

**REQUEST FOR TARIFF QUOTA**  
**Member State: TURKEY**  
**Part I**

1. Combined Nomenclature codes:

3901 20 90

2. Precise product description taking into account customs tariff criteria:

High density polyethylene

For chemical product only (mainly chapter 28 + 29 of Combined Nomenclature):

Not applicable

3. i) CUS No (Reference number in European Customs Inventory of Chemicals):

0141089-5

ii) CAS No (Chemical Abstracts Service Registry Number):

9002-88-4

iii) Other No: Not applicable

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**Part II**

4. Further information including commercial denomination, mode of operation, intended use of the imported product, type of product in which it is to be incorporated and end-use of that product:

**Commercial denomination**

High density polyethylene, having a specific gravity of more than 0.94, commonly known by its abbreviation HDPE.

**Mode of operation**

HDPE is a polymerized ethylene resin, used especially for containers, kitchenware, and tubing, or in the form of films and sheets for packaging. It is also a component in plastic bottles. General literature regarding HDPE is attached as Annex 1.

**Manufacturing process**

HDPE is derived from either modifying natural gas (a methane, ethane, propane mix) or from the catalytic cracking of crude oil into gasoline. In a highly purified form, it is piped directly from the refinery to a separate polymerization plant. Here, under the right conditions of temperature, pressure and catalysis, the double bond of the ethylene monomer opens up and many monomers link up to form long chains. HDPE is the result of "high pressure" operations.

**Product characteristics**

HDPE is a chemically resistant plastic that can be very durable. HDPE plastic comes in a high density form and is capable of being moulded, extruded and cast into many various shapes. It is often used in construction as it is cheap and can be shaped or moulded easily, this is why it is appropriated to be used for jobs such as guttering. HDPE is a hard, stiff, strong and a dimensionally stable material that absorbs very little water. It has good gas barrier properties and good chemical resistance against acids, greases and oils. It can be highly transparent and colourless but thicker sections are usually opaque and off-white HDPE also has good self-extinguishing properties

and resistance against ultra violet. Technical data sheets regarding the most common grades of HDPE are attached as Annex 2.

### **Intended use of the imported product**

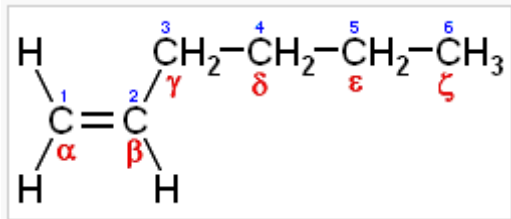
All industrial application, including packaging, construction, automotive, electrics and electronics materials

### **Type of product in which it is to be incorporated and end-use**

A great range of products, including houseware, toys, plastic bags, packaging, pipes, detergent bottles, containers for water, gasoline and other chemicals, rotational coating materials for paper, fabrics, wood and metals.

For chemical products only:

#### 5. Structural formula:



#### 6. Products are subject to a patent:

No

#### 7. Products are subject to an anti-dumping/anti-subsidy measure:

No

8. Name and addresses of firms known in Turkey and the EU approached with a view to the supply of identical, equivalent or substitute products (obligatory for quota requests):

Sole Turkish producer:

- PETKİM Petrochemicals Company  
P.O. Box 12,  
35800 Aliğa-İzmir  
Turkey  
Tel : +90 232 – 6161240  
Fax : +90 – 232 – 616 12 48

EU producers:

- Sabic Europe  
NL, Geleen  
DE, Gelsenkirchen
- Total Petrochemicals  
BE, Antwerp  
FR, Gonfreville  
BE, Feluy
- Borealis  
SE, Stenungsund
- Ineos  
FR, Lavera  
FR, Sarralbe  
BE, Antwerp  
IT, Rosignano
- Basell  
PL, Plock  
DE, Münchsmünster  
DE, Wesseling  
DE, Frankfurt



- MOL Petrochemicals  
HU, Tiszaújvaros
- Unipetrol  
CZ, Litvinov
- Repsol Chemicals  
ES, Tarragona  
PT, Sines
- Rompetrol Petrochemicals  
BG, Burgas

**Dates and results of these approaches:**

As detailed below, the sole Turkish producer of polyethylene - see attached as Annex 3, a PETKİM presentation showing it has 96 KT of production capacity of HDPE - can only satisfy 12 percent of total domestic demand. The remaining 88 percent of domestic demand must thus be satisfied by imports and Turkish converters have thus had to rely on imports. As evidenced by the import statistics regarding the last three years, imports from preferential partners cannot satisfy total demand in Turkey and over 453 KT has to be imported from non-preferential trading partners.

Since the domestic industry only produced 82 KT in 2015, converters requested offers from EU producers. While these were unable to meet the great majority of requests for HDPE, they have, in recent years, been very careful not to submit any information that could be used to justify a tariff waiver. While unable to satisfy domestic demand, Turkish and EU producers of HDPE have generally obstructed requests for tariff waivers in recent rounds. It is submitted that the onus of demonstrating the absence of sufficient domestic/production should not only be placed on industrial users. Any objecting Turkish or EU producer should evidence that it can satisfy all requests - and the existing production deficit - and such evidence should be made available to concerned industrial users.

Reasons for the unsuitability of the products of these firms for the purpose in question:

Not applicable.

9. Calculation of tariff quota volume:

Annual consumption of applicant: 819 KT

In KT	2013	2014	2015	2016 (anticipated)
Total Turkish Consumption	825	797	819	850

Source: ICIS

Estimated EU consumption: 5,785 KT

Annual Turkish/EU production/capacity: 96 / 6,530 KT

In KT	2013	2014	2015	2016 (anticipated)
Total Turkish Production	97	92	103	103
Total EU Production	5,299	5,572	5,434	5,434
Total Turkish Production Capacity	96	96	96	96
Total EU Production Capacity	7,005	6,795	6,530	6,450

Source: ICIS

Requested tariff quota volume: 453 KT - The requested quota volume corresponds to the balance between domestic consumption and exports on the one hand and domestic production and preferential imports on the other hand.

10. Special remarks:

i) indication of similar tariff suspensions or quotas: Not applicable

ii) indication of existing binding tariff information: Not applicable

iii) other remarks: Not applicable

**REQUEST FOR TARIFF QUOTA**  
**Member State: TURKEY**  
**Part III**

11. Request submitted by:

T.C. Ekonomi Bakanlığı,  
İthalat Genel Müdürlüğü  
İnönü Bulvarı No: 36,  
06510 Emek  
Ankara  
Turkey  
Tel: +90 312 204 75 00  
E-mail: askiyaalma@ekonomi.gov.tr

12. Anticipated annual imports for 2017 (first year of the validity period requested):

- Value (in EUR): 942 M€
- Quantity (in weight and supplementary unit if applicable for the CN code in question): 739 KT

13. Current imports for 2014 and 2015:

- Value (in EUR): 913 M€ for 2014 and 942 M€ for 2015
- Quantity (in weight and supplementary unit if applicable for the CN code in question): 723 KT in 2014 and 739 KT in 2015

14. Applicable duty rate at the time of the request (including preferential agreements, free trade agreements, if they exist for the origin of the requested goods):

Third country duty rate: 6.5 %

Preferential duty rate applicable: 0%

(EU, Israel, Croatia, Macedonia, Tunisia, Morocco, Palestine, Albania, Egypt, Kosovo, Georgia, Chile, Jordan, Mauritius, Montenegro, Serbia, EFTA countries, Bosnia Herzegovina, GSP beneficiaries, least-developed countries, Korea)

15. Estimated uncollected customs duties (in EUR) on an annual basis: 38 M€.



16.

17. Names and addresses of the user in the EU:

Name: Turkish Plastics Industry Foundation (PAGEV), on behalf of Turkish plastic converters.

Address: Halkalı Cad. No: 132/1 Tez-İs İş Merkezi Kat: 4, Sefaköy / İstanbul - Turkey

Tel./Fax: 90 (212) 425 13 13 - 14 – 15 and +90 (212) 624 49 26

E-mail: [pagev@pagev.org.tr](mailto:pagev@pagev.org.tr)

18. Declaration by the interested party that the imported products are not the subject of an exclusive trading agreement (join extra sheet – see Annex II to this communication) (obligatory)

The declaration is given as ANNEX -V.

ANNEX-I: General literature

ANNEX-II: Technical Data Sheets

ANNEX-III: A presentation of Petkim

ANNEX-IV: Turkish Customs Tariff of Polyethylene

ANNEX-V: Declaration by the interested party that the imported products are not the subject of an exclusive trading agreement