May 30, 2017

Mr. Brad Botwin
Director, Industrial Studies
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 1093
Washington, D.C. 20230

RE: Section 232 Investigation on the Effect of Imports of Steel on U.S. National Security (the "Section 232 Investigation")

Mr. Botwin,

I am writing on behalf of Russel Metals Inc. ("Russel Metals") to express our support of the submission by the Canadian Steel Producers Association in response to the U.S. Department of Commerce's request for public comments on the Section 232 Investigation.

Russel Metals is one of the largest metal distribution and processing companies in North America: for the year ended December 31, 2016, our consolidated revenues were CDN $2.6 billion. We primarily distribute steel products through our three principal business segments: service centers, energy products and steel distributors. Our business includes operations across Canada and the United States.

Our business, customers and stakeholders on both sides of the border benefit from the integrated steel supply chain between Canada and the United States. Canada is the top export market for U.S. steel products and our Canadian operations rely on American made steel to service our customers. Similarly, U.S. valued-added manufacturers benefit from a consistent supply of high-quality, competitively price steel inputs from Canada to facilitate further processing and assembly of final products. We believe any actions which disrupt the integrated Canadian-U.S. market on steel products would be detrimental to the national and economic security of both countries.

We believe the focus of the Section 232 Investigation ought to be where the problem resides — east, west and south of the United States. The United States maintains a small
trade surplus with Canada in respect of the USD$8.8 billion of trade in steel products between Canada and the U.S.

We wish to reiterate our support for the submission of the Canadian Steel Producers Association and respectfully request that Canada receive a full national exemption from any new tariffs, quotas or other measures implemented as a result of the Section 232 Investigation.

Thank you for your consideration in this matter.

BRIAN R. HEDGES
Chief Executive Officer