

MAIN FACTS AND CONCLUSIONS
of the Ministry of Economy of Ukraine within the framework of an anti-
dumping investigation into the import of fittings into Ukraine for
water supply and heating systems originating from
The People's Republic of China and the Republic of Türkiye

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Introduction

These materials were prepared by the Ministry of Economy of Ukraine (hereinafter referred to as *the Ministry*) as part of an anti-dumping investigation into the import into Ukraine of fittings for water supply and heating systems originating from the People's Republic of China and the Republic of Türkiye (hereinafter referred to as the investigation), initiated by the decision of the Interdepartmental Commission on International Trade (hereinafter referred to as the Commission) dated 15.10.2024 No. AD-569/2024/441-01.

The materials reflect the main issues that the Ministry investigated during the investigation, as well as the main facts and conclusions obtained based on the results of the research.

The investigation was carried out on the basis of the Law of Ukraine "On Protection of National Producers from Dumped Imports" No. 330-XIV of December 22, 1998 (hereinafter referred to as *the Law*), the Agreement on the Application of Article VI of the General Agreement on Tariffs and Trade of 1994 (hereinafter referred to as *the Agreement*), taking into account the provisions of bilateral and multilateral agreements, the consent to the mandatory implementation of which was granted by the Verkhovna Rada of Ukraine.

The materials were prepared on the basis of the most indicative information at the disposal of the Ministry, obtained in accordance with the procedure provided for by the Law and the Agreement, in particular, based on the results of consideration of information and evidence:

- complaints about the initiation and conduct of an anti-dumping investigation into the import into Ukraine of fittings for water supply and heating systems from China and Türkiye (hereinafter referred to as the complaint), filed by the Limited Liability Company "TRADE HOUSE "ROZMA" with the support of the Limited Liability Company "SAN TECH RAI";
- responses of interested parties to the investigation to questionnaires and additional requests;
- information from state authorities, enterprises, institutions and organizations;
- information from other sources available to the Ministry.

1. Procedural issues

1.1. Violation of the investigation

On January 18, 2024, the Ministry received a complaint from the Limited Liability Company "TRADING HOUSE "ROZMA" with the support of the Limited Liability Company "SAN TECH RAI" (hereinafter referred to as the applicants) "On the initiation and conduct of an anti-dumping investigation into the import into Ukraine of fittings for water supply and heating systems originating from China and Türkiye."

In accordance with Article 12 of the Law, the Ministry violated the anti-dumping procedure regarding the import into Ukraine of fittings for water supply and heating systems originating from the People's Republic of China and the Republic of Türkiye.

During the anti-dumping procedure, the Ministry reviewed the complaint for evidence of dumped imports and injury to the national producer as a result of such imports and established their sufficiency and justification for the purposes of initiating an anti-dumping investigation.

Based on the results of consideration of the materials and recommendations of the Ministry, the Commission adopted a decision dated October 15, 2024 No. AD-569/2024/441-01 "On the initiation and conduct of an anti-dumping investigation into the import into Ukraine of fittings for water supply and heating systems originating from the People's Republic of China and the Republic of Türkiye."

The notification of the said decision was published in the newspaper "Government Courier" dated 10/18/2024 No. 212 ¹.

In accordance with the requirements of Articles 13 and 34 of the Law, the Ministry notified known exporters, importers, associations of importers or exporters, the competent authorities of the country of export, and the applicant of the initiation of the investigation.

1.2. Stakeholders of the investigation

In accordance with Part Twelve of Article 12 of the Law, in the notice of initiation of the investigation published in the newspaper "Government Courier" dated October 18, 2024 No. 212, the Ministry registered interested parties to the investigation.

In accordance with paragraph 21 of Article 1 of the Law, the following interested parties were registered in the investigation:

Ukrainian manufacturers

1. Limited Liability Company "TRADING HOUSE "ROZMA" (LLC "TRADING HOUSE "ROZMA") (86/1 Holosiivskyi Ave., Kyiv, 03040, Ukraine);
2. Limited Liability Company "SAN TECH RAI" (LLC "SAN TECH RAI") (462 KM+100 M of the Kyiv-Odesa highway, Usativska village council, Biliaivskyi district, Odesa region, 67663, Ukraine);

Foreign manufacturers and/or exporters

3. WAVIN TR PLASTIK SANAYI AS (Guzelevel Mah. Girne Bulvari No:294/A Yuregir-ADANA / Türkiye);
4. VALF SANAYİİ A.Ş. (No: 1, 45030 Organize Sanayi Bölgesi Manisa/Yunusemre, Türkiye);

Importers

5. Limited Liability Company "SYMPHONY OF HEAT"

¹ <https://bit.ly/3Y8gAAV>

(LLC "SYMPHONY OF HEAT") (19 Svobody Ave., Sumy, 40016, Ukraine);

6. Limited Liability Company "TRADE AND INDUSTRIAL COMPANY "OMEGA-AVTOPOSTAVKA"" (LLC "OMEGA") (1 Promyslova St., Vasysheve village, Kharkiv district, Kharkiv region, 62495, Ukraine);

7. Limited Liability Company "BERKE PLASTIC UKRAINE" (LLC "BERKE PLASTIC UKRAINE") (101 E. Malanyuka St., Kyiv, 02002, Ukraine);

8. Limited Liability Company "THOUSAND AND ONE PIECE" (LLC "THOUSAND AND ONE PIECE") (31 Yevhen Konovaltsya St., office 26B, Kyiv, 01133, Ukraine);

9. Limited Liability Company "WATER INDUSTRY "

(LLC "WATER INDUSTRY" (Bogomoltsya St., building 7/14, app. 182, Kyiv, 01024, Ukraine);

10. Private enterprise "TEPLOSVIT ZAKHID" (PE "TEPLOSVIT ZAKHID" (P.O. Box 3662, Lviv, 79071, Ukraine);

Authorities of exporting countries

11. Ministry of Trade of the Republic of Türkiye (correspondence through the Embassy of the Republic of Türkiye in Ukraine. Address: 22 Panas Myrnygo St., Kyiv, 01901, Ukraine).

By letter dated 11/21/2024 No. 4411-05/83176-07, the Ministry notified the indicated parties that they were registered as interested parties in the investigation, and also informed them of their rights and obligations as interested parties within the framework of the investigation.

1.3. Establishing the investigation period

In accordance with paragraph eighteen of Article 1 and part two of Article 13 of the Law, the Ministry, in order to investigate the facts of dumped imports, determined the investigation period that immediately preceded the initiation of the investigation:

Q4 2023 – Q3 2024 (hereinafter referred to as the investigation period).

The investigation of the facts of causing material injury to the national producer, as well as the investigation of the causal relationship between dumped imports and causing material injury to the national producer, was carried out within the annual periods of the study period:

2021 - Q3 2024 (hereinafter referred to as the research period), namely

1st annual period: 01.01.2021 – 31.12.2021;

2nd annual period: 01.01.2022 – 31.12.2022;

3rd year period: 01.01.2023 – 31.12.2023; 4th

year period: 01.10.2023 – 30.09.2024.

Comments from interested parties regarding the investigation period

In its comments on the complaint, PP "TEPLOSVIT ZAKHID" reported that Article 2.2.1 of the Agreement on Implementation of Article VI of the GATT 1994 establishes that the period of investigation of dumping shall in most cases be one year, but in no case less than six months. The recommendations of the WTO Committee on Anti-Dumping Practice stipulate that the period of investigation of dumping shall be the 12-month period closest to the date of initiation of the anti-dumping investigation. According to Part 18 of Article 1 of the Law: "investigation period - the period immediately preceding the initiation of the anti-dumping investigation, during which the facts of dumping are investigated". Part 2 of Article 13 of the Law provides that the investigation period shall be selected, as a rule, for a period of up to one year, but not less than six months immediately preceding the initiation of the anti-dumping procedure. In the process of analyzing the complaint, PE "TEPLOSVIT ZAKHID" draws attention to the specifics of the period under investigation, during

which LLC "TRADE HOUSE "ROZMA" analyzed both the dynamics and trends of imports and changes in its activity indicators to substantiate evidence of injury caused by the import of the Goods, namely 2020 - 1st half of 2023, which does not cover the period specified by the Law and the Agreement. The anti-dumping investigation was initiated on the basis of the Commission's decision dated 15.10.2024 No. AD-569/2024/441-01, therefore, the six-month period immediately preceding the initiation of the Anti-dumping investigation is Q4 2023 - Q3 2024, and the period of injury investigation should be 2021 - 2023. The complaint does not contain any justifications for the selected and specified by the Applicants contrary to the Law and the Agreement of the period of the Anti-Dumping Investigation and cannot have such a justification in view of the direct norm of the Law. At the same time, the period under investigation in the Complaint covers two stable years (2020 and 2021) before the start of the full-scale invasion of the Russian Federation, as well as the difficult economic conditions of 2022 and the first half of 2023. Given this, it is logical to assume that the performance indicators of LLC "TRADE HOUSE "ROZMA" at the specified time experienced a significant decrease caused by large-scale hostilities, mass displacement of the population and power outages. Under such circumstances, comparing the data for 2020 - 2021 with the indicators of 2022 or the first half of 2023, as LLC "TRADE HOUSE "ROZMA" did (for example, in Section IV. "Evidence of damage caused to a national producer"), and conclusions about a significant reduction in certain indicators are incorrect. A significant impact on the activities of LLC "TRADE HOUSE "ROZMA" in the second part of the studied period was exerted by hostilities and massive shelling.

1.4. Sending questionnaires to interested parties in the investigation

In accordance with Part Three of Article 13 of the Law, the Ministry, in order to obtain information and evidence used for the purposes of conducting an investigation, sent questionnaires to interested parties of the investigation. When sending questionnaires to interested parties of the investigation, the Ministry determined the deadline by which it was necessary to provide a response. At the same time, the Ministry considered the applications of interested parties for extension/renewal of the deadlines for providing responses to the questionnaires and, in cases where the interested parties provided convincing evidence of the need for such an extension, made an appropriate decision.

Table 1.4.1

<i>Stakeholder</i>	<i>Directions</i>	<i>Term of provision</i>	<i>Date of receipt</i>
<i>Domestic manufacturers</i>			
LLC "TRADING HOUSE "ROZMA"	03.02.2025	03/12/2025	-
LLC "SUN TECH RAY"	03.02.2025	03/12/2025	03/12/2025
<i>Foreign manufacturers/exporters</i>			
WAVIN TR PLASTIK SANAYI AS	03.02.2025	03/12/2025	-
VALVE INDUSTRY INC.	03.02.2025	03/12/2025	-
<i>Domestic importers</i>			
LLC "SYMPHONY OF HEAT"	03.02.2025	03/12/2025	-
LLC "OMEGA"	03.02.2025	03/12/2025	-
LLC "BERKE PLASTIC UKRAINE"	03.02.2025	03/12/2025 (continued to 03/26/2025)	-

LLC "THOUSAND AND ONE DRIBBNICHKA"	03.02.2025	03/12/2025	-
"WATER INDUSTRY" LLC	03.02.2025	03/12/2025	-
PP "TEPLOSVIT ZAKHID"	03.02.2025	03/12/2025	-

Responses to questionnaires received within the deadlines set by the Ministry were accepted for consideration.

It should be noted that no foreign manufacturer/exporter provided a response to the questionnaire.

Based on the results of reviewing the responses of LLC "SUN TECH RAI" to the questionnaire for the domestic manufacturer, the Ministry, in order to obtain the information necessary for conducting the investigation, sent additional requests to the specified interested party.

Table 2.4.2

<i>Stakeholder</i>	<i>Directions</i>	<i>Term of provision</i>	<i>Date of receipt</i>
<i>Domestic manufacturers</i>			
LLC "SUN TECH RAY"	11.04.2025	02.05.2025 (continued to 05.05.2025)	05.05.2025
LLC "SUN TECH RAY"	05/27/2025	03.06.2025 (continued to 10.06.2025)	06/10/2025

1.5. Sending requests for information

In accordance with Part Four of Article 13 of the Law, in order to obtain information necessary for conducting an investigation, the Ministry sent requests to:

1. The State Customs Service of Ukraine regarding the provision of customs statistics on the import and export of goods;
2. Antimonopoly Committee of Ukraine regarding violations of legislation on the protection of economic competition;
3. State Statistics Service of Ukraine regarding the list of domestic producers of goods, total production volumes, production capacities and consumption of goods in Ukraine;
4. SE "Ukrpromzovnesheexpertiza" regarding the volumes of production and consumption of similar goods in Ukraine, the volumes of production capacities of the Goods in the exporting countries, and the average prices for the Goods in the domestic markets of the exporting countries.

1.6. Holding public hearings

The notice of initiation of the investigation, published in the newspaper "Government Courier" dated October 18, 2024 No. 212, set a 30-day period during which the Ministry considered the requirements for holding hearings.

Within the specified period, the Ministry was contacted by "ROZMA TRADING HOUSE" LLC and the Ministry of Trade of the Republic of Türkiye with requests to hold hearings.

At the same time, in connection with the military aggression of the Russian Federation against Ukraine, based on the proposal of the National Security and Defense Council of Ukraine, in accordance with Clause 20 of Part One of Article 106 of the Constitution of Ukraine, the Law of Ukraine "On the Legal Regime of Martial Law", by Decree of the President of Ukraine dated February 24, 2022 No. 64/2022 "On the Introduction of Martial Law in Ukraine", approved by the Law of

Ukraine dated February 24, 2022 No. 2102-IX, as amended, martial law has been introduced in Ukraine.

The Ministry informed interested parties about the specifics of conducting investigations under martial law, in particular, about the cancellation of public hearings in the format of face-to-face meetings.

In view of the above, in order to ensure that interested parties in the investigation exercise their right to protect their interests in accordance with the provisions of the Law, it was proposed to hold the hearing in the format of an exchange of opinions/positions of interested parties.

Within the established deadline (05.06.2025), the following interested parties submitted position papers to the Ministry:

- Ministry of Trade of the Republic of Türkiye;
- LLC "OMEGA"; - "SAN TECH RAI" LLC.

Interested parties also had the opportunity to provide their counterarguments to the positions of other interested parties. Counterarguments were received from LLC "SAN TECH RAI" within the established deadline (12.06.2025).

1.7. Comments from interested parties on the initiation of the investigation

In accordance with the notice on the initiation and conduct of the investigation, published in the newspaper "Government Courier" dated 18.10.2024 No. 212, the Ministry of Economy considered written comments and information regarding the initiation of the investigation within 60 days from the date of publication of the notice. Taking into account the provisions of paragraph three of part four of Article 6 of the Law, the deadline for providing comments was set at 17.12.2024.

Table 1.7

Stakeholder	Deadline	Incoming Letter No./Actual Registration Date
LLC "TRADING HOUSE "ROZMA"	17.12.2024	07/151683-24 dated 15.11.2024
LLC "SUN TECH RAY"		-
LLC "SYMPHONY OF HEAT"		07/160436-24 dated 06.12.2024 07/160986-24 dated 09.12.2024
LLC "OMEGA"		07/162559-24 dated 12.12.2024
LLC "BERKE PLASTIC UKRAINE"		-
LLC "THOUSAND AND ONE DRIBBNICHKA"		07/164063-24 dated 17.12.2024
"WATER INDUSTRY" LLC		-
PP "TEPLOSUIT ZAKHID"		07/164191-24 dated 12/18/2024
WAVIN TR PLASTIK SANAYI AS		-
VALVE INDUSTRY INC.		-
Ministry of Trade of the Republic of Türkiye		04/164389-24 dated 12/18/2024

By letter dated 18.12.2024 07/164176-24, LLC "THOUSAND AND ONE PIECE" withdrew the previously provided comments. Taking into account the above, the facts and circumstances set out in the letter of LLC "THOUSAND AND ONE PIECE" dated 17.12.2024 No. 07/164063-24 were not taken into account by the Ministry in full during the investigation.

The comments of the Ministry of Trade of the Republic of Türkiye and PE "TEPLOS VIT ZAHID" were received after the expiration of the deadlines set by the Ministry of Economy. At the same time, the Ministry of Trade of the Republic of Türkiye (inv. of the Ministry of Economy dated 19.12.2024 No. 04/164954-24) and PE "TEPLOS VIT ZAHID" (inv. of the Ministry of Economy dated 20.12.2024 No. 07/165461-24) provided the Ministry of Economy with relevant evidence with a request to renew the deadlines for providing comments. By letters dated 12/23/2024 No. 4411-05/92248-04, No. 4411-05/92321-07, the Ministry renewed the deadlines for providing comments for the Ministry of Trade of the Republic of Türkiye and PE "TEPLOS VIT ZAKHID" and took into account the previously provided comments by the indicated interested parties in full.

2. Information regarding the product under investigation and the product domestic production. Establishing similarity

2.1. Description and classification of the product under investigation

According to the Commission's decision of October 15, 2024 No. AD-569/2024/441-01, the product that is the subject of the investigation has the following description:

polypropylene fittings (including with copper alloy inserts) and copper alloy fittings with polypropylene inserts for water supply and heating systems, classified under codes ex3917 40 00 90, ex7412 20 00 00 according to the UKT Foreign Economic Activity.

The countries of origin of the goods described above are the People's Republic of China (hereinafter referred to as the PRC) and the Republic of Türkiye (hereinafter referred to as the TR).

Code and description of the product according to the Ukrainian Classification of Goods for Foreign Economic Activity:

Table 2.1

Code according to UKTZED	Description according to the UKT Foreign Economic Activity Code
3917 40 00 90	Polymeric materials, plastics and articles thereof; rubber and articles thereof Group 39 Plastics, polymeric materials and articles thereof [39B] Waste, parings and scrap; semi-finished products; articles - 3917 Tubes, pipes and hoses and their fittings (for example, joints, elbows, couplings), of plastics: - -3917 40 00 fittings: - - - 3917 40 00 30 for civil aviation - - - 3917 40 00 90 other
7412 20 00 00	Base metals and articles thereof Chapter 74 Copper and articles thereof 7412 Copper tube or pipe fittings (for example, couplings, elbows, sleeves): - 7412 10 00 00 of refined copper - 7412 20 00 00 from copper alloys

A fitting is a connecting element made of polypropylene by molding.

Main purpose: installation, repair of internal cold/hot water supply and heating systems.

Areas of use: use in the design and construction of private (domestic), multi-storey and industrial cold/hot water supply and heating systems.

Main function: connecting pipelines, changing direction, branching, changing diameter, switching to steel systems (connecting to old networks), connecting plumbing and heating devices, etc.

Applicable standards and technical requirements.

The production of the product under investigation and similar products produced by domestic and foreign manufacturers is regulated by a number of international and national standards that define the basic requirements for connecting parts of cold/hot water supply and heating systems made of polypropylene. These include:

- EN ISO 15874: International Standard for plastics piping systems for hot and cold water supply made of polypropylene (PP). Part 3 of this standard (EN ISO 15874-3) is specifically concerned with fittings. National adaptations of ISO 15874:

1. TS EN ISO 15874-3 (for the Republic of Türkiye);
2. GB/T 18742.3 (for the People's Republic of China), which is part of a series of standards for polypropylene pipes and fittings;
3. DSTU B V.2.7-145:2008 (modified adoption of EN ISO 15874-3:2003) – for Ukraine;
4. DSTU B V.2.5-18:2001: Ukrainian standard defining technical conditions for polypropylene connecting parts for hot-welding in the construction of cold and hot water supply networks.

- DIN 8077 and DIN 8078: German standards which, although mainly related to polypropylene pipes (DIN 8077 – dimensions, DIN 8078 – general quality and testing requirements), are fundamental to the entire polypropylene piping system and are often declared by component manufacturers.

Stakeholder comments

"OMEGA" LLC, in its written comments to the complaint, drew attention to the fact that the goods that are the subject of the investigation are not similar to the fittings that the company imported.

In particular, regarding the intended purpose, LLC "OMEGA" reported that the fittings imported by the company are used exclusively in vehicles (in air and hydraulic systems, etc.), while the object of the investigation concerns fittings for water supply and heating systems of buildings. At the same time, the company emphasized that the codes 3917 40 00 90 and 7412 20 00 00 according to the UKTZED do not include the division of the goods according to their intended purpose.

Taking into account the above and the requirements of the Law, the Ministry analyzed the statistical information provided by the State Customs Service, which confirmed the above facts. Thus, in addition to fittings intended for water supply and heating systems, during the study period, fittings were imported into Ukraine, [...]. Under the code 3917 40 00 90 according to the UKTZED, fittings for connecting polyvinyl chloride pipes were also imported. Taking into account the sample carried out by the Ministry in accordance with the description of the Goods, for the period 4 Q. 2023 - 3 Q. 2024 The share of import volumes of the Goods in total imports under codes 3917 40 00 90, 7412 20 00 00 according to the UKT Foreign Economic Activity was [...]%, including: under code 3917 40 00 90 – [...]%, under code 7412 20 00 00 – [...]%.

Regarding the material and classification according to the UKT ZED, OMEGA LLC noted that fittings classified under code 7412 20 00 00 must be made mainly of copper or its alloys. Domestic manufacturers, according to OMEGA LLC, have not proven that in fittings with a brass threaded insert the metal component prevails over the plastic one, but on the contrary, they have emphasized the superiority of the component made of polypropylene.

The Ministry investigated the issue and established that, according to customs statistics, under the code 7412 20 00 00 according to the UKT Foreign Economic Activity, only some types of goods were imported, in particular "American" fittings, the share of the metal component in which constituted the majority of the product in weight equivalent. According to the information received by the Ministry during the investigation, the production of the specified fittings is carried out by combining individual components (manufactured insert and imported brass part) and a new functional

product is created that has its own consumer properties, for example: "American" fitting², which can connect parts of metal systems of cold/hot water supply and heating with systems made of polypropylene.

In addition to the above, Omega LLC drew attention to the fact that domestic manufacturers produced only fittings with a diameter of 20 mm and more. In view of this, it proposed to set out the description of the Goods subject to anti-dumping measures as a list of specified descriptions of all types of Goods produced by the national manufacturer.

The Ministry, based on the analysis of the information provided in the responses of LLC "SAN TECH RAI" to the questionnaire for domestic producers and to additional requests, established that LLC "SAN TECH RAI" did not produce Goods with a nominal diameter of less than 20 mm and more than 110 mm. Taking this into account, the Ministry sent an additional request to the State Customs Service in order to determine the appropriateness of excluding the specified varieties from the description of the Goods, which are the subject of the investigation.

The State Customs Service, by letter dated 20.05.2025 No. 15/15-03-02/5.2/2963, for the purposes of avoiding evasion of anti-dumping duty, proposed to leave the description of the goods *"polypropylene fittings (including with copper alloy insert) and copper alloy fittings with polypropylene insert for water supply and heating systems"*, in respect of which an investigation was initiated, unchanged. At the same time, in order to identify the Goods that are the object of possible anti-dumping measures, typical images of fittings produced by a national producer should be attached to the description, indicating the relevant parameters in order to avoid further incorrect classification of goods and, as a result, non-payment of anti-dumping duty.

Instead, the Ministry will recommend the following product description:

"polypropylene fittings (including with copper alloy insert) and copper alloy fittings with polypropylene insert, used for connecting pipes of water supply and heating systems, the nominal diameter of which corresponds to the nominal outer diameter of pipes** dn-20-110 mm (inclusive), and are classified according to the UKT Foreign Economic Activity under the codes: ex3917 40 00 90, ex7412 20 00 00.*

* nominal diameter of the fitting dn – a parameter that must correspond to and be marked with the nominal outer diameter of the pipe for which it is intended;

** nominal external diameter of pipes dn – numerical designation of the external diameter of the pipe in mm, which is generally accepted in the pipe designation system, a parameter used as a characteristic of connecting parts, for example fittings .

2.2. Description and classification of goods produced by a domestic manufacturer

Technical description of the Product manufactured by the Applicant:

Polypropylene fittings of LLC "SAN TECH RAI" are universal and can be used in the construction and repair of cold and hot water supply systems, as well as in heating systems, classified under codes 3917 40 00 90 and 7412 20 00 00 according to the UKT ZED. In accordance with the technology, LLC "SAN TECH RAI" produces fittings from both polypropylene materials and multi-component fittings, which contain both polypropylene components and components from copper alloys.

Fittings manufactured by "SAN TECH RAI" LLC are divided into the following types, depending on their purpose:

1) installation fittings – polypropylene fittings using brass inserts/copper alloy fittings with polypropylene insert.

²A type of pipe fitting designed for quick, reliable, and airtight connection or disconnection of two parts of a pipeline without the need to rotate the pipes being joined.

Appointment:

- connection of plumbing and heating devices - taps, mixers, pumps, heating boilers, radiators, etc., depending on the scope of use;
- connection, transition to metal water supply and heating systems.

2) connecting fittings – fittings made of pure polypropylene, without the use of brass inserts.

The main purpose of the Product manufactured by "SAN TECH RAI" LLC is to combine the main elements of polypropylene water supply and heating systems with each other, to solve the architectural needs of the customer, and to create branched systems of varying complexity.

Polypropylene fittings manufactured by "SAN TECH RAI" LLC are manufactured [...].

2.3. Establishing the similarity of the goods produced by the Applicant to the goods that are subject of investigation

As part of the aforementioned study, the Ministry sent questionnaires to domestic manufacturers, foreign manufacturers and/or exporters, and importers, who were required to provide detailed information regarding the characteristics of the Goods.

Table 2.3. shows a comparison of the characteristics of the Goods originating in the Republic of Tajikistan and the PRC, which are the subject of the investigation, and the Goods produced by the Applicant.

Table 2.3

Criterion	Product manufactured by the applicant	Goods originating from the People's Republic of China and the Republic of Tatarstan	Comment
Total per Product			
Classification according to the UKT Foreign Economic Activity	3917 40 00 90, 7412 20 00 00	3917 40 00 90, 7412 20 00 00	Identical
Standards	EN ISO 15874, DSTU B V.2.5-18:2001, DIN 8077 and DIN 8078	EN ISO 15874 (TS EN ISO 15874-3 for TR, GB/T 18742.3 for the People's Republic of China), DIN 8077 and DIN 8078	Similar
Scope of application Goods	Used to connect cold and hot water supply and heating systems used in the construction of residential and public buildings and structures	Used to connect cold and hot water supply and heating systems used in the construction of residential and public buildings and structures	Identical
Technology and production process	[...]	The technological process of producing the Goods is similar at all enterprises where injection molding is carried out on automatic injection molding machines; minor differences in individual technological operations are possible.	Similar
Nominal outer diameter, mm	20-110, depending on the variety Goods	~20~110, depending on Product variety	Similar

Materials that used to manufacture goods	PP-R, PP-RCT, brass inserts	PP-R, PP-RCT, copper alloy inserts	Similar
MAX working temperature, °C	95	75-95, depending on the variety Goods	Similar
MAX pressure, bar	25	25	Identical
Estimated service life	50 years	50 years	Identical
Specifics of application in terms of individual types of the Product			
Square	Connecting element for polypropylene pipelines of cold and hot water supply, used when it is necessary to change direction	A connecting element for pipelines, designed for use with polypropylene pipes, which allows changing the direction of the pipeline on	Identical

Criterion	Product manufactured by the applicant	Goods originating from the People's Republic of China and the Republic of Tatarstan	Comment
	Pipeline laying with a 90° turn.	90°.	
Coupling coupling	Polypropylene couplings are used to connect polypropylene pipes and fittings of the same diameter when installing cold and hot water supply and heating systems.	Connecting element for polypropylene pipes, designed to connect pipes of the same diameter in water supply and heating systems.	Identical
Tee is unambiguous	A simple and reliable element allows for branching of pipelines of the same diameter. T max 95 °C.	A simple element for branching a pipeline of the same diameter, suitable for cold and hot water supply systems.	Identical
Threaded plug	Used for temporary sealing of threaded connections for the purpose of testing the system under pressure.	Designed for temporary sealing of threaded connections when testing pressure systems.	Identical
Reducing tee	A simple and reliable element allows you to branch pipelines of different diameters.	Element for branching pipelines of different diameters.	Identical
Adapter - reduction	This element is used as a transition of the pipeline from one diameter to another.	This element is designed to transition a pipeline from one diameter to another.	Identical

Contour	Used for installation in places where it is necessary to bypass an obstacle, namely a pipeline, riser, etc.	Designed to bypass obstacles such as pipelines or risers.	Identical
Cross	A polypropylene cross is used to branch a pipeline of the same diameter in three directions at right angles.	The element is used to branch a pipeline of the same diameter in three directions at right angles.	Identical
Rebate collar	A flanged collar is used to create a flange connection in which a polypropylene pipe is joined to metal pipes and valves.	The element is designed to create flange connections used to connect plastic pipes to metal pipes and shut-off valves.	Identical
Compensating loop	Designed to compensate for thermal expansion of pipes	The element is designed to compensate for thermal expansion of pipelines.	Identical
Welded saddle	Designed to create a pipeline branch.	The element is used to create pipeline branches.	Identical
Adapter with	Combined adapter with	Combined adapter with	Identical

Criterion	Product manufactured by the applicant	Goods originating from the People's Republic of China and the Republic of Tatarstan	Comment
external metal thread	with external thread, intended for installation of pipelines of hot and cold water supply and heating systems, used for direct transition from polypropylene pipeline to internal metal thread.	External thread is used to transition from polypropylene pipeline to metal pipes.	
"American"	The element is suitable for forming a detachable connection. It significantly simplifies the installation of equipment due to the fact that the brass part of the coupling can be connected to the equipment inlet without rotating the polypropylene part.	This element is used to form a detachable connection, which simplifies the installation of equipment.	Identical

90 degree angle plastic transition with union nut	Designed to change the direction of the pipeline at an angle of 90 degrees, allows for detachable connection to filters, meters and etc.	This element is used to change the direction of the pipeline by 90 degrees and allows for a detachable connection to filters, meters and other components.	Identical
Filter	The filter protects the system from clogging with rust, scale and other mechanical impurities. It is usually installed before devices whose service life depends on the quality of the water, thereby insuring the system from malfunction.	This filter serves to protect the system from mechanical impurities such as rust and scale.	Identical
Pipe-to-pipe collapsible connection	The element is used to obtain a collapsible connection of pipes of the same diameter.	This element is designed to obtain a collapsible connection of pipes of the same diameter.	Identical
Branch pipe with union nut	Element for transition from the plastic part to the metal part of the pipeline.	This element is used to transition from the plastic part of the pipeline to the metal part.	Identical
Plastic neck with union nut	Element for transition from the plastic part to the metal part of the pipeline.	This element is designed to transition from the plastic part of the pipeline to the metal part.	Identical
Tee with union nut	Used to enable threaded connection at the point of 90-degree pipe branching.	This element is used to create a threaded connection when laying a pipeline at an angle of 90	Identical
Criterion	Product manufactured by the applicant	Goods originating from the People's Republic of China and the Republic of Tatarstan	Comment
		degrees.	
Wall angle with internal metal thread	The wall elbow is designed to change the direction of the pipeline at an angle of 90 degrees, allowing you to connect a mixer or other components of the engineering system with a threaded connection using a metal thread.	This element is used to change the direction of the pipeline at an angle of 90 degrees, and has an internal thread for connecting mixers or other components of the engineering system.	Identical





Taking into account the above, the Goods produced by "SUN TECH RAI" LLC are similar to the Goods originating from the PRC and the Republic of Tajikistan, which are the subject of the investigation.





2.4. Product Variety Control Numbers (PCN codes)
















In order to ensure an objective comparison of the selling prices of the Goods that are the subject of the investigation with the corresponding selling prices of similar Goods on the domestic market of the exporting countries and the selling prices of similar Goods of the national producer, the investigation considered the issue of conducting a study in terms of product control numbers (hereinafter referred to as PCN codes), combined according to the main criteria that have the greatest impact on the formation of the price of the Goods and/or determine the belonging of the Goods to a certain category.



The methodology for assigning PCN codes based on the main characteristics, developed by the domestic producer, was sent to all interested parties of the investigation. Interested parties had the opportunity to provide their comments and observations on the specified methodology. Taking into account the positions of interested parties, the Ministry used the following methodology for determining PCN codes according to the main features and characteristics of the Goods:

Table 2.4

Product Characteristics	Classification	Additional description	Code
(A) Code according to UKTZED	3917 40 00 90	-	A01
	7412 20 00 00	-	A02
(B) Material	Polypropylene	-	B01
	Polypropylene with copper alloy insert	-	B02
	Copper alloys with polypropylene insert	-	B03
(C) Color	White	without added dyes	C01
	Another	with the addition dyes	C02
(D) Product type	Transition		D01
	Angle/elbow		D02
	Angle/elbow with reduction		D03
	Tee/triple elbow		D04

Product Characteristics	Classification	Additional description	Code
	Tee/triple elbow with reducer		D05
	Cross-piece		D06
	Crosspiece with reduction		D07
	Adapter - reduction		D08

	Withdrawal		D09
	Contour		D10
	Welded saddle		D11
	Plug		D12
	Clutch		D13
	Threaded stopper		D14
	Rebate collar		D15
	Filter		D16
	Threaded connection (American)		D17
	Collapsible connection		D18
	Plastic throat		D19
	Branch pipe with union nut		D20
	Elbow with union nut		D21
	Tee with union nut		D22
	Compensating loop		D23

Product Characteristics	Classification	Additional description	Code
(E) Availability of fasteners	Missing		E01
	Available		E02
(F) Number of holes	1	-	F01
	2 of the same diameter	-	F02

	2 different diameters	-	F03
	3 of the same diameter	-	F04
	3 different diameters	-	F05
	4 of the same diameter	-	F06
	4 different diameters	-	F07
(G) Connection type	PPR internal - PPR internal		G01
	PPR internal - PPR ext.	-	G02
	PPR internal - external thread	-	G03
	PPR internal – internal thread	-	G04
	PPR internal – PPR with flange nut	-	G05
	PPR internal – PPR with metal nut	-	G06
(H) Diameter of the first hole, mm*	Up to 20 mm	-	H01
	20 – 24 mm	-	H02
	25 – 31 mm	-	H03
	32 – 39 mm	-	H04
	40 – 49 mm	-	H05
	50 – 62 mm	-	H06
	63 – 74 mm	-	H07
	75 – 89 mm	-	H08
	90 – 109 mm	-	H09
	110 – 124 mm	-	H10
	125 – 159 mm	-	H11
	160 – 199 mm	-	H12
	More than 199 mm	-	H13
(I) Diameter of the second hole, mm*	Without second hole	-	IN
	Up to 20 mm	-	I01
	20 – 24 mm	-	I02
	25 – 31 mm	-	I03
	32 – 39 mm	-	I04
	40 – 49 mm	-	I05
	50 – 62 mm	-	I06
	63 – 74 mm	-	I07
	75 – 89 mm	-	I08
	90 – 109 mm	-	I09
	110 – 124 mm	-	I10
	125 – 159 mm	-	I11
	160 – 199 mm	-	I12
	More than 199 mm	-	I13
(J) Diameter of the third hole, mm*	Without third hole	-	JN
	Up to 20 mm	-	J01
	20 – 24 mm	-	J02
	25 – 31 mm	-	J03
Product Characteristics	Classification	Additional description	Code
	32 – 39 mm	-	J04
	40 – 49 mm	-	J05
	50 – 62 mm	-	J06
	63 – 74 mm	-	J07

	75 – 89 mm	-	J08
	90 – 109 mm	-	J09
	110 – 124 mm	-	J10
	125 – 159 mm	-	J11
	160 – 199 mm	-	J12
	More than 199 mm	-	J13
(K) Diameter of the fourth hole, mm*	Without fourth hole	-	KN
	Up to 20 mm	-	K01
	20 – 24 mm	-	K02
	25 – 31 mm	-	K03
	32 – 39 mm	-	K04
	40 – 49 mm	-	K05
	50 – 62 mm	-	K06
	63 – 74 mm	-	K07
	75 – 89 mm	-	K08
	90 – 109 mm	-	K09
	110 – 124 mm	-	K10
	125 – 159 mm	-	K11
	160 – 199 mm	-	K12
	More than 199 mm	-	K13
(L) Thread diameter, inch	Without threaded connection	-	LN
	1/2	-	L01
	3/4	-	L02
	1	-	L03
	5/4	-	L04
	6/4	-	L05
	2	-	L06

* - for Goods with different hole diameters, for the purposes of this PCN classification (within codes H, I, J, K), the sequence of holes is selected in decreasing order of their diameters (the first hole has the largest diameter, the last one has the smallest).

Example of PCN formation:

A01B01C01D05E01F05G01H04I04J02KNLN: polypropylene tee with reduction (hole diameters 32 mm, 32 mm, 20 mm) with internal connections, without copper alloy inserts, without wall mounting and threaded connections, white in color, classified under code 3917 40 00 90 of the Foreign Trade Classification.

The Ministry's conclusion to the section

Based on the results of the investigation, the Ministry established that the Goods of Ukrainian origin and Goods originating from the PRC and the Republic of Tajikistan, which are the subject of the investigation:

- a) have a similar description and similar coding according to the UKTZED;
- b) have similar or identical characteristics;
- c) have the same scope of application and use;
- d) are produced to similar standards;
- e) are produced using similar technology.

Thus, the Ministry has established that, within the meaning of paragraph 26 of Article 1 of the Law, the Goods of Ukrainian origin are similar to the Goods that are the subject of the investigation.

3. Information on the production volumes of the Goods in Ukraine and establishment of a proper national producer

The Ministry investigated information regarding domestic producers and parties who notified their interest in the investigation in accordance with Part Twelve of Article 12 of the Law, and who actively participated in the investigation by submitting written evidence or other information sufficient for the purposes of this investigation.

By letter dated 15.11.2024, LLC "TRADING HOUSE "ROZMA" reported that since the filing of the complaint, significant changes have occurred in the market situation, and given the possibility of a mirror increase in prices for metal components purchased by it in the People's Republic of China and the Republic of Türkiye, the application of anti-dumping measures will worsen the competitiveness of the enterprise in the domestic and foreign markets. Subsequently, LLC "TRADING HOUSE "ROZMA" did not cooperate with the Ministry during the investigation.

Only LLC "SAN TECH RAI" provided a response to the questionnaire for the domestic producer. Taking into account the above, the Ministry, in order to determine the appropriate domestic producer within the meaning of the provisions of Clause 16 of Article 1 and Article 11 of the Law, established the share of LLC "SAN TECH RAI" in the total production of similar Goods in Ukraine, and also determined whether the specified enterprise is related to exporters or importers, or is simultaneously an importer of the Goods that are the subject of the investigation.

In order to establish whether LLC "SUN TECH RAI" is a national producer in accordance with Part Four of Article 13 of the Law, the Ministry sent a request to the State Statistics Service of Ukraine to provide a list of domestic producers of the Goods, sales volumes and volumes of products produced by them, as well as volumes of consumption of the Goods in Ukraine for the period 2021 - Q3 2024.

In response to the request, the State Statistics Service of Ukraine noted that such information is obtained by state statistics bodies in the process of statistical observations, therefore it is confidential, protected by the Law of Ukraine "On State Statistics" and is used exclusively for statistical purposes in aggregated, depersonalized form.

The Ministry of Economy sent a request to the State Enterprise "Ukrpromzovnesheexpertiza" in order to obtain information on the total production volumes by producers and the volumes of consumption of the Goods in Ukraine.

In response to the request, the State Enterprise "Ukrpromzovnesheexpertiza" provided information and analytical materials on the market of polypropylene fittings for water supply and heating systems in 2021-2024, which provided the following information regarding the production volumes of such Goods in Ukraine.

Table 3.1

Manufacturer/Period	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
LLC "TRADING HOUSE "ROZMA", t	[...]	[...]	[...]	[...]
LLC "SAN TECH RAI", vol	[...]	[...]	[...]	[...]
TOTAL, t	[...]	[...]	[...]	[...]

Taking into account the information received, the Ministry established the shares of domestic producers of the Goods in total production in Ukraine.

Table 3.2

Manufacturer/Period	2021	2022	2023	4 square meters 2023 - 3
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				square meters 2024
LLC "TRADING HOUSE "ROZMA", %	[...]	[...]	[...]	[...]
LLC "SAN TECH RAI", %	[...]	[...]	[...]	[...]
TOTAL, %	100.0	100.0	100.0	100.0

After analyzing the available information, the Ministry established that the production volume of the Goods by LLC "SAN TECH RAI" during the entire research period amounted to more than 50% of the total production in Ukraine.

At the same time, during the analysis of customs statistics, it was established that in 2021-2022, in addition to imports of [...], which are not Goods, LLC "SAN TECH RAI" carried out [...] import operations into Ukraine of Goods originating from [...]. The volumes of the said imports amounted to [...] tons in 2021 originating from [...] and [...] tons in 2022 originating from [...], which amounted to [...] % and [...] % of the total volumes of imports into Ukraine of Goods originating from the People's Republic of China and the Republic of Türkiye in the respective years. In this regard, LLC "SAN TECH RAI" was sent an additional request in order to obtain clarifications regarding the import of Goods. In response, the company reported that [...].

Given the insignificant share of imports of Goods into Ukraine by LLC "SUN TECH RAI" in 2021-2022, and the absence of a similar practice in 2023-2024, the Ministry did not use the provisions of paragraph 1 of part one of Article 11 of the Law when determining a national producer.

The Ministry's conclusion to the section

The Ministry concluded that LLC "SUN TECH RAI" is a proper national producer within the meaning of the provisions of Clause 16 of Article 1 and Article 11 of the Law.

4. Dumping investigation

4.1. Methodological aspects of investigating dumping facts

As part of the investigation, foreign producers and/or exporters did not provide responses to the questionnaires.

Taking into account the above, in accordance with Part One of Article 31 of the Law, the Ministry made relevant conclusions regarding the facts of dumped imports of Goods into Ukraine based on the information in the possession of the Ministry.

In order to obtain the information necessary to investigate the facts of dumped imports, the Ministry sent a request to the State Enterprise "Ukrpromzovnesheksperytyza" by letter dated 11/22/2024 No. 4411-05/83374-07, and a request to the Embassy of Ukraine in the People's Republic of China and the Embassy of Ukraine in the Republic of Türkiye by letter dated 10/31/2024 No. 4411-05/77561-03.

The responses of the Embassy of Ukraine in the People's Republic of China and the Embassy of Ukraine in the Republic of Türkiye contained price ranges in the domestic markets of the respective countries for plastic and copper fittings in terms of pieces.

Instead, the information materials provided by the State Enterprise "Ukrpromzovnisheksperytyza" by letter dated 08.05.2025 No. 788 contained information on the average prices of polypropylene fittings for water supply and heating systems in tons.

In view of the above, within the framework of the investigation, the calculations of the dumping margin for imports into Ukraine of Goods originating from the People's Republic of China and the Republic of Türkiye were based on information provided by the State Enterprise "Ukrpromzovnesheksperytyza" and the State Customs Service.

According to Article 9 of the Law, as a result of the comparison of the normal value and the export price, the dumping margin is determined, the value of which is the difference by which the normal value exceeds the export price. The presence of a dumping margin during the investigation period is determined, as a rule, by comparing:

- 1) the weighted average of the normal value with the weighted average of the prices of all export transactions in the country of import;
- 2) or individual normal value with individual export prices in the country of import for each transaction.

The dumping margin was calculated by the Ministry using the following formula:

$$DM = (NV_{EXW} - EP_{EXW}) / EP_{border\ of\ Ukraine} * 100\%$$

, where

DM – dumping margin;

NV_{EXW} – normal value on EXW terms;

EP_{EXW} – export price on EXW terms;

EP_{border of Ukraine} – export price at the border of Ukraine.

DM – dumping margin

The Ministry calculated the dumping margin by making a fair comparison between the export price of the Goods and their normal value.

The comparison between the normal value determined in accordance with Article 7 of the Law and the export price determined in accordance with Article 8 of the Law shall be made in accordance with the provisions of Article 9 of the Law.

NV_{EXW} – normal value on EXW terms

According to the provisions of Article 7 of the Law, normal value is generally determined on the basis of prices established in the ordinary course of trade between independent buyers in the exporting country during the investigation period. Normal value on an EXW basis is determined by adjusting the actual transaction prices for the amounts of transport and other trading costs.

EP_{EXW} – export price on EXW terms

To determine the export price on EXW delivery terms, the Ministry drew conclusions based on the most indicative and substantiated information at its disposal, in particular, data from the State Customs Service regarding the average import price of goods, taking into account the necessary adjustments regarding transportation costs, provided by the State Enterprise "Ukrpromzovneshekspertyza".

The procedure for determining the export price is established in Article 8 of the Law.

EP_{border of Ukraine} – export price on the border of Ukraine terms

According to Part Eight of Article 14, Clause 4 of Part Five of Article 16 of the Law, the amount of the preliminary and final anti-dumping duty rate is determined:

as a percentage of the customs value of the goods that are the subject of an anti-dumping investigation. The customs value of this good is calculated in accordance with the basic terms of delivery CIF border of Ukraine; or the difference between the minimum price and the customs value of the specified good, calculated in accordance with the basic delivery conditions CIF border of Ukraine.

In the event of no sales of the goods subject to an anti-dumping investigation, according to the basic terms of delivery CIF-border of Ukraine, the Ministry may select the customs value closest to the basic terms of delivery CIF-border of Ukraine by making appropriate adjustments.

4.2. Establishment of facts of dumping regarding imports into Ukraine of goods originating from the Republic of Türkiye

4.2.1. Determination of normal value

According to Part One of Article 7 of the Law, normal value is, as a rule, determined on the basis of prices established in the ordinary course of trade between independent buyers in the country of export.

Since no Turkish producer and/or exporter that registered as part of the investigation cooperated properly by providing answers to the questionnaire for foreign producers and/or exporters, the Ministry, in accordance with Article 31 of the Law, based its conclusions on the existence of dumping on the basis of available information, namely data from the State Enterprise "Ukrpromzovneshekspertiza" on the average quarterly sales prices of polypropylene fittings for water supply and heating systems on the domestic market of the Republic of Türkiye. on EXW seller's warehouse terms for the investigation period.

Table 4.2.1

Period	Average price of the Product, TRY/t	Exchange rate, TRY/USD	Average price of the Product, USD/t
Q4 2023	[...]	28.51	[...]
Q1 2024	[...]	30.92	[...]
Q2 2024	[...]	32.37	[...]

Q3 2024	[...]	33.53	[...]
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4.2.2. Determining the export price

Since no Turkish producer and/or exporter registered as part of the investigation cooperated properly, the export price of the Goods originating in the Republic of Türkiye was determined according to the customs statistics of the State Customs Service of Ukraine on the customs value of imports of the Goods into Ukraine by quarter of the investigation period.

In order to make a fair comparison with the normal value, the export price on the terms of delivery CIF/CIP-border of Ukraine was adjusted by the average transport costs for delivering the goods to the border with Ukraine. According to the information and analytical materials of the State Enterprise "Ukrpromzovnesheexpertiza" on the market of polypropylene fittings for water supply and heating systems in 2021-2024, delivery to Ukraine of the Goods from the Republic of Türkiye after the start of the full-scale military invasion of the Russian Federation into Ukraine is carried out in [...].

According to the proposals of specialized transport and logistics companies, the cost of transporting products to [...] Ukraine from the Republic of Türkiye is about [...] USD or [...] USD/t.

Table 4.2.2

Period	Average import price of the Goods CIF, USD/t	Transportation costs, USD/t	Average import price of the Product EXW, USD/t
Q4 2023	[...]	[...]	[...]
Q1 2024	[...]	[...]	[...]
Q2 2024	[...]	[...]	[...]
Q3 2024	[...]	[...]	[...]

4.2.3. Calculation of dumping margin

Guided by the provisions of Articles 1, 7-9 of the Law, the Ministry determines the dumping margin, the value of which is the difference by which the normal value exceeds the export price. The dumping margin is determined as a percentage of the value of the Goods on the basic terms of delivery CIF/DAF-border of Ukraine.

The Ministry calculated the dumping margin by comparing the export price and the normal value, adjusted to the same basic conditions.

Based on the results of the calculations, the Ministry determined the following level of dumping margin for imports into Ukraine of Goods originating from the Republic of Türkiye:

Table 4.2.3

Period	Normal cost (NV _{EXW})	Export price (EP _{EXW})	Export price for border (EP _{CIF})	Dumping margin (DM)	Share in total import value Goods from Türkiye Republic during the investigation period
Q2 2023	[...]	[...]	[...]	[...]	[...]
Q3 2023	[...]	[...]	[...]	[...]	[...]
Q4 2023	[...]	[...]	[...]	[...]	[...]
Q1 2024	[...]	[...]	[...]	[...]	[...]
In general for the Republic of Türkiye				34.72	100

4.3. Establishment of facts of dumping regarding imports into Ukraine of goods originating from the People's Republic of China

4.3.1. Determination of normal value

Since no Chinese producer registered as part of the investigation, the Ministry, in accordance with Article 31 of the Law, based its conclusions on the existence of dumping on the basis of available information, namely data

SE "Ukrpromzovnesheexpertiza" on average quarterly sales prices of polypropylene fittings for water supply and heating systems on the domestic market of the People's Republic of China on EXW seller's warehouse terms for the investigation period.

Table 4.3.1

Period	Average price of the product, CNY/t	Exchange rate, CNY/USD	Average price of the Product, USD/t
Q4 2023	[...]	7.23	[...]
Q1 2024	[...]	7.19	[...]
Q2 2024	[...]	7.24	[...]
Q3 2024	[...]	7.17	[...]

4.3.2. Determining the export price

Since no Chinese manufacturer and/or exporter registered as part of the investigation, the export price of the Goods originating in the People's Republic of China was determined according to the customs statistics of the State Customs Service of Ukraine on the customs value of imports of the Goods into Ukraine by quarter of the investigation period.

In order to make a fair comparison with the normal value, the export price on the terms of delivery CIF/CIP-border of Ukraine was adjusted by the average transport costs for delivering the goods to the border with Ukraine. According to the information and analytical materials of the State Enterprise "Ukrpromzovnesheexpertiza" on the market of polypropylene fittings for water supply and heating systems in 2021-2024, the delivery of goods to Ukraine from the People's Republic of China after the start of the full-scale military invasion of the Russian Federation into Ukraine is carried out [...].

According to [...], the cost of shipping one container from [...] to [...] is [...] USD. This cost includes [...].

From [...] to the border with Ukraine [...] [...] is transported. The distance from [...] to the border is about [...] km. The transportation cost is [...] USD or [...] USD/t.

Table 4.3.2

Period	Average import price of the Goods CIF, USD/t	Transportation costs, USD/t	Average import price of the Product EXW, USD/t
Q4 2023	[...]	[...]	[...]
Q1 2024	[...]	[...]	[...]
Q2 2024	[...]	[...]	[...]
Q3 2024	[...]	[...]	[...]

4.3.3. Calculation of dumping margin

Guided by the provisions of Articles 1, 7-9 of the Law, the Ministry determines the dumping margin, the value of which is the difference by which the normal value exceeds the export price. The

dumping margin is determined as a percentage of the value of the Goods on the basic terms of delivery CIF/DAF-border of Ukraine.

The Ministry calculated the dumping margin by comparing the export price and the normal value, adjusted to the same basic conditions.

Based on the results of the calculations, the Ministry determined the following level of dumping margin for imports into Ukraine of Goods originating from the People's Republic of China:

Table 4.3.3

Period	Normal cost (NV _{EXW})	Export price (EP _{EXW})	Export price for border (EP _{CIF})	Dumping margin (DM)	Share in total import value Goods from the People's Republic of China Republic during the investigation period
Q2 2023	[...]	[...]	[...]	[...]	[...]
Q3 2023	[...]	[...]	[...]	[...]	[...]
Q4 2023	[...]	[...]	[...]	[...]	[...]
Q1 2024	[...]	[...]	[...]	[...]	[...]
In general for the People's Republic of China				166.65	100

Stakeholder comments

The Ministry of Trade of the Republic of Türkiye, in its comments to the complaint, noted the impossibility of verifying the methodology for calculating the dumping margin and establishing the fact of the presence of dumped imports of goods of Turkish origin. In addition, given the limited access to the study presented by the State Enterprise "Ukrpromzovnesheksperytyza", its accuracy, relevance and correctness cannot be assessed. PE "Teplosvit Zakhid" and LLC "SYMPHONY TEPLA" compared the prices of certain types of fittings of Turkish origin, which are imported and, subsequently, sold by the specified enterprises, at higher prices than the prices of similar products manufactured by LLC "Trading House "Rozma", noting that this indicates the absence of dumping.

The national producer noted that when determining the normal value of the Goods in the country of export, it is important to take into account macroeconomic factors that may affect its formation and, accordingly, the results of calculating the dumping margin level. Thus, currency devaluation may artificially lower the normal value when converted and, accordingly, the dumping margin, especially if the export price is denominated in such a stable currency as the dollar or euro.

In particular, in the Republic of Türkiye, during the investigation period, there was a sharp and sustained depreciation of the national currency, the Turkish lira, which leads to a decrease in the normal value when converted into the importer's currency.

The situation on the domestic market of the Republic of Türkiye, in the opinion of the national producer, does not give grounds to consider domestic prices on such a market as an objective or representative benchmark for determining normal value.

In view of the above, the national producer believes that there are sufficient grounds for applying alternative methods of determining the normal value of Goods originating in the Republic of Türkiye, in particular by:

- exchange rate adjustment to convert the normal value denominated in Turkish lira into euros, taking into account the rate that prevailed before the devaluation began;
- using prices for similar goods in countries with market economies, primarily in the EU;
- constructing normal value based on cost and profitability data.

SE "Ukrpromzovnesheexpertiza" in the provided informational and analytical materials also notes that [...].

It is worth noting that in accordance with paragraph 10 of part four of Article 9 of the Law, if it is necessary to convert currencies for price comparison, such conversion is carried out using the exchange rate on the date of sale of the goods that are the subject of consideration.

If the sale of foreign currency directly related to the export sale was made under forward contracts, the exchange rate used for forward sales shall be used. The date of sale under a forward contract shall be the date stated in the relevant invoice, but the date of conclusion of the contract, the date of order or the date of order confirmation, or another date if it is more appropriate for establishing the essential terms of the sale, may also be used.

In the process of an anti-dumping investigation, current exchange rate fluctuations are not taken into account, and interested exporters are given at least 60 days to reflect prolonged exchange rate fluctuations during the investigation period.

Article 2.4 of the Agreement contains similar provisions.

At the same time, according to the note to paragraphs 2 and 3 of Article VI of the General Agreement on Tariffs and Trade 1994, in certain circumstances, the practice of using multiple exchange rates may constitute, inter alia, a form of dumping by means of partial depreciation of a country's currency, against which action may be taken under paragraph 2 of Article VI. "Practice of using multiple exchange rates" means a practice by governments themselves or sanctioned by governments.

The practice of using multiple exchange rates consists of setting different currency exchange rates for different types of foreign economic transactions.

In this investigation, the Ministry has no evidence of the Republic of Türkiye's practice of using multiple exchange rates. However, taking into account significant exchange rate fluctuations in the currency in which the prices of the Goods are denominated on the domestic market of the Republic of Türkiye could have been taken into account by using the official exchange rate of the Turkish lira to the US dollar on a daily basis. However, the Ministry has information on the average sales prices of the Goods on the domestic market of the Republic of Türkiye only on a quarterly basis.

Conclusions

According to the calculations conducted by the Ministry, the established amount of the dumping margin for imports into Ukraine of Goods originating in the Republic of Türkiye and the People's Republic of China is higher than the minimum amount (2%) within the meaning of the provisions of Article 16 of the Law.

As a result of the calculations, the Ministry concluded that during the investigation period there were facts of dumping when importing goods originating in the Republic of Türkiye and the People's Republic of China into Ukraine.

The following dumping margin sizes have been established:

for the Republic of Türkiye – 34.72%; for the
People's Republic of China – 166.65%.

5. Establishing the fact of causing harm to a sector of the Ukrainian economy

5.1. Research into the financial and economic situation of a national commodity producer

According to the information provided in the response of the national producer to the questionnaire for domestic producers, and in order to study the impact of dumped imports on it, the Ministry, in accordance with the provisions of Part Five of Article 10 of the Law, investigated the economic factors and indicators of the national producer.

The main calculations were performed using MS Excel. The data in the tables are rounded to clearly demonstrate the results of the calculations.

Table 5.1.1

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Production volumes of the Goods, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-45.7	114.7	5.2
<i>Dynamics compared to the base period, %</i>	-	-45.7	16.6	22.7
Production capacity, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	0.0	0.0	0.0
<i>Dynamics compared to the base period, %</i>	-	0.0	0.0	0.0
Production capacity utilization rate, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-45.7	114.7	5.2
<i>Dynamics compared to the base period, %</i>	-	-45.7	16.6	22.7

The production volumes of the Goods by the national producer decreased by 45.7% in 2022 compared to 2021, but in the following periods they constantly increased: in 2023 by 114.7% compared to the previous period and by 16.6% compared to the base period, in the last period – by 5.2% compared to the previous period and by 22.7% compared to the base period. The volumes of production capacities remained unchanged throughout the study period. Taking into account the stability of production capacities, the dynamics of the production capacity utilization indicator during the study period was similar to the dynamics of the production volumes of the Goods. In general, despite the significant drop in 2022, the production of the Goods demonstrated a steady recovery and growth in the following periods, which positively affected the level of production capacity utilization. At the same time, despite the existing growth trend, it is worth noting the generally low level of utilization of the national producer's production capacities throughout the entire research period.

Table 5.1.2

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Sales volumes on the domestic market, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-43.0	84.4	32.2
<i>Dynamics compared to the base period, %</i>	-	-43.0	5.1	38.9
Domestic sales value, thousand USD	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-35.1	62.0	25.0
<i>Dynamics compared to the base period, %</i>	-	-35.1	5.1	31.4
Apparent consumption of the Goods in Ukraine, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-51.4	28.4	5.5
<i>Dynamics compared to the base period, %</i>	-	-51.4	-37.7	-34.2

Share of national producer in consumption of goods in Ukraine, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	17.4	43.6	25.3
<i>Dynamics compared to the base period, %</i>	-	17.4	68.6	111.3

In 2022, there was a significant decrease in both domestic sales and exports of the Goods. Thus, compared to 2021, domestic sales of the Goods decreased by 43.0%, and the value of these sales decreased by 35.1%. Export volumes showed a decrease of 40.8%

However, in the following periods, the dynamics of the indicators began to change. Thus, sales volumes to the domestic market showed a steady and noticeable recovery: in 2023, sales volumes on the domestic market increased by 84.4% compared to the previous 2022, which exceeded the indicators of the base 2021 by 5.1%. The cost of sales also recovered, increasing by 62.0%, which is also 5.1% more than in 2021. This positive trend continued during Q4 2023 - Q3 2024, when sales volumes on the domestic market increased by another 32.2% compared to the previous period, which is the highest indicator for the entire period under study, exceeding the indicator of the base 2021 by 38.9%. Similarly, the cost of sales increased by 25.0%, which is 31.4% more than in the base year 2021.

The total level of apparent consumption of the Goods in Ukraine in 2022 decreased by more than half compared to 2021. In subsequent periods, the market size, although showing growth, never reached the level of 2021, demonstrating an overall reduction of 34.2% over the study period.

Against the background of the above-mentioned dynamics of the Goods market in Ukraine, the share of the national producer in consumption has been steadily growing, reaching a growth rate of more than 2 times during the study period. However, it should be noted that the overall rather low level of presence of the Goods of the national producer on the market and, accordingly, a low statistical basis for comparison, as well as the competitive pricing policy of the national producer, allowed to achieve such results.

The above indicates that the domestic market is the main sales market for the Goods of the national producer.

Table 5.1.3

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Domestic sales prices, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	13.9	-12.2	-5.4
<i>Dynamics compared to the base period, %</i>	-	13.9	0.04	-5.4
Full cost of similar Goods ³, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	54.5	39.8	8.1
<i>Dynamics compared to the base period, %</i>	-	54.5	115.9	133.4

During the study period, there was a sudden increase in the cost of the Goods by more than 2.3 times. The dynamics of prices for the Goods of the national producer on the domestic market not only did not correspond to the growth rate of the cost, but also demonstrated a gradual decrease since 2023. Such a discrepancy between the pricing policy of the national producer and the changed circumstances had significant consequences for its financial result in terms of the sale of the Goods.

³according to Table 8.16.1 of the response of LLC "SAN TECH RAI" to the Ministry's request dated 27.05.2025 No. 4411-05/39338-07

Table 5.1.4

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Remaining goods in warehouses at the end of the period, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-3.4	23.1	-45.9
<i>Dynamics compared to the base period, %</i>	-	-3.4	18.9	-35.7

In 2022, the volume of the balance of the Goods in warehouses decreased by 3.4% compared to 2021. In 2023, there was an increase in balances: by 23.1% compared to the previous period and by 18.9% compared to the base period. In the latter period, the balance of the Goods in warehouses decreased sharply: by 45.9% compared to the previous period. This decrease led to the fact that at the end of the period the volume of the balance of the Goods was 35.7% lower than in the base period of 2021.

Table 5.1.5

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Financial result from sales to the domestic market, thousand USD⁴	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-60.34	-174.51	-552.99
<i>Dynamics compared to the base period, %</i>	-	-60.34	-129.55	-292.96
Financial result from sales to the domestic market, thousand UAH	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-52.95	-162.81	-831.93
<i>Dynamics compared to the base period, %</i>	-	-52.95	-129.55	-375.38
Profitability in the domestic market, %⁵	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-54.95	-128.91	-356.97
<i>Dynamics compared to the base period, %</i>	-	-54.95	-113.02	-159.52

Due to the different dynamics of average prices and cost of Goods, the financial result of the national producer from the sale of Goods on the domestic market of Ukraine rapidly and steadily deteriorated throughout the entire period of the study. In particular, the indicator of profitability of the sale of Goods during the period under study showed a deterioration of 160%.

Table 5.1.6

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
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⁴according to table 9.1.1 of the response of LLC "SAN TECH RAI" to the Ministry's request dated 27.05.2025 No. 4411-05/39338-07 ⁵ calculation based on data on sales volumes, profits and full cost of Goods sold on the domestic market of Ukraine, given in table 9.1.1, 8.16.1 and 4.1.1 of the response of LLC "SAN TECH RAI" to the Ministry's request dated 27.05.2025 No. 4411-05/39338-07

Number of employees involved in the production of the Goods, people.	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	2.7	0.9	1.8
<i>Dynamics compared to the base period, %</i>	-	2.7	3.6	5.5
Average salary, UAH/person	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	1.7	12.5	3.5
<i>Dynamics compared to the base period, %</i>	-	1.7	14.4	18.3
Average salary, USD/person.	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-14.3	-0.4	-2.8
<i>Dynamics compared to the base period, %</i>	-	-14.3	-14.7	-17.1
Labor productivity, tons/person.	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-47.1	112.8	3.4
<i>Dynamics compared to the base period, %</i>	-	-47.1	12.5	16.4

Throughout the study period, the number of employees involved in the production of the Goods gradually but steadily increased. In 2022, their number increased by 2.7% compared to the previous year. This trend continued in the following periods: in 2023, the growth was 0.9%, in the last period - 1.8%. In general, during the study period, the growth in the number of employees involved (including directly) in the production of the Goods was 5.5%.

In parallel with the increase in the number of employees, there was a constant increase in the average nominal wage. In 2022, it increased by 1.7%, reaching [...] UAH/person. Its most significant growth occurred in 2023 – by 12.5% compared to the previous year. This positive trend continued in the last period, when wages increased by another 3.5%. Thus, during the study period, the average wage increased by 18.3%. At the same time, it should be noted that in general [...]

With a slight increase in the number of employees involved in the production of the Goods, the dynamics of the labor productivity indicator was largely driven by the production volumes of the Goods. Except for 2022, the labor productivity indicator showed an improvement, increasing by 16.4% overall during the study period.

Therefore, despite the initial decline in labor productivity in 2022, further growth in the number of employees and average wages was accompanied by a recovery and further growth in productivity.

Table 5.1.7

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Volume of investments made, thousand UAH	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-53.9	4.5	267.6
<i>Dynamics compared to the base period, %</i>	-	-53.9	-51.8	77.2
Current liquidity ratio	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	39.7	-6.8	-52.5
<i>Dynamics compared to the base period, %</i>	-	39.7	30.2	-38.2

In 2022, the volume of investments made decreased by 53.9% compared to 2021. This decrease continued in 2023, when the volume of investments, although it increased by 4.5% compared to the previous year, still remained 51.8% lower compared to the base period. However, the latter period saw a rapid recovery in the investment activity of the national commodity producer. The volume of investments increased by 267.6% compared to the previous period, reaching the highest figure for the entire study period and exceeding the volumes of the base year 2021 by 77.2%.

Regarding the current liquidity ratio, its dynamics were also variable. In 2022, the ratio increased by 39.7%. This indicates an improvement in the company's ability to cover its short-term obligations. In 2023, the current liquidity ratio decreased by 6.8%, but still remained significantly higher than the baseline of 30.2%. However, in the last period, the current liquidity ratio decreased by 52.5% compared to the previous period. This indicator value is the lowest for the entire period under review and is 38.2% lower than the 2021 indicator. At the same time, the national producer reported that the decrease in the current liquidity ratio in the last period was due to [...].

Thus, the company has demonstrated a resumption of investment activity in the recent period, which may be related to development or expansion plans.

During the study, the financial and economic indicators of the national commodity producer demonstrated complex, but generally positive dynamics, due to recovery after a sharp decline in 2022.

Thus, in 2022, most of the financial and economic indicators of the national producer's activities showed a significant decrease, however, starting from 2023, their steady recovery and growth were observed, except for the financial result from the sale of Goods on the domestic market, which rapidly deteriorated throughout the entire study period. Taking into account the above, during the study period:

- production volumes increased by 22.7%;
- the level of utilization of production capacities increased by 22.7%;
- sales volumes in the domestic market increased by 38.9%;
- the value of sales on the domestic market increased by 31.4%;
- the share of consumption of the Product on the Ukrainian market has increased by more than 2 times;
- the average selling price on the domestic market decreased by 5.4%;
- the cost of the Goods increased by 2.3 times;
- the profitability of the sale of the Goods on the domestic market deteriorated by 160%;
- the balance of Goods in warehouses as of the end of the period decreased by 35.7%;
- the number of employees involved in the production of the Goods increased by 5.5%;
- the average wage, denominated in the national currency of Ukraine, increased by 18.3%, while, expressed in US dollars, it decreased by 17.1%; - labor productivity increased by 16.4%; - the volume of investments increased by 77.2%.

In general, during the study period, most of the financial and economic indicators of the national producer's activities demonstrated stable positive dynamics, with successful recovery and growth after 2022. At the same time, it is worth noting the low level of presence of the national producer on the Goods market in Ukraine, the low level of utilization of production capacities, and unsatisfactory indicators of profitability and financial results from the sale of Goods on the domestic market.

5.2. Investigation of the threat of significant harm to the national to the producer

In order to investigate the fact of the threat of causing significant damage, the Ministry sent relevant requests to the State Enterprise "Ukrpromzovnesheexpertiza" and the Embassies of Ukraine in the exporting countries to provide information, in particular, regarding the export potential of the exporting countries. Based on the results of the analysis of the information received, the following was established.

Growth rates of dumped imports

Table 5.2.1

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Volumes of dumped imports, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-45.3	18.2	18.5
<i>Dynamics compared to the base period, %</i>	-	-45.3	-35.4	-23.5
Volumes of dumped imports relative to consumption of the Goods in Ukraine, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	12.6	-7.9	12.3
<i>Dynamics compared to the base period, %</i>	-	12.6	3.7	16.4

The volume of dumped imports of the Goods into Ukraine decreased in 2022 by 45.3% and subsequently gradually increased in the following periods: by 18.2% in 2023 and by 18.5% in the latter period. However, relative to the apparent consumption of the Goods in Ukraine, the volume of dumped imports increased by 16.4%. Despite the significant difference in relative indicators compared to the national producer, dumped imports during the study period gained [...] pp. of the Goods market in Ukraine, which is more than [...] times higher than the gains of the national producer ([...] pp.).

Export potential

The analysis of production capacities in the People's Republic of China and the Republic of Türkiye, provided by the State Enterprise "Ukrpromzovnesheexpertiza" in information and analytical materials, indicates the significant export potential of these countries.

Table 5.2.2

Indicators	2021	2022	2023
Production capacity in the PRC and the Republic of Tajikistan , thousand tons	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	1.9	3.0
<i>Dynamics compared to the base period, %</i>	-	1.9	5.0
Production volumes in the PRC and the Republic of Tajikistan , thousand tons	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	1.7	0.1
<i>Dynamics compared to the base period, %</i>	-	1.7	1.8
Production capacity utilization in the PRC and TR , %	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-0.3	-2.8
<i>Dynamics compared to the base period, %</i>	-	-0.3	-3.1
Volumes of unused capacities in the PRC and TR, thousand tons.	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	2.9	13.6
<i>Dynamics compared to the base period, %</i>	-	2.9	16.8
Apparent consumption in Ukraine of Goods, thousand tons	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-51.4	28.4

Dynamics compared to the base period, %	-	-51.4	-37.7
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*Source: data from the State Enterprise "Ukrpromzovnesheexpertiza".

The analysis of the above data shows that the volumes of idle production capacities in the People's Republic of China and the Republic of Türkiye increased by 16.8% during the period 2021-2023. At the same time, the People's Republic of China and the Republic of Türkiye also increased their production capacities throughout the study period, which increased by 5.0% over the same period.

Overall, the volumes of unused capacities in the People's Republic of China and the Republic of Türkiye significantly exceeded the volumes of apparent consumption of the Goods in Ukraine. In particular, in 2023, the volumes of unused capacities in the People's Republic of China and the Republic of Türkiye exceeded the apparent consumption of the Goods in Ukraine by [...] times.

5.3. Calculation of damage margin

The calculation of the damage margin for the Goods is carried out according to the formula:

$$IM = (NIP - IP) * 100\% / EP_{CIF},$$

where

IM – damage margin;

NIP – the price at which no harm is caused to the national producer;

IP – import price;

EP_{CIF} – export price on CIF terms.

The price at which no damage is caused is calculated using the following formula:

$$NIP = C * (1 + P), \text{ where}$$

C – cost of sales of a unit of Goods; *P* – level of profitability for the industry.

The import price was calculated by the Ministry according to the following

formula: $IP = EP_{CIF} + CP$, where

EP_{CIF} – import price on CIF terms, import duty not paid; *CP* – customs payments.

According to the information provided by LLC "SAN TECH RAI", the profitability level is [20-30]%

provides the enterprise with the opportunity to plan its economic activities and investments stably. It allows the company to ensure the necessary level of profitability to service long-term investment projects and financial obligations. The enterprise can attract capital to expand production capacities or improve the technological base.

According to information provided by the State Enterprise "Ukrpromzovnesheexpertiza", a profitability level of [...] % is sufficient for the normal and effective functioning of the enterprise.

In view of the above, the Ministry has determined that the profitability indicator at the level of [...] % is sufficient for the normal and effective functioning of the enterprise.

The injury margin was calculated based on the data of the national producer regarding the cost of the Goods and the data of the customs import statistics of the State Customs Service.

Table 5.3

Cost price, USD/t (WITH)	Profitability, % (P)	The price of NT at which no harm is caused, USD/t (NIP)	Import source	Import price, USD/t (IR)	Export price, USD/t (EP _{EXW})	Margin of damage, %
[...]	[...]	[...]	People's Republic of China	[...]	[...]	383.09
			TR	[...]	[...]	135.15

Thus, the level of the duty rate calculated for the investigation period, which would prevent significant injury to the national producer, was for imports of the Goods into Ukraine: originating from the People's Republic of China – 383.09%; originating from the Republic of Türkiye – 135.15%.

The Ministry's conclusion to the section

The analysis conducted by the Ministry showed that during the study period, against the background of the general recovery of most socio-economic indicators of the national producer from the consequences of the events of 2022, there was a significant deterioration in the financial result from the sale of the Goods of the national producer on the domestic market of Ukraine.

Taking into account the above, as well as the significant export potential of the People's Republic of China and the Republic of Türkiye, which during the investigation period exceeded the level of consumption of the Goods in Ukraine by [...] times, there are reasons to believe that in the event of non-application of anti-dumping measures, there is a likelihood of a significant increase in the volume of dumped imports of Goods originating in the People's Republic of China and the Republic of Türkiye into Ukraine, which would threaten to cause material harm to the national producer.

6. Investigation of the causal relationship between dumped imports and damage

6.1. Research on the volume of dumped imports and market share

Based on data obtained during the investigation from the State Customs Service, the national producer, as well as the Ministry's calculated data, in accordance with Article 10 of the Law, the Ministry investigated whether there was a significant increase in dumped imports into Ukraine of the Goods that are the subject of the investigation, either in absolute terms or relative to the production or consumption of the Goods in Ukraine and market share during the investigation period.

During the investigation, the study of the volumes of imports into Ukraine of the Goods that are the subject of the investigation was carried out taking into account the sample carried out according to the description of the Goods based on detailed data from the customs import statistics of the State Customs Service.

In accordance with Part Four of Article 10 of the Law, to assess the cumulative impact of imports from several countries, it was established that in each country the existing dumping margin is higher than the minimum level, and the volume of dumped imports is not insignificant, and no inconsistency with the conditions of competition between imported and similar Goods has been identified.

Taking into account the above, the term "dumped imports" used in the text of these materials means supplies of the Goods that are the subject of the investigation, originating from the People's Republic of China and the Republic of Türkiye.

Table 6.1

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Total import volume, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-51.9	23.4	5.7
<i>Dynamics compared to the base period, %</i>	-	-51.9	-40.7	-37.3
Total import value, thousand USD	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-54.0	44.3	-1.2
<i>Dynamics compared to the base period, %</i>	-	-54.0	-33.7	-34.5
Volume of dumped imports, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-45.3	18.2	18.5
<i>Dynamics compared to the base period, %</i>	-	-45.3	-35.4	-23.5
Share of dumped imports in total imports, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	13.7	-4.2	12.0
<i>Dynamics compared to the base period, %</i>	-	13.7	8.9	22.1
Share of dumped imports relative to consumption, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	12.6	-7.9	12.3
<i>Dynamics compared to the base period, %</i>	-	12.6	3.7	16.4
Share of dumped imports relative to production in Ukraine, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	22.5	-39.0	12.3
<i>Dynamics compared to the base period, %</i>	-	22.5	-25.2	-16.0
Total production volumes of the Goods in Ukraine, t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-55.4	93.8	5.5
<i>Dynamics compared to the base period, %</i>	-	-55.4	-13.6	-8.8
Apparent consumption in Ukraine of Goods, tons⁵	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-51.4	28.4	5.5
<i>Dynamics compared to the base period, %</i>	-	-51.4	-37.7	-34.2
Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Share of national producer in consumption, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	17.4	43.6	25.3
<i>Dynamics compared to the base period, %</i>	-	17.4	68.6	111.3

⁵ The calculation was made according to the formula: Apparent consumption = Import volumes + Production volumes in Ukraine - Export volumes, based on data from the State Customs Service on import and export volumes of Goods and data from the State Enterprise "Ukrpromzovnesheptertiza" on production volumes in Ukraine.

Imports of Goods from the People's Republic of China and the Republic of Türkiye during the study period decreased by 23.5% in absolute terms. At the same time, the volume of total imports decreased by 37.3%. In connection with the above, the share of imports of Goods originating from the People's Republic of China and the Republic of Türkiye in total imports increased by 22.1%. Against the background of a decrease in the volume of consumption of Goods in Ukraine by 34.2% and the volume of production of Goods in Ukraine by 8.8%, there was an increase in dumped imports relative to the consumption of Goods in Ukraine by 16.4% and a decrease in dumped imports relative to the production of Goods in Ukraine by 8.8%. The increase in the share of dumped imports to Ukraine of Goods occurred, primarily, due to imports to Ukraine of Goods from third countries, the share in consumption of which decreased by 36.1% over the same period.

6.2. Research into the impact of dumped imports of goods on the prices of similar goods

In accordance with Part Three of Article 10 of the Law on the Impact of Dumped Imports on Prices of Similar Goods, the Ministry, based on data from Ukrainian executive authorities and Ukrainian producers, investigated the following facts:

- 1) whether the prices of the goods subject to dumped imports were significantly lower than the prices of similar goods;
- 2) whether the dumped imports have led to a significant decrease in prices for a similar product;
- 3) whether the dumped imports prevented a significant increase in prices for the like product that would have occurred in the absence of the dumped imports.

In order to fairly compare the prices of imports of Goods into Ukraine originating from the PRC and TR with the prices of the national producer on the domestic market of Ukraine, the Ministry compared the prices of Goods imported into Ukraine from the PRC and TR with the prices of goods sold by the national producer on the domestic market of Ukraine.

Table 6.2

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Average price of total imports, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-4.4	17.0	-6.6
<i>Dynamics compared to the base period, %</i>	-	-4.4	11.8	4.5
Average price of dumped imports, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-0.5	19.0	1.7
<i>Dynamics compared to the base period, %</i>	-	-0.5	18.4	20.4
Average selling price of goods of a national producer on the domestic market, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	13.9	-12.2	-5.4
<i>Dynamics compared to the base period, %</i>	-	13.9	0.0	-5.4

Full cost of goods of the national producer, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	54.5	39.8	8.1
<i>Dynamics compared to the base period, %</i>	-	54.5	115.9	133.4
Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Ratio of the price of dumped imports to the cost price of the national producer	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-35.6	-14.9	-6.0
<i>Dynamics compared to the base period, %</i>	-	-35.6	-45.2	-48.4
Ratio of the price of dumped imports to the price of the domestic producer	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-12.6	35.4	7.5
<i>Dynamics compared to the base period, %</i>	-	-12.6	18.4	27.2
Price to cost ratio of a national producer	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-26.3	-37.2	-12.5
<i>Dynamics compared to the base period, %</i>	-	-26.3	-53.7	-59.5

The analysis of the impact of dumped import prices shows that dumped import prices were increasing. Thus, in 2023, import prices of the Goods increased by 19.0% compared to 2022. During the investigation period, compared to the base period, they increased by 20.4% and by 1.7% compared to 2023.

At the same time, the sales prices of the Goods by the national producer on the domestic market in 2022 increased by 13.9% compared to the base period, but in 2023 and during the investigation period they decreased by 12.2% and 5.4%, respectively, compared to previous periods. Compared to the base period, the sales prices in 2023 remained at the same level, and during the investigation period they decreased by 5.4%.

Throughout the entire period of the study, the average prices of dumped imports were significantly lower than both the average selling prices and the cost price of the Goods of the national producer. At the same time, the average prices of dumped imports decreased by 48.4% relative to the cost price of the Goods of the national producer.

Also, during the study period, a significant decrease in the ratio of prices to the cost price of goods of the national producer was observed.

Taking into account the above, the Ministry concluded that during the research period there was a negative impact of dumped imports on the prices of the national producer, because:

- average prices of dumped imports were significantly lower than prices for similar goods of the national producer;
- dumped imports prevented a significant increase in prices for a similar product that would have occurred in the absence of dumped imports.

6.3. Research into the influence of other factors

In accordance with Part Seven of Article 10 of the Law, the Ministry analyzed the presence of other known factors, the simultaneous action of which may cause harm to the national producer.

*Volumes and prices of imports of goods from third countries***Table 6.3.1**

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Total import volume, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-51.9	23.4	5.7
<i>Dynamics compared to the base period, %</i>	-	-51.9	-40.7	-37.3
Volume of imports from third countries, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-61.7	34.4	-18.2
<i>Dynamics compared to the base period, %</i>	-	-61.7	-48.6	-58.0
Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Share of imports of goods originating from third countries relative to consumption, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-21.2	4.7	-22.5
<i>Dynamics compared to the base period, %</i>	-	-21.2	-17.5	-36.1
Share of imports of goods from third countries in total imports, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-20.4	8.9	-22.7
<i>Dynamics compared to the base period, %</i>	-	-20.4	-13.4	-33.0

The volume of imports of Goods from third countries (except the People's Republic of China and the Republic of Türkiye) during the study period decreased by 58%, while against the background of a decrease in total import volumes by 37.3%, the share of imports from third countries in total imports during the study period decreased by 33%. The share of imports into Ukraine of Goods originating from third countries in relation to consumption during the study period decreased by 33%.

Table 6.3.2

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Prices of dumped imports, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-0.5	19.0	1.7
<i>Dynamics compared to the base period, %</i>	-	-0.5	18.4	20.4
Prices of imports into Ukraine of goods originating from third countries, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	46.9	-16.2	23.4
<i>Dynamics compared to the base period, %</i>	-	46.9	23.0	51.9
Selling prices of similar goods of a national producer on the domestic market, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	13.9	-12.2	-5.4
<i>Dynamics compared to the base period, %</i>	-	13.9	0.0	-5.4

Full cost of goods of the national producer, USD/t	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	54.5	39.8	8.1
<i>Dynamics compared to the base period, %</i>	-	54.5	115.9	133.4

Imports of goods originating in third countries into Ukraine were carried out at prices that significantly exceeded the average prices of dumped imports. Also, the growth rate of such prices was significantly higher than the growth rate of average prices of dumped imports.

At the same time, the cost of a similar product of a national producer has increased at a much higher rate than the average import prices from third countries, which may indicate the need to optimize the costs of the national producer.

Thus, an analysis of the dynamics of imports into Ukraine of goods originating from third countries and the conditions of their implementation shows that it could not cause harm to the national producer.

Development of technology and engineering

As part of the investigation, no information was received from interested parties regarding the development of technology and equipment that significantly changes the physical or qualitative characteristics of the Goods or the presence of significant differences in production technology.

Results of export activities of the national commodity producer

Table 6.3.3

Indicators	2021	2022	2023	4 square meters 2023 - 3 square meters 2024
Export volumes of the national producer, tons	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-40.7	214.0	1.3
<i>Dynamics compared to the base period, %</i>	-	-40.7	86.3	88.8
Share of exports in production, %	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	9.2	46.3	-3.7
<i>Dynamics compared to the base period, %</i>	-	9.2	59.7	53.8
Financial result from the sale of Goods for export, thousand US dollars⁶	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-129.14	68.22	-400.66
<i>Dynamics compared to the base period, %</i>	-	-129.14	-109.26	-146.36
Profitability of sales of a unit of product for export, %⁷	[...]	[...]	[...]	[...]
<i>Dynamics compared to the previous period, %</i>	-	-137.18	92.96	-239.27
<i>Dynamics compared to the base period, %</i>	-	-137.18	-102.62	-108.88

The Applicant sold part of its products on foreign markets. During the study period, there was a significant increase in the volume of exports of the national producer by 88.8%. The share of the Applicant's exports in production also increased throughout the study period, except for a slight decrease in the last period. In general, the share of exports in production increased by 53.8% during

⁶according to the data in Table 9.1.1 regarding volumes, average prices and cost of sales of Goods for export

⁷calculation based on data on sales volumes, profits and full cost of Goods sold for export, given in Tables 9.1.1, 8.16.2 and 4.2.1 of the response of LLC "SAN TECH RAI" to the Ministry's request dated 27.05.2025 No. 4411-05/39338-07

the study period. The indicators of the financial result and profitability of the sale of the Goods of the national producer in the export direction had negative dynamics in 2022, with further stabilization in subsequent periods. In addition to the initial period, the sale of the Goods of the national producer for export was unprofitable.

The study of harm to the national producer was conducted, primarily, in relation to the activities of the national producer on the domestic market of Ukraine and the overall assessment of all economic factors as a whole.

The impact of Russia's armed aggression against Ukraine and its consequences (market narrowing)

Russia's full-scale invasion of Ukraine, which began in February 2022, affected almost the entire polypropylene fittings market, causing a common trend for most indicators related to both imports and the national producer, namely a significant decrease in 2022 and a gradual recovery in subsequent periods.

Apparent consumption of fittings in Ukraine in 2022 more than halved – by 51.4% compared to 2021. Although growth was observed in 2023 and over the recent period, the market has not yet returned to pre-war consumption levels.

It is important to understand that such sharp changes are not due to internal problems of the industry, but to unforeseen circumstances of national importance caused by the war. Energy restrictions, rising resource prices, labor shortages and a constant threat to production capacities remain key challenges. However, the production capacities of the national commodity producer remained unchanged, and their utilization, although decreased in 2022, exceeded the baseline by 22.7% during the investigation period.

Despite the difficult conditions, the national producer has demonstrated high resilience and adaptability. After the shocks of 2022, sales volumes to the domestic market not only fully recovered, but also increased by 38.9% compared to 2021. The value of these sales also increased by 31.4%.

Similar trends occurred with the production volumes of fittings by the national producer, which experienced a serious decline in 2022, decreasing by 45.7%. However, already in 2023, production volumes increased by 114.7%. And in the period from Q4 2023 to Q3 2024, the production volumes of the national producer not only reached, but also exceeded the pre-war level by 22.7%.

Ministry's conclusion

According to the results of the study, the Ministry established that during the study period, the volume of dumped imports into Ukraine of Goods originating from the People's Republic of China and the Republic of Türkiye decreased in absolute terms by 23.5% and relative to the production of similar Goods in Ukraine - by 16%, but increased relative to consumption - by 16.4%.

Dumped imports into Ukraine of goods originating in the People's Republic of China and the Republic of Türkiye during the investigation period was carried out under conditions that could cause significant harm to the national producer in the future. In particular, the average prices of dumped imports were significantly lower than the prices for similar goods of the national producer and prevented a significant increase in prices for similar goods of the national producer, which would have occurred in the absence of dumped imports.

The influence of other factors, in addition to dumped imports, in particular the full-scale military invasion of Ukraine by the Russian Federation and the export activities of the national producer, affected the state of the national producer. At the same time, the influence of such factors does not exclude the existence of a causal link between dumped imports and the threat of material injury to the national producer.

7. National interests

Within 60 days from the date of publication of the notice of initiation of the investigation in the newspaper "Government Courier" dated October 18, 2024 No. 212, the Ministry considered the written comments and information regarding the initiation of the investigation, as well as the compliance of the application of anti-dumping measures with the national interests of Ukraine.

Taking into account the comments of interested parties and information obtained during the investigation (from the complaint, the national producer's responses to the questionnaire, and the responses of state authorities to inquiries), the Ministry determined whether national interests required the application of anti-dumping measures.

In accordance with the provisions of Part One of Article 36 of the Law, the study of the national interests factor was based on an assessment of all interests, in particular:

- interests of the national producer of goods and its investments;
- interests of consumers of the Goods; employment of the population of Ukraine; international economic interests of Ukraine.

7.1. Interests of the national producer

LLC "SUN TECH RAI" in response to the questionnaire for the domestic producer emphasized that the application of anti-dumping measures on imports of Goods to Ukraine from the People's Republic of China and the Republic of Türkiye fully meets the national interests of Ukraine. The situation on the fittings market in Ukraine is quite difficult for the national producer, therefore, without the Government of Ukraine taking emergency preventive measures appropriate to this situation, the situation of the national producer will further deteriorate in the near future.

For its part, the national producer is trying to partially offset the negative impact of dumped imports of goods from the People's Republic of China and the Republic of Türkiye, in particular, a gradual modernization of production is being carried out. It is planned to further expand production, create new jobs, improve working and living conditions of employees and take measures to improve the social infrastructure of enterprises. However, due to dumped imports, the situation in the industry has significantly worsened.

At the same time, despite the difficult financial and economic situation, the national producer continues to produce products, provide jobs to the regions of Ukraine and support its employees, and pay taxes and fees.

According to LLC "SUN TECH RAI", termination of the investigation without applying anti-dumping measures will negatively affect the national interests of the state, since the lack of profits of the national producer affects the reduction of revenues to the state budget, and the reduction of its wage fund affects the revenues to the local budget and contributions to state social funds.

Failure to apply protection measures against dumped imports may lead to the complete economic collapse of the national fittings manufacturer. The bankruptcy of a national goods producer will have negative consequences - social stability in the region will be shaken, the standard of living of the population will fall, and social unrest will worsen. In addition, the growth of import volumes leads to the outflow of foreign exchange from Ukraine.

The application of anti-dumping measures will eliminate unfair imports and will positively affect the state of the national producer, allowing it to increase production and sales of products in Ukraine, load unused capacities and increase employment of the population. These measures will also positively affect the restoration of competition and the process of investment in national production.

According to the assurances of LLC "SAN TECH RAI", dumped imports have already led to a significant decrease in the profitability of the national producer, accordingly, it did not have the opportunity to consider the implementation of investment projects, since it was not confident in their payback. In the event of the elimination of dumped imports, the national producer will be able to

restore the profitability of sales, the accumulated funds in the event of the application of anti-dumping measures will be directed to the modernization of production equipment, capital repairs, which, in turn, will allow to improve productivity, load unused capacities, increase production volumes and expand the assortment, reduce the cost of production of the Goods, will lead to an increase in the level of wages, will allow to create new jobs.

LLC "SUN TECH RAI" emphasized that it does not advocate a ban on imports, but only asks for protection of the Ukrainian industry from dumped imports, which is a manifestation of unfair competition and harms the national producer and even displaces suppliers of the Goods from other (third) countries that cannot compete with dumped imports and whose share in total imports is decreasing.

The Ukrainian market remains open to imports from other trading partner countries of Ukraine that import their own products into Ukraine in good faith, in particular EU countries.

At the same time, the national producer plans to use the protection primarily for modernization and restructuring, which will allow the industry to adapt to competitive conditions in the future. In particular, it is planned to accumulate funds and carry out a number of production modernization projects during the period of anti-dumping measures.

At the same time, it should be noted that LLC "TRADE HOUSE "ROZMA", the applicant in this investigation, informed the Ministry that components - brass metal inserts - are used for the production of products. The share of these components in the cost of products is from 40% to 60%. LLC "TRADE HOUSE "ROZMA" is not a manufacturer of these components and will purchase them from suppliers from the PRC and the Republic of Tatarstan. Suppliers of LLC "TRADING HOUSE "ROZMA" informed the company about the increase in prices for these products in the event of the introduction of anti-dumping duties in the amount corresponding to the percentage of the introduction of the anti-dumping duty. This, in turn, will lead to an increase in cost and loss of competitiveness in foreign markets. According to LLC "TRADING HOUSE "ROZMA", since the time of filing the complaint, significant changes have occurred in the market situation and, taking into account the above, the introduction of the anti-dumping duty will worsen the competitiveness of the company as a manufacturer in the domestic and foreign markets.

7.2. Consumer interests

According to LLC "SUN TECH RAI", the quality of fittings produced in Ukraine meets world standards, that is, the interests of Ukrainian consumers are fully protected. In addition, the application of anti-dumping measures meets the interests of consumers, since the increase in production volumes of domestic manufacturers will primarily affect the cost of products. The increase in income at enterprises will allow more funds to be directed to the modernization of production.

Also, effective communication with the manufacturer is important for consumers in terms of protecting consumer rights, prompt correction and taking into account consumer needs, etc., which is possible primarily with Ukrainian manufacturers, since holding a foreign manufacturer liable for violating consumer rights is complicated.

According to PE "TEPLOSUIT ZAKHID", the monopolization of the market in Ukraine will lead to negative consequences for end consumers, who will be limited in choosing the specified product line, and even at inflated prices, since the introduction of a de facto monopoly of manufacturers of fittings for water supply and heating systems and the impossibility of imports will lead to the destruction of competition in the domestic market. The lack of competition over time can lead to both a deterioration in quality and an unjustified overestimation of the price of goods. The impossibility of imports will negatively affect both the end consumer and the budget of Ukraine in the form of a decrease in revenues from VAT and customs payments.

It is worth noting that due to the significant share of imports of Goods originating from the People's Republic of China and the Republic of Türkiye on the Ukrainian market, and given the high

calculated dumping margin rates and the inability of the national producer to fully replace imports of Goods originating from the People's Republic of China and the Republic of Türkiye at the expense of its production capacities, it may be necessary to find alternative sources of supply of Goods to Ukraine. At the same time, anti-dumping measures are proposed to be applied in the form of levying anti-dumping duties and against a limited range of sources of supply of Goods, which cannot be considered a prohibitive mechanism that would make it impossible to import Goods to Ukraine.

7.3. Employment of the population

LLC "SUN TECH RAI" emphasizes that national interests require our own Ukrainian production of fittings. This, first of all, provides independence from foreign manufacturers, and also encourages the employment of Ukrainian citizens in production, which is very important in the conditions of existing unemployment. The impact of dumped imports on the employment of the population is an important factor of the national interest of Ukraine, since the further displacement of domestic producers from the domestic market by imports will lead to the closure (bankruptcy) of enterprises of the national producer and to a decrease in the number of workers employed in the production and sale of goods. Given the complexity and labor intensity of the production process, various categories of highly qualified specialists remain unemployed, for whose training the state has spent significant funds. At the same time, in the conditions of the closure of enterprises, it will be very difficult for such specialists to get a job in a specialty, which will set the state the task of ensuring social protection of the unemployed and their further retraining.

7.4. The need to restore competition and eliminate the impact of disparities in trade resulting from dumping

The national producer noted that demand for imports in the context of the disappearance of domestic production will cause capital outflows outside Ukraine and lead to an increase in Ukraine's negative trade balance, which is especially dangerous right now, in conditions when the long-term negative balance in foreign trade in goods has led to significant devaluation pressure on the national currency.

The application of anti-dumping measures can prevent capital outflow and deterioration of Ukraine's trade balance by supporting domestic production of fittings in Ukraine and increasing Ukraine's investment attractiveness for foreign investors.

Suppliers of imported goods who have no desire to build their own sales and logistics network use a policy of low prices to oust domestic producers from the market.

7.5. International interests

International economic interests consist in ensuring the existence of fair competitive conditions for trade in Goods on the basis of fair market competition.

The possibility of applying anti-dumping measures on imports of Goods originating in the PRC and the Republic of Tajikistan is provided for by the WTO Agreement on the Application of Article VI of the GATT and is a direct right of Ukraine.

The restoration of competitive conditions as a result of the application of anti-dumping measures on imports into Ukraine of goods originating from the People's Republic of China and the Republic of Türkiye will not contradict WTO rules and will confirm Ukraine's position as a country that protects the economic interests of national producers and fair competition.

Therefore, to protect Ukraine's international economic interests, which consist in ensuring the existence of fair conditions for trade in goods on the basis of fair and market competition, increasing Ukraine's export potential, and protecting national producers through relevant WTO instruments, the application of anti-dumping measures is necessary and fully consistent with Ukraine's international economic interests.

The Ministry of Trade of the Republic of Türkiye reported that the application of anti-dumping duties against imports of Goods originating in the Republic of Türkiye will inevitably harm commercial relations between the two countries and will negatively affect consumers - Ukrainian citizens, who already have problems meeting their own needs due to the military aggression of the Russian Federation.

The Ministry's conclusion to the section

Despite the presence of risks in terms of the interests of domestic producers and consumers of the Goods in Ukraine, based on the results of the study, the Ministry, given that when studying factors of national interest, special attention is paid to the need to eliminate the impact of imbalances in trade that arose as a result of injurious dumping and restore competition, concluded that the application of anti-dumping measures on imports into Ukraine of Goods originating in the People's Republic of China and the Republic of Türkiye, in general, does not contradict national interests.

8. Planned actions of the national producer in the event of application definitive anti-dumping measures

The application of anti-dumping measures on imports into Ukraine of Goods originating from the People's Republic of China and the Republic of Türkiye will enable the national producer to increase the competitiveness of the Goods it produces. For this purpose, LLC "SUN TECH RAI" plans to: [...].

9. Final conclusions and recommendations of the Ministry

The results of the anti-dumping investigation showed that there is sufficient evidence and grounds for the Ministry to submit proposals for consideration by the Commission on the advisability of applying definitive anti-dumping measures on imports into Ukraine of fittings for water supply and heating systems originating from the People's Republic of China and the Republic of Türkiye.

As part of the investigation, the Ministry reached the following conclusions:

1. LLC "SUN TECH RAI" is a proper national producer within the meaning of Clause 16 of Article 1 and Article 11 of the Law.
2. A Ukrainian-made good within the meaning of Clause 26 of Article 1 of the Law is similar to the Good that is the subject of the investigation.
3. During the research period, imports into Ukraine of Goods originating from the Republic of Türkiye and the People's Republic of China were carried out at dumped prices.
4. During the research period, there was a low level of presence of the national producer on the Goods market in Ukraine, a low level of utilization of production capacities, and unsatisfactory indicators of profitability and financial results from the sale of Goods on the domestic market.
5. Economic conditions in the markets of the Republic of Türkiye and the People's Republic of China are such that they indicate the likelihood of a significant increase in the volume of dumped imports of the Goods into Ukraine, which would threaten to cause significant damage to the national producer. In particular, the volume of unused capacities in the People's Republic of China and the Republic of Türkiye significantly exceeded the apparent consumption of the Goods in Ukraine.

6. There is a causal link between the dumped import of the Goods into Ukraine and the threat of causing significant harm to the national producer, as evidenced by the following facts:

- the volume of dumped imports into Ukraine of Goods originating from the Republic of Türkiye and the People's Republic of China increased relative to the consumption of Goods in Ukraine by 16.4%;
- average prices of dumped imports were significantly lower than prices for the goods of the national producer;
- Dumped imports prevented a significant increase in prices for the domestic producer's goods, which would have occurred in the absence of dumped imports.

The influence of other factors, in addition to dumped imports, in particular the full-scale military invasion of Ukraine by the Russian Federation and the export activities of the national producer, affected the state of the national producer. At the same time, the influence of such factors does not exclude the existence of a causal link between dumped imports and the threat of material injury to the national producer.

7. The application of anti-dumping measures on the import into Ukraine of goods originating in the Republic of Türkiye and the People's Republic of China, in general, does not contradict the national interests of Ukraine.

Thus, the results of the anti-dumping investigation showed that there is sufficient evidence and grounds to submit to the Commission proposals regarding the advisability of applying definitive anti-dumping measures on imports into Ukraine of fittings for water supply and heating systems originating in the People's Republic of China and the Republic of Türkiye.

During the anti-dumping investigation, the Ministry calculated:

- damage margin:
 - for Goods originating in the Republic of Türkiye – 135,15%,
 - for Goods originating in the People's Republic of China – 383,09%;
- dumping margin:
 - for manufacturers and exporters of Goods originating from the Republic of Türkiye – 34,72%;
 - for manufacturers and exporters of Goods originating from the People's Republic of China – 166,65%.

In accordance with paragraph 3 of part five of Article 16 of the Law, upon the proposal of the Ministry, the Commission shall decide on the introduction of a definitive anti-dumping duty and establish the rate of the definitive anti-dumping duty, which shall not exceed the dumping margin calculated in accordance with the Law and may be less than this margin if such rate is sufficient to prevent injury to the national producer.

Based on the facts and conclusions established by the investigation, in accordance with Article 16 of the Law, it is proposed to apply definitive anti-dumping measures for a period of five years on imports into Ukraine of goods originating in the Republic of Türkiye and the People's Republic of China, which have the following description:

polypropylene fittings (including with copper alloy insert) and copper alloy fittings with polypropylene insert, used for connecting pipes of water supply and heating systems, the nominal diameter* of which corresponds to the nominal outer diameter of pipes** dn-20-110 mm (inclusive), and are classified according to the UKT Foreign Economic Activity under the codes: ex3917 40 00 90, ex7412 20 00 00.

** nominal diameter of the fitting dn – a parameter that must correspond to and be marked with the nominal outer diameter of the pipe for which it is intended;*

*** nominal external diameter of pipes dn – numerical designation of the external diameter of the pipe in mm, which is generally accepted in the pipe designation system, a parameter used as a characteristic of connecting parts, for example fittings .*

The "ex" symbol next to the classification code means that anti-dumping measures apply to goods whose description is specified in the decision.

To establish the following rates of definitive anti-dumping duty:

for Goods originating in the Republic of Türkiye – 34,72%,

for Goods originating in the People's Republic of China – 166,65%.