

**ASSOCIATION  
BETWEEN  
THE EUROPEAN UNION  
AND TURKEY**

The Association Council

**Brussels, 27 July 2017  
(OR. en)**

**UE-TR 4806/17**

**COVER NOTE**

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From:	Mr Joost KORTE, Deputy-Director General for Trade, European Commission
date of receipt:	25 July 2017
To:	President of the EU-Turkey Association Council
Subject:	Interim review of the countervailing measures on imports of certain rainbow trout originating in Turkey

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Your Excellency,

I have the honour to refer to my letter of 11 July 2017 regarding a request for the initiation of review of countervailing measures on imports of certain rainbow trout originating in Turkey.

I wish to inform you that the European Commission, following the receipt of this request, has now decided to initiate the interim review.

Consequently, this letter constitutes the official application to the EU-Turkey Association Council in the sense of Article 47 of the additional Protocol to the EU-Turkey Association Agreement.

Copies of the Notice of initiation published in the Official Journal of the European Union together with a copy of the non-confidential version of the complaint are enclosed for your information.

According to the Commission's standing practice, the Permanent Representation of Turkey to the European Union has been informed by Note Verbale of the initiation of the anti-dumping proceeding.

I take this opportunity to renew to the President of the EU-Turkey Association Council the assurance of my highest consideration, and to remind you that you will be kept duly informed of any further developments.

Yours sincerely,

Joost KORTE

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Encl. : Notice of Initiation  
Non-confidential version of the complaint

## V

*(Announcements)*PROCEDURES RELATING TO THE IMPLEMENTATION OF THE COMMON  
COMMERCIAL POLICY

## EUROPEAN COMMISSION

**Notice of initiation of a partial interim review of the countervailing measures applicable to imports of certain rainbow trout originating in Turkey***(2017/C 234/04)*

The European Commission (‘the Commission’) has received a request for an interim review pursuant to Article 19 of Regulation (EU) 2016/1037 of the European Parliament and of the Council of 8 June 2016 on protection against subsidised imports from countries not members of the European Union <sup>(1)</sup> (‘the basic anti-subsidy Regulation’).

**1. Request for review**

The request for review was lodged by the Aegean Exporters Association (‘the applicant’), on behalf of producers/exporters of rainbow trout of Turkey (‘the country concerned’).

**2. Product under review**

The product subject to this review is rainbow trout (*Oncorhynchus mykiss*)

- live weighing 1,2 kg or less each, or
- fresh, chilled, frozen and/or smoked:
  - in the form of whole fish (with heads on), whether or not gilled, whether or not gutted, weighing 1,2 kg or less each, or
  - with heads off, whether or not gilled, whether or not gutted, weighing 1 kg or less each, or
  - in the form of fillets weighing 400 g or less each,

originating in Turkey and currently falling within CN codes ex 0301 91 90, ex 0302 11 80, ex 0303 14 90, ex 0304 42 90, ex 0304 82 90 and ex 0305 43 00 (TARIC codes 0301 91 90 11, 0302 11 80 11, 0303 14 90 11, 0304 42 90 10, 0304 82 90 10 and 0305 43 00 11) (‘product under review’).

**3. Existing measures**

The measures currently in force are a definitive countervailing duty imposed by Commission Implementing Regulation (EU) 2015/309 <sup>(2)</sup>.

The applicant alleges that the continued imposition of the measure on imports of the product under review at its current level is no longer necessary to offset the countervailable subsidisation. In this respect, the applicant has provided sufficient evidence showing a significant change in the structure and the terms of the implementation of the direct subsidies granted to producers on a per kg of rainbow trout produced. With the new modalities eligibility limits are reached much faster, and for any production above that limit, no more subsidies are granted. Therefore this change resulted in a significant decrease of the subsidy amount received by, in particular, the large exporting producers of the product under review.

In the light of the above, the Commission considers that there is sufficient prima facie evidence that the circumstances with regard to subsidisation have changed significantly and are of a lasting nature and, therefore, the measures should be reviewed.

<sup>(1)</sup> OJ L 176, 30.6.2016, p. 55.

<sup>(2)</sup> Commission Implementing Regulation (EU) 2015/309 of 26 February 2015 imposing a definitive countervailing duty on imports of certain rainbow trout originating in Turkey (OJ L 56, 27.2.2015, p. 12).

#### 4. Procedure

Having determined, after informing the Member States, that sufficient evidence exists to justify the initiation of a partial interim review limited to the examination of subsidisation, the Commission initiates a review in accordance with Article 19 of the basic Regulation. The purpose of the review is to establish if the continued imposition of the measures is still necessary to offset the countervailable subsidy.

Following the review, it may be necessary to amend the rate of duty imposed on imports of certain rainbow trout originating in Turkey.

The Government of Turkey has been invited for consultations.

##### 4.1. Procedure for the determination of the need for the continued imposition of the measures

Exporting producers<sup>(1)</sup> of the product under review from Turkey and the authorities of Turkey are invited to participate in the Commission investigation.

Investigating exporting producers

Procedure for selecting exporting producers to be investigated in Turkey

###### (a) Sampling

In view of the potentially large number of exporting producers in Turkey involved in this proceeding and in order to complete the investigation within the statutory time limits, the Commission may limit the exporting producers to be investigated to a reasonable number by selecting a sample (this process is also referred to as 'sampling'). The sampling will be carried out in accordance with Article 27 of the basic Regulation.

In order to enable the Commission to decide whether sampling is necessary, and if so, to select a sample, all exporting producers, or representatives acting on their behalf, are hereby requested to make themselves known to the Commission. These parties have to do so within 15 days of the date of publication of this notice in the *Official Journal of the European Union*, unless otherwise specified, by providing the Commission with information on their company(ies) requested in Annex I to this notice.

In order to obtain information it deems necessary for the selection of the sample of exporting producers, the Commission will also contact the authorities of Turkey and may contact any known associations of exporting producers.

All interested parties wishing to submit any other relevant information regarding the selection of the sample, excluding the information requested above, must do so within 21 days of the publication of this notice in the *Official Journal of the European Union*, unless otherwise specified.

If a sample is necessary, the exporting producers may be selected based on the largest representative volume of exports to the Union which can reasonably be investigated within the time available. All known exporting producers, the authorities of the country concerned and associations of exporting producers will be notified by the Commission, via the authorities of the country concerned, if appropriate, of the companies selected to be in the sample.

In order to obtain information it deems necessary for its investigation with regard to exporting producers, the Commission will send questionnaires to the exporting producers selected to be in the sample, to any known association of exporting producers, and to the authorities of the country concerned.

All exporting producers selected to be in the sample will have to submit a completed questionnaire within 37 days from the date of notification of the sample selection, unless otherwise specified.

Without prejudice to the application of Article 28 of the basic Regulation companies that have agreed to their possible inclusion in the sample but are not selected to be in the sample will be considered to be cooperating ('non-sampled cooperating exporting producers'). Without prejudice to section (b) below, the countervailing duty that may be applied to imports from non-sampled cooperating exporting producers will not exceed the weighted average amounts of subsidisation established for the exporting producers in the sample<sup>(2)</sup>.

<sup>(1)</sup> An exporting producer is any company in the country concerned which produces and exports the product under investigation to the Union market, either directly or via a third party, including any of its related companies involved in the production, domestic sales or exports of the product under review.

<sup>(2)</sup> Pursuant to Article 15(3) of the basic Regulation, any zero and *de minimis* amounts of countervailable subsidies and amounts of countervailable subsidies established in the circumstances referred to in Article 28 of the basic Regulation shall be disregarded.

(b) Individual subsidy margin for companies not included in the sample

Non-sampled cooperating exporting producers may request, pursuant to Article 27(3) of the basic Regulation, that the Commission establish their individual subsidy amounts. The exporting producers wishing to claim an individual subsidy margin must request a questionnaire and return it duly completed within 37 days of the date of notification of the sample selection, unless otherwise specified.

However, exporting producers claiming an individual subsidy amount should be aware that the Commission may nonetheless decide not to determine their individual subsidy amount if, for instance, the number of exporting producers is so large that such determination would be unduly burdensome and would prevent the timely completion of the investigation.

**4.2. Other written submissions**

Subject to the provisions of this Notice, all interested parties are hereby invited to make their views known, submit information and provide supporting evidence. Unless otherwise specified, this information and supporting evidence must reach the Commission within 37 days of the date of publication of this Notice in the *Official Journal of the European Union*.

**4.3. Possibility to be heard by the Commission investigation services**

All interested parties may request to be heard by the Commission investigation services. Any request to be heard must be made in writing and must specify the reasons for the request. For hearings on issues pertaining to the initial stage of the investigation the request must be submitted within 15 days of the date of publication of this Notice in the *Official Journal of the European Union*. Thereafter, a request to be heard must be submitted within the specific deadlines set by the Commission in its communication with the parties.

**4.4. Instructions for making written submissions and sending completed questionnaires and correspondence**

Information submitted to the Commission for the purpose of trade defence investigations should be free from copyrights. Interested parties, before submitting to the Commission information and/or data which is subject to third party copyrights, must request specific permission to the copyright holder explicitly allowing a) the Commission to use the information and data for the purpose of this trade defence proceeding and b) to provide the information and/or data to interested parties to this investigation in a form that allows them to exercise their rights of defence.

All written submissions, including the information requested in this Notice, completed questionnaires and correspondence provided by interested parties on a confidential basis should be labelled 'Limited' <sup>(1)</sup>. Any request for confidential treatment must be duly justified.

Interested parties providing 'Limited' information are required to furnish non-confidential summaries of it pursuant to Article 29(2) of the basic Regulation, which will be labelled 'For inspection by interested parties'. These summaries should be sufficiently detailed to permit a reasonable understanding of the substance of the information submitted in confidence. If an interested party providing information on a confidential basis does not furnish a non-confidential summary of it in the requested format and quality, such information may be disregarded.

Interested parties are invited to make all submissions and requests by email including scanned powers of attorney and certification sheets, with the exception of voluminous replies which shall be submitted on a CD-ROM or DVD by hand or by registered mail. By using email, interested parties express their agreement with the rules applicable to electronic submissions contained in the document 'CORRESPONDENCE WITH THE EUROPEAN COMMISSION IN TRADE DEFENCE CASES' published on the website of the Directorate-General for Trade: [http://trade.ec.europa.eu/doclib/docs/2011/june/tradoc\\_148003.pdf](http://trade.ec.europa.eu/doclib/docs/2011/june/tradoc_148003.pdf). The interested parties must indicate their name, address, telephone and a valid email address and they should ensure that the provided email address is a functioning official business email which is checked on a daily basis. Once contact details are provided, the Commission will communicate with interested parties by email only, unless they explicitly request to receive all documents from the Commission by another means of communication or unless the nature of the document to be sent requires the use of a registered mail. For further rules and information concerning correspondence with the Commission including principles that apply to submissions by email, interested parties should consult the communication instructions with interested parties referred to above.

<sup>(1)</sup> A 'Limited' document is a document which is considered confidential pursuant to Article 29 of Regulation (EU) 2016/1037 (OJ L 176, 30.6.2016, p. 55.) and Article 12 of the WTO Agreement on Subsidies and Countervailing Measures. It is also a document protected in accordance with Article 4 of Regulation (EC) No 1049/2001 of the European Parliament and of the Council (OJ L 145, 31.5.2001, p. 43).

Commission address for correspondence:

European Commission  
Directorate-General for Trade  
Directorate H  
Office: CHAR 04/039  
1049 Bruxelles/Brussel  
BELGIQUE/BELGIË  
Email: trade\_trout\_review@ec.europa.eu

#### 5. Non-cooperation

In cases where any interested party refuses access to or does not provide the necessary information within the time limits, or significantly impedes the investigation, findings, affirmative or negative, may be made on the basis of facts available, in accordance with Article 28 of the basic Regulation.

Where it is found that any interested party has supplied false or misleading information, the information may be disregarded and use may be made of facts available.

If an interested party does not cooperate or cooperates only partially and findings are therefore based on facts available in accordance with Article 28 of the basic Regulation, the result may be less favourable to that party than if it had cooperated.

Failure to give a computerised response shall not be deemed to constitute non-cooperation, provided that the interested party shows that presenting the response as requested would result in an unreasonable extra burden or unreasonable additional cost. The interested party should immediately contact the Commission.

#### 6. Hearing Officer

Interested parties may request the intervention of the Hearing Officer in trade proceedings. The Hearing Officer acts as an interface between the interested parties and the Commission investigation services. The Hearing Officer reviews requests for access to the file, disputes regarding the confidentiality of documents, requests for extension of time limits and requests by third parties to be heard. The Hearing Officer may organise a hearing with an individual interested party and mediate to ensure that the interested parties' rights of defence are being fully exercised.

A request for a hearing with the Hearing Officer should be made in writing and should specify the reasons for the request. For hearings on issues pertaining to the initial stage of the investigation the request must be submitted within 15 days of the date of publication of this Notice in the *Official Journal of the European Union*. Thereafter, a request to be heard must be submitted within specific deadlines set by the Commission in its communication with the parties.

The Hearing Officer will also provide opportunities for a hearing involving parties to take place which would allow different views to be presented and rebuttal arguments offered on issues relating to the investigation.

For further information and contact details interested parties may consult the Hearing Officer's web pages on DG Trade's website: <http://ec.europa.eu/trade/trade-policy-and-you/contacts/hearing-officer/>.

#### 7. Schedule of the investigation

The investigation will be concluded, pursuant to Article 22(1) of the basic Regulation within 15 months of the date of the publication of this Notice in the *Official Journal of the European Union*.

#### 8. Processing of personal data

Any personal data collected in this investigation will be treated in accordance with Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data<sup>(1)</sup>.

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<sup>(1)</sup> OJ L 8, 12.1.2001, p. 1.

## ANNEX

<input type="checkbox"/>	'Limited version' (1)
<input type="checkbox"/>	Version 'For inspection by interested parties'
(tick the appropriate box)	

**ANTI-SUBSIDY PROCEEDING CONCERNING IMPORTS CERTAIN RAINBOW TROUT ORIGINATING IN TURKEY****INFORMATION FOR THE SELECTION OF THE SAMPLE OF EXPORTING PRODUCERS IN TURKEY**

This form is designed to assist exporting producers in Turkey in responding to the request for sampling information made in point 4.1(a) of the notice of initiation.

Both the 'Limited' version and the version 'For inspection by interested parties' should be returned to the Commission as set out in the notice of initiation.

**1. IDENTITY AND CONTACT DETAILS**

Supply the following details about your company:

Company name	
Address	
Contact person	
Email address	
Telephone	
Fax	

**2. TURNOVER, SALES VOLUME AND PRODUCTION**

Indicate the turnover in the accounting currency of the company during the period 1 July 2016 - 30 June 2017 (export sales to the Union for each of the 28 Member States (2) separately and in total and domestic sales) of certain rainbow trout as defined in the notice of initiation and the corresponding weight or volume. State the unit of weight or volume and the currency used.

	Ton Whole Fish Equivalent (T WFE) (*)	Value in accounting currency Specify the currency used
Export sales to the Union, for each of the 28 Member States separately and in total, of the product under investigation, manufactured by your company	Total:	
	Name each Member State (1):	
Domestic sales of the product under investigation, manufactured by your company		

(\*) Conversion factors from net weight to whole fish equivalent (WFE)

(1) Add additional rows where necessary.

(1) This document is for internal use only. It is protected pursuant to Article 4 of Regulation (EC) No 1049/2001 of the European Parliament and of the Council (OJ L 145, 31.5.2001, p. 43). It is a confidential document pursuant to Article 29 of Council Regulation (EC) No 597/2009 (OJ L 188, 18.7.2009, p. 93) and Article 12 of the WTO Agreement on Subsidies and Countervailing Measures.

(2) The 28 Member States of the European Union are: Belgium, Bulgaria, the Czech Republic, Denmark, Germany, Estonia, Croatia, Ireland, Greece, Spain, France, Italy, Cyprus, Latvia, Lithuania, Luxembourg, Hungary, Malta, the Netherlands, Austria, Poland, Portugal, Romania, Slovenia, Slovakia, Finland, Sweden, and the United Kingdom.

Indicate the production volume and capacity during the period 1 July 2016 - 30 June 2017 of certain rainbow trout as defined in the notice of initiation for each of the production licence your company has:

Licence number	Region	Maximum production quantity in Ton Whole Fish Equivalent (T WFE) (*)	Actual production quantity in Ton Whole Fish Equivalent (T WFE) (*)
<b>Total of all licences</b>			

(\*) Conversion factors from net weight to whole fish equivalent (WFE)

Product presentation	Factor
Live	1,00
Fresh/chilled (gutted, head on)	0,85
Frozen (gutted, head on)	0,85
Fillets: Fresh/chilled	0,47
Fillets: Frozen	0,47
Fillets: Smoked	0,40

### 3. ACTIVITIES OF YOUR COMPANY AND RELATED COMPANIES (\*)

Give details of the precise activities of the company and all related companies (please list them and state the relationship to your company) involved in the production and/or selling (export and/or domestic) of the product under investigation. Such activities could include but are not limited to purchasing the product under investigation or producing it under sub-contracting arrangements, or processing or trading the product under investigation. In any case, please indicate whether your company produces live trout, fresh trout, frozen trout, fillets, smoked trout fillets or several of these product types (please list them).

Company name and location	Activities	Relationship

### 4. OTHER INFORMATION

Please provide any other relevant information which the company considers useful to assist the Commission in the selection of the sample.

### 5. INDIVIDUAL SUBSIDY MARGIN

The company declares that, in the event that it is not selected to be in the sample, it would like to receive a questionnaire and other claim forms in order to fill these in and thus claim an individual subsidy margin in accordance with section 4.1(b) of the notice of initiation.

Yes

No

(\*) In accordance with Article 127 of Commission Implementing Regulation (EU) 2015/2447 of 24 November 2015 laying down detailed rules for implementing certain provisions of Regulation (EU) No 952/2013 of the European Parliament and of the Council laying down the Union Customs Code, two persons shall be deemed to be related if: (a) they are officers or directors of the other person's business; (b) they are legally recognised partners in business; (c) they are employer and employee; (d) a third party directly or indirectly owns, controls or holds 5 % or more of the outstanding voting stock or shares of both of them; (e) one of them directly or indirectly controls the other; (f) both of them are directly or indirectly controlled by a third person; (g) together they control a third person directly or indirectly; or (h) they are members of the same family (OJ L 343, 29.12.2015, p. 558). Persons shall be deemed to be members of the same family only if they stand in any of the following relationships to one another: (i) husband and wife, (ii) parent and child, (iii) brother and sister (whether by whole or half blood), (iv) grandparent and grandchild, (v) uncle or aunt and nephew or niece, (vi) parent-in-law and son-in-law or daughter-in-law, (vii) brother-in-law and sister-in-law. In this context 'person' means any natural or legal person.

In accordance with Article 5(4) of Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code, 'person' means a natural person, a legal person, and any association of persons which is not a legal person but which is recognised under Union or national law as having the capacity to perform legal acts (OJ L 269, 10.10.2013, p. 1).



**6. CERTIFICATION**

By providing the above information, the company agrees to its possible inclusion in the sample. If the company is selected to be part of the sample, this will involve completing a questionnaire and accepting a visit at its premises in order to verify its response. If the company indicates that it does not agree to its possible inclusion in the sample, it will be deemed not to have cooperated in the investigation. The Commission's findings for non-cooperating exporting producers are based on facts available and the result may be less favourable to that company than if it had cooperated.

Signature of authorised official:

Name and title of authorised official:

Date:

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**INTERIM REVIEW REQUEST  
ON BEHALF OF TURKISH EXPORTERS/PRODUCERS  
SUBMITTED BY  
THE AEGEAN EXPORTERS' ASSOCIATION**

**REGARDING THE COUNTERVAILING DUTY INFORCE  
ON  
"RAINBOW TROUT"  
ORGINATING IN TURKEY**

**OPEN FOR CONSULTATION VERSION**

**13 MARCH 2017**

**INTERIM REVIEW REQUEST ON BEHALF OF ALL “TURKISH EXPORTERS/PRODUCERS”  
SUBMITTED BY THE “AEGEAN EXPORTERS’ ASSOCIATION” REGARDING THE  
COUNTERVAILING DUTY IN FORCE ON “RAINBOW TROUT” ORIGINATING IN TURKEY**

**1. Background of the Definitive Countervailing Duty on Rainbow Trout Originating in Turkey:**

1. The European Commission initiated the investigation following a complaint lodged on 3 January 2014 by the “Danish Aquaculture Association” (‘the complainant’) on behalf of producers representing more than 25 % of the total Union production of certain rainbow trout via a Notice published in the Official Journal of the European Union (‘Notice of initiation’)<sup>1</sup>. The Notice of initiation was subject to a corrigendum published in the Official Journal of the European Union on 4 September 2014 (‘the corrigendum’)<sup>2</sup>.
2. The European Commission imposed a provisional countervailing duty on imports of certain rainbow trout originating in Turkey by Implementing Regulation (EU) No 1195/2014<sup>3</sup> (‘the provisional Regulation’).
3. The European Commission imposed definitive countervailing duty between 6,7% and 9,5% for the companies selected in the sampling, 7,6% for the cooperating companies not selected in the sampling and 9,5% for non-cooperating companies of CIF value on imports of

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<sup>1</sup> Notice of initiation of an anti-subsidy proceeding concerning imports of certain rainbow trout originating in Turkey (OJ C 44, 15.2.2014, p. 9).

<sup>2</sup> Corrigendum to the Notice of initiation of an anti-subsidy proceeding concerning imports of certain rainbow trout originating in Turkey (OJ C 297, 4.9.2014, p. 23)

<sup>3</sup> Commission Implementing Regulation (EU) No 1195/2014 of 29 October 2014 imposing a provisional countervailing duty on imports of certain rainbow trout originating in Turkey (OJ L 319, 6.11.2014, p. 1).

certain rainbow trout (trout) originating in Turkey by Implementing Regulation (EU) No 309/2015<sup>4</sup> ('the definitive Regulation').

**2. Product Concerned:**

4. As set out in recital 24 of the provisional Regulation, and recital 14 of the definitive Regulation, the product concerned is rainbow trout (*Oncorhynchus mykiss*):

- live weighing 1,2 kg or less each, or
- fresh, chilled, frozen and/or smoked:
  - in the form of whole fish (with heads on), whether or not gilled, whether or not gutted, weighing 1,2 kg or less each, or
  - with heads off, whether or not gilled, whether or not gutted, weighing 1 kg or less each, or
  - in the form of fillets weighing 400 g or less each,

originating in Turkey and currently falling within CN codes ex 0301 91 90, ex 0302 11 80, ex 0303 14 90, ex 0304 42 90, ex 0304 82 90 and ex 0305 43 00 ('the product concerned').

5. Regarding the production process of the product concerned please find attached:

Annex-1.a – General Flowchart of Aquaculture Production Process of Rainbow Trout

Annex-1.b – General Flowchart of Hatchery Production Process of Rainbow Trout

Annex-1.c - General Flowchart of Cage Farm Production Process of Rainbow Trout

Annex-1.d - General Flowchart of Processing Process of Rainbow Trout

Annex-1.e- General Flowchart of Smoked Fillet Process of Rainbow Trout

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<sup>4</sup> Commission Implementing Regulation (EU) No 2015/309 of 26 February 2015 imposing a definitive countervailing duty on imports of certain rainbow trout originating in Turkey (OJ L 56, 27.02.2015).

**3. Applicant :**

6. The applicant of the interim review request is the "Aegean Exporters' Association". "Aegean Exporters' Association" is the largest Exporters' Association of exporters/producers of the product concerned in Turkey. The largest producers/exporters of the product concerned which were selected in the sampling in the investigation are Kilic, GMS (Gümüşdoğa) and Özpekler which are also members of the "Aegean Exporters' Association".
7. The application is submitted by this largest exporters' association on behalf of all the Turkish producers/exporters of rainbow trout. Please find attached the list of all the producers/exporters of rainbow trout in Turkey in Annex-2.
8. The Council of the Sector of "Aquaculture Products and Dairy Products Exporters' Association" took a decision at its meeting held on the 17th of May 2016 to file a complaint for interim review of the countervailing duty in force in the EU on behalf of all the Turkish producers/exporters of rainbow trout. Please find attached this decision and its translation in Annex-3.
9. The Council of the Sector of "Aquaculture Products and Dairy Products Exporters' Association" represents producers/exporters in this field and established according to the Law Regarding Establishment and Duties of "Turkish Exporters' Assembly and Exporters' Associations" numbered 5910 published in the Official Journal dated 3 July 2009 and numbered 27277. Please find attached the concerned Law in Annex-4.
10. Article 9 of the concerned Law states that *"In order to determine sectorial policies and develop those policies, and determine standards in exportation, production, packaging and quality according to international norms and make harmonization and cooperation among the Exporters' Association, Council of Sectors is established by participation of Chair of Board of Management of the Associations and additional members selected by Board of*

*Management of the Associations determined according to export performance criteria defined in the Regulation”.*

11. This interim review request is made on the basis of those reasons cited below:

- A reasonable period of time of at least one year has elapsed since the imposition of the definitive measure and
- The subsidy margin decreased significantly because of the amendment in the implementation of the direct subsidy scheme which is lasting in nature,
- The export price of the product concerned increased significantly since the imposition of the countervailing measure on the product concerned.
- The current subsidy margin is below the “de minimis” margin for certain exporters and decreased significantly in general because of the amendment made in the “direct subsidy regulation” and as well as the significant depreciation of Turkish Lira against Euro,
- The current subsidy margins do not cause injury on the European rainbow trout producers.

**4. Amendment in the implication of the direct subsidy scheme :**

12. “Direct subsidies” per kg of trout produced are provided to producers under the main subsidy scheme the product concerned benefits.

13. In the investigation, the countervailing duties for 3 (Kilic, GMS and Ternaeben) out of 4 producers/exporters selected in the sampling were determined solely based on that “direct subsidy scheme”. No subsidy was determined based on any other subsidy programs. For the other producer/exporter Özpekler selected in the sampling, the countervailing duty was determined as 6,4% based on that “direct subsidy scheme” and 0,3% based on the “loan subsidies” program.

14. In this regard, the amendment of that “direct subsidy scheme” is essential for the determination of current level of countervailing duty for the companies selected in the sampling and for all producers/exporters in Turkey in general.
15. The investigation confirmed the existence of direct subsidies for rainbow trout. It was found that for the investigation period the level of subsidy per kg of trout was set at 0,65 TL/kg for production up to 250 tons a year. Half of this amount (0,325 TL/kg) was granted for production quantities between 251-500 tons/year and no subsidies were granted for production quantities above 500 tons. The subsidy was granted to producers of the product concerned having a license from the Ministry of Food, Agriculture and Livestock.
16. The following legal provisions provide for direct subsidies during the investigation period (2013): Turkish Decree No 2013/4463 on agricultural subsidies in 2013, dated 07 March 2013 and published in the Official Journal No 28612 on 8 April 2013 (applying retroactively as of 1 January 2013).
17. The government of Turkey has been providing direct subsidies of trout since 2003. There has been no change in the terms of application and the level of subsidy per kg of trout between 2005 and 2015.
18. However, while the level of subsidy per kg of rainbow trout did not change in 2016 the structure and the terms of implementation of the direct subsidy scheme changed and the change is lasting in nature in 2016.
19. Turkish Decree No 2016/8791 on agricultural subsidies in 2016, dated 25 March 2016 published in the Official Journal No 29703 on 5 May 2016 (implemented retroactively as of 1 January 2016). This decree is submitted as Annex-9.

20. The Communique named “Communique on Aquaculture Support” numbered 2016/33 regarding the implementation of Decree No 2016/8791 was published in the Official Journal dated 3 August 2016. This Communique is attached as Annex-10.
21. The related provisions of the Decree regarding the direct subsidy to the aquaculture industry are as follows:

*“(16) According to per kg. defined below direct subsidy is paid directly to producers of aquaculture products provided that they are registered to the aquaculture producer registry system.*

*If there is more than one fish farming unit in the same potential zone in the sea defined by the Ministry, in the same reservoir (dam) or in the reservoirs located in the same regions which belong to the same person or to the same enterprise/company, those units are regarded as a single unit belong to that enterprise/company and the direct subsidy is paid according to that interpretation. In this respect, for subsidy calculation, the maximum total amount of production for such a unit is 500.000 kg. The direct payment is made based on the full amount stated below for production of up to 250.000 kg. and based on the 50% of the full amount for production between 250.001 and 500.000 kg.*

*To get the maximum benefit from the current water supply that exists in our country, with the goal of ensuring production of aquaculture products and diversified fish species, a direct payment is provided to producers using the closed system production”.*

Number	Aquaculture Industry Support		TL/Kg.
1	Trout	Up to 250.000 kg. (including 250.000 kg.)	0,65
		250.001 - 500.000 kg.	0,325
2	New Species	Up to 250.000 kg. (including 250.000 kg.)	1,00
		250.001 - 500.000 kg.	0,50
3	Oyster		0,05
4	Closed System Production		0,50



22. The related provision of Article 5 “Aquaculture Support” of the Communiqué states that :

*“ç) When calculating the amount, which an establishment can benefit from the product support;*

*1) If the same real person and legal entities have more than one fish farming establishment located within the same potential area in the seas, in the same dam lake or dam lakes separated to within the same region defined by the Ministry, these fish farming establishments are considered as a single fish farming establishment.*

*2) In terms of support, regarding more than one fish farming establishment which belongs to the same real person and legal entities within the same potential area in the seas, in the same dam lake or dam lakes separated to within the same region defined by the Ministry, the facility owners prior to the publication date of the Decree regarding Agricultural Supports to be made in 2016 is considered as basis. Transfers regarding such facilities made after 5/5/2016, which is the publication date of the decree, are excluded from the support.*

*3) The establishment which is able to benefit from aquaculture support is limited annually with 500.000 kg as mentioned in the Cabinet Decree no. 2016/8791, and for the part up to 250.000 kg (250.000 kg included) the total of the unit price, and for the part from 250.001 to 500.000 kg (500.000 kg included) 50% of the unit price is considered”*

23. This amendment in the “direct subsidy scheme” changes the criteria for benefiting direct subsidy. According to the current “direct subsidy scheme”, the exporters/producers which have more than one farm in the same region or in the same dame (reservoir) could only receive direct subsidy only for one farm not for the others” which is limited only up to 500 tons.

24. Thus, this change in the implementation significantly decreased the “total direct subsidy amount” for the exporters/producers which have more than one farm in the same reservoir or in the reservoirs located in the same regions.
25. Ministry of Food, Agriculture and Livestock clearly expressed to continue implementing “direct subsidy scheme” as it was established by the Decree No 2016/8791 on agricultural subsidies in 2016, dated 25 March 2016 published in the Official Journal dated 5 May 2016 numbered 29703 and by the “Communique on Aquaculture Support” published in the Official Journal dated 3 August 2016 and numbered 2016/33 regarding implementation of the Decree No 2016/8791.
26. Ministry of Food, Agriculture and Livestock highlighted its will to continue the implementation of “direct subsidy scheme” as it was regulated in 2016. In the official letter of Ministry of Food, Agriculture and Livestock attached in Annex-9, it is stated that *“This amendment made in 2016 is not only limited or specific to 2016, according to the rules identified in the above paragraph (referring to regulation of 2016) we are considering to implement this practice in the next years”*. Thus, this amendment in the regulation regarding the “direct subsidy scheme” is lasting in nature.

**5. The Impact of the Amendment in the Direct Subsidy Scheme on Turkish Rainbow Trout Producers/Exporters:**

**5.1. The Impact of the Amendment in the Direct Subsidy Scheme on Turkish Rainbow Trout Producers/Exporters in General:**

27. The Ministry of Food, Agriculture and Livestock submitted a worksheet as attached to its official letter submitted in Annex-11 to show the significant decrease in the total subsidy

received by Turkish producers/exporters of the product concerned as a result of this amendment in the “direct subsidy scheme” in 2016.

28. The Table-1 below indicates that the total subsidy provided to Turkish producers/exporters was [LIMITED] indexed as 100 TL. in 2013 (investigation period), [LIMITED] 83 TL. in 2014, [LIMITED] 78 TL. in 2015, and 62 TL. in 2016 for the production quantities of [LIMITED] 100 tons (indexed as 100), [LIMITED] 89 tons, [LIMITED] 84 tons and [LIMITED] 86 tons (estimated) of the product concerned respectively.

Table-1:

YEAR	Total Production (kg)	Total Production Received Direct Subsidy (Kg)	Share of Production Benefited By Direct Subsidy (%)	Direct Subsidy Received (TL)	Direct Subsidy Per Kg (TL)
2013*	100	100	100	100	100
2014	89	83	93	84	95
2015	84	78	72	79	93
2016**	86	62	63	63	73

\* 2013 figures are indexed as 100.

\*\*2016 production figure is estimated.

29. The total subsidy received by Turkish producers/exporters decreased significantly from [LIMITED] as indexed 100 TL. in 2013 to 62 TL. in 2016. In other words, total subsidy received by Turkish rainbow trout producers/exporters decreased 38% between the investigation period (2013) and 2016. Please see the graph 1 below [LIMITED].
30. The average subsidy per kg. received by Turkish rainbow trout producers/exporters was [LIMITED] indexed as 100 TL. in 2013, [LIMITED] 95 TL. in 2014, [LIMITED] 93 TL. in 2015 and [LIMITED] 73 TL. in 2016. It means that the average subsidy per kg. received by Turkish rainbow trout producers/exporters declined 27% between 2013 (investigation period) and 2016. Please see the graph 2 below [LIMITED].

31. This figure clearly shows the significant decrease of the average subsidy per kg production of the product concerned in 2016 as a result of the amendment in the direct subsidy scheme.
32. In addition to that, as it is highlighted in the official letter of the Ministry of Food, Agriculture and Livestock attached in Annex-11, while [LIMITED]% indexed as 100 of total production of rainbow trout was benefited from the “direct subsidy” in 2013 (investigation period), this ratio declined to [LIMITED] 73 as a result of this amended regulation in 2016.

**5.2. The Impact of the Amendment in the Direct Subsidy Scheme on the Largest Producer/Exporter (KILIÇ) :**

33. In order to show the impact of the amendment in the “direct subsidy scheme” and its effects on the current countervailing duty rate on the producers/exporters the largest producer/exporter of Turkey is selected as sample.
34. Please find below the calculation showing the impact of the changes on the level of subsidization as well as on the subsidy margin for Kiliç which is the largest producer/exporter of the product concerned. KILIÇ was selected in the sampling and individual countervailing duty was determined and imposed on those producers/exporters at the end of the investigation.
35. Kiliç is the largest exporter/producer of rainbow trout in Turkey. The subsidy margin established for Kiliç in the original investigation was 9,5% of CIF value. The subsidy margin determination made for Kiliç was based only on the “direct subsidy scheme” since no subsidy margin was established for the company based on any other subsidy programs.

36. As is shown in the Table attached as Annex-12-b, all of the farms of KILIÇ has 6 farms in Karkamış Dam and 3 farms in Menzelet Dam. In this regard, KILIÇ is able to receive the subsidy only one farm out of 6 farms limited to 500 tons in Karkamış Dam and 1 farm out of 3 farms in Menzelet Dam limited to 500 tons.
37. The Table submitted in Annex-12-a shows the total production quantities and the total subsidy amounts received by the company and the corresponding average subsidy per kg. received by the company between 2013 and 2016.
38. As it might be noted in the Table, Kiliç received [LIMITED] TL. direct subsidy in 2013 (investigation period) indexed as 100, [LIMITED] TL. 109 direct subsidy in 2014, [LIMITED] TL. direct subsidy 109 in 2015, and [LIMITED] TL. direct subsidy 23 in 2016.
39. Because of the amendment in the “direct subsidy scheme” in 2016, the subsidy amount received by Kiliç decreased 77% between the investigation period (2013) and 2016.
40. The average subsidy amount per kg. received by Kiliç was [LIMITED] TL/Kg. in the investigation period (2013) as indexed 100, [LIMITED] 100 TL/Kg. in 2014 , 105 TL/Kg. in 2015 and 22 TL/Kg. in 2016. The average subsidy per kg. received by Kiliç decreased 78% between 2013 and 2016.
41. Please see the Graph-3 below [LIMITED] regarding subsidy average amounts per kg of production received by Kiliç between 2013 and 2016.
42. In this regard, the current subsidy margin for Kiliç should be 2,1%. The calculation is : 9,5% (subsidy margin for Kiliç) \* ([LIMITED] (2016 subsidy amount per kg.) / [LIMITED] (2013 subsidy amount per kg.)= 2,1%). This calculation does not take into account the increase in export sales prices and significant depreciation of TL. against Euro between 2013 and 2016. Please take note that this calculation is based on the gross subsidy received. As the

Commission is aware of the fact that 2% is deducted from this gross subsidy amount as service amount to the unit cooperative or provincial/district unions.<sup>5</sup> This deduction is not taken into account in this calculation.

43. If we use average exchange rates of Turkish Central Bank for 2013 and 2016, to see the effects of depreciation of TL. against Euro on the current countervailing duty rate, we find that the current subsidy margin for Kılıç would be 1,2%. The calculation is as follows: 9,5% (subsidy margin for Kılıç) \* **[LIMITED]** (2016 subsidy amount per kg.) / **[LIMITED]** (2013 subsidy amount per kg.) \* [1,90131 (Average EUR/TL exchange rate for 2013) /3,3376 (Average EUR/TL exchange rate for 2016)] = 1,2%
44. As a consequence, in addition to the significant decrease in the direct subsidy amount received by Kılıç in 2016, considering the significant depreciation of Turkish Lira TL. against Euro, and the significant increase in export prices in real terms, the Aegean Exporters' Association is of the view that the current subsidy margin for Kılıç is certainly below the "de minimis" margin.
45. In addition, the level of subsidy amount for the investigated product has not changed since the direct subsidy scheme has put into force in 2005<sup>6</sup>.

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<sup>5</sup> Article 8 of Aquaculture Support Communique numbered 2016/33 published in the Official Journal dated 3 August 2016 numbered 29790

<sup>6</sup> *Turkish Decree No 2007/12624 on agricultural subsidies in 2007*, dated 19 September 2007 and published in the *Official Journal No 26671* on 15 October 2007 (applying retroactively as of 1 January 2007).

*Turkish Decree No 2008/13489 on agricultural subsidies in 2008*, dated 31 March 2008 and published in the *Official Journal No 26848* on 15 April 2008 (applying retroactively as of 1 January 2008).

*Turkish Decree No 2009/14615 on agricultural subsidies in 2009*, dated 30 January 2009 and published in the *Official Journal No 27126* on 21 January 2009 (applying retroactively as of 1 January 2009).

*Turkish Decree No 2010/158 on agricultural subsidies in 2010*, dated 1 March 2010 and published in the *Official Journal No 27856* on 2 March 2010 (applying retroactively as of 1 January 2010).

*Turkish Decree No 2011/1430 on agricultural subsidies in 2011*, dated 14 February 2011 and published in the *Official Journal No 27856* on 24 February 2011 (applying retroactively as of 1 January 2011).

46. Thus, taking into account that this amendment in the direct subsidy scheme significantly reduced the total subsidy amount received by exporters/producers in 2016 and this amendment in the direct subsidy scheme is lasting in nature, the Aegean Exporters' Association believes that "changed circumstances review investigation" should be initiated based on that fact.

**2. The export prices of the product concerned from Turkey have increased significantly since the investigation period:**

47. The investigation was initiated on the 15th of February, 2014 and the investigation period for the determination of the subsidy amount was from 1 January 2013 to 31 December 2013.

48. The average export price of "rainbow trout" from Turkey to the EU increased significantly since 2013. Please see the Table-2 regarding import statistics collected from EUROSTAT and Table-3 regarding export statistics of Turkey collected from Turkish Statistical Institute.

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*Turkish Decree No 2012/3106 on agricultural subsidies in 2012*, dated 16 April 2012 and published in the *Official Journal No 28285* on 7 May 2012 (applying retroactively as of 1 January 2012).

*Turkish Decree No 2013/4463 on agricultural subsidies in 2013*, dated 07 March 2013 and published in the *Official Journal No 28612* on 8 April 2013 (applying retroactively as of 1 January 2013).

*Turkish Decree No 2014/6091 on agricultural subsidies in 2014*, dated 07 April 2014 and published in the *Official Journal No 28970* on 12 April 2014 (applying retroactively as of 1 January 2014).

*Turkish Decree No 2015/7495 on agricultural subsidies in 2015*, dated 16 March 2015 and published in the *Official Journal No 28612* on 8 April 2015 (applying retroactively as of 1 January 2015).

Table-2:

HS codes	Definition of Product	2013			2014			2015			2016 (January - October)		
		Kg	Euro	Euro/Kg	Kg	Euro	Euro/Kg	Kg	Euro	Euro/Kg	Kg	Euro	Euro/Kg
03054300	Smoked Trout	4.340.400	34.101.063	7,86	4.359.000	34.806.700	7,99	3.983.100	32.428.496	8,14	3.580.900	29.026.814	8,11
03031490	Frozen Trout	10.269.500	30.796.457	3,00	9.260.800	28.079.927	3,03	7.178.900	23.002.291	3,2	7.918.800	25.430.389	3,21
03021180	Fresh or Chilled Trout	1.872.600	5.419.456	2,89	1.819.700	5.601.692	3,08	1.585.100	4.923.708	3,11	1.067.800	3.428.045	3,21
03048290	Frozen Fillets Trout	889.800	4.123.117	4,63	840.500	4.082.722	4,86	852.000	4.236.943	4,97	958.900	4.673.798	4,87
03044290	Fresh or Chilled Fillets	22.500	95.530	4,25	27.200	132.460	4,87	11.000	83.904	7,63	38.100	211.271	5,55

Source:EUROSTAT

Table-3:

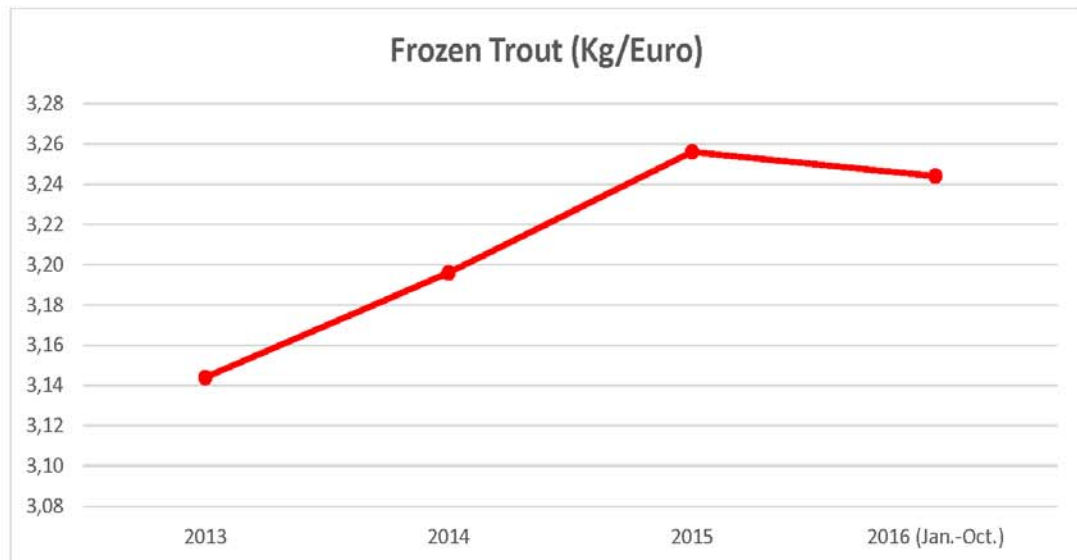
HS codes	Definition of Product	2013			2014			2015			2016		
		Kg	Euro	Euro/Kg	Kg	Euro	Euro/Kg	Kg	Euro	Euro/Kg	Kg	Euro	Euro/Kg
03054300	Smoked Trout	4.080.934	31.587.754	7,74	4.369.265	33.797.678	7,74	4.387.262	34.971.939	7,97	4.742.267	37.918.260	8,00
03031490	Frozen Trout	11.554.737	31.975.683	2,77	10.913.382	31.323.032	2,87	9.090.543	27.484.395	3,02	11.349.672	34.339.899	3,03
03021180	Fresh or Chilled Trout	3.325.674	8.764.111	2,64	3.250.287	8.325.308	2,56	3.508.561	9.302.984	2,65	4.213.541	12.981.073	3,08
03048290	Frozen Fillets Trout	565.214	2.344.082	4,15	802.659	3.493.647	4,35	1.017.509	4.515.933	4,44	1.187.128	5.570.475	4,69
03044290	Fresh or Chilled Fillets	274.637	1.165.423	4,24	156.587	699.096	4,46	24.645	125.218	5,08	97.375	480.112	4,93

Source :Turkish Statistical Institute

49. The main product groups exported to the European Union are “smoked trout” and “frozen trout”. According to statistics of Eurostat, the average export price of “frozen trout” increased 7% from 3.00 Euro/Kg in 2013 to 3,21 Euro/Kg. in 2016 (January-October) as it can be seen from the Graph-4 below:

Graph-4:

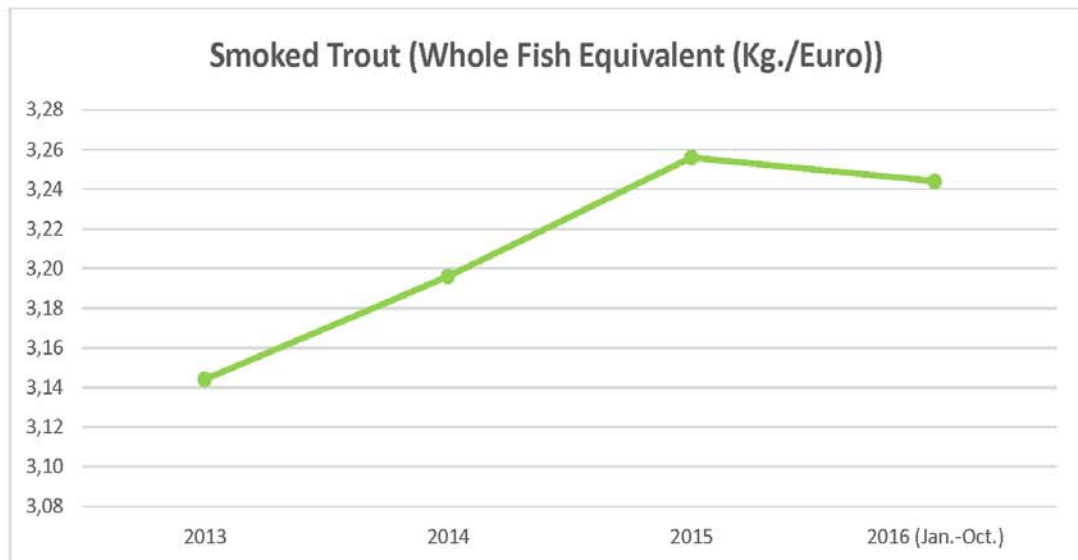




50. The average export price of “smoked trout” increased 3,4% from 7,86 Euro/Kg. in 2013 to 8,11 Euro/Kg. in 2016 (January-October). In terms of the “whole fish equivalent”, the average export price increased significantly from 3,14 Euro/Kg. in 2013 to 3,24 Euro/Kg. in 2016 (January-October). It means more than 8% increase in price in whole fish of smoked trout between 2013 and 2016 (January – October). Please see the graph-7 regarding development of prices of smoked trout in terms of whole fish equivalent. 1 kg. smoked fillet is produced by using 2,5 kg. rainbow trout according to whole fish equivalent.<sup>7</sup>

Graph-5:

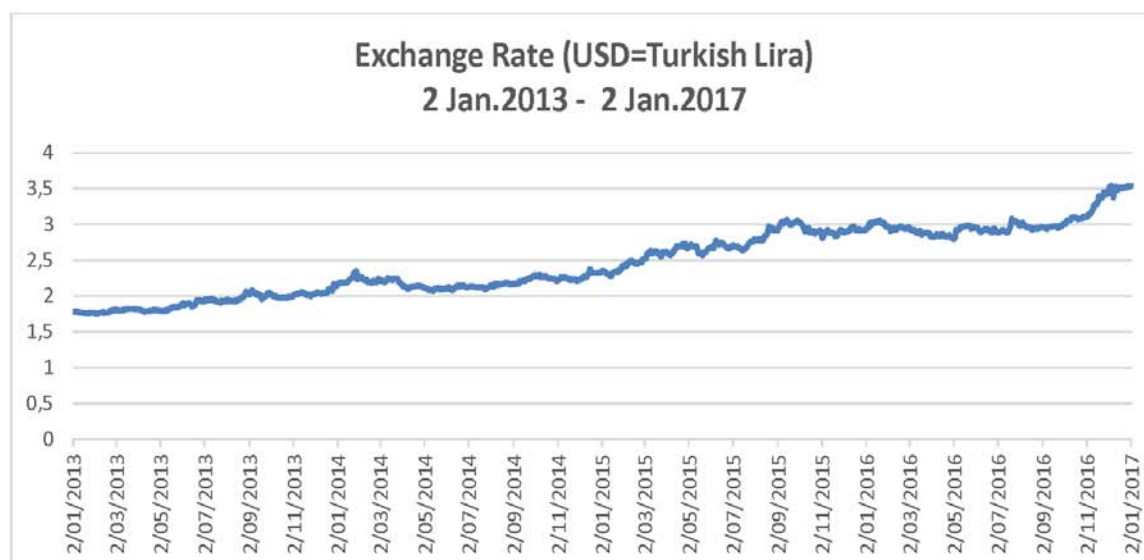
<sup>7</sup> Please refer to page 15 of AD & CVD Questionnaire For Exporters/Producers in the Rainbow Trout AD & CVD Investigation.



51. One of the main reasons for the increasing export prices of rainbow trout is the significant increase in the fish meal prices. Fish meal prices are in the USD in Turkey. Although there is no clear increase in fish meal prices in USD, due to the outstanding depreciation of the Turkish Lira against the USD, fish meal prices significantly increased in terms of the Turkish Lira. The Turkish Lira depreciated more against the USD than against the Euro since 2013 and this increased the cost of production in terms of Euro leading to increase in the export price of rainbow trout to the European Union.

3. Turkish Lira has been depreciated significantly against Euro and USD since 2013 :

Graph-6:



Source: Turkish Central Bank

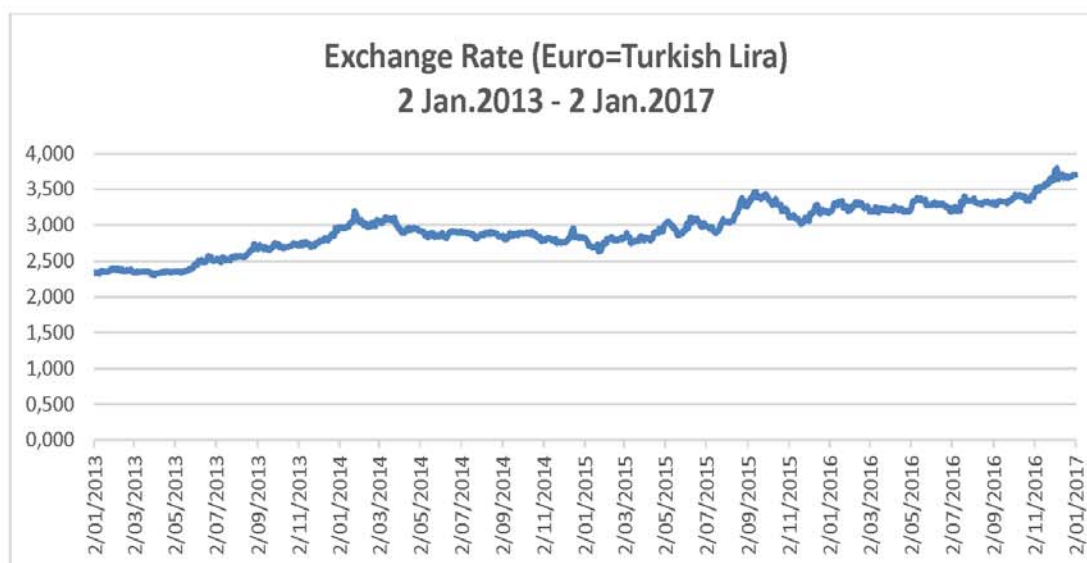
Annual average USD/TL rates (Central Bank of Turkey)

<u>Year</u>	<u>Average</u>	<u>Change</u>
2013 (IP)	1.90131	-----
2014	2.18786	15.1%
2015	2.72002	24.3%
2016	2.9835	9.7%
2017 (3 Mar.)	3.7421	

52. As it can be easily seen from the graph and the table above, Turkish Lira depreciated significantly since the imposition of the countervailing duty. Between the IP and 2016, Turkish Lira depreciated 57% in average against the USD.

53. In addition, as seen from the chart and the table above, the USD/TRL exchange rate has been in an upward trend. The expected inflation rate in Turkey is in the 7-9% range for the years ahead. Therefore, the change in the USD/TRL rate is not a temporary increase; contrarily it would be rational to assume that the rate will not change its course substantially. This is especially so when considering the rate is more than 3,74 TRL/USD as of 3 March 2017. The market expectations are not in favor of the Turkish Lira either for 2017.

Graph-7:



Source: Turkish Central Bank

Annual average EUR/TL rates (Central Bank of Turkey)

Year	Average	Change
2013	2.52535	-----
2014	2.90597	15.1%
2015	3.01826	3.9%
2016	3.33760	10.6%
2017 (3 Mar.)	3.9177	

54. The cumulative change in the EUR/TRL exchange rate in 2016 compared to 2013 is 32.2%. As seen from the chart and the table above, the EUR/TRL has also been in an upward trend. Based on the inflations rates in the EU and Turkey, therefore, it would also be rational to expect that the trend in the EUR/TRL rate will not substantially change its course. The EUR/TL rate is 3.9177 as the date of 3 March 2017. The expectation for 2017 is that the EUR/TL rate will be above 4.00.

55. However, the Lira was weaker against the USD than against the Euro since the Euro weakened against the USD in the recent years. Due to the economic circumstances in the

Euro-zone countries, it is not expected that the Euro will appreciate substantially against the USD in the near future.

**4. One of the sampled companies Ternaeben Group went bankrupt during the investigation process:**

56. Although the subsidy margin determination was made based on the export sales in 2013, Ternaeben Group went bankrupt during the investigation process. The Aegean Exporters Association believes that because of the cash need of that Group, it distorted the European Union market and caused initiation of the anti-dumping and subsidy investigation by decreasing its export price to the EU significantly. Thus, the export price of Ternaeben Group in 2013 is not reliable and healthy and being considered as not representative for Turkish exporters.

57. Significant increase in export sales prices despite the countervailing duty in force after the bankruptcy of Ternaeben Group and being out of the market of Ternaeben Group proves that Ternaeben Group caused distortion in the European market.

58. In this respect, the Aegean Exporters' Association considers that there is a need for the initiation of an interim review investigation and determine a sampling which should represent all of the producers/exporters in Turkey.

**CONCLUSION:**

59. As concluding;

1. There has been no change in the amount of the direct subsidy for trout in terms of the Turkish Lira but the amendment in the direct subsidy scheme significantly decreased the subsidy received by the exporters/producers for 2016. This

amendment is a lasting in nature in the direct subsidy scheme as highlighted in the official letter by the Ministry of Food, Agriculture and Livestock.

2. The export prices of rainbow trout from Turkey to the EU have increased remarkably since 2013 both in terms of the Euro and the Turkish Lira.
3. Turkish Lira depreciated 57% against USD and 32% against Euro between 2013 and 2016. This is not a temporary increase in the USD and Euro against TRL. This is a change in circumstances with a lasting nature.
4. The withdrawal of Ternaeben Group from the European Union market supports increasing export prices in that market and prevents market distortion in the EU.
5. As the export prices have increased remarkably and Turkish Lira has depreciated significantly against the USD and Euro, the amount of subsidy in the TRL has not changed since 2013, the subsidy margin has declined substantially to call for an interim review in accordance with Article 19 of the Council Regulation (EC) No 597/2009 of 11 June 2009 "On protection against subsidized imports from countries not members of the European Community".
6. Therefore, considering the abovementioned facts and the changed circumstances lasting in nature especially in the structure and implementation of the "direct subsidy scheme" which is the essential part of the total subsidy amount established for the exporters/producers in the original investigation and the of current countervailing duty, the "Aegean Exporters' Association" on behalf of Turkish all exporters/producers of the product concerned would kindly request the European Commission to initiate an interim review investigation on "rainbow trout" originating in Turkey to revise the rate of countervailing duty in force and to determine the current subsidy amount received by Turkish exporters/producers and assess the current state of the EU industry in order to determine whether there is any further need for a countervailing duty at the current countervailing duty rates.

**ANNEXES** :

**Annex-1.a** – General Flowchart of Aquaculture Production Process of Rainbow Trout (OPEN)

**Annex-1.b** – General Flowchart of Hatchery Production Process of Rainbow Trout (OPEN)

**Annex-1.c** - General Flowchart of Cage Farm Production Process of Rainbow Trout (OPEN)

**Annex-1.d** - General Flowchart of Processing Process of Rainbow Trout (OPEN)

**Annex-1.e** - General Flowchart of Smoked Fillet Process of Rainbow Trout (OPEN)

**Annex-2** – List of Turkish Exporters/Producers (OPEN)

**Annex-3** - Decision of Council of Sector of “Aquaculture Products and Dairy Products Exporters’ Association (Turkish and its translation) (OPEN)

**Annex-4** - Law Regarding Establishment and Duties of “Turkish Exporters’ Assembly and Exporters’ Associations” (OPEN)

**Annex-5** – Communique on “Aquaculture Support” numbered 2012/50 published in the Official Journal No 28339 on 30 June 2012 and its translation (OPEN)

**Annex-6** – Communique on “Aquaculture Support” numbered 2013/26 published in the Official Journal No 28661 on 29 May 2013 and its translation (OPEN)

**Annex-7** – Communique on “Aquaculture Support” numbered 2014/50 published in the Official Journal No 29023 on 7 June 2014 and its translation (OPEN)

**Annex-8** – Communique on “Aquaculture Support” numbered 2015/20 published in the Official Journal No 28339 on 24 May 2015 and its translation (OPEN)

**Annex-9** - Turkish Decree No 2016/8791 on agricultural subsidies in 2016, dated 25 March 2016 published in the Official Journal No 29703 on 5 May 2016 and its translation (OPEN)

**Annex-10** – Communique on “Aquaculture Support” numbered 2016/33 published in the Official Journal No 29790 on 3 August 2016 and its translation (OPEN)

**Annex-11** – Official Letter of Ministry of Food, Agriculture and Livestock dated 21 February 2017 and its translation (LIMITED)

**Annex-12a** – Kılıç Direct Subsidy Worksheet for 2013-2016 (LIMITED)

**Annex-12b** – Kılıç Direct Subsidy Worksheet Regarding Clarification of Decrease in Direct Subsidy for 2016 (LIMITED)

**Annex-13** – Power of Attorney