

January 24, 2020

DISSEMINATION BY THE LIVINGSTON GROUP, LLC

FARA Registration #6344

Dear Secretary Pompeo:

I understand that you will be in Ukraine on January 30 to meet with President Zelenskyy, Foreign Minister Prystaiko and the business community.

The Livingston Group represents the Ukrainian steel association, Ukrmetalurgprom, to advance bilateral trade between the United States and Ukraine. We urgently suggest that steel trade be part of your discussions next week.

With regard to steel trade, Ukraine is a good actor globally and bilaterally with the United States. Ukrmetalurgprom is a member of the OECD Steel Committee and is among 16 industry groups working with the Global Forum on Steel Excess Capacity to effectively address global excess in steel production.

In addition to working within the confines of the global steel capacity, the volume of steel from Ukraine entering the United States is minimal. As of August 2019, Ukrainian iron and steel imports to the United States accounted for approximately one percent of total imports. The percentage is even less when total steel consumption in the United States is considered. Further, Ukrmetalurgprom member companies exporting to the United States have been and continue to be subject to antidumping duty suspension agreements under which they have successfully adhered to fair minimum values and volumes determined by the Department of Commerce. The companies also continue to comply with the Section 232 tariffs.

However, metallurgy accounts for 25 percent of manufacturing production and 300,000 employees within Ukrainian industry. It remains a significant contributor to Ukraine's economic security despite the reduction of steel production since 2014 due to the loss of steelmaking facilities in the Donbass. The metallurgical industry and the entire Ukrainian economy remain under constant pressure given ongoing economic and territorial aggression by Russia.

Congress and the Trump Administration have met our national security considerations in the region by confronting the continual onslaught in Ukraine through public support and security assistance. The US repeatedly reaffirms its "unwavering support for Ukraine's

sovereignty and territorial integrity” and continues to provide critical funds to Ukraine for weapons, training, and advisory efforts.

At the UN General Assembly in September 2019, the Trump Administration acknowledged Ukraine’s manufacturing capability and the importance of doing more trading with Ukraine. In October 2019, the new Minister of Economic Development, Trade and Agriculture of Ukraine met with the USTR on the sidelines of the IMF and World Bank annual board meetings.

Ukrmetalurgprom supports continued positive dialogue between the United States and Ukraine and encourages a trade agreement on steel imports to the United States.

Sincerely,
Bob Livingston

Cc: Counselor Ulrich Brechbuhl

THE LIVINGSTON GROUP, LLC PROVIDES REPRESENTATION FOR THE ASSOCIATION OF ENTERPRISES UKRMETALURGPROM (A UKRAINIAN TRADE ASSOCIATION) IN ORDER TO ADVANCE THE BILATERAL TRADE RELATIONSHIP BETWEEN THE GOVERNMENTS OF THE UNITED STATES AND UKRAINE. ADDITIONAL INFORMATION IS AVAILABLE AT THE DEPARTMENT OF JUSTICE, WASHINGTON, DC.