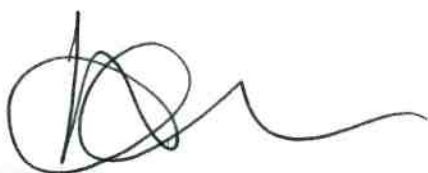


REPORT No. 786

SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON ROPES AND CABLES (ALSO KNOWN AS ROPES AND CABLES OF STEEL OR WIRE ROPES) OF A DIAMETER THAT IS EXCEEDING 32MM, ORIGINATING IN OR IMPORTED FROM THE FEDERAL REPUBLIC OF GERMANY AND THE UNITED KINGDOM: FINAL DETERMINATION

The International Trade Administration Commission of South Africa herewith presents its
**Report No 786: SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON ROPES AND
CABLES (ALSO KNOWN AS ROPES AND CABLES OF STEEL OR WIRE ROPES) OF
A DIAMETER THAT IS EXCEEDING 32MM, ORIGINATING IN OR IMPORTED FROM
THE FEDERAL REPUBLIC OF GERMANY AND THE UNITED KINGDOM: FINAL
DETERMINATION**



**AYABONGA CAWE
CHIEF COMMISSIONER**

PRETORIA

24/07/ 2026

INTERNATIONAL TRADE ADMINISTRATION COMMISSION OF SOUTH AFRICA

REPORT NO. 786

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SYNOPSIS

On 03 June 2024, the International Trade Administration Commission of South Africa (the “Commission”) notified interested parties through Notice No. 2550 of 2024 in Government Gazette No. 50772, that unless a substantiated request is made indicating that the expiry of the anti-dumping duties against imports of ropes and cables originating in or imported from the Federal Republic of Germany (“Germany”) and the United Kingdom (“the UK”) would likely lead to the continuation or recurrence of dumping and injury, the anti-dumping duties on ropes and cables (“the subject products”) originating in or imported from the Germany and the UK would expire on 23 December 2025.

A detailed response to the Commission’s sunset review questionnaire was received from Haggie Steel Wire Rope Proprietary Limited (“the Applicant”) on 07 July 2025. After all deficiencies were identified and addressed, an updated final application was received on 14 October 2025.

The information submitted by the Applicant was verified on 19 - 20 November 2025. A verification report was sent to the Applicant on 05 December 2025. The comments on the verification report were received from the Applicant on 12 December 2025. A letter confirming that the application was deemed to be properly documented was sent to the Applicant on 05 December 2025.

On 17 December 2025, the Commission initiated a sunset review of the anti-dumping duties on the subject products, originating in or imported from Germany and the UK, through Notice No. 3695 of 2025 published in Government Gazette No. 53872.

The investigation was initiated after the Commission considered that the Applicant had submitted prima facie information to indicate that there is a likelihood of the continuation of dumping and recurrence of material injury to the Southern African Customs Union ("SACU") industry should the current anti-dumping duties expire.

Upon initiation of the investigation, the known manufacturers/exporters of the subject products in Germany and the UK were sent foreign manufacturers/exporters questionnaires to complete. Importers of the subject products were also sent questionnaires to complete. The deadline for the responses was 23 January 2026.

No responses were received from any manufacturers/exporters or importers.

The Commission made a final determination before essential facts that the expiry of the anti-dumping duties on ("the subject products") originating in or imported from Germany and the UK would likely lead to the continuation of dumping and the recurrence of material injury.

On 5 May 2026, essential facts letters were sent to all interested parties, informing them of the "essential facts" which were being considered by the Commission and inviting interested parties to comment. Comments to the Commission's essential facts letters were received from the Applicant and the Botswana Trade Commission.

The Commission noted that this application was brought based on the continuation of dumping and the recurrence of material injury. No responses from the manufacturers of the subject products were received, and therefore, the determination of the likelihood of

the continuation of dumping and the recurrence of injury was made on the best information available, being that provided by the Applicant.

The Commission made a final determination that the expiry of the anti-dumping duties on the subject products, originating in or imported from Germany and the UK would lead to the continuation of dumping and the recurrence of material injury.

The Commission therefore made a final determination to recommend to the Minister of Trade, Industry and Competition (“the Minister”) that the current anti-dumping duties on the subject products, originating in or imported from Germany and the UK be maintained as follows:

Item	Tariff heading	Description	Imported from or originating in	Rates of anti-dumping duties
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%

215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited GmbH and Pfeifer Drako)	Germany	93%

1. APPLICATION AND PROCEDURE

1.1 LEGAL FRAMEWORK

This investigation was conducted in accordance with the International Trade Administration Act, 2002 ("ITA Act"), the International Trade Administration Commission Anti-Dumping Regulations ("ADR"), read with the World Trade Organization ("WTO") Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade, 1994 ("ADA").

The analytical framework in sunset review investigations

Regulation 54 of the ADR provides that duties shall remain in place for a period not longer than five years or until a sunset review is finalised, if such a review is initiated before the expiry of the anti-dumping duty.

Unlike in an original investigation, in a sunset review, the Commission determines whether the removal of the current anti-dumping duty would likely result in the continuation or recurrence of dumping and material injury. This is a forward-looking analysis. Whereas in an original investigation historical (past) injury and dumping data is analyzed and will be the basis for deciding whether to impose an anti-dumping duty, in a sunset review investigation such historical data serves as a point of comparison against which estimates of future performance, if a duty were removed, are evaluated. This focus on estimates is not only because of the nature of such proceedings, but also because past data will likely be skewed, showing positive trends in response to the duty that was imposed. Accordingly, critical in a sunset review are estimates because this data is key to assessing the (future) impact of removing an anti-dumping duty on a domestic industry.

Regarding estimates, the ADR provides that the SACU industry is required to provide the Commission with information indicating the likelihood of a continuation or recurrence of dumping and injury in the event that the anti-dumping duty is removed.

In assessing injury in a sunset review, therefore, the Commission will consider –

- Whether the SACU industry submitted information demonstrating that there is a likelihood of the continuation of injury (in instances where subject imports continued after the imposition of duties); or
- Whether the SACU industry submitted information demonstrating that there is a likelihood of the recurrence of injury (in instances where the applicant cannot demonstrate that it is experiencing injury at present).

In terms of dumping, the Commission will consider whether the SACU industry submitted information to demonstrate that there is –

- a likelihood of the continuation of dumping (in instances where subject imports continued after the imposition of duties); or
- a likelihood of the recurrence of dumping (in instances where there were no subject imports after the imposition of duties).

Finally, the data that is provided by an Applicant in a sunset review, although estimates, are not mere conjecture. Rather, the data is normally based on the situation that an Applicant faced before anti-dumping duties were imposed.

1.2 APPLICANT

The application was lodged by Haggie Steel Wire Rope Proprietary Limited being the only producer of the subject products in the SACU.

1.3 ACCEPTANCE OF APPLICATION

The application was accepted by the Commission as being properly documented in accordance with ADR 21 on 21 November 2025.

1.4 ALLEGATIONS BY THE APPLICANT

The Applicant alleged that the expiry of the anti-dumping duties on the subject products, originating in or imported from Germany and the UK would likely lead to the continuation of dumping and the recurrence of material injury.

The Applicant further alleged that because of the continuation of dumping of the subject products from Germany and the UK, it would experience material injury in the form of:

- (a) Increase in volume of imports;
- (b) Decline in sales volume;
- (c) Decline in gross and net profit;
- (d) Decline in output;
- (e) Decline in market share;
- (f) Decline in return on investment;
- (g) Decline in productivity;
- (h) Decline in cash flow;
- (i) Decline in capacity utilisation; and
- (j) Inability to raise capital.

1.5 INVESTIGATION PROCESS

The Applicant submitted an application to the Commission on 07 July 2025. After all deficiencies were identified and addressed, an updated final application was received on 14 October 2025.

The information submitted by the Applicant was verified on 19 - 20 November 2025. A verification report was sent to the Applicant on 05 December 2025. Comments on the verification report were received from the Applicant on 12 December 2025. A letter confirming that the application was deemed to be properly documented was sent to the Applicant on 05 December 2025.

On 17 December 2025, the Commission initiated a sunset review of the anti-dumping duties on the subject products, originating in or imported from Germany and the UK, through Notice No. 3695 of 2025 published in Government Gazette No. 53872.

1.6 INVESTIGATION PERIODS

The period of investigation for dumping is from 01 May 2024 to 30 April 2025. The period of investigation for injury is 01 May 2022 to 30 April 2025 and estimates for 01 May 2025 to 30 April 2026 in the event that the anti-dumping duties expire.

The Applicant brought the application based on the likely continuation of dumping of the subject products, resulting in the recurrence of material injury if the anti-dumping duties are allowed to expire.

The Commission was requested to apply a forward-looking analysis and seek to resolve the issue of what would be likely to occur if the anti-dumping duties were terminated. Thus, the likelihood determination is a prospective determination – recurrence. The Applicant provided its financial performance to the Commission for the period 01 May 2022 to 30 April 2025 and the dumping period of investigation is from 01 May 2024 to 30 April 2025, while the estimate period in which there is a likelihood of injurious dumping to recur, should the anti-dumping duties be terminated, is from 01 May 2025 to 30 April 2026.

1.7 COMMENTS

The Commission considered comments received from interested parties regarding the application and procedure. Non-confidential versions of these comments are available on the public file.

1.8 PARTIES CONCERNED

1.8.1 SACU industry

The application was lodged by Haggie Steel Wire Rope Proprietary Limited, being the only producer of the subject products in the SACU.

1.8.2 Responses by Foreign Manufacturers/Exporters/Importers

No responses were received from any manufacturer /exporter in Germany and the UK, nor from any importer in the SACU.

On 5 May 2026, the Commission issued essential facts letters to interested parties, and the due date to comment on the Commission's essential facts letters was 12 May 2026. Comments to the Commission's essential facts letters were received from the Applicant and the Botswana Trade Commission.

Comments by the Applicant the Botswana Trade Commission

The Applicant and the Botswana Trade Commission stated that they agree with the Commission's proposed determination that the expiry of the anti-dumping duties imposed on ropes and cables, originating in or imported from Germany and the UK would likely lead to the continuation of dumping and the recurrence of material injury to the SACU industry.

1.9 FINAL DETERMINATION AND RECOMMENDATION

The Commission made a final determination that the expiry of the anti-dumping duties on the subject products, originating in or imported from Germany and the UK would likely lead to the continuation of dumping and the recurrence of material injury.

No responses from the manufacturers/exporters of the subject products in Germany and the UK were received and therefore, the determination of the likelihood of the continuation of dumping and recurrence of injury is based on the best information available, being that provided by the Applicant. In these circumstances, it is the Commission's practice to recommend that the anti-dumping duties be maintained at the current levels unless compelling reasons, arising from evidence or circumstances not available during the original investigation, warrant a departure from that practice.

The Commission therefore made a final determination to recommend to the Minister that the current anti-dumping duties on the subject products originating in or imported from Germany and the UK be maintained as follows:

Item	Tariff heading	Description	Imported from or originating in	Rates of anti-dumping duties
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%

215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
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2. PRODUCTS, TARIFF CLASSIFICATION AND DUTIES

2.1 SUBJECT PRODUCT

2.1.1 Description

Ropes and Cables:

Ropes and Cables (also known as Ropes and Cables of Steel or Wire Ropes) of a diameter that is greater than 32mm is a complex product with several different specifications that can affect its performance and service life. It consists of one or more strands, laid spirally around a core of steel or a fibre core.

Ropes and Cables consist of one or numbers of strands of high carbon steel wire which can be coated with a galvanized layer (i.e. zinc) or sheathed or impregnated and sheathed in plastic. The wires are generally laid spirally around one core of either steel, fibre (natural or synthetic), Independent Wire Rope Core (IWRC) or Wire Main Core (WMC), but it can be laid in various other configurations in order to give the strand or rope the desired physical properties. Variances in the layout of the wires can include variances in: strand diameter, rope diameter, number of wires, sizes of wires, wire finish (black or galvanised), wire tensile grade, type of lubricant and strand or rope length.

2.1.2 Like product

In the original investigation, the Commission found that the SACU products and the imported products from Germany and the UK are like products, for purposes of comparison, in terms of section 1 of the ADR.

2.1.3 Tariff classification

The subject products are classifiable as follows:

Table 2.1.3: Tariff classification

Tariff heading/ subheading	Description	Statistic al unit	Rate of duty				
			General	EU ¹	EFTA ²	SADC ³	MERCOSUR ⁴
73.12	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated:						
7312.10	- Stranded wire, ropes and cables:						
7312.10.10	Stranded wire, of wire which is plated, coated or clad with copper- zinc base alloys (brasses)	kg	free	free	free	free	free
7312.10.24	Ropes and cables, of wire which is not plated, coated or clad, of a diameter exceeding 13 mm (excluding that of wire of stainless steel and that identifiable as conveyor belt cord)	kg	15.00%	free	free	free	15.00%
7312.10.30	Other ropes and cables, of wire which is plated, coated or clad with zinc	kg	5.00%	free	free	free	5.00%
7312.10.90	Other	kg	15.00%	free	free	free	15.00%

Source: SARS

¹ European Union

² European Free Trade Association

³ Southern African Development Community

⁴ Southern Common Market (Argentina, Brazil, Paraguay and Uruguay)

2.1.4 Other applicable duties and rebates

The following anti-dumping duties are applicable:

Item	Tariff heading	Description	Imported from or originating in	Rates of anti-dumping duties
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited GmbH and Pfeifer Drako)	Germany	93%

3. SACU INDUSTRY

3.1 INDUSTRY STANDING

The application was lodged by Haggie Steel Wire Rope Proprietary Limited, being the only producer of the subject products in SACU.

The Commission made a final determination that the application can be regarded as being made “by or on behalf of the domestic industry” in terms of Regulation 7 of the ADR.

4. CONTINUATION OF DUMPING

4.1 METHODOLOGY IN THIS INVESTIGATION FOR GERMANY

Regulation 54.4 of the ADR states that:

“In the event that the SACU industry requests that the anti-dumping duty be maintained, it shall provide the Commission with a proper application containing the necessary information to establish a prima facie case that the removal of the anti-dumping duty will be likely to lead to the continuation or a recurrence of injurious dumping.” (Own emphasis).

4.1.1 Normal value calculation

As no responses were received from any manufacturer/exporter in Germany, the Commission made its final determination based on the best information available, namely that provided by the Applicant.

The Applicant stated that it undertook efforts to obtain domestic selling prices from producers operating in Germany. The Applicant contacted WireCo, a producer with operations in Germany, by email to request domestic pricing for the subject product. The Applicant sent a follow-up email to WireCo requesting a response to the initial inquiry. No price information has been provided by WireCo despite the correspondence.

In the absence of domestic prices, the Applicant decided to use normal values for Germany on the basis of third-country sales from Germany to India, which meets the requirement for choosing a suitable third-country market. India was considered an appropriate third-country market based on the following reasons:

- Industrial comparability - India has an established steel wire rope manufacturing industry with major producers (Usha Martin, Tata Steel, Bharat Wire Ropes) employing comparable production methods,

technology, and quality standards (ISO, EN, API, DNV) to German and the UK manufacturers;

- Market development - India has a substantial and growing market for steel wire products (CAGR 5.6% for 2025-2031) driven by construction, automotive, and industrial sectors, demonstrating comparable market conditions.

Export prices from Germany and the United Kingdom to India are representative under Section 32(2)(b)(ii) (bb) of the ITA Act and Article 2.2 of the WTO Anti-Dumping Agreement, based on:

- substantial volume of exports to India from Germany and the UK, which exceeds exports to SACU by more than 200%, demonstrating that India is a major export market.

During the investigation period for dumping (May 2024 to April 2025), exports of steel wire ropes from Germany to India, based on export data sourced from TradeMap, were used to determine the normal value.

Export data sourced from TradeMap was used to calculate the normal value as follows:

Third Country Export from Germany to India (April 2024 to May 2025)	EUR/Kg
Unit price per kilogram	7.04

Adjustments to the normal value

In order to calculate the ex-factory normal value, an adjustment for inland transport cost was taken into account. The adjustment amount of EUR 4,395 divided by the container volume of 21,668 kg results in a per-unit adjustment of EUR 0.20 per kg.

The ex-factory normal value after adjustment was calculated as follows:

Normal Value: Germany May 2024 – April 2025	EUR/kg
FOB normal value	7.04
Less adjustment for transportation	0.20
Ex-factory normal value	6.84

4.1.2 Export Price

As no responses were received from any manufacturer/exporter in Germany, the Commission made its final determination based on the best information available, namely that provided by the Applicant.

In calculating the export price, the Applicant stated that the official South African Revenue Service (“SARS”) import statistics are unreliable due to a significant number of tariff subheading mismatches between the SACU tariff classification system and the scope of the anti-dumping duties. In calculating the export prices for Germany, the Commission decided to use export statistics from TradeMap for the applicable EU tariff subheading, which more accurately reflect the subject product scope. TradeMap provides trade data based on official customs statistics from exporting countries.

The average FOB export price for the subject product was calculated as follows:

Export price	EUR/kg
Unit price per kilogram	5.15

Adjustment to the export price

In order to calculate the ex-factory export price, an adjustment for inland transport cost was taken into account. The Applicant used information obtained from a formal quotation to make an adjustment to calculate the ex-factory export price. The transport cost was calculated to be 0.20 EUR/kg (EUR 4 395 / 21 668).

The ex-factory export price after adjustment was as follows:

Ex-factory export price: Germany May 2024 – Oct 2025	EUR/kg
FOB export price	5.15
Less adjustment for transportation	0.20
Ex-factory export price	4.95

4.1.3 Margin of dumping

The dumping margin for Germany was calculated as follows:

Germany	EUR/kg
Ex-factory normal value	6.84
Ex-factory export price	4.95
Margin of dumping	1.89
Margin of dumping as a % of ex-factory export price	38.18%

4.2 METHODOLOGIES IN THIS INVESTIGATION FOR THE UK

4.2.1 Normal value

As no responses were received from any manufacturer/exporter in the UK, the Commission made its final determination based on the best information available, namely that provided by the Applicant.

The Applicant stated that it undertook efforts to obtain domestic selling prices from producers operating in the UK. The Applicant contacted WireCo, a producer with operations in the UK, by email to request domestic pricing for the subject products. The Applicant sent a follow-up email to WireCo requesting a response to the initial inquiry. No price information has been provided by WireCo despite these contacts

In the absence of domestic prices, the Applicant decided to use the normal values for the UK on the basis of third-country sales from UK to India, which meets the requirement for choosing a suitable third-country market. India was considered an appropriate third-country market based on the following reasons:

- Industrial comparability - India has an established steel wire rope manufacturing industry with major producers (Usha Martin, Tata Steel, Bharat Wire Ropes) employing comparable production methods, technology, and quality standards (ISO, EN, API, DNV) to German and UK manufacturers;
- Market development - India has a substantial and growing market for steel wire products (CAGR 5.6% for 2025-2031) driven by construction, automotive, and industrial sectors, demonstrating comparable market conditions.

Export prices from Germany and the UK to India are representative under Section 32(2)(b)(ii) (bb) of the ITA Act and Article 2.2 of the WTO Anti-Dumping Agreement, based on:

- Substantial volume of exports to India from Germany and the UK, which exceeds exports to SACU by more than 200%, demonstrating that India is a major export market.

During the investigation period for dumping (May 2024 to April 2025), export data for steel wire ropes from the UK to India, sourced from TradeMap, were used to determine the normal value.

Export data from TradeMap was used to calculate the normal value as follows:

Third Country Export from UK to India (April 2024 to May 2025)	EUR/kg
Unit price per kilogram	6.86

Adjustment to the normal value

In order to calculate the ex-factory normal value, an adjustment for the inland transport cost was taken into account. The adjustment amount of EUR 625 was divided by the container volumes of 21 668 kg, resulting in a per-unit adjustment of 0.03 EUR/kg.

The ex-factory normal value after adjustment was as follows:

Normal Value: UK May 2024 – April 2025	EUR/kg
FOB normal value	6.86
Less adjustment for transportation	0.03
Ex-factory price normal value	6.83

4.2.2 Export Price

As no responses were received from any manufacturer/exporter in the UK, the Commission made its final determination based on the best information available, namely that provided by the Applicant.

In calculating the export price, the Applicant stated that the official SARS import statistics are unreliable due to a significant number of tariff subheading mismatches between the SACU tariff classification system and the scope of the anti-dumping duties. In calculating the export prices for UK, the Commission decided to use export statistics from TradeMap for the applicable EU tariff subheading, which more accurately reflect the subject product scope. TradeMap provides trade data based on official customs statistics from exporting countries.

The average FOB export price for the subject product was calculated as follows:

Export price May 2024 – April 2025	EUR/kg
Unit price per kilogram	5.30

Adjustment to the export price

In order to calculate the ex-factory export price, an adjustment for inland transport cost was taken into account. The Applicant used information from a formal quotation to make an adjustment to calculate the ex-factory export price. The transport cost was calculated to be 0.03 EUR/kg (EUR 625 / 21 668).

The ex-factory export price after adjustment was as follows:

Ex-factory export price: UK May 2024 – April 2025	EUR/KG
FOB export price	5.30
Less adjustment for transportation	0.03
Ex-factory export price	5.27

4.2.3 Margin of dumping

The dumping margin for UK was calculated as follows:

UK	EUR/kg
Ex-factory normal value	6.83
Ex-factory export price	5.27
Margin of dumping	1.56
Margin of dumping as a % of ex-factory export price	29.60%

SUMMARY - DUMPING

Based on the information submitted, the Commission made a final determination that the expiry of the duties would likely lead to the continuation of dumping of the subject products from Germany and the UK.

5. RECURRENCE OF MATERIAL INJURY

The Applicant provided its financial performance to the Commission for the period 01 May 2022 to 30 April 2025, and the estimated period used to determine whether there is a likelihood of injurious dumping recurring, which is from 01 May 2025 to 30 April 2026.

5.1 IMPORT VOLUMES AND EFFECT ON PRICES

5.1.1 Import volumes and value

The following table shows the volume of allegedly dumped imports of the subject products obtained from SARS:

Table 5.1.1.1: Import volumes: ropes and cables

Import Volumes (kg)	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Germany	1,903	1,204	752	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
UK	0	0	20,825	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other imports	790, 992	941,262	724,142	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Total Imports	792, 895	942, 466	745, 719	1 984 015
Imports from Germany as a % of total imports	0,24%	0,13%	0,10%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Imports from the UK as a % of total imports	0,00%	0,00%	2,79%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]

				[INCREASE FROM NCY2025]
Other imports	99,76%	99,87%	97,11%	36,50%
Total imports	100%	100%	100%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
7312.10.30 and 7312.10.90				
Germany	34 364	59 284	39 042	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
UK	350 891	358 350	157 128	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other Imports	3 010 858	3 074 408	4 386 454	4 386 454
Total Imports	3 396 113	3 492 042	4 582 625	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Imports from Germany as a % of total imports	1,01%	1,70%	0,85%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Imports from the UK as a % of total imports	10,33%	10,26%	3,43%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other Import	88,66%	88,04%	95,72%	85,69%
Total imports	100%	100%	100%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]

The Applicant stated that the expiry of anti-dumping duties would lead to a substantial increase in the import volume of dumped imports, as low prices will encourage downstream users to increase their imports, instead of purchasing from SACU producers.

According to the Applicant, the expiry of the duties would also lead to a recurrence of material injury as dumped imports at low prices will cause, inter alia, a rapid and significant increase in the volume and market share of dumped

imports and a concurrent reduction in the SACU producers' SACU sales and production volumes and market share, which in turn will lead to a decline in profitability and return on investment.

Commission's consideration

The effectiveness of the anti-dumping duties has led to no imports from the UK and minimal imports from Germany. If the anti-dumping duties were to expire, imports of the subject products would likely increase.

5.2 Effect on domestic prices

5.2.1 Price undercutting

Table 5.2.1: Price undercutting

R/kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant's ex-factory selling price (R/kg)	100	103	122	122
Landed cost of imports from Germany (R/kg)	738,85	256,37	511,12	511,16
Undercutting per kg	[CONFIDENTIAL] [NEGATIVE]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Undercutting Margin % per kg Germany	[CONFIDENTIAL] [NEGATIVE]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Landed cost of imports from UK	0.00	0.00	92.02	92,22
Undercutting per kg	[CONFIDENTIAL]	[CONFIDENTIAL] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [UNCHANGED FROM NCY2023] [INCREASE FROM	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]

			NCY2024]	
Undercutting Margin % per kg UK	[CONFIDENTIAL]	[CONFIDENTIAL] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [UNCHANGED FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]
7312.10.30 and 7312.10.90				
Applicant's ex-factory selling price	100	128	133	133
Landed cost of imports from Germany	280,32	201,14	191,25	191,29
Undercutting per kg (Germany)	[CONFIDENTIAL] [NEGATIVE]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Undercutting Margin % per kg (Germany)	[CONFIDENTIAL] [NEGATIVE]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Landed cost of imports from the UK	118,12	164,15	142,17	142,21
Undercutting per kg (UK)	[CONFIDENTIAL] [NEGATIVE]	[CONFIDENTIAL] [NEGATIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Undercutting Margin % per kg (UK)	[CONFIDENTIAL] [NEGATIVE]	[CONFIDENTIAL] [NEGATIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that import statistics from SARS for the subject products are unreliable because the tariff subheadings are broad and cover a wide range of products and not only the products which are the subject of the anti-dumping duties. The products entering the market under the relevant tariff sub-headings have a diameter below the level to which anti-dumping duties apply and are sold at higher prices than the subject products, thereby distorting the price of imports calculated from the SARS statistics.

Commission's consideration

It is evident that due to the current anti-dumping duty, there was no price undercutting for all the tariff subheadings from Germany. However, the Applicant did experience price undercutting for tariff heading 7312.10.24 in 2024, as the landed cost of imports from the UK was lower than the domestic market prices.

5.2.2 Price depression

The tables below show the Applicant's price undercutting for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.2.2: Price depression

R/kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant's ex-factory selling price (R/kg)	100	104	124	124
7312.10.30 and 7312.10.90				
Applicant's ex-factory selling price (R/kg)	100	128	133	133

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that if anti-dumping duties expire, the Applicant is expected to be forced to depress prices, as a result of the expected influx of dumped imports and that would lead to further material injury.

Commission's consideration

The information in the tables indicates that the applicant did not experience price depression over the period of investigation.

5.2.3 Price suppression

The tables below show the Applicant's price suppression for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.2.3 Price suppression

Rand/kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant SACU Sales Ex-Factory Price	100	105	124	124
Total production cost per kg	100	98	90	118
Gross profit per kg	100	123	224	141
Gross profit margin (%)	100	118	181	114
Cost as % selling price	100	94	72	95
7312.10.30 and 7312.10.90				
Applicant SACU Sales Ex-Factory Price	100	128	133	133
Total production cost per kg	100	98	76	103
Gross profit per kg	100	205	280	211
Gross profit margin (%)	100	160	211	159
Cost as % selling price	100	77	57	77

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant indicated that if the anti-dumping duties expire, the Applicant sales volumes are expected to decline as downstream users would be expected to increase their imports from the dumping countries at dumped prices. This will lead to increase per unit costs as the Applicant will be unable to achieve economies of scale.

The Applicant further stated that increased unfair competition from dumped imports will prevent the Applicant from increasing prices in line with increased costs, and the Applicant may also lower prices or offer additional discounts as a result of the increase in dumped imports (price depression). This can be expected to have a significant negative impact on the Applicant's profitability and return on investment and make the continued operation of the business unsustainable in the medium- to- long term.

Thus, an expiry of the anti-dumping duties will lead to a recurrence of material injury in the form of price suppression, as the Applicant will be unable to increase its prices in line with increases in costs due to unfair competition from dumped imports being imported at dumped prices and would likely be forced to sell the subject products at a loss. The Applicant also indicated that an expiry of the anti-dumping duties would lead to a recurrence of injury in the form of price suppression, and it will be forced to lower its prices in order to compete with the significantly cheaper dumped imports.

Commission's consideration

The Commission considered that the Applicant did not experience price suppression on any of the subject products during the period of investigation. Notwithstanding the absence of price suppression, should the duties be terminated, other data indicates that there would be recurrence of material injury of the subject products.

5.3 Economic factors and indices having a bearing on the state of the industry

5.3.1 Actual and potential decline in volumes and values

The tables below show the Applicant's sales volumes for the injury period from 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.1 (a): Sales volumes

	2022/2023	2023/2024	2024/2025	Estimates if duties expire
Kg				
7312.10.24				
Applicant's sales volume in SACU	100	95	109	73
7312.10.30 and 7312.10.90				
Applicant's sales volume in SACU	100	89	94	63

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that should the anti-dumping duties expire, the Applicant sales volumes are expected to decline as downstream users would be expected to increase their imports from the dumping countries at dumped prices.

Table 5.3.1 (b): Sales values

Rands	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant's SACU Sales	100	99	135	90
7312.10.30 and 7312.10.90				
Applicant's SACU Sales	100	114	125	83

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant also stated that, should the anti-dumping duties expire, the Applicant's sales values are expected to decline, as downstream users are likely to increase their imports from the dumping countries at dumped prices.

The Applicant stated that it is therefore expected to sell lower volumes at the same or lower prices, resulting in a decline in sales value. It further stated that if the anti-dumping duties expire, this is expected to lead to a recurrence of material injury in the form of a significant decrease in sales value and volumes.

Commission's consideration

The Commission noted that the Applicant's sales for ropes and cables increased in the years 2024 and 2025. From the tables above, it is shown that should the anti-dumping duties expire, it is anticipated that Applicant's sale values and sale volumes will decrease resulting in the SACU industry experiencing material injury.

5.3.2 Profit

The tables below show the Applicant's profit for the injury period from 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.2: Profit

Rands	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant Sales Volume (kg)	100	95	109	73
Total gross profit	100	117	245	103
Total Net profit	100	120	216	8
7312.10.30 and 7312.10.90				
Applicant Sales Volume (kg)	100	89	94	63
Total gross profit	100	182	263	132
Total Net profit	100	203	248	73

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that should the anti-dumping duties expire, the Applicant's sales volumes are expected to decline as downstream users are likely to increase their imports from the dumping countries at dumped prices. This would lead to increase per unit costs as the Applicant will be unable to achieve economies of scale. The Applicant will also continue to incur increased expenses due to inflationary pressures. At the same time, increased unfair competition from dumped imports will prevent the Applicant from increasing prices in line with increased costs (price suppression) and the Applicant may also lower prices or offer additional discounts as a consequence of the increase in dumped imports (price depression).

The Applicant further stated that, it expects that the expiry of anti-dumping duties would lead to it selling the subject products at a net loss, which is not sustainable. Thus, the expiry of the anti-dumping duties would lead to a recurrence of material injury in the form of a decline in profit to a loss.

5.3.3 Output

The tables below show the Applicant's production volumes for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.3: Output

Kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant's production volume	100	95	109	73
7312.10.30 and 7312.10.90				
Applicant's production volume	100	89	94	63

The above table has been indexed due to confidentiality using Dec 2021- Nov 2022 as a base year

The Applicant stated that if the anti-dumping duties expire, the Applicant's sales volumes are expected to decline as downstream users are likely to increase their imports from the dumping countries at dumped prices. It will then be forced to reduce its production volumes, since production cannot be sustained at current levels if the Applicant is unable to sell the products. This will prevent the Applicant from achieving economies of scale.

The reduction in production and sales volumes, combined with continued inflationary pressure and increased unfair competition from dumped imports, which will prevent the Applicant from increasing prices in line with increased costs and may even lead to further depression of prices, is expected to lead to the Applicant selling the subject products at a loss, which is unsustainable. Thus, if the anti-dumping duties expire, this is expected to lead to a recurrence of material injury in the form of a significant decrease in output.

5.3.4 Market share

The tables below show the Applicant's market share of the subject products for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.4: Market share (Volumes)

Kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant sales volume (kg)	100	95	109	73
Dumped Imports Volume (kg)				
Germany	1 903	1 204	752	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
UK	0	0	20 825	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other Imports Volume(kg)	790 992	941 262	724 142	724,142
Total imports	792 895	942 466	745 719	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Total Market	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Applicant Market Share (Volume) %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]
Market Share by Volume Dumped Imports (Germany) %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]

Market Share by Volume Dumped Imports (UK) %	[CONFIDENTIAL]	[CONFIDENTIAL] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [UNCHANGED FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other Imports Market Share (Volume) %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [UNCHANGED FROM NCY2025]
Total imports	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Total Market	CONFIDENTIAL [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
7312.10.30 and 7312.10.90				
Applicant sales volume (kg)	100	89	94	63
Dumped Imports Volume (kg)				
Germany	34 364	59 284	39 042	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
UK	350 891	358 350	157 128	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other Imports Volume(kg)	3 010 858	3 074 408	4 386 454	4 386 454
Total imports	3 396 113	3 492 042	4 582 625	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]

Applicant Market Share (Volume) %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]
Market Share by Volume Dumped Imports (Germany) %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Market Share by Volume Dumped Imports (UK) %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other Imports Market Share (Volume) %				
Total imports	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [UNCHANGED FROM NCY2025]
Total Market	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that a decrease in the domestic industry's market share is an important consideration in determining material injury. The Applicant further stated that it experienced material injury in the form of a decrease in market share by volume during the period of investigation.

The Applicant further stated that should the anti-dumping duties expire, the Applicant's sales volumes are expected to decline as downstream users are likely to increase their imports from the dumping countries at dumped prices. The Applicant is expected to lose a significant portion of its market share to dumped imports if the anti-dumping duties expire. This loss of market share would be even greater if the SACU market were to decrease in size.

5.3.5 Productivity

The tables below show the Applicant's productivity of the subject products for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.5: Productivity

Kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant total production Volume (kg)	100	95	109	73
Total number of production employees (employees)	100	100	116	97
Production per employee (kg)	100	95	94	75
7312.10.30 and 7312.10.90				
Applicant total production Volume (kg)	100	89	94	63
Total number of production Employees (employees)	100	100	116	97
Production per Employee (kg)	100	89	81	65

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that if the anti-dumping duties expire, the Applicant's sales volumes are expected to decline as downstream users can be expected to increase their imports from the dumping countries at dumped prices.

As a result, the Applicant will be forced to reduce its production volumes, since these cannot be sustained at current levels if the Applicant is not able to sell the products.

Despite decreasing production volumes, the Applicant will not be able to significantly reduce its number of production employees whilst continuing to operate the plant. Thus, a decrease in production volumes will lead to a significant decline in productivity.

The Applicant further stated that this is not sustainable, and, in the long term, the Applicant will not be able to sustain operations at its plant whilst facing unfair competition from dumped imports and will likely have to consider closing the plant permanently and retrenching all employees.

Commission's consideration

From the above table the Commission noted that the Applicant's productivity in terms of the subject products increased during the investigation period. Should the current anti-dumping duties be terminated, it would cause the current situation to change. Productivity in terms of the subject products is expected to decrease should the anti-dumping duties expire.

5.3.6 Return on investment

The tables below show the Applicant's return on investment of the subject products for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.6: Return on investment

Rand	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Net profit subject product	100	120	216	8
Net assets subject product	100	939	1,310	1,610
Return on net assets (%)	100	13	17	1
7312.10.30 and 7312.10.90				
Net profit subject product	100	203	248	73
Net assets subject product	100	270	330	1,420
Return on net assets (%)	100	75	75	5

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that if the anti-dumping duties expire, the Applicant's sales volumes are expected to decline as downstream users would be expected to

increase their imports from the dumping countries at dumped prices. This would lead to increase per unit costs as the Applicant will be unable to achieve economies of scale. The Applicant would also continue to face increased expenses as a result of inflationary pressures.

The Applicant further stated that, increased unfair competition from dumped imports will prevent the Applicant from increasing prices in line with increased costs (price suppression) and the Applicant may also lower prices or offer additional discounts as a consequence of the increase in dumped Imports. It is further expected that the expiry of anti-dumping duties would lead to the Applicant selling the subject product at a loss, which is unsustainable. This loss would also have a significant negative impact on the Applicant's net assets, which is expected to decrease further if the anti-dumping duties expire.

5.3.7 Utilisation of production capacity

The tables below show the Applicant's utilisation of production capacity of the subject products for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.7: Production capacity

Kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Applicant production capacity (SACU& Non-SACU)	100	100	100	100
Applicant total production volume (SACU& Non-SACU)	100	95	109	73
Applicant capacity utilisation (%)	100	95	109	73
7312.10.30 and 7312.10.90				
Applicant production capacity (SACU& Non-SACU)	100	100	100	100
Applicant total production volume (SACU& Non-SACU)	100	89	94	63

Applicant capacity utilisation (%)	100	89	94	63
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The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that it has experienced material injury in the form of very low-capacity utilisation. If the anti-dumping duties expire, the Applicant's sales volumes are expected to decline as downstream users can be expected to increase their imports from the dumping countries at dumped prices. As a result, the Applicant will be forced to reduce its production volumes, since these cannot be sustained at current levels if sales decline. This will lead to a significant reduction in capacity utilisation and a significant increase in per unit costs (and consequently a decline in profitability), which is not sustainable.

In the long term, the Applicant will not be able to sustain operations at its plant whilst facing unfair competition from dumped imports and will likely have to consider closing the plant permanently and retrenching all employees.

This shows that the expiry of the anti-dumping duties would lead to a recurrence of material injury in the form of a decline in capacity utilisation.

5.3.8 Actual and potential negative effects of cash flow

The tables below show the Applicant's actual and potential negative effects on cash flow of the subject products for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.8:(i) Cash flow

Rand	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Incoming cash flow	100	-99	378	378
Outgoing cash flow	-100	213	244	-1,438
Net cash flow	100	-84	591	-1,319

Table 5.3.8(ii): Cash flow

Rand	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.30 and 7312.10.90				
Incoming cash flow	-100	-31	66	66
Outgoing cash flow	100	37	30	-223
Net cash flow	100	14	174	-403

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that the combined effect of reduced sales volumes and low or decreasing prices will result in a significant decrease in the Applicant's sales value, which will result in a significant increase in outgoing cash flow and net cash flow. As a result, the expiry of the anti-dumping duties would lead to a recurrence of material injury in the form of significantly reduced cash flow.

5.3.9 Inventories

The tables below show the Applicant's inventory levels of the subject products for the injury period beginning 01 May 2022 to 31 April 2025, and estimates in the event the duties expire:

Table 5.3.9(i): Inventories

7312.10.24	2022/2023	2023/2024	2024/2025	Estimates if duties expire
Inventory Volume (kg)	100	64	99	99
Inventory Value (R)	100	61	100	337

Table 5.3.9(ii): Inventories

7312.10.30 and 7312.10.90	2022/2023	2023/2024	2024/2025	Estimates if duties expire
Inventory Volume (kg)	100	62	83	83
Inventory Value (R)	100	57	85	325

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that, in preparing forecasts for this application, it has assumed it will be able to reduce production by the same volume as sales. However, it is likely that the Applicant will not be able to reduce production volumes by as much as sales volumes (as it will not be clear by how much sales volumes will decrease).

This means the Applicant may produce stock it is unable to sell, resulting in increased inventory volume going forward. Even if the absolute volume of inventories were to remain at current levels, this would still represent an increase relative to sales volumes. This shows that the expiry of the anti-dumping duties would lead to a continuation of material injury in the form of increased inventory.

5.3.10 Employment

The tables below show the Applicant's employment levels of the subject products for the injury period beginning 1 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.10: Employment

No. of employees	2022/2023	2023/2024	2024/2025	Estimates if duties expire
Number of direct production employees (employees)	100	99	110	88
Number of indirect Production employees (employees)	100	112	166	166
Total number of production employees (employees)	100	100	116	97

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that it experienced material injury in the form of a decrease in total number of employees in NCY2024 (decrease from base and previous year). Despite decreasing production volumes, in the short term the Applicant will not be able to reduce their number of production employees whilst continuing to operate the plant. As such, the expiry of anti-dumping duties will not have an immediate impact on employment in the short term.

However, in the long term, the Applicant will not be able to sustain operations at its plant whilst facing unfair competition from dumped imports and would likely have to consider closing the plant permanently and retrenching all employees.

5.3.11 Wages

The tables below show the Applicant's wages for production employees in relation to the subject products for the injury period beginning 01 May 2022 to 31 April 2025, and estimates in the event the duties expire:

Table 5.3.11: Wages

Rands	2022/2023	2023/2024	2024/2025	Estimates if duties expire
Total remuneration to Production employees (R)	100	111	118	103
Total remuneration per production employee (R)	100	111	102	107

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that despite decreasing production volumes, the Applicant will not be able to significantly reduce their number of production employees in the short-term whilst continuing to operate the plant. At the same time, the Applicant will have to continue paying increased wages to employees. This would lead to a decrease in wages, which, when combined with expected lower sales volumes.

5.3.12 Growth¹

The tables below show the Applicant's growth in relation to the subject products for the injury period beginning 01 May 2022 to 30 April 2025, and estimates in the event the duties expire:

Table 5.3.12(i): Growth

Kg 7312.10.24	2022/2023	2023/2024	2024/2025	Estimates if duties expire
Total SACU market (Volume) / total SACU demand (kg)	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [UNCHANGED FROM NCY2025]
Percentage growth from previous year (Total SACU Market (Volume) / Total SACU Demand) (%)	[CONFIDENTIAL]	[CONFIDENTIAL] [NEGATIVE] [UNCHANGED FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Applicant SACU sales volume (kg)	100	95	109	73
Percentage growth from previous year (Applicant SACU sales volume (%))	0	-100	299	-654
Dumped imports volume (Germany) (kg)	1 903	1 204	752	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Dumped imports volume (UK) (kg)	0	0	20 825	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Percentage growth from	0,00%	(36,72%)	(37,56%)	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]

previous year (dumped imports volume (Germany) (%)				[INCREASE FROM NCY2025]
Percentage growth from previous year (dumped imports volume (UK) (%)	0,00%	0,00%	0,00%	[CONFIDENTIAL] [POSITIVE] [UNCHANGED FROM NCY2023] [INCREASE FROM NCY2025]
Non-dumped imports Volume (kg)	792,895	942,466	745,719	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Percentage growth from previous year (non-dumped imports volume) (%)	0,00%	18.86%	-20.88%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]

Table 5.3.12(ii): Growth

Kg	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.30 and 7312.10.90				
Total SACU market (Volume) / total SACU demand (kg)	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [UNCHANGED FROM NCY2025]
Percentage growth from previous year (Total SACU Market (Volume) /Total SACU Demand) (%)	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [NEGATIVE] [UNCHANGED FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [NEGATIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2025]
Applicant SACU sales volume (kg)	100	89	94	63
Percentage growth from previous year (Applicant SACU	0	(100)	51	-304

sales volume (%)				
Dumped imports volume (Germany) (kg)	34 364	59 284	39 042	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Dumped imports volume (UK) (kg)	350 891	358 350	157 128	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Percentage growth from previous year (dumped imports volume (Germany) (%)	0,00%	72,52%	(34,14%)	273,50%
Percentage growth from previous year (dumped imports volume (UK) (%)	0,00%	2,13%	(56,15%)	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]
Non-dumped imports Volume (kg)	3 010 858	3 074 408	4 386 454	4 386 454

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that if the anti-dumping duties expire, the Applicant sales volumes are expected to decline as downstream users can be expected to increase their imports from the dumping countries at dumped prices.

The Applicant further stated that even if the SACU market does not decrease in size, the Applicant is expected to lose a significant portion of its market share to dumped imports if the anti-dumping duties expire. This loss of market share would be even greater if the SACU market decreases in size.

5.3.13 Ability to raise capital or investments

The tables below show the Applicant's ability to raise capital/investment in relation to the subject products for the injury period beginning 1 May 2022 to 31 April 2025, and estimates in the event the duties expire:

Table 5.3.13(i): Ability to raise capital or investments

Rands	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.24				
Total capital/investment in the subject product	100	78	147	147
Capital expenditure during year on subject product	-100	-37	-67	0

Table 5.3.13(ii): Ability to raise capital or investments

Rands	2022/2023	2023/2024	2024/2025	Estimates if duties expire
7312.10.30 and 7312.10.90				
Total capital/investment in the subject product	100	74	125	125
Capital expenditure during year on subject product	-100	-23	-42	0

The above table has been indexed due to confidentiality using 2022/2023 as a base year

The Applicant stated that it has a strong ability to raise funds through group financing. The Applicant further stated that with the combined cash flow of the Scaw SA Group and the Barnes Group, Wire & Strand is able to secure funding quickly when required.

The Applicant indicated that if the anti-dumping duties expire, the Applicant will not be able to achieve returns on its investment, which will limit the Applicant's ability to raise capital for future investments in maintaining or expanding capacity as needed.

5.4 SUMMARY – RECURRENCE OF MATERIAL INJURY

Commission's consideration

The Commission noted that the anti-dumping duties currently in place have had a disciplining effect on imports from Germany and the UK, limiting their volumes and mitigating the extent of the injury to the domestic industry.

Although certain performance indicators of the domestic industry improved during the period under review, particularly up to 2024/2025 (e.g. profits), key indicators indicate that the industry remains vulnerable. In particular –

- Capacity utilisation has remained at relatively low levels;*
- Output shows a declining trend in the most recent period and in the estimates;*
- Profitability declines significantly in the estimated period; and*
- Imports from Germany and the UK, although currently limited, are projected to increase significantly should the duties expire.*

Then the removal of the current anti-dumping duties would likely result in the

following:

- A significant increase in the volume of dumped imports;*
- Renewed price pressure on the domestic industry, in particular price suppression;*
- A deterioration in the financial performance of the domestic industry.*

Accordingly, the Commission made a final determination that in the absence of the anti-dumping duties, the domestic industry would likely experience a recurrence of material injury.

Based on the information submitted, the Commission made a final determination that the expiry of anti-dumping duties on the subject products originating in or imported from Germany and the UK would likely lead to recurrence of material injury to the SACU industry.

6. SUMMARY OF FINDINGS

6.1 Continuation of dumping

From the information available, it is evident that the expiry of the anti-dumping duties imposed on the subject products would likely lead to the continuation of dumping of the subject products originating in or imported from Germany and the UK.

6.2 Recurrence of material injury

Similarly, there is sufficient information to indicate that the expiry of the anti-dumping duties would likely lead to the recurrence of material injury experienced by the SACU industry.

7. FINAL DUTIES

7.1 Amount of duties

The table below is provided for the purposes of comparison between the applicable anti-dumping duties and the calculated anti-dumping margins in the investigation:

Item	Tariff heading	Description	Imported from or originating in	Rates of anti-dumping duties	Calculated dumping margin
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%	29.43%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%	36.69%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%	29.43%

215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%	36.69%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%	29.43%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited GmbH and Pfeifer Drako)	Germany	93%	36.69%

The above table compares the current anti-dumping duties with the calculated dumping margin.

No responses from the manufacturers of the subject products in Germany and the UK were received and therefore, the determination of the likelihood of the continuation of dumping is based on the best information available, being that provided by the Applicant. In these circumstances, it is the Commission's practice to recommend that the anti-dumping duty be maintained at the current levels unless there are compelling reasons to deviate from its practice.

Commission's consideration

There was no commercial volume of imports of the subject products from Germany and the UK during the period of investigation. It is also noted that the calculated duties are lower than the Anti-Dumping duties currently in place. It can be concluded that the current Anti-Dumping duties on the subject products have been effective in levelling the playing field.

8. FINAL DETERMINATION

The Commission made a final determination that the expiry of the anti-dumping duties on the ("subject products") originating in or imported from the Germany and the UK would likely lead to the continuation of dumping and recurrence of the material injury.

No responses were received from the manufacturers/exporters of the subject products in Germany and the UK, and therefore the determination of the likelihood of the continuation of dumping and recurrence of material injury was made on the best information available, being that provided by the Applicant.

The Commission therefore made a final determination to recommend to the Minister that the current anti-dumping duties on the subject products originating in or imported from Germany and the UK be maintained as follows:

Item	Tariff heading	Description	Imported from or originating in	Rates of anti-dumping duties
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%

215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited GmbH and Pfeifer Drako)	Germany	93%