

**REPORT NO. 764**

**REVIEW OF THE TARIFF STRUCTURE AND INVESTIGATION INTO THE POSSIBLE INTRODUCTION OF AN IMPORT SURVEILLANCE SYSTEM FOR STEEL PRODUCTS, CLASSIFIABLE UNDER CHAPTERS 72, 73, 82, AND 83 OF SCHEDULE No. 1 TO THE CUSTOMS AND EXCISE ACT**

The International Trade Administration Commission of South Africa herewith presents its **Report No. 764: Review of the tariff structure and investigation into the possible introduction of an import surveillance system for steel products classifiable under chapters 72, 73, 82, and 83 of Schedule No.1 to the Customs and Excise Act**, with recommendations.



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**AYABONGA CAWE**  
**CHIEF COMMISSIONER**

**PRETORIA**

**29 November 2025**

**REPUBLIC OF SOUTH AFRICA**  
**INTERNATIONAL TRADE ADMINISTRATION COMMISSION OF SOUTH AFRICA**

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**REVIEW OF THE TARIFF STRUCTURE AND INVESTIGATION INTO THE POSSIBLE INTRODUCTION OF AN IMPORT SURVEILLANCE SYSTEM FOR STEEL PRODUCTS, CLASSIFIABLE UNDER CHAPTERS 72, 73, 82, AND 83 OF SCHEDULE No.1 TO THE CUSTOMS AND EXCISE ACT**

**Synopsis**

On 19 March 2025, the International Trade Administration Commission (“ITAC” or the “Commission”) initiated an investigation into the review of the tariff structure and the possible introduction of an import surveillance system for steel products, classifiable under Chapters 72, 73, 82 and 83 of Schedule No. 1 to the Customs and Excise Act.

The Commission considered all the relevant information at its disposal. In particular, the Commission considered the following factors:

- The importance of the domestic steel industry in supporting economic recovery efforts, infrastructure development, and industrial growth, together with the need to use tariff measures to strengthen local manufacturing and competitiveness in the sector as envisaged in the Steel and Metal Fabrication Masterplan;
- The significant role of the South African steel industry as a vital contributor to the economy, particularly on beneficiation objectives and job creation. The associated backward and forward linkages of the sector, with steel-consuming industries collectively contributing significantly to the country’s GDP and employing millions of people;
- The need for the improvement of South Africa’s tariff structure and rebate structure for steel products within Chapters 72,73, 82 and 83 of the Customs and Excise Act in order to facilitate a better response to some of the problems facing the domestic industry;

- The significant challenges that the South African steel industry currently faces, such as rising input costs, including raw materials, labour, logistics and electricity, which are eroding competitiveness;
- The influx of low-priced steel imports across the whole steel value chain, particularly from Asian markets such as China and India;
- The ongoing problems of pervasive circumvention of import duties, customs fraud, and other unlawful activities, necessitating the need for a collaborative and holistic approach in confronting some of these challenges;
- The existing scope for the Commission to play a role in working with industry and other government agencies to develop, and enhance compliance with, industry standards and compulsory specifications in the steel sector;
- The unprecedented emergency posed by the ongoing geo-political landscape, particularly insofar as trade policy is concerned, likely necessitating a departure from ordinary tariff setting.

The Commission found that the overall global trading conditions with regards to steel products, both globally and domestically, remain very subdued, with a number of major economies imposing significant tariffs to protect their domestic industries in the face of global steel overcapacity and associated trade diversions. This is causing significant strain to an already struggling domestic steel manufacturing industry.

The Commission concluded that there is a need for the adoption of a holistic, integrated package of trade measures and non-trade interventions in order to restore the domestic industry's competitiveness, support domestic industrialisation, safeguard employment, and ensure access to essential inputs, while at the same time promoting a stable and predictable environment for investment in the steel value chain.

In light of the foregoing, the Commission recommended that:

- The rate of customs duties on all products listed in Table 1 of Annexure A be increased to their respective WTO bound rates, in order to address import surges, price undercutting and duty circumvention affecting the domestic steel industry;

- Rebate provisions be created, as outlined in Table 2 of Annexure A, including the extension of such provisions to Schedule 2 duties where applicable, to ensure that downstream manufacturers have access to inputs not produced domestically;
- The products listed in Table 3 of Annexure A be subjected to import controls in terms of section 6 of the ITA Act, and that, as compulsory standards for these products are developed, such standards be incorporated into the import permit system as additional conditions for permit issuance;
- Input products listed in Table 4 of Annexure A be maintained at a free-of-duty rate, given their non-availability in the SACU region and their importance to downstream competitiveness;
- Rebate Items 460.15/7210.61/01.06; 460.15/7210.70/01.06; and 460.15/7225.99/01.06 be maintained and extended to also cover Schedule 2 duties, with only amendments to their administrative guidelines to address abuse concerns;
- The current global trading environment be recognised as constituting an unprecedented emergency, justifying consideration of safeguard action under Article XIX of the GATT 1994, or, where appropriate, measures consistent with Article XXI(b)(iii) relating to emergencies in international relations; and
- A committee comprising of industry role players and members of the Commission be established in terms of Section 14 of the ITA Act 71 of 2002, to advise the Commission on steel-related matters.

During the final stages of the Commission's investigation, additional requests were received from interested parties for: the addition of products on the list to be considered for possible duty increases; requests for additional rebate provisions to be created; and requests for more products to be considered for addition to the import control list. The Commission decided to initiate a second phase of the investigation to cover these additional aspects and has since initiated this formally through a notice in the Government Gazette on 21 November 2025. Upon completion of this additional phase, a separate Report will be forwarded to the Minister for his consideration.

## **1. THE APPLICATION AND TARIFF POSITION**

1.1. The Minister of Trade, Industry and Competition (hereon referred to as the “Minister”) has requested the International Trade Administration Commission (“ITAC”), in terms of Section 16(1)(d)(i) and 18 of the International Trade Administration Act, Act No. 71 of 2002 (“ITA Act”), to investigate or, where appropriate, review and make recommendations on the following:

- Improvement of South Africa’s tariff structure for steel products within Chapters 72,73, 82 and 83 of Schedule No. 1 to the Customs and Excise Act, Act No. 91 of 1964 (“Customs and Excise Act”) with the aim to, where possible, enhance the effective rates of protection and address current loopholes;
- The establishment of an import permit system aimed at ensuring transparency so that pervasive circumvention of import duties, customs fraud, and other unlawful activities can be addressed in real time and support the development of the domestic steel value chain rather than restrict trade;
- Any appropriate measures, such as tariff amendments, rebates, simplification and/or additional tariff classifications; and
- Any other non-trade measures that may be required to fully utilize the opportunity that presents itself in the global trade environment.

1.2. As motivation for the review, the Minister stated, inter alia, that:

- Considering the worldwide steel production overcapacity, increased trade protectionist measures implemented by some countries, and associated trade diversions occurring globally, South Africa’s steel value chains are facing serious sustainability challenges, which are impacting negatively on the socio-economic objectives;
- Persistent local conditions of slow economic growth, depressed demand, energy and freight logistics challenges are further exacerbating this problem. While a number of initiatives are being implemented through the Steel and Metal Fabrication Masterplan, additional trade policy instruments may be necessary to ensure the facilitation of South Africa’s industrialisation objectives and socio-

economic goals, which are supportive of South Africa's domestic downstream steel production capabilities and jobs;

- In addition, South Africa's downstream industries possess capabilities to manufacture and onshore production for a broad array of products covered within Chapters 72,73,82, and 83. However, the South African steel industry stakeholders face numerous challenges, including an influx of low-priced imports; and
- South Africa has demonstrated greater competitiveness potential in a number of value-added steel products, including mounting structures, high pressure containers, stranded wire, tanks, anchors, rock drilling tool, transmission equipment, tools, springs, pipes and fittings.

## **2. INDUSTRY AND MARKET**

- 2.1. Recent trends in the global steel industry reveal continued dominance by Asian countries, particularly China, India, South Korea, and Vietnam. These nations have solidified their roles as major steel producers and exporters due to robust manufacturing capabilities and government support. Production capacity has expanded to approximately 2 billion tons annually, with China accounting for over 55% of global production, reaffirming its position as the largest steel producer.
- 2.2. However, recent trends, including geopolitical tensions, supply chain disruptions, and China's shift toward reducing carbon emissions, have impacted global production patterns. Excess steelmaking capacity remains a critical issue, especially in countries with lower demand growth. Rising raw material costs, including iron ore and coking coal, continue to pressure profit margins worldwide.
- 2.3. Steel remains fundamental to sustainable development and is a key driver of the industrialisation ideal of an economy. Due to its forward and backward linkages, steel plays a crucial role in both the mineral beneficiation strategies of South Africa and its job creation drive.
- 2.4. South Africa possesses a vibrant steel value chain, boasting upstream primary steel producers using iron ore to those using scrap as an input material in electric arc furnaces to manufacture primary products. At a primary level of the domestic value chain, there are various companies manufacturing a wide range of products, ranging

from flat carbon steel products to flat stainless-steel products, and including those manufacturing a wide range of long steel products. These companies include: ArcelorMittal SA (AMSA), Columbus Stainless, Scaw, SA Metal Group, Unica Iron and Steel and Cape Gate, amongst others.

- 2.5. The domestic product offering at the upstream level of the value chain include: hot rolled steel, cold rolled steel, coated steel, blooms, slabs, billets, rebar, wire rod, angles, and shapes and sections, amongst others.
- 2.6. At the downstream level of the value chain, South Africa has a wide range of sub-sectors manufacturing value-added steel products, including, but not limited to: fasteners, mounting structures, high pressure containers, stranded wire, tanks, anchors, rock drilling tool, transmission equipment, tools, springs, pipes, and fittings.
- 2.7. Despite its historical vibrance and significance in the industrialisation of the country, the steel industry currently faces a number of challenges, including declining domestic demand and increased imports, as articulated in the Masterplan.
- 2.8. In its assessment of the South African steel industry, Genesis, in an impact study (2024) of the tariff support on the steel value chain, conducted on behalf of the DTIC, found that South Africa's demand for steel has declined significantly during the period 2010 to 2022.
- 2.9. In an industry characterised by economies of scale, the sustained decline in demand and production levels does not bode well for the long-term sustainability of the industry. This reality, together with many other challenges such as increased energy costs, has given rise to the recent realignment in the domestic steel sector.
- 2.10. The results of the impact study from Genesis, while a bit mixed, suggested that the tariff support afforded to the various sub-sectors of the steel value chain has been reasonably successful. Also, the study revealed that a duty was more effective when combined with a safeguard or anti-dumping measures, but had limited impact on its own, a view supported by some industry role players. Also, the results of the study highlights that the duty's effectiveness on coated steel products was undermined by circumvention strategies, again, a view echoed by some industry role players.
- 2.11. Overall, the findings of the study points to the need for a more comprehensive approach to tariff setting, as opposed to a piecemeal approach. This means that

more needs to be done to provide support domestic manufacturing industries in the form of a combination of ordinary tariff support and trade remedy measures, together with the need for any non-tariff measures that might assist in consolidating the support for the domestic steel manufacturing sector.

- 2.12. The recent announcement by AMSA to discontinue its long steel business is witness to the reality that a more coordinated and comprehensive approach is needed in order to support the sector. This is the second major development in the domestic long steel sector in the last 10 years, following the demise of Evraz Highveld Steel, a heavy section producer. The loss of 3500 direct jobs and the potential loss of thousands of indirect jobs cannot be underestimated in a country characterised by high levels of unemployment and other socio-economic challenges. This loss of significant capacity will realign the long steel industry in South Africa and will see increased significance of the steel mini mills that produce some of the range of products produced by AMSA, such as wire rod, rebar and sections.
- 2.13. On the flat steel front, the domestic industry has also been undergoing some realignment, albeit more positive. The industry has seen new capacity coming online, with Scaw metals and Columbus Stainless entering the market for the manufacture of carbon hot rolled steel. This presents an opportunity for government to look at ways of leveraging these successes and providing further assistance to the flat steel industry and ensure its resilience.
- 2.14. The review was formally initiated through a notice in Government Gazette No. 52347 of 19 March 2025 under Notice 3061 of 2025 for a period of four (4) weeks, for interested parties to comment on the areas outlined hereunder:
- The possible increase in the rate of customs duty to the respective World Trade Organisation (WTO) bound rates on identified products falling under these four Chapters, where policy space exists to do so;
  - The extent to which the challenges faced in relation to an influx of low-priced imports arising from global structural overcapacity constitutes an 'emergency' situation, necessitating emergency action, including as envisaged in Article XIX of the General Agreement on Trade and Tariffs 1994 (GATT), the suspension in whole or part, or withdrawal or modification of any tariff concession, to the extent and for such a time

as may be necessary to prevent or remedy further harm;

- The desirability of raw material input support measures to improve the cost competitiveness of domestic steel producers in overcoming price disadvantages arising from global structural overcapacity and incomparable scale economies found in countries of origin for competing products. Such measures would include measures that reduce input prices on scrap, iron ore, coking coal, and any other feedstock material used in the production of steel;
- The potential discontinuation of the following rebate provisions due to their unintended negative consequences in the domestic manufacturing industry;

Rebate Items 460.15/7210.61/01.06; 460.15/7210.70/01.06; and  
460.15/7225.99/01.06;

- The possible creation of rebate provisions for the importation of targeted input products used in manufacturing activities, classifiable under Chapter 72, 73, 82, and 83 of the Customs and Excise Act;
  - Consideration of 'alternative' measures to *ad valorem* customs duties, including, but not limited to, tariff rate quotas, minimum import or reference pricing, specific or formula duties;
  - The possible introduction of import controls on certain steel products. Import control would involve compliance with certain pre-determined conditions by the Commission prior to importation of specific categories of products;
  - The possible introduction of an import surveillance system to assist in addressing, amongst other things, circumvention of import duties, customs fraud, misdeclaration, under invoicing and other unlawful activities; and
  - Proposals on the identification of additional high-risk steel products to be prioritised in the development of compulsory specifications, in the collaboration with the NRCS.
- 2.15. As outlined above, the Minister has requested ITAC to make recommendations on the improvement of South Africa's tariff structure for the steel products subject to this review, with the aim to, where possible, enhance the effective rates of protection and address current loopholes. This, according to the Minister, could be any

appropriate measures such as tariff amendments, rebates, simplification and/or additional tariff classifications.

- 2.16. Following the publication of the review in the Government Gazette of 19 March 2025 for interested parties to comment, during the publication period, comments were received from in excess of one hundred and fifty (150) interested parties, ranging from requests for duty increases, the creation of rebate provisions, inclusion of specific products under import control and other general comments on the potential impact of the review on the steel value chain.

### **3. TRADE MEASURES**

- 3.1. A full scoping exercise was conducted regarding the tariff structure for the chapters subject to this review with the aim of identifying possible areas of improvement, with a particular focus on potential areas of additional tariff support where policy space to do so still exists.
- 3.2. Policy space exists for a number of products in the steel value chain, including, but not limited to: tubes, pipes and hollow profiles; rails; wire products; reservoirs and tanks; chains of iron and steel; fastener products; springs and leaves; kitchen and other household articles; and sanitary ware. The policy space to increase the tariffs on these tariff lines differs from product to product, with some products already enjoying a certain level of tariff protection, albeit lower than the WTO bound rate, and others having no duty protection at all.
- 3.3. Domestic manufacturing capacity exists for the majority of these products. Hence the existence of some level of tariff protection for most of them.
- 3.4. Following the publication of the review in the Government Gazette, requests for additional tariff support were received from a number of interested parties in various sub-sectors of the domestic steel industry value chain, as outlined below.

## Bars and Rods

- 3.5. Scaw Metals SA (Pty) Ltd (“Scaw”) submitted information motivating for an increase in the general rate of customs duty applicable on bars and rods imported under tariff subheading 7213.10, citing that duty-free imports compete with locally manufactured bars and rods.
- 3.6. The products under review are used across a broad spectrum of downstream industries, most notably in construction, mining, automotive, and general industrial and engineering applications. The WTO bound rate for the products under review is 10% *ad valorem*.
- 3.7. The company further requested the Commission to consider an increase in customs duty on all steel products from HS code 72.07 up to, and including, chapter 73, to the WTO bound rates.
- 3.8. These products range from slabs and billets, flats rolled products in the form of coils and plates, angles, shapes, sections, and wire rod. The local industry manufacturing these wide range of products is comprised of Scaw Metals (Pty) Ltd, Cape Gate (Pty) Ltd, Arcelor Mittal South Africa Limited (“AMSA”), Columbus Stainless Steel, SAFAL steel (Pty) Ltd, Durfeco Steel Processing (Pty) Ltd, National Steel, and Turn Bar, amongst others.
- 3.9. According to the domestic manufacturers of these products, global excess capacity, particularly in Asia, has led to a surge in low-priced steel imports, which continue to enter the SACU market and suppress local prices.
- 3.10. Scaw also requested that the import duties on midstream and downstream steel products be increased by a further 30% above the WTO bound rates as an emergency measure and that tariffs be unified across chapter 73 to avoid duty circumvention through tariff lines that attract no import duties.
- 3.11. The requested tariff increases are aimed at providing real and immediate relief to the local steel industry, which the company describes as being in a state of industrial crisis.
- 3.12. As a motivation for the duty increase on bars and rods, Scaw highlighted several key factors, including:

- the importance of reinforcing bars as a product with strong localisation potential, especially in the construction and infrastructure sectors;
  - the unfair competition and duty circumvention alleged to be occurring where reinforcing bars are imported duty free under subheading 7213.10 despite of the 10% duty applicable on the correct tariff code;
  - the unintended consequence of having a tariff differential, thereby creating a loophole for circumvention, undermining domestic producers and distorting market conditions;
  - the need to impose a duty on tariff subheading 7213.10, a subheading that is free of duty and used to import products similar to domestically manufactured products, rendering the industry vulnerable to import pressures through price suppression and import penetration;
  - the increasing volume of low-priced imports, particularly from Zimbabwe, directly competing with locally produced billet and reinforcing bar products. Some of these imports are sold at prices below domestic production costs, contributing to lost sales and market share;
- 3.13. The Commission found that aggregate import volumes of upstream products such as flat rolled products, classifiable under tariff headings 72.09 and 72.11, increased by as much as 129% and 39% respectively, during the year 2024, while import volumes of bars and rods imported under tariff headings 73.14 and 73.15 increased by 1387% and 61% respectively.
- 3.14. Import volumes of upstream steel products originating from Africa (largely Zimbabwe, Mozambique, Zambia, Egypt) increased by an average of 49% over the three-year period.
- 3.15. Import volumes of upstream steel products originating from Asia (including China, Japan, Taiwan, South Korea, India, and Indonesia) also increased by an average of 20% over the three-year period.
- 3.16. The significant increase in import volumes is indicative of trade diversion and is having a direct impact on the domestic market, placing the sustainability of the domestic industry at risk.

- 3.17. The local manufacturing industry was impacted directly by loss in market shares emanating from increased import volumes of upstream products as well as downstream products competing directly with their customers.
- 3.18. A similar pattern of import growth was also observed in a number of downstream steel products during 2024. Import volumes of tubes and pipes increased by 37%, those of stranded wire, ropes and cables, increased by 26%, barbed wire increased by 70% and steel fasteners increased by 30%, eroding market shares of downstream domestic manufacturers.
- 3.19. Also, it is the domestic manufacturing industry's view that importers are circumventing the existing 10% duty through tariff subheading 7213.10 which does not attract a duty.
- 3.20. In order to curb such a duty circumvention, the domestic manufacturing industry argues that all duty-free tariff subheadings should be removed as they are presenting opportunities for duty circumvention and are causing harm to the industry. Instead, industrial rebates should be implemented where specific products and suitable substitutes are not available in the SACU region.

### **Tubes and Pipes**

- 3.21. Barnes Tubing Industries (Pty) Ltd ("Barnes Tubing") submitted information motivating for an increase in the general rate of customs duty applicable on steel tubes and pipes, classifiable under tariff subheadings 7306.30.10, 7306.30.20, 7306.61.10, 7306.61.20, 7306.69.10, 7306.69.20 and 7306.90 from 10% *ad valorem* to the applicable WTO bound rate of 15% *ad valorem*.
- 3.22. Barnes Tubing is South Africa's largest ERW steel tube and pipes by both tonnage and range and the company has been manufacturing steel tube and pipe since 1998. The company has three manufacturing facilities manufacturing the subject products in Spartan, Wadeville and Alrode.
- 3.23. In its motivation for the duty increase, Barnes Tubing cited, amongst others, that:
- 70% of the tariff codes under tariff heading 73.06 attract a 10% duty which is 5% below the applicable 15% WTO bound rate and it is in this tariff heading where there is an influx of low-priced imports from China entering the domestic market;

- The low-priced imports are in the range that every tube and pipe manufacturing company can manufacture locally, particularly with locally available raw materials; and
  - The surge in low priced imports is creating considerable pressure on the company's long-term viability.
- 3.24. The subject product is other tubes, pipes and hollow profiles, of iron or steel. This includes: open seam or welded, riveted or similarly closed tubes and pipes of different sizes and dimensions.
- 3.25. There are several local manufacturers of the subject product, including Barnes Tubing, Macsteel Tube and Pipes, and Garsin Steel Tube and Pipe.
- 3.26. The products are supplied to various sectors of the local market, including manufacturing and fabrication, mining, construction, pipeline and related industries, and furniture.
- 3.27. According to SARS' official statistics, aggregate import volumes across the seven tariff subheadings increased from 31 820 876 kg in 2022 to 33 670 997 kg in 2023 and further increased to 52 626 322 kg in 2024.
- 3.28. Imports originated mainly from China. Imports from China increased by 10% and 62% in 2023 and 2024, respectively, averaging 36% over the period under review. This is despite the current applied MFN rate of customs duty of 10% *ad valorem*.
- 3.29. China's share of total imports increased from 74% (23 434 072 kg) in 2022 to 77% (25 853 593 kg) in 2023 and further increased to 80% (41 852 322 kg) in 2024. On average, China's share of total imports was 77% per year over the period under review.
- 3.30. During the verification, Barnes Tubing raised concerns regarding increased imports coming from Mozambique in recent years at free of duty under the SADC-FTA. SARS statistics show that imports from Mozambique were recorded only for the years 2023 and 2024. Import volumes from Mozambique increased almost 70-fold from approximately 49 320 kg in 2023 to 3 316 954 kg in 2024.
- 3.31. Overall, the local industry has experienced declines in production and sales volumes. Import volumes have increased significantly and the local industry is faced

with excessively high price disadvantages against imports over the period under review.

3.32. The Commission concluded that support for an increase in the general rate of customs duty applicable on steel tubes and pipes, classifiable under tariff subheadings 7306.30.10, 7306.30.20, 7306.61.10, 7306.61.20, 7306.69.10, 7306.69.20 and 7306.90 from 10% *ad valorem* to the WTO bound rate of 15% *ad valorem* is justified.

### **Steel reinforcing bars**

3.33. ArcelorMittal South Africa Limited (“AMSA”) submitted information motivating the increase in the general rate of customs duty on steel reinforcing bars classifiable under tariff subheading 7213.10, from free of duty to the WTO Bound rate of 10% *ad valorem*.

3.34. As reasons for its request for a duty increase on steel reinforcing bars, AMSA cited the following:

- The product is classifiable under tariff subheading 7213.10 and is currently imported duty free into the domestic market with no protection afforded to the domestic manufacturing industry;
- The tariff subheading also presents a loophole for duty circumvention for the importation of other steel reinforcing bars, classifiable under other dutiable tariff subheadings; and
- Although there is currently limited import volumes cleared under this tariff subheading, recent global developments in the steel sector, including the tariffs adopted by the USA, may also lead to imports being redirected to the SACU market and tariff subheading 7213.10 may be used to clear increased volumes of imports and to circumvent duties.

3.35. The subject product is a hot-rolled deformed steel reinforcing bar in irregularly wound coils, of iron or non-alloy steel containing indentations, ribs, grooves or other deformations in all dimensions and sizes.

3.36. The end-use of the product is mainly in the construction industry, for reinforcing concrete structures. The subject product resists tension, compression, and

temperature variation in reinforced concrete because the surface protrusions on a deformed bar inhibit longitudinal movement relative to the surrounding concrete.

- 3.37. There are several local manufacturers of the subject product, including AMSA, Cape Gate (Pty) Ltd and Scaw Metals.
- 3.38. The demand for the product is mainly driven by the construction industry. The growth in infrastructure investment is driven by both public and private sector demand.
- 3.39. While domestic production and sales volumes have declined, import volumes under the subject tariff subheading increased from 528 440 kg in 2022 to 547 996 kg in 2023. In 2024, imports increased to 1 055 340 kg. On average, import volumes increased by 48% over the period under review. This may be indicative of the tariff subheading potentially being used to circumvent duties applicable to other related tariff subheadings and/or the local industry facing increased foreign competition on products classifiable under the subject tariff subheading.
- 3.40. Should the 10% *ad valorem* duty be supported, it will provide additional protection to the domestic steel industry manufacturing the steel reinforcing bar product range. Furthermore, it will assist in addressing the potential threat of the tariff subheading being used as a loophole to circumvent duties applicable on other related tariff subheading for the rebar product range.
- 3.41. The Commission found that support for an increase in the general rate of customs duty applicable on steel reinforcing bar, classifiable under tariff subheading 7213.10, from free of duty to the WTO bound rate of 10% *ad valorem* is necessary.

### **Wire nails: Staples**

- 3.42. Dunrose Trading 57 (Pty) Ltd t/a Abracon (hereon referred to as Abracon) submitted comments motivating for an increase in the general rate of customs duty applicable to staples, classifiable under tariff subheading 7317.00.40, from 10% *ad valorem* to the WTO bound rate of 15% *ad valorem*.
- 3.43. The applicant further requested that import tariffs applicable to all wire nails classifiable under tariff subheadings 7317.00.02, 7317.00.04, 7317.00.06 and 7317.00.40 be increased beyond the WTO bound rate, to 40% *ad valorem*.

- 3.44. In 2013, the Commission considered and supported a duty increase application from 5% *ad valorem* to 15% *ad valorem* on the basis that the domestic industry had been experiencing significant price disadvantages against imports originating from East Asian which led to declining market share and declining domestic production. The tariff support was envisioned to assist the industry to regain its competitiveness against imports, improve capacity utilisation and improve the domestic industry's cost-competitiveness (ITAC Report No. 432).
- 3.45. According to the applicant, however, in 2017 the Commission rejected an anti-dumping application against imports of round wire nails originating from China, which the domestic industry had envisioned to assist in reducing the high level of harmful imports.
- 3.46. The products under investigation are various types of wire nails including steel wire nails, collated nails, roof screws, and staples. The products are all manufactured using wire rods as input material.
- 3.47. Steel round wire nails are classifiable under tariff subheading 7317.00.06 and used within the hardware industry on wooden and concrete applications.
- 3.48. Collated nails are used within the pallet and bedding industry including wooden fastening applications. Collated nails consist of a coil of nails used within a pneumatic nail tool to decrease production time when manufacturing pallets or bed bases. These nails are classifiable under tariff subheading 7317.00.02
- 3.49. Roof screw nails are used on roof installations to fasten steel roof sheets unto wooden trusses. Roof screw nails include a washer to prevent any roof leakages and are classifiable under tariff subheading 7317.00.04.
- 3.50. Staples are used as versatile fasteners primarily used in construction, crafting, and upholstery and are classified under tariff subheadings 7317.00.40
- 3.51. The main input material for the manufacture of the wire nails is the wire rod, which is sourced domestically.
- 3.52. Other known domestic manufacturers of wire nails in the SACU market include: Abracon, Hendok Wire, Cape Gate, Green Steel Products and Consolidated Wire Industries.

- 3.53. The domestic industry faces challenges related to increasing input costs (energy and wire rod), declining domestic production due to rising level of low-priced import volumes originating from China. The import volumes are capturing high value applications and, in some applications, imports are landed in the SACU below the cost of input materials required by SACU manufacturers to produce the equivalent product.
- 3.54. Overall, import volumes of the subject products increased during the period under review, eroding the market share of domestically manufactured products. In addition, the reciprocal tariffs imposed by the USA on domestically manufactured goods, threatens to erode the domestic manufacturing industry's export market.
- 3.55. Despite tariff support at the WTO bound rate, the domestic industry continues to be uncompetitive against imports of staples and all other wire nails.
- 3.56. The Commission found that support for an increase in the general rate of customs duty applicable to staples, classifiable under tariff subheading 7317.00.40 from 10% *ad valorem* to 15% *ad valorem* is justified.

### **Wire rod and wire products**

- 3.57. Option Springs (Pty) Ltd ("Option Springs") and Mattress Components Manufacturer (Pty) Ltd ("MCM") are South African producers of mattress springs, a product supplied to local and international bedding manufacturing companies. The two companies have jointly motivated for an increase in the general rate of customs duty on products classifiable under tariff subheadings 7217.10.10, 7217.30.11 and 7320.20.10 from the WTO bound of 10 % *ad valorem* to 40% *ad valorem*, an increase above the bound rate, across all regions, except for SADC countries.
- 3.58. The companies also expressed support for additional trade remedy measures including reference pricing, import surveillance, formula duties and tariff rate quotas (TRQs).
- 3.59. Both companies argue that the domestic industry has been severely impacted by high volume imports of low-priced and potentially under-declared products, which have undermined sales volumes, capacity utilization, and profitability. These challenges are compounded by rising local operating costs notably electricity tariffs, transportation, and municipal charge as well as freight disruptions.

- 3.60. The applicants contend that, given the current market conditions, their operations have become unsustainable, and without tariff relief, they may be forced to downscale or close, leading to job losses.
- 3.61. Both companies rely on locally sourced bedding wire classifiable under tariff subheading 7217.10.10 and 7217.30.11 to produce mattress springs, that are classifiable under tariff subheading 7320.20.10.
- 3.62. In turn, the downstream bedding companies use the mattress springs sets as primary inputs, to which they add fabrics such as linen, plait, and sponge to produce final mattresses for retail.
- 3.63. Between year 2022 and 2024 the local industry saw a decreasing sales and production volumes citing escalating input costs (energy, freight, and municipal tariffs) declining domestic demand, high import penetration of low-priced and under-declared goods and reduced capacity utilization as challenges that contributed to declining competitiveness and reduced sales.
- 3.64. The excess global capacity in steel resulted in increasing import volumes of springs that eroded the domestic producer's market shares. This resulted in reduced production, capacity utilisation and employment opportunities. Without intervention, the increasing import volumes combined with domestic challenges faced by local manufacturers, are placing the viability and sustainability of the SACU industry at risk of collapsing, constituting an emergency measure.

### **Stranded wire ropes, cables and slings**

- 3.65. In response to the review initiated by the Commission, Haggie Steel Wire Rope (Pty) Ltd ("Haggie") submitted information requesting the Commission to increase the general rate of duties of several stranded wire ropes, cables and slings, measuring a diameter of less than 13mm, to their respective WTO bound rates of 15% *ad valorem* and an increase beyond the bound rate, to 40% *ad valorem*.
- 3.66. Haggie manufactures value added wire products, namely stranded wire, steel wire ropes, cables and slings. It's product range comprises of Surface Mining Ropes for underground mining, Offshore Ropes used in off-shore drilling applications, General Purpose Ropes used in agriculture, fishing, logging, and high-strength fencing, as well as Aluminium Conductor Steel Reinforce (ACSR) cables designed for the

electrical distribution sector namely Eskom and municipalities. The company and the manufacturing plant is located in Germiston, Gauteng.

- 3.67. The Commission, in its Report No. 571, recommended an increase in duties on products with a diameter larger than 13mm, on the basis of Haggie's capacity at the time which had sufficient capacity to reliably supply products above 13mm. Products with a diameter of less than 13mm were excluded from the increase through the creation of additional 8-digit tariff subheading under tariff heading 73.12. Additionally, rebate provisions were created to cater for products that are not manufactured domestically that fall within the tariff subheadings subject to a duty increase.
- 3.68. An anti-dumping duty is also in place on stranded wire, steel wire ropes and cables, ranging from 10.4% to 93%. This dates back to an investigation by the Board on Tariffs and Trade (BTT) in the year 2000. In 2009 and 2014, sunset reviews found that the expiry of the duties on Germany, UK and China would likely lead to the re-occurrence of dumping (Report No.288, Report No.462 and Report No.480).
- 3.69. As reasons for its current request, Haggie cited that there has been a significant influx of low-priced steel wire ropes products, predominantly imported from China, which compete directly with Haggie's locally manufactured products in a shrinking mining market. The combination of a declining domestic demand and the surge of low-value imports is creating considerable pressure on Haggie's long-term viability.
- 3.70. Additionally, the company explained that they had stopped the manufacture of wire ropes and cables of a diameter smaller than 13mm for seven years due to increased import competition. However, the company has recently resumed the manufacture of the smaller diameter ropes as part of its strategy to prevent further loss of market share. As such, the company has since invested in the relevant machinery and requires tariff support to become competitive against imported products.
- 3.71. Stranded wire is a product that consists of a number of individual wires bundled and compressed together and typically insulated with plastics. The rope consists of a core and is made by twisting together multiple strands of wire which, themselves, consist of several stranded wires.
- 3.72. Haggie produces wire ropes for various industrial applications including Surface mining ropes used in the mining industry. Offshore ropes are used for anchoring oil

platforms, operating large cranes and mining at sea. General purpose ropes which serve sectors such as agriculture, fishing and construction. Additionally aluminium conductor steel reinforces (ACSR) strands which are produced for the electrical reticulation industry.

- 3.73. Demand of the subject product is mainly driven by developments in the mining industry. Haggie highlights that the mining sector plays a significant role in the sustainability of their business but that the mining industry has been experiencing a downward trend in exploration activities from 2006 to 2023.
- 3.74. The known manufacturers of the subject product in the SACU region include Haggie Wire Rope (Pty) Ltd and Ndlovu Wire (Pty) Ltd.
- 3.75. The known importers of stranded wire, steel wire rope cables include distributors such as Actum (Pty) Ltd, Rope Constructions Company (Pty) Ltd, Lift Quip (Pty) Ltd, Shutterlock (Pty) Ltd, and Bumcrete (Pty) Ltd, amongst others.
- 3.76. During the period of investigation, total import volumes of the subject product originated mainly from China (71%), Italy (5%), Malaysia (4%), South Korea (4%), Portugal (2%) and India (2%) and the rest of the world (12%).
- 3.77. Imports volumes of the subject product increased by 26% in 2024 and 22% in 2025 (Jan to Aug) when compared to the corresponding period in 2024.
- 3.78. The sharp rise in import volumes and a concomitant erosion of the domestic industry's market share is indicative of trade diversion and the effects of the global excess capacity affecting the downstream domestic industry manufacturing stranded wire, steel wire ropes, cables and slings. Without targeted intervention, the excess global capacity and trade diversion will place the sustainability of the industry, stability of employment and income opportunities and returns on capital investment at risk of being eroded.

### **Welded link chain**

- 3.79. In response to the review initiated by the Commission, McKinnon Chain SA (Pty) Ltd submitted information requesting the Commission to increase the general rate of customs duty on other parts of welded link chains classifiable under tariff subheadings 7315.90.90 from 10% *ad valorem* to the WTO bound rate of 15% *ad valorem*. This tariff classification encompasses chains fitted with accessories.

- 3.80. In addition, the applicant requested the Commission to increase customs duties applicable to tariff subheadings 7315.82.01, 7315.82.03, 7315.82.05, 7315.82.07, 7315.82.90 and 7315.90.90 from the current 15% *ad valorem* (the WTO bound rate) to the 65.55% *ad valorem*.
- 3.81. In 2017, the Commission recommended an increase in ordinary rate of customs duty on the subject products from free of duty to 15% *ad valorem* (ITAC Report 546). This resulted in a reduction of import volumes of low-priced chains. The Commission further recommended anti-dumping duties on the subject product. However, these were rejected by the Minister of Trade, Industry and Competition.
- 3.82. The company submits that it will be unable to operate in the foreseeable future in the absence of a sufficiently high tariff to enable it to be competitive against imported products and it has to re-evaluate its employment levels as its current operations are unsustainable given the level of imports of the subject product.
- 3.83. The subject product is described as non-articulated welded link chain of a diameter of 4mm or more not exceeding 10mm, commonly known as welded link chain. The subject product is sold to retail/hardware, household, transport, marine, mining and industrial applications.
- 3.84. McKinnon Chain SA (Pty) Ltd is the only known manufacturer of the welded link chain products in the SACU region.
- 3.85. The demand of the subject products is mainly driven by the mining, agricultural, construction and general engineering industries where the subject products are used for lifting, hoisting, towing, material handling and securing loads.
- 3.86. The domestic industry faces challenges related to increasing input costs (energy and transportation), declining domestic demand, import volumes capturing high value applications and increasing costs associated with reducing its carbon footprint in relation to Carbon Border Adjustment Mechanism (CBAM).
- 3.87. It is the applicant's view that tariff subheading 7315.90.90, which attracts a lower tariff (10% *ad valorem*) is being used to circumvent duties. During the period under review, imports under the tariff subheading have increased by an average of 12%, despite declining demand.

- 3.88. On average 64% of products imported under tariff subheading 7315.90.90 are imported from Asia (China and India), while 26% on average are imported from Europe (mainly Spain, Germany and Austria).
- 3.89. Import from China under this tariff subheading increased by an average of 71%, while imports from Spain increased by an average of 3 800% and those from Germany increased by an average of 4%.
- 3.90. Despite declining domestic demand during the period under investigation, imports of chains fitted with accessories continued to increase by 12% during the period under review. The applicant also faces pricing pressure from low-priced imports originating from China and Spain as well high-priced products (presumably of differing specifications) from Germany.
- 3.91. Imports have displaced locally manufactured products on high value applications. The applicant has relied on exports of high-grade sub-assemblies to subsidize domestic losses and notes that it has been unable to sell the same products domestically due to low-priced imports.
- 3.92. The Commission supported an increase in the general rate of customs duty applicable to other parts of welded link chains from 10% *ad valorem* to 15% *ad valorem* in the Government Gazette for interested parties to comment.

### **Tinplated crown corks (metal caps)**

- 3.93. In response to the review initiated by the Commission, Coleus Packaging (Pty) Ltd (“Coleus”), a manufacturer of tinplated crown corks, submitted information motivating for an increase in the general rate of customs duties on crown corks classifiable under tariff subheadings 8309.10 and 8309.90 from 5% *ad valorem* to the WTO bound rate of 20% *ad valorem*.
- 3.94. Crown corks are metal caps, in a circular design and scalloped edges, used to seal glass bottles containing beverages such as beer, cider and soft drinks.
- 3.95. As motivation for its request, Coleus stated the following reasons:
- The duty imposed on the tin-free steel sheets, an input product for the manufacture of crown corks, makes it cheaper for entities to import ready-made product than to purchase the product locally;

- There has been a significant increase in import volumes of the product in 2025; and
  - Should the tariff support be granted, Coleus will be more price-competitive and this is envisaged to lead to higher production volumes and a reduction in the marginal costs of production as its output level increases.
- 3.96. Coleus is the only known manufacturer of metal caps for the beverage industry in the SACU region.
- 3.97. Known importers of the subject product include: Crownman (Pty) Ltd; African Cellar Suppliers (Pty) Ltd; and Beerplus (Pty) Ltd.
- 3.98. During the period under review (2022 to 2025) 48% of import volumes originated from Europe (mainly, Italy, Germany, Greece, France, Spain) while 51% of total import volumes originated from Asia (mainly China, Singapore, India and Malaysia).
- 3.99. During the period 2022 to 2024, import volumes of the subject product declined by an average of 3%. However, import volumes in 2025 have increased by 23% when compared to the same period in 2024.
- 3.100. The spike in import volumes was driven by imports from Europe which increased by 104% in 2025.
- 3.101. During the period 2022 to 2024, the market also saw a significant increase in import volumes from Asia, which increased by an average of 16%.

### **Certain stainless steel flat products and carbon steel flat products**

- 3.102. Columbus Stainless (Pty) Ltd (“Columbus”), the sole producer of stainless-steel flat products (“SSFP”) in the Southern African Customs Union (“SACU”), submitted a comprehensive request motivating for a uniform 30% *ad valorem* duty on a wide range of locally manufactured stainless classifiable under tariff heading 72.19 and subheadings 7220.20.90 and 7220.90.90 as well as carbon steel flat products classifiable under tariff heading 72.08, 72.09, 72.10, 72.11 and 72.12. Columbus manufactures its stainless steel and carbon steel flat products through fully integrated processes, melting, casting, hot rolling, and cold rolling at its Middelburg plant in the Mpumalanga Province.

3.103. The company plays a strategic role in the domestic steel value chain by benefiting minerals and through its support for localisation and transformation in the industry. It supplies critical inputs to downstream industries such as the automotive, construction, engineering, and food processing industries.

3.104. Due to unfavourable conditions in the market for stainless steel, the company diversified its product offerings to include the manufacture of carbon steel flat products.

3.105. As reasons for its submission Columbus cited, during the verification meeting, that:

- The global excess capacity in the manufacture of steel products, combined with domestic challenges faced by local manufacturing industry is making domestic manufacturing unsustainable and is grounds for emergency measures;
- Imports of stainless and carbon flat products surged dramatically, with stainless steel imports increasing over 490% between 2014 and 2024;
- Imports originating from China, India, and Indonesia are imported at prices that significantly undercut local prices, often below Columbus's cost of production;
- Circumvention of tariff codes, misclassification at ports of entry, and under-invoicing at customs undermines the effectiveness of the current 10% duty;
- The SACU market remains vulnerable to trade diversion arising from growing protection in global key markets such as the U.S. and EU, both of which have implemented 25–30% steel duties to insulate their markets from global steel oversupply.

3.106. Though the applicable rate current applied rate of customs duty on the stainless-steel products manufactured locally is 10% *ad valorem*, sustained undercutting, rising input costs, and increased import volumes, particularly from Asia, all render this level of protection inadequate. According to Columbus, these imports are often misclassified, under-invoiced, or enter duty-free under preferential trade agreements, undermining the current tariff support provided.

3.107. As a result, Columbus's domestic market share has declined sharply, and the company has reported substantial financial losses despite operating at world-class production standards. The absence of effective trade remedies has made the

stainless segment especially vulnerable to structural price undercutting and unfair competition.

- 3.108. In response to weakening margins in the stainless-steel segment, Columbus expanded its operations in 2020 to include the production of carbon steel flat products. This diversification aimed to optimise plant utilisation and improve resilience during stainless steel market downturns. Columbus's carbon product line includes hot-rolled and cold-rolled flat products, primarily used in general engineering, construction, and industrial manufacturing. While Columbus remains a relatively small player in the carbon flat steel segment, its production supports downstream fabrication and construction industries.
- 3.109. The market for carbon steel market is dominated by larger producers such as AMSA and Scaw Metals while imports, particularly from China and India continue to enter the SACU market at prices well below domestic production costs. Columbus has reported consistent undercutting of up to 25% below its ex-factory carbon steel prices, eroding its ability to compete.
- 3.110. The increasing protection in global markets affects the industry indirectly through trade diversion but directly too as Columbus is subject to quotas in the EU.
- 3.111. As such, Columbus included these products in its submission for an increase to a uniform 30% *ad valorem* duty to restore fair competition and improve the viability of its newer product line.
- 3.112. The company calls for urgent, comprehensive action to save South Africa's steel industry. It argues that without a 30% *ad valorem* blanket import duty, backed by strong enforcement and quality controls, the domestic sector will not survive the continued influx of dumped, low-cost imports. They position themselves as a willing partner to government in achieving industrial and economic development goals.
- 3.113. Imports of the subject stainless steel mainly originate from China, Japan, Italy, Finland, and India while imports of carbon steel flat product mainly originate from China, Germany and Japan.
- 3.114. While stainless steel imports only increased by an average of 1% over the three-year period 2022-2024, the imports originating from China increased by an average of 16% with imports under tariff heading 72.20, increasing by average of 94% over the three-year period. The imports displaced locally manufactured products.

- 3.115. Despite attempts to diversify into the carbon steel market, the local manufacturing industry faces high import competition where import volumes increased by an average of 16% over the 3-year period.
- 3.116. During the period under review, the industry has remained under immense pressure owing to depressed market conditions and increasing imports. While its attempts to diversify into the carbon steel market have assisted in improving capacity utilisation, Columbus' production volumes of all products have declined over the three-year period under review.
- 3.117. The domestic stainless steel flat products manufacturing industry is heavily reliant on export sales volumes of the products, with approximately 65% of its production in 2024 being destined for the export market. In Europe, the domestic industry's products are subject to a quota, and the EU is investigating the potential to increase its safeguard tariffs to 50% on all steel, including stainless steel. If approved, this may place additional strain on the local industry, increasing its need to find market opportunities in the local market or lose significant volumes.
- 3.118. On the other hand, carbon steel flat products are mainly sold to downstream processing companies, including in the tube and pipe, mining components and general engineering industries, with stainless steel local sales destined mainly for the automotive, food and beverage, industrial and construction applications.
- 3.119. Overall, despite attempts to remain competitive and diversifying into other markets, the local industry faces challenges from high import volumes which are undermining its ability to be competitive, increase production, retain jobs and remain sustainable in the medium to long term. The risks to its closure are largely a result of the global excess capacity in the steel market.
- 3.120. Also, widespread circumvention practices, including tariff code misclassification, under-invoicing, and abuse of rebate provisions undermine the effectiveness of the existing 10% duty on steel products, negatively impacting the competitiveness of locally produced products.
- 3.121. The 10% *ad valorem* customs duty applicable on these products might have been beneficial at the time of imposition but is no longer sufficient to protect the domestic

industry in the face of low-priced imports and trade diversion arising from global markets increasing their protections.

3.122. The Commission found that there is a need for tariff protection that goes beyond the existing levels allowable by the WTO bound rates in order to respond effectively to some of the prevailing global challenges in this sector. Major international markets are being closed out, giving rise to an immediate threat of trade diversions and increased imports coming into the country whilst export opportunities continue to shrink.

### **Article XIX of the General Agreement on Trade and Tariffs 1994 (GATT)**

3.123. Following the publication of the steel tariff review notice in the Government Gazette of 19 March 2025 and the subsequent publication of the Commission's preliminary determinations on 20 August 2025, various stakeholders in the steel industry value chain made representations arguing for an emergency to be declared and invoking of Article XIX of the GATT pertaining to safeguard duties and Article XXI pertaining to security exceptions. Interested parties arguing for this include, amongst others: Dunrose Trading 57 (Pty) Ltd t/a Abracon; McKinnon Chain SA (Pty) Ltd; Barnes Tubing Industries (Pty) Ltd; AMSA; Hall Longmore Holdings ("Hall Longmore"); and the South African Iron and Steel Institute ("SAISI").

3.124. In his Directive to the Commission, the Minister identified as reasons for issuing the Directive: the worldwide steel production overcapacity; increased trade protectionist measures implemented by some countries; and associated trade diversions occurring globally. He considered all these to be causing serious sustainability challenges for the South African domestic steel industry, impacting negatively on the socio-economic objectives of the country. In addition, the Minister identified persistent local conditions of slow economic growth; depressed demand; energy and freight logistics challenges to be further exacerbating this problem.

3.125. The domestic steel manufacturing industry is of the opinion that all the above challenges identified by the Minister have only intensified. This, according to the industry, amounts to an emergency and calls for much more urgent interventions, particularly with large number of jobs at stake, potentially raising an issue of national security.

3.126. The industry has made a proposal that South Africa should, as an emergency measure, consider a flat tariff of 30% across the board for all primary steel products, particularly given the traditionally low bound rates of 10%-15%, which is much lower than its developing peers. It is the industry's opinion that other countries have done the same recently, potentially closing the markets to imports. As such, South Africa should also act.

3.127. The Commission has found that the prevailing international circumstances warrant consideration of appropriate action under the safeguard provisions of the International Trade Administration Act, 2002 and the Amended Safeguard Regulations in order to prevent or remedy serious injury to the domestic steel manufacturing industry. Also, the Commission found that the prevailing circumstances owing to the geopolitical climate give rise to considering the need for an emergency in international relations to be declared as contemplated in Article XXI of the GATT. This matter is being referred to the Minister for his consideration of action under the said provision of the GATT.

### **Proposed Creation of Rebate Provisions**

3.128. Following the publication of the steel tariff review notice in the Government Gazette of 19 March 2025, various stakeholders in the steel industry value chain submitted requests for the creation of various rebate provisions for the duty-free importation of certain grades of steel of products not made domestically. Following a preliminary investigation by the Commission, these proposals were published as part of the Commission's preliminary determinations on 20 August 2025

3.129. The proposed rebate provisions include:

- Allied Steelrode (Pty) Ltd:  
Proposed creation of a rebate provision for the duty-free importation of certain heavy structural steel in the form of H sections;
- ArcelorMittal South Africa (AMSA) Limited:  
Proposed creation of a rebate provision for the duty-free importation of certain sizes of steel billets;

- BTA Pipe Supplies (Pty) Ltd:  
Proposed creation of a rebate provision for the duty-free importation of certain tubes and pipes;
- Unique Ventilation and Support Systems (Pty) Ltd:  
Proposed creation of a rebate provision for the duty-free importation of hexagon bars.
- Clyde Industrial Corporation (Pty) Ltd:  
Proposed creation of a rebate provision for the duty-free importation of certain grades of rails;
- DGL Logistics (Pty) Ltd:  
Proposed creation of a rebate provision for the duty-free importation of certain grades of wire rod; and

3.130. The Commission found justification to create all the above-mentioned rebate provisions to ensure security of supply to downstream manufacturing and fabrication industries in cases where the product specifications are not made domestically. All the rebate provisions will be made subject to an ITAC permit issued in terms of guidelines, rules and conditions, provided that the said product specifications are not available domestically and that the relevant local industry Association(s) confirms that fact in writing.

#### **4. NON-TRADE MEASURES**

4.1. In his Directive to the Commission, the Minister also requested the Commission to investigate the possibility for the establishment of an import permit system aimed at ensuring transparency so that pervasive circumvention of import duties, customs fraud, and other unlawful activities can be addressed in real time and support the development of the domestic steel value chain rather than restrict trade. In addition, the Minister requested the Commission to consider any other non-trade measures that may be required to fully utilize the opportunity that presents itself in the global trade environment. The non-tariff measures are discussed below.

## **An Import Permit System and an Import Pre-Surveillance System**

- 4.2. South Africa has historically subjected various products to import control regulations and this was done for a number of reasons, including: health concerns, environmental concerns, security and safety concerns, and compliance with technical standards. The steel sector is no exception and a number of products in this sector have been subjected to import control regulations at different times in the past.
- 4.3. In light of the Minister's Directive, an overview of the steel products subject to this review was conducted in order to gauge whether or not any the long standing challenges in the domestic steel sector give rise to the need for consideration of such products under import control regulations. The list of products identified for possible import controls was compiled by the Commission and subsequently published in the Government Gazette for interested parties to comment.
- 4.4. Following the initiation notice of 19 March 2025 and the publication of the Commission's preliminary determinations on 20 August 2025, there was widespread support for the introduction of import controls on the list of products as published. The domestic manufacturing industry also expressed its willingness to work with the Commission in finalising some of the main conditions and details to be used for the granting or rejection of an import permit under this regime. One of the proposed conditions, as supported by industry, is having a price floor for each product on the list, below which an import permit may be rejected.
- 4.5. It is the industry's view that all imports of products in this category should be declared beforehand, with specific declarations for the FOB price, the tonnage and the country of origin. A benchmark index will be developed for each sub-category, similar to the scrap price benchmark, to identify where imports are under-valued, potentially leading to duty circumvention and related customs fraud activities.
- 4.6. It is the industry's view that this should be used as a beginning of a fully-fledged import pre-surveillance system and should be continuously improved by adding more conditions and parameters as and when it becomes necessary.

- 4.7. In light of this, the Commission found that all the products that were published for comments for this purpose be subjected to import controls in line with section 6 of ITA Act and the Import Control Regulations.

### **Standards and compulsory specifications**

- 4.8. The Commission has been engaging with the NRCS with the aim of identifying products for the potential development of standards and/or compulsory specifications. The NRCS, together with the steel industry, is already at an advanced stage in the development of compulsory specifications for roofing and cladding products, at the request of the roofing and cladding industry.
- 4.9. The ongoing engagements between ITAC and the NRCS have highlighted the challenges the regulator faces in regulating steel products, particularly the lack of local laboratory support in South Africa. The regulator proposed collaboration on high-risk products and suggested involving the South African Bureau of Standards (SABS) to assist with laboratory needs and standard development. NRCS expressed openness to proposals and the possibility of establishing a memorandum of understanding (MOU) for joint action.
- 4.10. It is the NRCS' view that that ITAC should work with industry in compiling a list of products to be prioritised in the development of compulsory specifications. ITAC should compile a submission to the NRCS regarding the need for compulsory specifications for identified steel products. The NRCS will then, in collaboration with ITAC, work on a proposal for the development of compulsory specifications for high-risk steel products. The NRCS will provide insights on the enforcement processes at ports of entry to ensure compliance with regulations for imported steel products.
- 4.11. Following the publication of the review in the Government Gazette, no tangible submissions were received from industry regarding specific steel products to be considered for the development of standards and compulsory specifications, in collaboration with the NRCS.
- 4.12. The Commission concluded that, as and when standards are developed for any steel related product category falling in in the import control list, such standards or compulsory specifications should be incorporated into the import permit control system as an additional requirement for the issuing of import permits.

## 5. COMMENTS RECEIVED

- 5.1. Following the publication of the review on 19 March 2025, in excess of a hundred and fifty (150) comments were received from interested parties, ranging from requests for duty increases, requests for the creation of rebate provisions and general comments on the potential impact of the review on the steel value chain.
- 5.2. The Commission subsequently published its preliminary determination on the matter on 20 August 2025, and further comments were received from interested parties.
- 5.3. Below is the summary of some of the main points raised by interested parties.

### **Automotive Industry**

- 5.4. Comments on the matters in the publication notice from the automotive industry were received from Compuren CC, Trident Steel Africa (Pty) Ltd, BMW (South Africa) (Pty) Ltd, Ford Motor Company of Southern Africa (Manufacturing) (Pty) Ltd, the National Association of Automotive Component and Allied Manufacturers (NAACAM) and the National Association of Automotive Manufacturers of South Africa (NAAMSA).
- 5.5. All six organizations objected to the preliminary determination that the rate of customs duties on all products listed in Table 1 be increased to their respective bound rates, specifically steel products used in the manufacture of automotive components and vehicles. Reasons provided include, *inter alia*, that:
  - Increasing the rate of duty on steel products used in the manufacture of automotive components and automobiles will increase the cost of producing vehicles in South Africa and erode cost competitiveness in the global market. Cost competitiveness is especially important when the decision is made at head office level, on where a product or vehicle should be produced within the various global OEM production networks;
  - The automotive industry is largely dependent on imported steel products which are not manufactured in South Africa. The industry states that some products have certain quality requirements which the locally manufactured products do not meet;

- The local vehicle manufacturers further state that they are facing increasing pressure from the rapid influx of low-cost vehicle imports from China and India. These vehicle imports, according to the manufacturers, are often fully built-up, significantly cheaper than locally manufactured vehicles due to the benefits received from foreign government subsidies, have lower production costs, and benefit from favourable South African policies. As a result, South African consumers, grappling with high interest rates and reduced disposable income, are increasingly opting for these affordable alternatives, eroding demand for locally produced vehicles.
- 5.6. The government's key objectives, as articulated in the South African Automotive Masterplan (SAAM) 2035, include increasing local content in South African assembled vehicles up to 60%, doubling employment in the automotive value chain, and improving automotive industry competitiveness levels to that of leading international competitors, amongst others. Increasing duties on automotive-related steel products will promote increased consumption of locally manufactured automotive products thus contributing to the incremental achievement of these objectives.
- 5.7. The Commission took the view that the automotive industry and the steel manufacturers, with support from the government, should collaborate to identify common, high-volume steel product specifications used across the sector. These products should then be prioritised for local production. However, in instances where specific grades of steel are not available locally, and there are not sufficient volumes to justify local manufacturing, temporary rebate provisions should be created.
- 5.8. The Commission further noted that various rebate provisions are already in place for automotive grades of flat steel products. Similar provisions are being considered for long steel products.

### **Fasteners**

- 5.9. The supporting comments on the matters in the publication notice from the fasteners industry were received from the Fastener Distributors Association (FDA), Hendok Group and the South African Fasteners Manufacturers Association (SAFMA).

- 5.10. All participating organizations and companies expressed full support for the preliminary determination that the customs duty rates on all products listed in Table 1 be increased to their respective bound WTO rates. The industry is of the view that aligning duties to the bound rates is a necessary measure to prevent circumvention practices by importers who currently reroute products through alternative tariff classifications to avoid higher duties.
- 5.11. The respondents note that it is particularly important that nails and staples be included in the list of products subject to duty adjustments, as these products are frequently imported at low or dumped prices, undermining the competitiveness and sustainability of local manufacturers. The relevant tariff subheadings include the following:
- 7317.00.40 – Nails, tacks, drawing pins, corrugated nails, staples (other than those of heading 83.05), of iron or steel – Other.
  - 7317.00.90 – Other nails, tacks, staples and similar articles, of iron or steel.
- 5.12. Imports under these tariff lines have increased significantly, predominantly from low-cost producing countries in Asia. This surge in imports has exerted downward pressure on domestic prices, while local producers continue to face escalating input costs, notably wire rod and zinc used for galvanising.
- 5.13. To restore fair competition, safeguard local manufacturing, and close avenues for circumvention through undervaluation or misclassification, it is recommended that the customs duties on these products be increased to their bound rates, in alignment with South Africa's WTO obligations and industrial development objectives.
- 5.14. After conducting verifications of various companies, it is the Commission's view that an increase in the rate of customs duty on all products in this category be supported. The domestic manufactures have shown capability and capacity to produce for and supply to the local market.

## Flat steel

5.15. Several submissions on flat steel products were received. Submissions in support for duty increases applicable to flat steel products were received from several stakeholders including SAISI, SAFAL, SAMCRA, SCAW, Columbus Stainless and AMSA. The support covers across the board flat steel products including Hot-Rolled and Cold Rolled Steel, Coated Steel and Steel specific for the roofing industry. Overall, the stakeholders have proposed blanket increases in the rate of customs duty exceeding the applicable WTO bound rates, suggesting an “emergency duty” of about 30% *ad valorem*. Mainly, the support for increase in the rate of customs duty and the request for a higher duty is centred across the following reasons:

- The current applied duties, mostly 0–15% *ad valorem*, are insufficient to protect domestic production from dumped and subsidized imports, particularly from China, India, and Vietnam;
- The proposed blanket 30% tariff increase will assist to curb import surges into the domestic market;
- Moreover, stakeholders have proposed that customs duties should also be increased for tariff subheadings under Chapters 72 and 73 which can be used to circumvent applicable duties through tariff codes switching and under-invoicing. These tariff subheadings included, *inter alia*, the following: 7312.10.23, 7312.90.10, 7315.90.90, 7314.20, 7320.20.90, 7320.90, 7219.13.10, 7219.14.10, 7308.40.10, 7318.16.29, 7325.10.

5.16. Objections to the proposed duty increase applicable to flat steel products (mainly upstream) were also received from several stakeholders including Nippon Steel Corporation, Renlaw Sharpening & Engineering, Unique Ventilation & Support Systems (Pty) Ltd (“UVSS”), Tradecore. Strut Africa (Pty) Ltd. Reasons for objections include, amongst others, the following:

- Tariff support should be directed at protecting manufacturers of finished products and not the upstream steel sector at the expense of the downstream industry.
- These decisions (considering the number of tariff codes affected, and public interest) justify a more detailed & expanded analysis, including the consideration of alternative

measures.

- Tariff increases should be product specific justified by evidence and linked to reciprocity commitments from the domestic industry (per ITAC rules)
  - Certain products covered by the Notice are not available locally.
  - In certain instances, locally available products do not meet the quality and specification requirements for intended use.
- 5.17. Overall, the Commission concluded that the local industry appears to be battling against low-priced import competition despite customs duties being at the WTO bound rates for certain products. The situation is worse for products for which there is no protection in the form customs duties. As such, it is clear that additional protection is required to safeguard the industry against its potential full demise should Government, through ITAC, not intervene.
- 5.18. However, as there are products currently not manufactured locally, rebate provisions as published, and those further suggested by the industry during this round of consultation, should be positively considered save for such areas wherein the local industry indicated that capacity is available. In addition, published amendments to existing rebate provision/s and/or requests for amendments by the industry should be considered, especially the suggested amendment to the rebate on the importation of flat steel for the “local domestic cooling, cooking and laundry appliances.”

**General engineering and household tools/articles (including kitchenware and ironmongery)**

- 5.1. In the product category of general engineering and household tools/articles (including kitchenware and ironmongery), comments were received from AMC Cookware (Pty) Ltd, Doormax (Pty) Ltd, Doorware (Pty) Ltd, Ussher Inventions (Pty) Ltd t/a Lasher Tools, MacCorkindale Investments (Pty) Ltd t/a Macki Metal Smiths, and W.G MacDonald (Pty) Ltd.
- 5.2. Lasher Tools and Macki Metal Smiths are in support of the preliminary determination to increase duties on hand tools classifiable under tariff subheadings 82.01, 82.03, 82.04, 82.05, 82.07, and 82.09 and knives classifiable under tariff headings 82.08;

82.09 and 82.11 to the bound rate of 20% *ad valorem*. The companies cited reasons including sufficient local capacity to manufacture the products and that the increase will assist in curbing circumvention of duties by importers using rerouting methods to avoid the anti-dumping duties.

- 5.3. AMC Cookware (Pty) Ltd, W.G MacDonald (Pty) Ltd and Doormax (Pty) Ltd conversely objected to the increase of duties on ironmongery products, cookware, knives, and household tools. Reasons cited for the objection include lack of local production capacity of ironmongery products, the cost-raising effects the duties will have on the end-consumers and reduced competitiveness.
- 5.4. Doorware (Pty) Ltd further requested additional rebate provisions on components for the assembly of door handles with or without locking mechanisms.
- 5.5. Following the verification process conducted with manufacturers of stainless steel, the Commission established that there is sufficient local manufacturing capacity to supply manufacturers of kitchenware such as pots, pans, and utensils. With regards to hand and garden tools, Lasher Tools and Macki Metal Smiths indicated that they have sufficient capacity to manufacture and supply these products to the domestic market.
- 5.6. The Commission decided to support an increase in duties of these products to their bound rates as to further protect the local industry and to prevent circumvention of duties through rerouting methods.

#### **Long steel products (excluding wire products)**

- 5.7. Interested parties commenting on the preliminary determination to increase duties on the products listed in Table 1 to their respective WTO bound rates from the long steels sub-industry include AMSA, Guma (Pty) Ltd, Euro Steel Services (Pty) Ltd, EMV Africa, MacSteel, and RSC Ekusasa Mining.
- 5.8. RSC Ekusasa Mining, a manufacturer of underground mining support products urges that the bound rates be applied to underground mining support products to prevent substandard imports and the undercutting of local producers.
- 5.9. AMSA further submitted that the duties on the following tariff subheadings be increased to their bound rates as there is local manufacturing of the products and to prevent circumvention: 7304.39.35, 7304.41.2, 7304.48.30, 7304.59.45.8,

7308.40.10, 7312.10.23, 7312.90.10, 7314.20, 7318.16.29, 7320.20.10, 7320.20.90, 7320.90, and 7325.10.

5.10. In objection to duty increases on long steel products (excluding wire products), companies and organisations including MacSteel and Eurosteel cited the reported closure of the AMSA long steel division which will result in numerous long steel products ceasing to be manufactured locally. These organisations requested the creation of temporary rebate facilities for products AMSA will no longer produce.

5.11. Guma (Pty) Ltd, Euro Steel Services requested the creation of temporary rebate provisions on the following products:

- Rails, of iron or steel, of a length of 50 m or more but not exceeding 60m, of a mass of 48g/km or more but not exceeding 60kg/m, for railway application, classifiable under tariff subheading 7302.10
- Bars and rods, classifiable under tariff subheadings 7228.30, 7228.40 and 7228.50
- Seamless carbon pipes classifiable under tariff subheadings 7304.11, 7304.19.05, 7304.19.10, and 7304.19.90.

5.12. Macsteel further submitted a comprehensive list of over 150 products for which temporary rebate provisions will need to be created should the AMSA long steel division close.

5.13. AMSA, additionally, submitted that the rebates of the following products be removed as there is local manufacturing capacity: 7304.19.10/90, 7214.99, 7227.90, 7214.99, 7210.70.30 (only bronze and silver to be removed). They further suggest the following for the tariff subheadings mentioned below:

- 7216.33: The rebate should only be valid for H sections exceeding 305x305mm AMRAS can supply 150x150mm up to and including the 305x305mm
- 7302.10: The Rebate should apply for rails exceeding 57kg/m and
- 7210.70: Need to be split to only 7210.70.30 and 7210.70.40. Those are the only 2 HS codes in which the appliances products listed would find applicability.

- 5.14. The Commission decided to support an increase in duties on these products to their respective bound rates in order to curb the undercutting of local producers' pricing, protect local manufacturers and prevent circumvention of duties.
- 5.15. The Commission also decided to initiate an investigation into the possible creation of rebate provisions for long products in the wake of the loss of capacity in AMSA's Newcastle Works.

### **Wire industry**

- 5.16. Several companies including Barnes Fencing, Cape Gate, consolidated wire industries, steel and wire manufacturers, Haggie Steel Wire, and Scaw Metals submitted comments in support for higher import duties on wire and related products, mainly citing that domestic producers face unfairly priced imports that erode local market share and threaten employment. Moreover, increased duties would provide a necessary protective buffer against dumped or low-priced imported wire, allowing local manufacturers to recover costs, maintain production capacity, and preserve jobs. Current tariff levels are said to be insufficient to counter import competition and that a higher general rate would promote industrial stability and investment in local manufacturing capability.
- 5.17. Companies objecting to duty increases include, amongst others, Nockers Engineering Products, and manufactures of precision springs. These stakeholders highlight that wire products are essential intermediate inputs for construction and manufacturing, and that higher duties would raise input costs, reduce competitiveness, and strain already fragile downstream industries. They contend that domestic producers do not always supply sufficient quantities, quality, or price-competitive material, making imports necessary to sustain operations. The objectors therefore advocate retaining current tariff levels or reducing duties to ensure affordability and market stability across the value chain.
- 5.18. Stakeholders specifically requesting rebate creation or retention generally support the protection of local upstream producers but argue that downstream manufacturers require relief mechanisms to offset higher duties on inputs they cannot source locally. They seek rebate provisions to ensure continued access to specific grades or sizes of wire not manufactured in South Africa, preserving production continuity and export competitiveness.

- 5.19. Conversely, a few upstream producers, including Barnes Fencing, oppose the creation of broad rebate provisions, arguing it would undermine the intended protective effect of higher duties by allowing import circumvention.
- 5.20. Overall, the local industry appears to be battling against low-priced imports competition despite customs duties being at the WTO Bound Rates for certain products. The situation is worse for products for which there is no protection in the form of customs duties. As such, it is clear that additional protection is required to safeguard the industry against a potential full demise should Government, through ITAC, not intervene.

### **Stainless steel (including stainless steel wire)**

- 5.21. Companies in support of higher duties on stainless steel products include Columbus Stainless and SAISI. These firms argue that the local stainless-steel industry faces severe pressure from low-priced imports, particularly from Asia, which have resulted in reduced capacity utilisation and job losses. They assert that existing duties are insufficient to counter import undercutting and dumping, and that higher tariffs would help stabilise domestic prices, restore profitability, and protect the integrated local value chain from melt shop to finished product. Supporters further emphasise that increased duties would create a more level playing field, encourage reinvestment in plant upgrades, and strengthen South Africa's strategic stainless steel production base.
- 5.22. Companies objecting to duty increases include SJM Flex SA, NDE, BCG Stainless Steel, SASSDA, Greytex and manufactures of precision springs. These stakeholders contend that stainless steel products are critical intermediate goods used in manufacturing, construction, food processing, and engineering industries, and that higher import duties would directly raise production costs for downstream fabricators and exporters. They note that local producers often focus on limited product ranges, grades, or dimensions, leaving gaps that must be filled through imports to meet industrial demand. Objectors therefore advocate maintaining current rates or lowering duties to ensure supply diversity, price competitiveness, and the continued viability of downstream industries that depend on stainless steel as a key input.

- 5.23. Stakeholders requesting rebates or opposing their removal include Graytex, NDE and SASSDA. These companies support the protection of upstream stainless-steel producers in principle but emphasise the need for rebate provisions to access specialised stainless-steel products not available locally. They argue that such relief mechanisms are essential to sustain the competitiveness of downstream fastener, spring, and component manufacturers to name a few, especially in export markets.
- 5.24. Conversely, Columbus Stainless oppose broad rebate creation, warning that it would undermine the intended protective effect of higher duties by allowing widespread importation of stainless products that could otherwise be locally sourced, thereby weakening domestic value addition.
- 5.25. The Commission decided that additional protection is required in this industry in order to safeguard the industry against a potential full demise should Government, through ITAC, not intervene.
- 5.26. However, should there be other products not available locally but affected by the impending increase in duties, the Commission will consider the creation of rebate provisions for such products at a later stage.

**Preliminary determination that the ongoing geopolitical landscape does constitute an unprecedented emergency, necessitating urgent action in line with Articles XIX and XXI of the GATT**

- 5.27. The preliminary determination that the ongoing geopolitical landscape constitutes an unprecedented emergency, necessitating urgent action in line with Articles XIX and XXI of the GATT received support from some local manufacturers.
- 5.28. The local manufacturers argued that the current geopolitical landscape reflects an emergency in the market which warrants the invocation of GATT Article XIX, which manifests as a safeguard and Article XXI, which pertains to a national security emergency which would allow ITAC to increase duties beyond the bound rate. They, however, advocate for ITAC to pursue the practical processes necessary for the invocation of Articles XIX and XXI as it will result in immediate implementation of increased duties on products.
- 5.29. Conversely, XA Global Trade Advisors, representing D. Purdue and Sons, Graytex Metals, Gurtech, Hi-Tec Nuts, Fastener Agencies Pty Ltd (ifasten), Linq Zinc (Pty) Ltd, Metals and Alloyed Steel Traders, Protech Fasteners Pty Ltd, and Sagenta

Distribution, argue that the ongoing geopolitical landscape does not constitute an unprecedented emergency and does not qualify as an essential security interest under Article XXI(b)(iii) of the GATT. They explain that ‘essential security interest’ should be understood to refer to “those interests relating to the quintessential functions of the state, namely, the protection of its territory and its population from external threats, and the maintenance of law and public order internally.”

- 5.30. XA Global Trade Advisors assert that the current geopolitical situation does not qualify as a matter of protecting South Africa’s territory or its population from external threats or the maintenance of law and public order internally, neither does it constitute an ‘emergency in international relations’ as there is no armed conflict, heightened tension or crises, or general instability engulfing or surrounding the state.
- 5.31. Furthermore, there have been queries raised and clarity sought from respondents regarding the invocation of the two GATT articles. Amongst others, including from the government of the United Kingdom of Great Britain and Northern Ireland.

**A preliminary determination that a committee comprising of industry role players and members of the Commission be formed in terms of Section 14 of the ITA Act 71 of 2002, to advise the Commission on steel-related matters**

- 5.32. Across the various subsectors and industries which commented on the preliminary determination to form a committee comprising of industry role players to advise the Commission on steel-related matters, this determination received strong support with no opposing parties. It is generally agreed that such a committee can bolster any support offered to the steel industry and react more flexibly and swiftly to a sudden change adversely affecting the domestic industry, such as sudden surges in imports).
- 5.33. There are parties, however, that requested clarity regarding the formation of said committee. They requested that the terms of reference and the mandate be clear and published for the comment. Other interested parties also requested that the committee be representative of actors across the value chain, including SACU upstream producers, downstream users, importers and foreign producers.
- 5.34. Proposals for the scope of the committee were also submitted. These, amongst others, included:

- Continuous monitoring of existing steel rebate provisions to ensure adequacy;
- Import surveillance to address customs fraud;
- Price adjustments to scrap metals; and
- Increases and/or adjustments to duties on certain products.

5.35. The Commission decided to make a final determination that the Section 14 Committee should be formed and that, in terms of section 14(1), a request be made to the Minister for the establishment of a committee.

## **6. FINDINGS**

6.1. The Commission considered all the relevant information at its disposal. In particular, the Commission considered the following factors:

- The importance of the domestic steel industry in supporting economic recovery efforts, infrastructure development, and industrial growth, together with the need to use tariff measures to strengthen local manufacturing and competitiveness in the sector as envisaged in the Steel and Metal Fabrication Masterplan;
- The significant role of the South African steel industry as a vital contributor to the economy, particularly on beneficiation objectives and job creation. The associated backward and forward linkages of the sector, with steel-consuming industries collectively contributing significantly to the country's GDP and employing a significant number of people;
- The need for the improvement of South Africa's tariff structure and rebate structure for steel products within Chapters 72,73, 82 and 83 of the Customs and Excise Act in order to facilitate a better response to some of the problems facing the domestic industry;
- The significant challenges that the South African steel industry currently faces, such as rising input costs, including raw materials, labour, and electricity, which are eroding competitiveness;

- The influx of low-priced steel imports across the whole steel value chain, particularly from Asian markets such as China and India;
  - The ongoing problems of pervasive circumvention of import duties, customs fraud, and other unlawful activities, necessitating the need for a collaborative and holistic approach in confronting some of these challenges;
  - The existing scope for the Commission to play a role in working with industry and other Government Agencies to develop, and enhance compliance with, industry standards and compulsory specifications in the steel sector;
  - The unprecedented emergency posed by the ongoing geo-political landscape, particularly insofar as trade policy is concerned, likely necessitating a departure from ordinary tariff setting.
- 6.2. The Commission found that the overall global trading conditions with regards to steel products, both globally and domestically, remain very subdued, with a number of major economies imposing significant tariffs to protect their domestic industries in the face of global overcapacity and associated trade diversions. This is causing significant strain to an already struggling domestic steel manufacturing industry.
- 6.3. The Commission concluded that there is a need for the adoption of a holistic, integrated package of trade measures and non-trade interventions in order to restore the domestic industry's competitiveness, support domestic industrialisation, safeguard employment, and ensure access to essential inputs, while at the same time promoting a stable and predictable environment for investment in the steel value chain.

## **7. RECOMMENDATION**

7.1. In light of the foregoing, the Commission recommended that:

- The rate of customs duties on all products listed in Table 1 of Annexure A be increased to their respective WTO bound rates, in order to address import surges, price undercutting and duty circumvention affecting the domestic steel industry;
- Rebate provisions be created, as outlined in Table 2 of Annexure A, including the extension of such provisions to Schedule No. 2 duties where applicable, to ensure that downstream manufacturers have access to inputs not produced domestically;
- The products listed in Table 3 of Annexure A be subjected to import controls in terms of section 6 of the ITA Act, and that, as compulsory standards for these products are developed, such standards be incorporated into the import permit system as additional conditions for permit issuance;
- Input products listed in Table 4 of Annexure A be maintained at a free-of-duty rate, given their non-availability in the SACU region and their importance to downstream competitiveness;
- Rebate Items 460.15/7210.61/01.06; 460.15/7210.70/01.06; and 460.15/7225.99/01.06 be maintained and extended to also cover Schedule No. 2 duties, with only amendments to their administrative guidelines to address abuse concerns;
- The current global trading environment be recognised as constituting an unprecedented emergency, justifying consideration of safeguard action under Article XIX of the GATT 1994, or, where appropriate, measures consistent with Article XXI(b)(iii) relating to emergencies in international relations.
- A committee comprising of industry role players and members of the Commission be established in terms of Section 14 of the ITA Act 71 of 2002, to advise the Commission on steel-related matters.

## **ANNEXURE A**

### **TABLE 1**

Tariff Heading / Subheading	Article Description	Applied Rate	Bound Rate
7210.12.20	Flat-rolled products of iron or non-alloy steel, of a width of 600 mm or more, clad, plated or coated: Of a thickness of less than 0,5 mm: Other, of a width exceeding 950 mm	0%	10%
7213.10	Bars and rods, hot-rolled, in irregularly wound coils, of iron or non-alloy steel: Containing indentations, ribs, grooves or other deformations produced during the rolling process	0%	10%
7216.91	Angles, shapes and sections of iron or non-alloy steel: Other: Cold-formed or cold-finished from flat-rolled products	0%	10%
7216.99	Angles, shapes and sections of iron or non-alloy steel: Other: Other	0%	10%
7217.90	Wire of iron or non-alloy steel: Plated or coated with other base metals: Other	0%	10%

Tariff Heading / Subheading	Article Description	Applied Rate	Bound Rate
7224.10	Other alloy steel in ingots or other primary forms; semi-finished products of other alloy steel: Ingots and other primary forms	0%	10%
7224.90	Other alloy steel in ingots or other primary forms; semi-finished products of other alloy steel: Other	0%	10%
7225.11	Flat-rolled products of other alloy steel, of a width of 600 mm or more: Of silicon-electrical steel: Grain-oriented	0%	10%
7225.19	Flat-rolled products of other alloy steel, of a width of 600 mm or more: Of silicon-electrical steel: Other	0%	10%
7226.11	Flat-rolled products of other alloy steel, of a width of less than 600 mm: Of silicon-electrical steel: Grain-oriented	0%	10%
7226.19	Flat-rolled products of other alloy steel, of a width of less than 600 mm: Of silicon-electrical steel: Other	0%	10%
7226.20	Flat-rolled products of other alloy steel, of a width of less than 600 mm: Of silicon-electrical steel: Of high speed steel	0%	10%
7227.10	Bars and rods, hot-rolled, in irregularly wound coils, of other alloy steel: Of high speed steel	0%	10%
7227.20	Bars and rods, hot-rolled, in irregularly wound coils, of other alloy steel: Of silico-manganese steel	0%	10%
7228.10	Other bars and rods of other alloy steel; angles, shapes and sections, of other alloy steel; hollow drill bars and rods, of alloy or non-alloy steel: Bars and rods, of high speed steel	0%	10%
7228.20	Other bars and rods of other alloy steel; angles, shapes and sections, of other alloy steel; hollow drill bars and rods, of alloy or non-alloy steel: Bars and rods, of silico-manganese steel	0%	10%
7229.20	Wire of other alloy steel: Of silico-manganese steel	0%	10%
7229.90.10	Wire of other alloy steel: Other: Plated or coated with copper	0%	10%
7229.90.90	Wire of other alloy steel: Other: Other	0%	10%

Tariff Heading / Subheading	Article Description	Applied Rate	WTO Bound Rate
7306.40	Tubes and pipes: Other, welded, of circular cross-section, of iron or non-alloy steel: Other, welded, of circular cross-section, of stainless steel	10%	15%
7306.50	Tubes and pipes: Other, welded, of circular cross-section, of iron or non-alloy steel: Other, welded, of circular cross-section, of other alloy steel	10%	15%

Tariff Heading / Subheading	Article Description	Applied Rate	WTO Bound Rate
7306.30.10	Tubes and pipes: Other, welded, of circular cross-section, of iron or non-alloy steel: With a wall thickness not exceeding 2 mm, galvanised	10%	15%
7306.30.20	Tubes and pipes: Other, welded, of circular cross-section, of iron or non-alloy steel: With a wall thickness not exceeding 2 mm, not galvanised	10%	15%
7306.61.10	Tubes and pipes: Of square or rectangular cross-section: With a wall thickness not exceeding 2 mm	10%	15%
7306.61.20	Tubes and pipes: Of square or rectangular cross-section: With a wall thickness exceeding 2 mm	10%	15%
7306.69.10	Tubes and pipes: Of other non-circular cross-section: With a wall thickness not exceeding 2 mm	10%	15%
7306.69.20	Tubes and pipes: Of other non-circular cross-section: With a wall thickness exceeding 2 mm	10%	15%
7306.90	Tubes and pipes: Of other non-circular cross-section: Other	10%	15%
7317.00.40	Nails, tacks, drawing pins, corrugated nails,	10%	15%

Tariff Heading / Subheading	Article Description	Applied Rate	WTO Bound Rate
7304.19.90	Tubes, pipes and hollow profiles, seamless, of iron (excluding cast iron) or steel: Other	10%	15%
7304.23.90	Tubes, pipes and hollow profiles, seamless, of iron (excluding cast iron) or steel: Other drill pipe: Other	10%	15%
7304.24	Tubes, pipes and hollow profiles, seamless, of iron (excluding cast iron) or steel: Other drill pipe: Other, of stainless steel	10%	15%
7304.29.90	Tubes, pipes and hollow profiles, seamless, of iron (excluding cast iron) or steel: Other: Other	10%	15%
7307.11.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Of non-malleable cast iron: Other	0%	15%
7307.19.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Other: Other	0%	15%
7307.21.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Flanges: Other	0%	15%
7307.22.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Threaded elbows, bends and sleeves: Other	0%	30%
7307.23.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Butt welding fittings: Other	0%	30%
7307.29.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Other: Other	0%	30%
7307.91.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Flanges: Other	0%	30%
7307.92.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Threaded elbows, bends and sleeves: Other	0%	15%
7307.93.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Butt welding fittings: Other	0%	15%
7307.99.90	Tube or pipe fittings (for example, couplings, elbows, sleeves), of iron or steel: Other: Other	0%	15%
7310.10.90	Tanks, casks, drums, cans, boxes and similar containers, of iron or steel: Of a capacity of 50 li or more: Other	0%	15%
7310.21.90	Tanks, casks, drums, cans, boxes and similar containers, of iron or steel: Of a capacity of less than 50 li: Other	0%	15%
7310.29.90	Tanks, casks, drums, cans, boxes and similar containers, of iron or steel: Other : Other	0%	15%
7311.00.90	Containers for compressed or liquified gas, of iron or steel: Other	0%	15%
7314.12.90	Cloth (including endless bands), grill, netting and fencing, of iron or steel wire, expanded metal of iron or steel: Endless bands for machinery, of stainless steel: Other	0%	15%
7314.14.90	Cloth (including endless bands), grill, netting and fencing, of iron or steel wire, expanded metal of iron or steel: Other woven cloth, of stainless steel: Other	0%	15%
7314.19.90	Cloth (including endless bands), grill, netting and fencing, of iron or steel wire, expanded metal of iron or steel: Other: Other	0%	15%
7314.49	Cloth (including endless bands), grill, netting and fencing, of iron or steel wire, expanded metal of iron or steel: Other cloth, grill, netting and fencing: Other	5%	15%
7315.11.90	Chain and parts thereof, of iron or steel: chain: Other	0%	15%
7315.12.90	Chain and parts thereof, of iron or steel: Other chain: Other	0%	15%
7315.19.90	Chain and parts thereof, of iron or steel: Parts: Other	0%	15%
7317.00.90	Nails, tacks, drawing pins, corrugated nails, staples (excluding those of heading 83.05) and similar articles, of iron or steel, whether or not with heads of other material (excluding such articles with heads of copper): Other	0%	15%
7318.12	Screws, bolts, nuts, coach screws, screw hooks, rivets, cotters, cotter-pins, washers (including spring washers) and similar articles, of iron or steel: Other	0%	15%
7318.21.90	Screws, bolts, nuts, coach screws, screw hooks, rivets, cotters, cotter-pins, washers (including spring washers) and similar articles, of iron or steel: Spring washers and other lock washers: Other	0%	15%
7318.22	Screws, bolts, nuts, coach screws, screw hooks, rivets, cotters, cotter-pins, washers (including spring washers) and similar articles, of iron or steel: Spring washers and other lock washers: Other washers	0%	30%
7324.21.90	Sanitary ware and parts thereof, of iron or steel: Of cast iron, whether or not enamelled: Other	10%	30%
7325.99	Other cast articles of iron or steel: Other: Other	0%	15%
7326.19	Other articles of iron or steel: Forged or stamped, but not further worked: Other	0%	15%
7326.90.90	Other articles of iron or steel: Other: Other	0%	15%
7312.10.20	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: Stranded wire, ropes and cables: Other stranded wire	5%	15%
7312.10.25	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: Stranded wire, ropes and cables: Other ropes and cables, of wire which is not plated, coated or clad	5%	15%
7312.10.27	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: Stranded wire, ropes and cables: Ropes and cables, of wire which is plated, coated or clad with zinc, of a diameter not exceeding 13 mm (excluding that of wire of stainless steel and that identifiable as conveyor belt cord)	5%	15%
7312.10.40	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: Stranded wire, ropes and cables: Other ropes and cables, of wire which is plated, coated or clad with zinc	5%	15%

Tariff Heading / Subheading	Article Description	Applied Rate	WTO Bound Rate
8201.10.90	Hand tools: Spades, shovels, timber wedges and other tools of a kind used in agriculture: Spades and shovels: Other	0%	20%
8201.30.90	Hand tools: Spades, shovels, timber wedges and other tools of a kind used in agriculture: Mattocks, picks, hoes and rakes: Other	0%	20%
8201.40.90	Hand tools: Spades, shovels, timber wedges and other tools of a kind used in agriculture: Axes, bill hooks and similar hewing tools: Other	0%	20%
8201.90.10	Hand tools: Spades, shovels, timber wedges and other tools of a kind used in agriculture: Other hand tools of a kind used in agriculture, horticulture or forestry: Fork with 8 or more prongs	15%	20%
8201.90.90	Hand tools: Spades, shovels, timber wedges and other tools of a kind used in agriculture: Other hand tools of a kind used in agriculture, horticulture or forestry: Other	0%	20%
8202.20.20	Hand saws; blades for saws of all kinds: Band saw blades: Of a width of 13 mm or more but not exceeding 40 mm, of high speed bimetal	10%	20%
8202.20.90	Hand saws; blades for saws of all kinds: Band saw blades: Other	0%	20%
8202.39.90	Hand saws; blades for saws of all kinds: Other, including parts: Other	0%	20%
8202.99	Hand saws; blades for saws of all kinds: Other saw blades: Other	0%	20%
8203.20.90	Files, rasps, pliers, pincers, tweezers, metal cutting shears, pipe-cutters, bolt croppers, perforating punches and similar hand tools: Pliers, pincers, tweezers and similar tools: Other	0%	20%
8204.11.90	Hand-operated spanners and wrenches; interchangeable spanner sockets, with or without handles: Non-adjustable: Other	0%	20%
8204.12.90	Hand-operated spanners and wrenches; interchangeable spanner sockets, with or without handles: Adjustable: Other	0%	20%
8204.20.90	Hand-operated spanners and wrenches; interchangeable spanner sockets, with or without handles: Interchangeable spanner sockets, with or without handles: Other	0%	20%
8205.20.90	Hand tools, not elsewhere specified or included; blow lamps; vices, clamps and the like anvils; portable forges; hand or pedal-operated grinding wheels with frameworks: Hammers and sledge hammers: Other	0%	20%
8205.40.90	Hand tools, not elsewhere specified or included; blow lamps; vices, clamps and the like anvils; portable forges; hand or pedal-operated grinding wheels with frameworks: Screwdrivers: Other	0%	20%
8205.59.90	Hand tools, not elsewhere specified or included; blow lamps; vices, clamps and the like anvils; portable forges; hand or pedal-operated grinding wheels with frameworks: Other: Other	0%	20%
8205.70.90	Hand tools, not elsewhere specified or included; blow lamps; vices, clamps and the like anvils; portable forges; hand or pedal-operated grinding wheels with frameworks: Vices, clamps and the like: Other	0%	20%
8205.90	Hand tools, not elsewhere specified or included; blow lamps; vices, clamps and the like anvils; portable forges; hand or pedal-operated grinding wheels with frameworks: Other, including sets of articles of two or more of the foregoing subheadings	0%	20%
8207.13.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: With working part of cermets: Other	0%	20%
8207.19.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: Other, including parts: Other	0%	20%
8207.40.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: Tools for tapping or threading: Other	0%	20%
8207.60.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: Tools for boring or broaching: Other	0%	20%
8207.70.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: Tools for milling: Other	0%	20%
8207.80.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: Tools for turning: Other	0%	20%
8207.90	Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools, including dies for drawing or extruding metal, and rock drilling or earth boring tools: Other interchangeable tools	0%	20%
8208.40.90	Knives and cutting blades, for machines or for mechanical appliances: For agricultural, horticultural or forestry machines: Other	0%	20%
8208.90	Knives and cutting blades, for machines or for mechanical appliances: Other	0%	20%
8209.00.90	Plates, sticks, tips and the like for tools, unmounted, of cermets: Other	0%	20%
8211.10.90	Knives with cutting blades, serrated or not, and blades therefor: Sets of assorted articles: Other	15%	20%
8211.92.90	Knives with cutting blades, serrated or not, and blades therefor: Other knives having fixed blades: Other	15%	20%
8211.93.90	Knives with cutting blades, serrated or not, and blades therefor: Knives (excluding those having fixed blades): Other	15%	20%
8211.94.90	Knives with cutting blades, serrated or not, and blades therefor: Blades: Other	15%	20%

Tariff Heading / Subheading	Article Description	Applied Rate	WTO Bound Rate
8303.00.90	Armoured or reinforced safes, strong-boxes and doors and safe deposit lockers for strong-rooms, cash or deed boxes and the like, of base metal: Other	15%	20%
8308.20.90	Clasps, frames with clasps, buckles, buckle-clasps, hooks and the like, of base metal, of a kind used for clothing or clothing accessories, footwear, jewellery: Tubular or bifurcated rivets: Other	0%	20%
8311.10.90	Wire, rods, tubes, plates, electrodes and similar products, of base metal or of metal carbides, coated or cored with flux material, of a kind used for soldering, brazing : Coated electrodes of base metal, for electric arc-welding: Other	0%	20%
8311.30.90	Wire, rods, tubes, plates, electrodes and similar products, of base metal or of metal carbides, coated or cored with flux material, of a kind used for soldering, brazing: Coated rods and cored wire, of base metal, for soldering, brazing or welding by flame: Other	0%	20%
8311.90.90	Wire, rods, tubes, plates, electrodes and similar products, of base metal or of metal carbides, coated or cored with flux material, of a kind used for soldering, brazing: Other: Other	0%	20%

**TABLE 2**

Tariff Heading / Subheading	Article Description	Extent of Rebate
7216.33	<i>"H sections of iron or non-alloy steel, not further worked than hot-rolled, hot-drawn or extruded, of a height and width of 254 mm x 254 mm or more but not exceeding 300 mm x 300 mm, classifiable under tariff subheading 7216.33, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7207.10	<i>"Semi-finished products of iron or non-alloy steel, containing by mass less than 0,25 per cent of carbon, of rectangular (including square) cross-section measuring 330 mm x 420 mm ; 255 mm x 300 mm; 510 mm x 320 mm; 320 mm x 420 mm; 250 mm x 300 mm and 320 mm x 560 mm, classifiable under tariff heading 7207.1, in such times, in such quantities and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7207.10	<i>"Semi-finished products of iron or non-alloy steel, containing by mass less than 0,25 per cent of carbon, of a circular cross-section of 130 mm or more but not exceeding 180 mm, classifiable under tariff heading 7207.1, in such times, in such quantities and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7207.20	<i>"Semi-finished products of iron or non-alloy steel, containing by mass 0,25 per cent or more of carbon, of a rectangular (including square) cross-section measuring 330 mm x 420 mm; 255 mm x 300 mm; 510 mm x 320 mm; 320 mm x 420 mm; 250 mm x 300 mm; 320 mm x 560 mm and 560 mm x 320 mm, classifiable under tariff heading 7207.20, in such times, in such quantities and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7304.19.10	<i>"Tubes, pipes and hollow profiles, seamless, of iron (excluding cast iron) or steel, other, of a wall thickness not exceeding 25 mm and an outside cross-sectional dimension not exceeding 170 mm, classifiable in tariff subheading 7304.19.10, for use in the industrial, mining and infrastructure applications, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7304.19.90	<i>"Other, tubes, pipes and hollow profiles, seamless, of iron (excluding cast iron) or steel, classifiable in tariff subheading 7304.19.90, for use in industrial, mining and infrastructure applications, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7306.30.30	<i>"Other tubes, pipes and hollow profiles of circular cross-section, of iron or non-alloy steel, with a wall thickness exceeding 2 mm, galvanised, classifiable in tariff subheading 7306.30.30, for use in water infrastructure and fire systems, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7307.91.90	<i>"Other, flanges, (excluding those of cast iron), classifiable in tariff subheading 7307.91.90, for use in pipeline assembly and infrastructure applications, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty
7307.93.90	<i>"Other, butt welding fittings, classifiable in tariff subheading 7307.93.90, for use in industrial or water infrastructure applications, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided the products are not available in the SACU market"</i>	Full Duty

Tariff Heading / Subheading	Article Description	Extent of Rebate
7302.10	<i>"Rails, of a mass of 48 kg/m or more but not exceeding 51 kg/m, with a length of 11 m or more but not exceeding 18 m, having a tensile strength exceeding 1175 MPa and a Brinell Hardness of 350 HBW or more but not exceeding 390 HBW, classifiable under tariff subheading 7302.10, for use in the manufacture of railway turnouts and port infrastructure rail, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit."</i>	Full Duty
7227.90	<i>"Wire rods, hot-rolled, in irregularly wound coils, of other alloy steel, with a diameter of 5.5 mm or more but not exceeding to 12 mm, classifiable under tariff subheading 7227.90, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided that the product is not available in the SACU market."</i>	Full Duty
7214.99	<i>"Other bars and rods of iron or non-alloy steel, not further worked than forged, hot-rolled, hot-drawn or hot-extruded, but including those twisted after rolling, other, of thickness exceeding 22.4mm and of a height exceeding lengths of 6 m but not exceeding 7.2 m, classifiable under tariff subheading 7214.99, in such quantities, at some times and subject to such conditions as the International Trade Administration may allow by specific permit."</i>	Full Duty
7210.61.30	<i>"Flat rolled products of iron or non-alloy steel, of a width of 1 200 mm, of a thickness exceeding 0.20 mm or more but not exceeding 0.45 mm, plated or coated with aluminium-zinc alloys, classifiable under tariff subheading 7210.61.30, for use in the manufacture of hot plate stoves, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided that the products are not available in the SACU market"</i>	Full Duty
7210.61.30	<i>"Flat rolled products of iron or non-alloy steel, of a width of 1 000 mm, of a thickness exceeding 0.20 mm or more but not exceeding 0.45 mm, plated or coated with aluminium-zinc, classifiable under tariff subheading 7210.61.30, for use in mining core trays, in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided that the products are not available in the SACU market"</i>	Full Duty
7210.70	<i>"Flat rolled products of iron or non-alloy steel, of a width of 600 mm or more, painted, varnished or coated with plastics, classifiable under tariff heading 7210.70, for use in the manufacture of domestic fridges/freezes in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided that the products are not available in the SACU market"</i>	Full Duty
7210.70.30	<i>"Flat rolled products of iron or non-alloy steel, of a width of 1 225 mm, of a thickness exceeding 0,20 mm but not exceeding 0,45 mm, painted, varnished or coated with plastics, classifiable under tariff subheading 7210.70.30, for use in insulated panels in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided that the products are not available in the SACU market."</i>	Full Duty
7210.70.30	<i>"Flat rolled products of iron or non-alloy steel, of a width of 600 mm but not exceeding 970 mm, of a thickness of 0.20 mm or more but not exceeding 0,45 mm, painted, varnished or coated with plastics, classifiable under tariff subheading 7210.70.30, plain or in colours bronze, woodgrain and silver (metallic), for use in steel garage doors in such quantities, at such times and subject to such conditions as the International Trade Administration Commission may allow by specific permit, provided that the products are not available in the SACU market"</i>	Full Duty

**TABLE 3**

<b>Product Description</b>	<b>Affected Tariff Subheadings</b>
Corrugated roof sheeting	721041
Coated and Uncoated Flat Steel	7210, 7212, 7219, 7225
Reinforcing Steel (Rebar) and Structural Steel	7213, 7214, 7215, 7216
Wire Rod and Wire Products	7217, 7223
Railway Track Material & Structural Steel for Transportation	7225, 7302
Pipes and Tubes for Infrastructure & Water Supply	7304, 7305, 7306
Steel Structures and Fabricated Metal Components	7308
Tanks, Containers, and Reservoirs	7309, 7310
Wire Products, Barbed Wire, and Mesh	7312, 7313, 7314
Screws, Bolts, and Fasteners	7318
Household and Industrial Steel Products	7321, 7323, 7326
Knives, Cutlery, and Blades for Household and Industrial Use	8211, 8212, 8213, 8214
Hand Tools for Construction, Manufacturing, and Agriculture	8201, 8202, 8203, 8204, 8205
Cutting Tools and Industrial Blades	8207
Hand-Operated Spanners, Wrenches, and Fasteners	8204
Multi-Tools and Other Specialized Hand Tools	8205
Locks, Padlocks, and Security Fittings	8301.10, 8301.20, 8301.40, 8301.50, 8301.60
Safes, Strongboxes, and Security Containers	8303.00
Metal Fittings for Construction & Furniture	8302.10, 8302.30, 8302.41, 8302.42, 8302.49, 8302.50
Metal Signage and Nameplates	8310.00
Metal Chains (Non-Motorized Use)	7315.11, 7315.12, 7315.19, 7315.20
Bells, Gongs, and Alarm Systems	8306.10, 8306.21, 8306.29

**TABLE 4**

Tariff Heading / Subheading	Article Description	Applied Rate	Bound Rate
7201.10	Pig iron and, spiegeleisen in pigs, blocks or other primary forms: Non-alloy pig iron containing by	0%	5%
7201.20	Pig iron and, spiegeleisen in pigs, blocks or other primary forms: Non-alloy pig iron containing by	0%	5%
7201.50	Pig iron and, spiegeleisen in pigs, blocks or other	0%	5%
7202.11	Ferro-alloys: Ferro-manganese: Containing by	0%	5%
7202.19	Ferro-alloys: Ferro-manganese: Other	0%	5%
7202.21	Ferro-alloys: Ferro-silicon: Containing by mass	0%	5%
7202.29	Ferro-alloys: Ferro-silicon: Other	0%	5%
7202.30	Ferro-alloys: Ferro-silicon: Ferro-silico-	0%	5%
7202.41	Ferro-alloys: Ferro-chromium: Containing by mass	0%	5%
7202.49	Ferro-alloys: Ferro-chromium: Other	0%	5%
7202.50	Ferro-alloys: Ferro-chromium: Ferro-silico-	0%	5%
7202.60	Ferro-alloys: Ferro-chromium: Ferro-nickel	0%	5%
7202.70	Ferro-alloys: Ferro-chromium: Ferro-molybdenum	0%	5%
7202.80	Ferro-alloys: Ferro-chromium: Ferro-tungsten and	0%	5%
7202.91	Ferro-alloys: Other: Ferro-titanium and ferro-silico-	0%	5%
7202.92	Ferro-alloys: Other: Ferro-vanadium	0%	5%
7202.93	Ferro-alloys: Other: Ferro-niobium	0%	5%
7202.99.30	Ferro-alloys: Other: Ferro-silico-magnesium	5%	5%
7202.99.90	Ferro-alloys: Other: Other	0%	5%
7203.10	Ferrous products obtained by direct reduction of iron ore: Ferrous products obtained by direct	0%	5%
7203.90	Ferrous products obtained by direct reduction of	0%	5%
7204.10	Ferrous waste and scrap: Waste and scrap of cast	0%	5%
7204.21	Waste and scrap of alloy steel: Of stainless steel	0%	5%
7204.29	Waste and scrap of alloy steel: Other	0%	5%
7204.30	Waste and scrap of alloy steel: Waste and scrap of	0%	5%
7204.41	Ferrous waste and scrap: Other waste and scrap: Turnings, shavings, chips, milling waste, sawdust, filings, trimmings and stampings, whether or not in bundles	0%	5%
7204.49	Ferrous waste and scrap: Other waste and scrap:	0%	5%
7204.50	Ferrous waste and scrap: Other waste and scrap:	0%	5%
7205.10	Granules and powders, of pig iron, spiegeleisen,	0%	5%
7205.21	Granules and powders, of pig iron, spiegeleisen,	0%	5%
7205.29	Granules and powders, of pig iron, spiegeleisen,	0%	5%
7206.10	Iron and non-alloy steel in ingots or other primary forms (excluding iron of heading 72.03): Ingots	0%	10%
7206.90	Iron and non-alloy steel in ingots or other primary forms (excluding iron of heading 72.03): Other	0%	10%