

**BEFORE THE INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**CARBON AND CERTAIN ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA,
SOUTH AFRICA, SPAIN, TURKEY, UKRAINE, UNITED ARAB EMIRATES, AND UNITED KINGDOM
INV. NOS. 701-TA-573-574 AND 731-TA-1349-1358 (PRELIMINARY)**

**TESTIMONY OF
CRAIG A. LEWIS, ESQ.
HOGAN LOVELLS US LLP
ON BEHALF OF
PUBLIC JOINT STOCK COMPANY YENAKIEVE IRON & STEEL WORKS**

1. Good morning Commission staff. My name is Craig Lewis and I am a partner with Hogan Lovells. I am appearing today on behalf of Ukrainian producers Yenakieve Steel and its Makiivka steel works. I regret that Metinvest was unable to provide a company witness from Ukraine on such short notice.

2. Until very recently, Yenakieve was a fully integrated Ukrainian steel company operating within the Metinvest Group. Yenakieve Steel produced a wide range of metal products including billets, angles, channels, beams, wire rod, and rebar.

3. I refer you to the map we have provided. The Yenakieve and Makiivka steel works are located in the Donetsk region of Eastern Ukraine. Since 2014, the Donbas region of Ukraine, including the cities of Yenakieve and Makiivka, has become a war zone, as separatist groups, backed by Russia, seized the region through military action. Political and security control of the region has been taken away from the Ukrainian Government and seized by the separatists.

4. The resulting conflict has claimed the lives of many thousands of innocent civilians and Ukrainian soldiers. It has also had a profound negative impact on manufacturing industries in the region. Critical infrastructure has been damaged or destroyed, including

separatist also began a systematic inventory of the plants, their equipment, and stores. Employees were physically threatened if they resisted. The rebels seized over 40 different facilities in the Donbas region, many of them also from the Metinvest Group, including Yenakiiieve Coke, Khartsyzk Pipe, Komsomolske Flux, Krasnodon Coal, Donetsk Coke, and others.

10. In the face of these events, and because Metinvest cannot place its employees at risk, or violate the laws of Ukraine, the Group determined just a few weeks ago that it was no longer possible to continue operations at these enterprises. All of the staff have been let go. Metinvest no longer operates or controls these mills and their economic future is unknown. These companies employed and sustained over 20,000 people and their families during a time of great suffering in the region. Employees affected by these most recent events are now being offered positions at Metinvest's enterprises in the territory controlled by Ukraine. There are recent press reports that Russian mining interests may now be seeking to take advantage of the situation by supplying the mills with iron ore from Russia, but this is uncorroborated. In the meantime, the mills themselves are now beyond Metinvest's control and are not part of the Ukrainian economy.

11. While these events are tragic in their own right, they are also highly relevant to the Commission's injury analysis. With the loss of its only wire rod manufacturing capacity in Ukraine, the Metinvest Group today is no longer a source of wire rod imports from Ukraine. While I cannot get into the specific figures in a public forum like this, this event removes a very substantial portion of total Ukrainian export capacity for the foreseeable future and perhaps permanently.

12. Thank you for your time. I am happy to answer any questions that the Staff may have.

THE SITUATION IN THE EASTERN REGIONS OF UKRAINE

15 February 2017 (00:00)



Control over settlements:



Under control of Ukraine

Positions of Ukrainian military



Existing



Combat's location



Territory of the pro-Russian militants shelling

The border



Border areas under the control of Ukraine



Border areas not under control of Ukraine



Humanitarian corridors through ceasefire demarcation line

Main check-points on Ukraine-Russia border



Working



Controlled by pro-Russian militants



Humanitarian logistics centers for the residents of the occupied Donbas region



Seven task forces (ships and coast guard motorboats) are continuing to guard the Azov Sea to prevent the penetration of sabotage and intelligence groups on the coast of Donetsk and Zaporizhia oblasts, and to guard the raids of the Mariupol and Berdyansk ports



The location of military units of the Russian Federation



Boeing 777 crash site July 17, 2014



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of Defense
of Ukraine

<http://www.mil.gov.ua>



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