.242	406.896	708.477	1.101.896	805.340	745	956	1.192	1.166	1.017
History of Egypt	311	3.131	1.076	368	734	283.621	3.090.787	1.333.815	1.323.330	928.166	912	987	1.240	3.596	1.265
History of India	480	5	898	780	425	460.830	15.537	1.504.822	1.165.697	655.307	960	3.115	1.676	1.495	1.542
Republic of Japan	80	80	70	120	140	134.744	150.007	152.278	225.759	265.563	1.684	1.870	2.175	1.881	1.897
The Ukraine	0	0	0	0	104	15	0	0	63	106.175	1.000	0	0	1.105	1.026
Oman of Oman	0	0	0	22	50	0	0	0	5.060	40.738	0	0	0	230	820
Total of Lists	5.085	9.293	21.252	22.078	13.283	5.052.650	10.380.622	28.940.329	26.345.995	14.470.273	994	1.117	1.362	1.193	1.089
The General Total	6.439	11.557	22.914	23.118	13.331	6.474.473	13.175.240	31.686.232	28.053.432	14.695.017	1.006	1.140	1.383	1.213	1.102

Annex – 3 Domestic Production Branch Economic Indicators

The Indicator	The Unit	2020	2021	2022	2023	2024
The Import	The ton	6.439	11.557	22.914	23.118	13.331
Category: Consumption	The Index	100	111	133	130	91
Import market share	The Index	100	161	268	276	227
Import/Domestic Production Oram	The Index	100	THE 'S 224	521	654	448
The Manufacture	The Index	100	80	68	55	46
Domestic sales	The Index	100	91	68	63	57
Overseas sales	The Index	100	83	67	59	31
Capacity	The Index	100	135	135	160	160
THE KKO	The Index	100	59	50	34	29
Category: Employment	The Index	100	93	114	88	99
The Productivity	The Index	100	87	60	62	47
The Stocks	The Index	100	80	109	87	96
Profitability	The Index	100	— (LAUGHS) 147	267	51	— (LAUGHS) 587
Breaking the price	% OF	— X	— X	X	X	X
The Price Printing	% OF	— X	X	X	X	X

Appendix-4: IYU List to be Exempted from Measure

Afganistan İslam Cumhuriyeti, Angola Cumhuriyeti, Antigua ve Barbuda, Arjantin Cumhuriyeti, Arnavutluk Cumhuriyeti, Azerbaycan Cumhuriyeti, Bangladeş Halk Cumhuriyeti, Barbados, Belarus Cumhuriyeti, Belize, Benin Cumhuriyeti, Birleşik Meksika Devletleri, Bolivarcı Venezuela Cumhuriyeti, Bolivya Çok Uluslu Devleti, Bosna Hersek, Botsvana Cumhuriyeti, Brezilya Federatif Cumhuriyeti, Burkina Faso, Burundi Cumhuriyeti, Bütan Krallığı, Cabo Verde Cumhuriyeti, Cezayir Demokratik Halk Cumhuriyeti, Cibuti Cumhuriyeti, Cook Adaları, Çad Cumhuriyeti, Doğu Timor Demokratik Cumhuriyeti, Dominik Cumhuriyeti, Dominika, Ekvator Cumhuriyeti, Ekvator Ginesi Cumhuriyeti, El Salvador Cumhuriyeti, Endonezya Cumhuriyeti, Eritre Devleti, Esvatini Krallığı, Etiyopya Federal Demokratik Cumhuriyeti, Fas Krallığı, Fiji Cumhuriyeti, Filipinler Cumhuriyeti, Filistin Devleti, Fransız Polinezyası, Gabon Cumhuriyeti, Gambiya Cumhuriyeti, Gana Cumhuriyeti, Gine Cumhuriyeti, Gine-Bissau Cumhuriyeti, Grenada, Guatemala Cumhuriyeti, Guyana Kooperatif Cumhuriyeti, Güney Afrika Cumhuriyeti, Güney Sudan Cumhuriyeti, Gürcistan, Haiti Cumhuriyeti, Hindistan Cumhuriyeti, Honduras Cumhuriyeti, Irak Cumhuriyeti, Jamaika, Kamboçya Krallığı, Kamerun Cumhuriyeti, Karadağ, Kazakistan Cumhuriyeti, Kenya Cumhuriyeti, Kırgız Cumhuriyeti, Kiribati Cumhuriyeti, Kolombiya Cumhuriyeti, Komorlar Birliği, Kongo Demokratik Cumhuriyeti, Kore Demokratik Halk Cumhuriyeti, Kosova Cumhuriyeti, Kosta Rika Cumhuriyeti, Kotdivuar Cumhuriyeti, Küba Cumhuriyeti, Laos Demokratik Halk Cumhuriyeti, Lesotho Krallığı, Liberya Cumhuriyeti, Libya Devleti, Lübnan Cumhuriyeti, Madagaskar Cumhuriyeti, Kuzey Makedonya Cumhuriyeti, Malavi Cumhuriyeti, Maldivler Cumhuriyeti, Malezya, Mali Cumhuriyeti, Marşal Adaları Cumhuriyeti, Mikronezya Federe Devletleri, Moğolistan, Moldova Cumhuriyeti, Montserrat, Moritanya İslam Cumhuriyeti, Morityus Cumhuriyeti, Mozambik Cumhuriyeti, Myanmar Birliği Cumhuriyeti, Namibya Cumhuriyeti, Nauru Cumhuriyeti, Nepal, Nijer Cumhuriyeti, Nijerya Federal Cumhuriyeti, Nikaragua Cumhuriyeti, Niue, Orta Afrika Cumhuriyeti, Özbekistan Cumhuriyeti, Pakistan İslam Cumhuriyeti, Palau Cumhuriyeti, Panama Cumhuriyeti, Papua Yeni Gine Bağımsız Devleti, Paraguay Cumhuriyeti, Peru Cumhuriyeti, Ruanda Cumhuriyeti, Rusya Federasyonu, Saint Kitts ve Nevis Federasyonu, Saint Lucia, Saint Vincent ve Grenadinler, Samoa Bağımsız Devleti, Sao Tome ve Prinsipe Demokratik Cumhuriyeti, Senegal Cumhuriyeti, Seyşeller Cumhuriyeti, Sırbistan Cumhuriyeti, Sierra Leone Cumhuriyeti, Solomon Adaları, Somali Federal Cumhuriyeti, Sri Lanka Demokratik Sosyalist Cumhuriyeti, Sudan Cumhuriyeti, Surinam Cumhuriyeti, Şili Cumhuriyeti, Tacikistan Cumhuriyeti,

Tanzanya Birleşik Cumhuriyeti, Togo Cumhuriyeti, Tonga Krallığı, Trinidad ve Tobago Cumhuriyeti, Tunus Cumhuriyeti, Tuvalu, Türkmenistan, Uganda Cumhuriyeti, Ukrayna, Umman Sultanlığı, Uruguay Doğu Cumhuriyeti, Ürdün Haşimi Krallığı, Vanuatu Cumhuriyeti, Vietnam Sosyalist Cumhuriyeti, Yemen Cumhuriyeti, Zambiya Cumhuriyeti, Zimbabve Cumhuriyeti.

Annex-5: Trade Map Analysis (2024 Exporting Countries by Quantity)

	MICKTAR (TON)					B.F \$/Ton				
The Exporter	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
The Chinese Republic of China	828.139	929.047	1.066.561	1.107.625	1.391.169	822	1.013	1.084	936	860
History of India	198.770	181.364	132	202.340	162.930	1.119	1.191	2.095.508	1.292	1.272
Republic of Thailand	85.305	97.694	93.641	116.448	112.934	1.013	1.184	1.398	1.384	1.320
United States of America	59.714	84.289	49.086	57.898	84.694	1.040	1.098	1.305	1.333	1.302
Republic of Chile	98.278	111.133	96.909	92.273	83.090	790	996	1.282	1.153	1.003
The Russian Federation	52.391	66.273	60.957	50.475	50.460	595	835	1.147	822	831
The Indonesian Republic of Indonesia	7.098	2.931	16.322	12.057	27.439	910	993	1.264	979	970
South Africa	33.917	44.003	35.156	20.130	24.475	967	1.185	1.461	1.361	1.384
History of Poland	15.508	17.364	1	10.269	21.335	809	991	16.061.000	1.112	1.146
Republic of Mexico	2.594	1.479	8.415	5.728	16.066	873	1.515	1.201	1.238	1.209
Republic of Peru	11.111	13.265	14.494	15.334	15.260	822	1.115	1.200	1.089	960
Republic of Namibia	7.907	1.262	7.938	7.800	15.076	1.023	1.445	1.223	1.009	936
History of Zambia	7.873	3.972	11.399	6.407	10.080	1.112	1.105	1.418	1.508	1.448
Republic of Iran	6.251	5.919	11.160	11.860	8.776	661	706	824	863	923
Total of Lists	1.414.856	1.559.995	1.472.171	1.716.644	2.023.784	879	1.046	1.340	1.041	961
The General Total	1.579.561	1.692.011	1.591.442	1.841.548	2.082.062	934	1.121	1.432	1.089	1.018