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REPORT NO. 785

SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON STRANDED WIRE, OF IRON OR STEEL, NOT ELECTRICALLY INSULATED, OF A DIAMETER OF 12,7 MM OR MORE (EXCLUDING THAT OF WIRE OF STAINLESS STEEL, THAT OF WIRE PLATED, COATED OR CLAD WITH COPPER AND THAT IDENTIFIABLE AS CONVEYOR BELT CORD) CLASSIFIED UNDER TARIFF SUBHEADING 7312.10.17, ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA: FINAL DETERMINATION

The International Trade Administration Commission of South Africa herewith presents its **Report No. 785: SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON STRANDED WIRE, OF IRON OR STEEL, NOT ELECTRICALLY INSULATED, OF A DIAMETER OF 12,7 MM OR MORE (EXCLUDING THAT OF WIRE OF STAINLESS STEEL, THAT OF WIRE PLATED, COATED OR CLAD WITH COPPER AND THAT IDENTIFIABLE AS CONVEYOR BELT CORD) CLASSIFIED UNDER TARIFF SUBHEADING 7312.10.17, ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA: FINAL DETERMINATION**

AYABONGA CAWE
CHIEF COMMISSIONER

PRETORIA
07/09/ **2026**

INTERNATIONAL TRADE ADMINISTRATION COMMISSION OF SOUTH AFRICA

REPORT NO. 785

SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON STRANDED WIRE, OF IRON OR STEEL, NOT ELECTRICALLY INSULATED, OF A DIAMETER OF 12,7 MM OR MORE (EXCLUDING THAT OF WIRE OF STAINLESS STEEL, THAT OF WIRE PLATED, COATED OR CLAD WITH COPPER AND THAT IDENTIFIABLE AS CONVEYOR BELT CORD) CLASSIFIED UNDER TARIFF SUBHEADING 7312.10.17, ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA: FINAL DETERMINATION

SYNOPSIS

On 07 June 2024, the International Trade Administration Commission of South Africa ("the Commission") notified interested parties through Notice No. 2550 of 2024 in Government Gazette No. 50772, that unless a substantiated request is made indicating that the expiry of the anti-dumping duties against imports of stranded wire ("the subject product") originating in or imported from the People's Republic of China ("China") would likely lead to the continuation or recurrence of dumping and injury, the anti-dumping duties on stranded wire originating in or imported from China will expire on 23 December 2025.

A detailed response to the Commission's sunset review questionnaire was received from Haggie Wire and Strand Proprietary Limited ("the Applicant"), on 07 July 2025. After all deficiencies were addressed, an updated final application was received on 16 October 2025.

The information submitted by the Applicant was verified between the 17 -18 November 2025. A verification report was sent on 03 December 2025 and a response to the verification report was received on 10 December 2025. A properly documented letter was sent to the Applicant on 11 December 2025.

On 17 December 2025, the Commission initiated a sunset review investigation of the anti-dumping duty on stranded wire originating in or imported from China, through Notice No. 3693 of 2025 in Government Gazette No. 53872.

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

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

One response was submitted by an importer, Post Tensioning & Structural Solutions (Pty) Ltd ("PTSS"). However, it was determined that PTSS did not import the subject product from China but rather sourced it from Portugal during the period of investigation.

The Commission made a final determination before essential facts that the expiry of the anti-dumping duty on the subject product originating in or imported from China would likely lead to the continuation of dumping and the continuation or recurrence of material injury.

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

Comments by the Applicant to the Commission's essential facts letter

The Applicant expressed its disagreement with the Commission's proposed recommendation to the Minister of Trade, Industry and Competition ("the Minister") regarding the maintenance of the existing anti-dumping duty on stranded wire. The

Applicant argued that, given the Commission's determination that the margin of dumping is 213.79%, the existing anti-dumping duty should be increased accordingly. According to Regulation 59 of the ADR, the Commission's recommendation in a sunset review can lead to the withdrawal, amendment, or reconfirmation of the original anti-dumping duty. Therefore, the Commission has the authority to increase the existing anti-dumping duty on stranded wire.

Commission's consideration

The Commission agrees that, in accordance with 59, it has the authority to withdraw, amend, or reconfirm the original anti-dumping duty. The factors that the Commission considers when making its determination whether to withdraw, amend, or reconfirm the duties in place are as follows:

1. *Firstly, in assessing injury in a sunset review, the Commission will consider –*
    - *whether the SACU industry submitted information demonstrating that there is a likelihood of the continuation of injury (in instances where subject imports continued after imposition of duties); and/or*
    - *whether the SACU industry submitted information demonstrating that there is a likelihood of the recurrence of injury (in instances where the applicant cannot demonstrate that it is experiencing injury at present).*

In this investigation, the Commission found that imports occurred during the investigation period. Additionally, it noted that the product currently under investigation falls under tariff subheading 7312.10.17, which includes other products not subject to this investigation. Since this tariff subheading covers various products, the Applicant was requested to provide the information on the percentage contribution of the product under investigation to imports under this tariff heading during the investigation period.

The Applicant responded that, based on its understanding of the market and the SARS import data for the period from January 2023 to April 2025, it estimated that approximately 85% of total imports under tariff subheading 7312.10.17, by volume, consists of the subject product. Additionally, 73% of total imports under

this tariff subheading, also by volume, originate from China.

The Applicant further stated that as the data provided by SARS does not include the diameter of individual goods, each import transaction was classified based on the goods description, country of origin, and unit value per kilogram. The Applicant highlighted that the per-unit value is a reliable indicator of product type within this tariff subheading, given the significant difference in value per kilogram between bulk commodity stranded wire and other products that fall under the same subheading.

The Applicant submitted that the products with a unit price lower than <R40/kg ranging from R11.57 to R13.86 per kilogram, are the subject product. In contrast, products with higher unit prices >=R40/kg, ranging from R309.62 to R2,586.11 per kilogram, are considered non-subject products. The 73% was calculated by taking the import volumes of the subject product which amounted to 884,685 volumes divided by the total imports volume of 1,217,328kg from January 2023 to April 2025.

The Commission consulted with SARS to verify whether the product in question was imported during the investigation period. However, SARS was only able to provide the Bill of Entry ("BOE") data. It was also found that the BOE data does not include the diameter of individual goods, and SARS cannot provide further breakdowns.

The Commission noted that the Applicant based its estimated price on the total import volumes from all countries, rather than focusing solely on China. When applying the applicant's methodology specifically to China, the estimate indicated that 100% of imports from China consist of the subject product.

In analysing the imports information provided by the Applicant, the Commission identified some discrepancies. For instance, the Applicant claimed certain transactions are non-subject products, however, some of these transactions reported zero volumes with exceptionally high unit prices. For example,

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transaction 202408, indicated zero imports with a unit price of R/kg 2,586.11; for transaction 202311, zero volumes with a unit price 8,165.00; and for transaction 202304, for subject product reflected zero imports with a unit price of R/kg 14.29. Given this information, the Commission considered, that relying on unit prices to determine the subject product was insufficient and it remains unclear whether imports of the subject product continued while the 113.25% duty was in effect, taking into account that the tariff subheading encompasses a wide range of other products.

Additionally, based on the injury analysis, the Commission noted that the current anti-dumping duty has helped mitigate the injurious effects of dumped imports from China on the domestic industry.

The Commission further noted that the Applicant experienced minimal injury from 2023 to 2025. There has been price suppression, with selling prices decreasing. Additionally, employment and profits have also declined.

Despite these challenges, some indicators show performance improvements due to the existing duties. The Applicant holds a significant market share, while the alleged dumped imports account for only 1.67% and other imports account for 2.04%. Notably, sales volumes have increased by 39 index points, output has risen by 31 index points, the ability to raise capital and capacity utilisation have increased, and productivity has improved by 62 index points.

Given that the imports include other products, it is unclear if the injury suffered by the Applicant is solely due to these imports. However, the Commission considered that if the duties were to be terminated, it is highly likely that there would be a decline in sales volumes, output, productivity, and further decreases in capacity utilization, employment, investment and profits as well as increase in wages.

2. *Secondly, in terms of dumping, the Commission will consider whether the SACU industry submitted information to demonstrate that there is –*

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

In calculating the dumping margin of 213.79%, the Commission noted that the Applicant based their normal value on third-country exports from China to Germany using Eurostat data, a directorate of the EU responsible for providing statistical information to EU institutions. These exports included data for EU tariff subheadings 7312 10 61, 7312 10 65, and 7312 10 69. While these tariff subheadings include stranded wire with diameters smaller than those specified in this application, they represent the best available information, as the EU does not classify stranded wire imports by the specific diameters relevant to this case. The export information used includes other products, and this is the best information available.

For the export price, the Commission noted that the Applicant relied on the SARS import statistics for imports, which also include other products.

The Commission considered that the current duty levels are already significant and serve to protect the domestic industry while mitigating the extent of the industry's injury. In this context, imposing duties equivalent to 215% of the calculated dumping margin may not be justified. Taking all the information into account, although the dumping information is based on information that includes other products, this is the best information available.

The Commission noted that no responses were received from the manufacturers/exporters of the subject product in China and therefore the determination of the likelihood of the continuation of dumping and continuation or recurrence of material injury was based on the best information available, being that provided by the Applicant. In these circumstances, it is the Commission's practice to recommend that the anti-dumping duties be maintained at their current levels unless compelling reasons,

beyond the evidence considered during the investigation, warrant a deviation from this practice.

After considering all comments received, the Commission made a final determination that the expiry of the anti-dumping duty on stranded wire originating in or imported from China would likely lead to the continuation of dumping and the continuation or recurrence of material injury.

Therefore, the Commission made a final determination to recommend to the Minister that the current anti-dumping duty on the subject product originating in or imported from China be maintained be maintained as follows:

Item	Tariff heading	Description	Imported from or originating in	Rate of anti-dumping duties
215.02	7312.10.17	Stranded wire, of iron or steel, not electrically insulated, of a diameter of 12,7 mm or more (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord)	China	113.25%

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1. APPLICATION AND PROCEDURE

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

The analytical framework in sunset review investigations

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

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

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

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

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

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

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

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

1.2 APPLICANT

The application was lodged by Haggie Wire and Strand Proprietary Limited, the sole producer of the subject product within SACU.

1.3 ACCEPTANCE OF APPLICATION

The application was accepted by the Commission as being properly documented in accordance with ADR 21 on 11 December 2025.

1.4 ALLEGATIONS BY THE APPLICANT

The Applicant alleged that the expiry of the anti-dumping duty on the subject

product originating in or imported from China would likely lead to the continuation of dumping and continuation or recurrence of material injury.

The Applicant further alleged that because of the continuation of dumping of the subject product from China, it would experience material injury in the form of:

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

1.5 INVESTIGATION PROCESS

The Applicant submitted an application to the Commission on 07 July 2025. After all deficiencies were addressed, an updated final application was received on 16 October 2025. The information submitted by the Applicant was verified between the 17 -18 November 2025. A verification report was sent on 03 December 2025 and a response to the verification report was received on 10 December 2025. A properly documented letter was sent to the Applicant on 11 December 2025.

On 17 December 2025, the Commission initiated a sunset review investigation of the anti-dumping duty on stranded wire, originating in or imported from China, through Notice No. 3693 of 2025 in Government Gazette No. 53872.

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

2026.

1.6 INVESTIGATION PERIODS

The investigation period for dumping is from 1 May 2024 to 30 April 2025, and the injury investigation involves evaluation of data for the period 1 May 2022 to 30 April 2025, as well as estimates 01 May 2025 to 30 April 2026 in the event the anti-dumping duty expires.

The Applicant brought the application based on the likely continuation of dumping of the subject product, resulting in the continuation or recurrence of material injury, if the anti-dumping duty is allowed to expire.

1.7 PARTIES CONCERNED

1.7.1 SACU industry

The application was lodged by Haggie Wire and Strand Proprietary Limited, the sole producer of the subject product within the SACU.

1.7.2 Responses by Foreign Manufacturers/Exporters/Importers

Response by importer Post Tensioning & Structural Solutions (Pty) Ltd ("PTSS")

The Commission noted a response to the Commission's importer's questionnaire submitted by an importer named PTSS.

PTSS in its response clarified that it sources prestressing strand from Europe, specifically Portugal, and does not import it from China. However, some prestressing strand from China may be included in integrated post-tensioning or stay-cable systems supplied to PTSS. They indicated that the prestressing strand is a vital part of the stay-cable system and is not sold separately.

The tariff code for the integrated stay-cable system was requested from PTSS, which they stated is primarily classified under tariff subheading 7308.90.99, covering structures and parts of structures, including bridge components. The shipment consisted of a prefabricated stay-cable system for bridge construction, with certain individual components within the system (such as strands and ancillary materials) declared under their respective tariff codes in the customs entry

Commission's consideration

The Commission considered that the stay-cable system imported by PTSS is declared under tariff subheading 7308.90.99. However, individual components, such as strands and other materials, are identified under their specific tariff codes. To verify this, the Commission obtained the BOE from SARS to determine whether PTSS imported the stranded wire classified under tariff heading 7312.10.17. The BOE information covering the period from May 2022 to April 2025 showed that PTSS imported the stranded wire product from Portugal during 2024 and 2025. The Commission also noted that the information further indicated that PTSS did not import this product from China during the investigation period. Accordingly, its response does not provide evidence relevant to the assessment of dumping or injury in respect of imports originating in China.

1.8 The Commission made a final determination before essential facts that the expiry of the anti-dumping duty on the subject product originating in or imported from China would likely lead to the continuation of dumping and the continuation or recurrence of material injury.

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

1.10 COMMENTS

The Commission considered all information and comments submitted by interested parties. All responses and comments received from interested parties are contained in the Commission's public file for this investigation and are available for perusal. It should be noted that this report does not purport to present all comments received and considered by the Commission.

1.11 FINAL DETERMINATION AND RECOMMENDATION

After considering all comments received, the Commission made a final determination that the expiry of the anti-dumping duty on stranded wire originating in or imported from China would likely lead to the continuation of dumping and the continuation or recurrence of material injury.

No responses were received from the manufacturers/exporters of the subject product in China and therefore the determination of the likelihood of the continuation of dumping and continuation or recurrence of material injury is based on the best information available, being that provided by the Applicant. In these circumstances, it is the Commission's practice to recommend that the anti-dumping duties be maintained at their current levels unless compelling reasons, beyond the evidence considered during the investigation, warrant a deviation from this practice.

Therefore, the Commission made a final determination to recommend to the Minister that the current anti-dumping duty on the subject product originating in or imported from China be maintained be maintained as follows:

Item	Tariff heading	Description	Imported from or originating in	Rate of anti-dumping duties
215.02	7312.10.17	Stranded wire, of iron or steel, not electrically insulated, of a diameter of 12,7 mm or more (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord)	China	113.25%

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2. PRODUCTS, TARIFF CLASSIFICATION AND DUTIES

2.1 SUBJECT PRODUCT

2.1.1 Description

The subject product of this application is Prestressed Concrete Strand (also called PC Strand, Stay Cable or Stranded Wire) of a diameter equal to or greater than 12.7 mm is a high tensile and low relaxation strand which is formed by twisting together several prestressed wires into the desired thickness.

Stranded Wire is a diverse product with a wide range of uses and it is particularly used in connection with prefabricated concrete elements, typical pre-tensioning and post-tensioning projects and several construction projects. It is used in the construction of numerous prestressed concrete structures, such as bridges, high-rise buildings and various industrial facilities where heavy lifting, support and tension is required.

2.1.2 Like product

In the original investigation the Commission found that the SACU products and the imported products are "like products" for purposes of comparison in terms of Regulation 2.6 of the ADR.

2.1.3 Tariff classification

The subject product is classifiable as follows:

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Table 2.1.3: Tariff classification

HS Tariff subheading	Description	Statistical unit	Rate of duty					
			General	EU/UK[1]	EFTA[2]	SADC[3]	MERCOSUR[4]	AfCFTA[5]
73.12	**Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated:**							
7312.10	**- Stranded wire, ropes and cables:**							
7312.10.10	- - Stranded wire, of wire which is plated, coated or clad with copper-zinc base alloys (brasses)	kg	free	free	free	free	free	free
7312.10.15	- - Stranded wire, of wire which is plated, coated or clad with tin	kg	free	free	free	free	free	free
7312.10.17	- -Stranded wire, of a diameter of 4,8 mm or more (excluding that of wire of stainless steel and that identifiable as conveyor belt cord)	kg	15%	free	free	free	15%	9%

Source: SARS

2.1.4 Other applicable duties and rebates

The following anti-dumping duty is applicable:

Item	Tariff heading	Description	Imported from or originating in	Rate of anti-dumping duties
215.02	7312.10.17	Stranded wire, of iron or steel, not electrically insulated, of a diameter of 12,7 mm or more (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord)	China	113.25%

[1] European Union/United Kingdom
[2] European Free Trade Association
[3] Southern African Development Community
[4] Southern Common Market (Argentina, Brazil, Paraguay and Uruguay)
[5] African Continental Free Trade Area

2.1.5 Rebate provisions

The following rebate of dumping duty is currently applicable:

Rebate Item	Tariff heading	Description	Extent of Rebate
460.15	7312.10.17	Stranded wire, ropes and cables of iron or steel, not electrically insulated, 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.	Full duty

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3. SACU INDUSTRY

3.1 INDUSTRY STANDING

The application was lodged by Haggie Wire and Strand Proprietary Limited, the sole producer of the subject product within the SACU.

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

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4. CONTINUATION OF DUMPING

4.1 METHODOLOGIES IN THIS INVESTIGATION FOR CHINA

Regulation 54.4 of the ADR states that:
"In the event that the SACU industry requests that the anti-dumping duty be maintained, it shall provide the Commission with a proper application containing the necessary information to establish a prima facie case that the removal of the anti-dumping duty will be likely to lead to the continuation or a recurrence of injurious dumping." (Own emphasis).

The Applicant stated that it was able to contact an agent in China and perform a web search. However, the agent provided an EXW (Ex Works) price for South Africa, which was an export price rather than a domestic price within China. As a result, the Applicant was unable to obtain online price information for the domestic market.

4.1.1 Normal value

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

In calculating the normal value for China, the Applicant relied on third-country sales from China to Germany, which meets the requirement for choosing a suitable third-country market. The Applicant stated that the only EU member state with import volumes of stranded wire from China comparable to China's exports to SACU during the period is Germany. Although the industry does not have knowledge about the domestic market on the use of Stranded Wire in Germany, Stranded Wire is mainly used in the construction industries which are common in all countries. Taking this information into account, the Applicant has stated that Germany is the appropriate third country to determine China's normal value for stranded wire.

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The data used was obtained from Eurostat, a directorate of the European Union (EU) responsible for providing statistical information to EU institutions. Which represent the best available information.

The normal value at Free on Board ("FOB") was calculated as follows:

Third Country Export from China to Germany (April 2024 to May 2025)	FOB Normal value price (EUR/ kg)
HS7312.10.17	1,85

Commission's consideration

The Commission considered that since the Applicant could not obtain the normal value in the domestic market, it is of the view that the Applicant provided adequate substantiation as an alternative basis for calculation of the normal.

The Commission made a final determination to accept the normal value for the purpose of its final determination.

Adjustment

In order to calculate the ex-factory normal value, an adjustment for landside charges was made. The Applicant provided information from a quotation of USD 875 per container weighing 25 000 kg. This results in a per-unit adjustment of USD 0.04 per kg. Using an exchange rate from USD to EUR/kg obtained from IRESS The calculated amount for the adjustment is EUR 0.03.

Commission's consideration

It is the Commission's practice to consider adjustments to the normal value to bring the price back to the ex-factory level. The Commission made a final determination to allow the adjustment landside charges to arrive at the ex-factory price.

The normal value after adjustment was calculated as follows:

Third Country Export from China to Germany (April 2024 to May 2025)	FOB Normal value price (EUR/ kg)	Less Adjustment	Ex-Factory Normal value
HS7312.10.17	1,85	0,03	1.82

4.1.2 Export price

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

In calculating the export price, the Commission normally uses official South African Revenue Service ("SARS") statistics. The Applicant has provided export price information based on the official SARS import statistics.

The import FOB price is provided in ZAR/Kg. The export price was converted using an exchange rate of 1 ZAR = 0,050950 EUR/kg obtained from IRESS for the period from May 2024 to April 2025.

The export price at an FOB level was calculated as follows:

Import Price	Export Volumes Kg	Export Value ZAR	FOB Export price (ZAR/ kg)	FOB Expo price (EUR/
HS7312.10.17	240 401	2 870 658	11.94	0.61

Commission's consideration

In any dumping investigation, the Commission normally uses audited import statistics from SARS to determine the volume of the subject product entering the SACU from the countries under investigation and other countries as it considers these statistics to be most reliable. The import statistics provided by the Applicant were verified against SARS audited statistics and found to be accurate and correct are correct.

The Commission made a final determination that the Applicant has provided adequate motivation for the calculation of the export price.

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Adjustment

The Applicant has also applied an adjustment for landside charges amounting to USD 875 per container weighing 25 000 kg. This results in a per-unit adjustment of USD 0.04 per kg. The adjustment is based on information provided by Black Sea International Logistics Co Limited. Using an exchange rate of 1 USD = 0.928850 EUR/kg obtained from IRESS for the period from May 2024 to April 2025. The calculated amount for the adjustment is EUR 0.03.

Commission's consideration

It is the Commission's practice to consider adjustments to the normal value to bring the price back to the ex-factory level. The Commission made a final determination to allow the adjustment for landside charges to arrive at the ex-factory price.

The export price after adjustment was calculated as follows:

Import Price	FOB Export price (EUR/ kg)	Less Adjustment	Ex-Factory Export price
HS7312.10.17	0.61	0,03	0,58

4.1.3 Dumping margins

The following dumping margins were calculated:

Normal value	EUR/Kg
Ex-Factory Normal value	1.82
Ex-Factory export price	0,58
Dumping Margin on Ex-Factory export price	1.24
Dumping Margin as % of the ex-factory export price	**213.79%**

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SUMMARY - DUMPING

Based on the information submitted, the Commission made a final determination that the expiry of the anti-dumping duty would likely lead to the continuation of dumping the subject product originating in or imported from China.

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5. CONTINUATION OR RECURRENCE OF MATERIAL INJURY

The Applicant submitted the following material injury information for the period 1 May 2022 to 30 April 2025, and estimates for 1 May 2025 to 30 April 2026 in the event the anti-dumping duty expires:

5.1 IMPORT VOLUMES AND EFFECT ON PRICES

5.1.1 Import volumes and value

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

Table 5.1.1: Import volumes

HS 7312.10.17	May 2022-April 2023	%	May 2023-April 2024	%	May 2024-April 2025	%	2026 Estimates	%
Import volumes (Kg)								
Alleged dumped imports China	1 445	5,19	644 296	96,57	240 401	44,99	7 167 019	96,06
Other Imports	26 417	94,81	22 860	3,43	293 963	55,01	293 963	3,94
Total	**27 862**	**100%**	**667 156**	**100%**	**534 364**	**100%**	**7 460 982**	**100%**

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

The Applicant indicated that despite the imposition of anti-dumping duty, dumped imports have continued throughout the investigation period for injury. This shows that these dumped imports enter the SACU markets at such low prices that imports can continue despite the imposition of anti-dumping duty.

The Applicant further stated that the expiration of anti-dumping duty is expected to lead to a significant increase in the volume of dumped imports. Low prices would likely encourage downstream users to increase their imports rather than purchasing from SACU producers. If the anti-dumping duty is lifted, the import

volume of dumped goods is projected to rise from 240,401 kg in May 2024 to April 2025 to 7,167,019 kg, representing an increase of 2,881.27%. Additionally, the total volume of imports is anticipated to increase from 534 364 kg during the same period to 7 460 982 kg, which amounts to an increase of 1 296.24%.

5.2 Effect on domestic prices

5.2.1 Price undercutting

Table 5.2.1: Price undercutting

HS 7312.10.17	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Ex-factory selling Price (R/kg)	100	98	97	97
Import Price landed (R/kg) China	4,12	18,00	15,50	15,56
Price undercutting (R/kg)	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]
Price undercutting %	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]

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

The Applicant stated that, based on the information provided in the table, it experienced significant price undercutting during the investigation period related to dumping. This undercutting has placed pressure on the Applicant to limit price increases in line with the rising costs, resulting in price suppression and decreased profitability. If the anti-dumping duty expires, the Applicant is expected to continue facing price undercutting, which would further reduce profitability and return on investment. Additionally, the expiration of the anti-dumping duty may also force the Applicant to offer higher discounts, which would result in the Applicant suffering more significant price suppression and/or depression.

The Applicant indicated that if it were to increase prices in line with total cost increases (to avoid price suppression), this would likely result in a further decline in sales volume to dumped imports, which would, in turn, necessitate additional price increases. In the long run, the Applicant may not be able to sustain its operations at the plant while contending with unfair competition from dumped and would likely have to consider closing the plant permanently and retrenching all employees.

The expiry of the anti-dumping duty would likely to force the Applicant to decrease prices as a consequence of the increase in dumped imports. However, as it is not possible to reliably predict the extent of this decrease, historic prices are the best information available at the time of submission. As such, the Applicant has estimated its future price based on the prices in the final year of the investigation period for dumping.

Commission's consideration

It is evident from the table above that there is price undercutting the over the period of investigation, from 2022 to 2025. The subject product is expected to still experience undercutting if the anti-dumping duty is terminated.

5.2.2 Price depression

The table below shows the Applicant's selling price for the period 01 May 2022 to 30 April 2025, and estimates in the event the duty expires:

Table 5.2.2: Price depression

R/kg	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
HS 7312.10.17				
Applicant's ex-factory selling price	100	98	97	97

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

The information in the table above indicates that the Applicant's ex-factory selling price per kg showed a decreasing trend over the period of investigation from 2022 to 2025.

The Applicant stated that it experienced material injury in the form of price depression during the investigation period, with ex-factory prices decreasing to below the levels achieved in the first and second years of the investigation period for injury. Following the expiry of the anti-dumping duties, the Applicant is expected to still experience depressed prices, as a consequence of the expected flood of dumped imports. The expiry of the anti-dumping duties is therefore expected to lead to a continuation of material injury in the form of price depression.

Commission's consideration

The Commission noted the Applicant experienced price depression, with a decrease in the selling price of the subject product during the period of investigation.

5.2.3 Price suppression

The following table shows the Applicant's cost of production and selling prices for the subject product for the period 01 May 2022 to 30 April 2025, and an estimate in the event the duty expires.

Table 5.2.3 Price suppression

HS 7312.10.17	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Applicant's ex-factory selling price (R/kg)	100	98	97	97
SACU's production cost (R/kg)	100	107	109	137
Gross profit per unit	100	34	9	-188
Gross profit %	100	35	10	-194
Cost as % selling price (%)	100	109	113	141

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

The Applicant stated that the table above indicates that it experienced material injury in the form of price suppression in 2024 and 2025. The Applicant was unable to increase prices in line with increases in costs. This had a significant negative impact on the Applicant's profitability and return on investment.

Additionally, the Applicant indicated that if the anti-dumping duty was to expire, it expects a decline in sales volumes. Downstream users are likely to increase their imports from countries engaged in dumping at lower prices. This would lead to increase per unit costs as the Applicant will be unable to achieve economies of scale. At the same time, increased unfair competition from dumped imports would prevent the Applicant from increasing prices in line with increased costs and the Applicant may also lower prices or offer additional discounts as a result of the increase in dumped imports (price depression). This can be expected to have a significant negative impact on the Applicant's profitability and return on investment and makes the continued operation of the business unsustainable in the medium to long term.

The Applicant stated that the expiry of the anti-dumping duty would lead to a continuation of material injury, as the Applicant would be unable to increase its prices in line with increases in costs due to unfair competition from dumped imports being imported at dumped prices and would likely be forced to sell the subject product at a loss. Due to the ongoing threat from imports, The Applicant has been unable to pass on increases in overhead expenses. This is expected to worsen considerably if the anti-dumping duty is terminated.

Commission's consideration

The Commission noted that the Applicant experienced price suppression during the POI. Applicants' price decreased over the period 2022 to 2025, while gross profit decreased and cost-to-price ratio for the subject product increased over this time. The Commission considered that if the anti-dumping duty expired, price suppression would occur, leading to the SACU industry continuing experiencing material injury.

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

5.3.1 Actual and potential decline in volumes and values

The following table shows the Applicant's sales volumes of the subject product for the period 01 May 2022 to 30 April 2025 and estimates in the event the duty expires.

Table 5.3.1 (a): Sales volume

HS 7312.10.17 kg	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Applicant's sales volume in SACU	100	102	139	69

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

The information on the above table shows that sales volumes increase during the POI period. The Applicant stated that if the anti-dumping duty expires, the Applicant sales volumes are expected to decline. This is because downstream users are likely to increase their imports. As a result, there is expected to be a recurrence of material injury in the form of a significant decrease in sales volume.

Consequently, per unit costs are expected to rise since the Applicant will be unable to achieve economies of scale. Furthermore, increased unfair competition from dumped imports would hinder the Applicant's ability to raise prices in response to rising costs. In fact, the Applicant might be forced to lower prices or offer additional discounts due to the influx of dumped imports.

The Applicant is expected to sell lower volumes at similar or reduced prices, leading to a decrease in sales value. If the anti-dumping duty expires, this is expected to lead to a recurrence of material injury in the form of a significant decrease in sales value and volume.

Commission's consideration

The Commission noted that the sales volume of the subject product increased from 2022 to 2025 from 100 index points to 139 points. Although sales volumes showed an increase, if the anti-dumping duty is terminated, the sales volumes are projected to decline.

Table 5.1.3.1 (b): Sales values

Rands	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Applicant's sales values in SACU	100	100	135	67

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

The Applicant indicated that if the anti-dumping duty expires, its sales volumes are likely to decline. This is because downstream users are expected to increase their imports. As a result, the Applicant will face higher per unit costs due to the inability to achieve economies of scale. Furthermore, increased unfair competition from dumped imports will prevent the Applicant's ability to raise prices in line with these rising costs. Consequently, the Applicant may have to lower prices or offer additional discounts because of the increase in dumped Imports.

The Applicant is therefore expected to sell lower volumes at lower prices, leading to a decrease in sales value. If the anti-dumping duty expires, this is expected to lead to a recurrence of and increase in material injury in the form of a significant decrease in sales value.

5.3.2 Profit

The following table shows the Applicant's profit before interest and tax for the period 01 May 2022 to 30 April 2025, and estimates in the event the duty expires:

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Table 5.3.2: Profit

HS 7312.10.17	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Unit sold (kg)	100	102	139	69
Total Gross profit (R)	100	35	13	-131
Total Net Profit (R)	100	16	-12	-157
Total Gross profit (R/kg)	100	34	(10)	(188)
Total net Profit (R/kg)	2,92	15	(9)	(226)

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

The table above shows that the Applicant has experienced a downward trend in both gross and net profits throughout the investigation period. The Applicant stated that it has experienced material injury in the form of decline in operating and net profit during the investigation period for injury, including negative profit levels in 2025. This had a significant negative impact on the Applicant's return on investment.

The Applicant further stated that if the anti-dumping duty is terminated, it would result in the Applicant selling the subject product at both an operating and net loss, which is not sustainable. This situation would lead to a continued increase in material injury in the form of a further negative decline.

5.3.3 Output

The following table outlines the Applicant's production volume of the subject product for the period 01 May 2022 to 30 April 2025, and an estimate in the event the duty expires:

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Table 5.3.3: Output

HS 7312.10.17	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Production volumes Kg	100	106	131	78

The information on the table above indicates that production volumes increased throughout the period of investigation. The Applicant has stated that if the anti-dumping duty expires, their sales volumes are expected to decline. This is because downstream users would likely increase their imports of dumped products at lower prices. Consequently, the Applicant would be forced to reduce production volumes, as these levels cannot be maintained if they are unable to sell their products. This could prevent the Applicant from achieving economies of scale.

Furthermore, this reduction in production and sales volumes, combined with continued inflationary pressure and increased unfair competition from dumped imports, which could prevent the Applicant from increasing prices in line with increased costs and may even lead to further depression of prices, is expected to lead to the Applicant selling the subject product at a loss, which is unsustainable.

5.3.4 Market share

The following table shows the market share for the subject product for the period 01 May 2022 to 30 April 2025, and estimates in the event the duty expires:

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Table 5.3.4: Market share (Volumes)

HS 7312.10.17 (kg)	May 2022-April 2023	%	May 2023-April 2024	%	May 2024-April 2025	%	2026 Estimate	%
Applicant	100	[CONFIDENTIL] [POSITIVE]	102	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023]	139	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [INCREASE FROM NCY2024]	69	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [DECREASE FROM NCY2024]
Other SACU Producers	0	0%	0	0%	0	0%	0	
Alleged dumped imports								
China	1 445	[CONFIDENTL] [POSITIVE]	644 296	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	240 401	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]
Other imports	26 417	[CONFIDENTL] [POSITIVE]	22 860	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	293 963	CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [DECREASE FROM NCY2024]	293 963	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]
Total imports	27 862	[CONFIDENTIAL] [POSITIVE]	667 156	CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	534 364	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]	CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [UNCHANGED FROM NCY2024]
Total Market	[CONFIDENTIAL] [POSITIVE]	100%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	100%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	100%	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [UNCHANGED FROM NCY2025]	1

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

The information in the table indicates that the Applicant experienced material injury in the form of a decrease in market share over the period of investigation.

The Applicant indicated that if the anti-dumping duty expires, its sales volumes are likely to decline. This is because downstream users are expected to increase their imports from dumped sources at lower prices. As a result, the Applicant is expected to lose a significant portion of its market share to dumped imports. This clearly shows that the expiry of the anti-dumping duty would lead to a continuation of material injury in the form of a decline in market share.

Commission's consideration

The Commission considered that the Applicant's market share decreased over the period of investigation from 2022 to 2025. If the current anti-dumping duty is terminated, imports from China will increase. This increase would lead to a further reduction in the Applicant's market share volume.

5.3.5 Productivity

The following table shows the Applicant's productivity in respect of the subject product for the period 01 May 2022 to 30 April 2025, and estimates in the event the duty expires:

Table 5.3.5: Productivity

HS 7312.10.17 (kg)	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Total production volume	100	106	131	78
Number of employees (Manufacturing only)	100	89	81	81
Kg per employee	100	119	162	97

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

From the table above it is evident that productivity (the production per employee) for the subject product increased over the POI. The Applicant stated that if the anti-dumping duty expires, the downstream users can be expected to increase their imports prices. As a result, the Applicant would be forced to reduce its production volumes, since these cannot be sustained at current levels if the Applicant is not able to sell the products. A decrease in production volumes would lead to a significant decline in productivity. This is not sustainable, and, in the long term, the Applicant will not be able to sustain

operations at its plant whilst facing unfair competition from dumped imports and would likely have to consider closing the plant permanently and retrenching all employees.

The Applicant further stated that this demonstrates that the expiry of the anti-dumping duty would lead to the recurrence of material injury in the form of a decline in productivity.

5.3.6 Return on investment

The following table shows the Applicant's return on investment on earnings before interest and tax basis for the period 01 May 2022 to 30 April 2025, and estimates in the event the duty expires:

Table 5.3.6: Return on investment

Rand	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Net profit (product concerned)	100	16	(12)	(157)
Net assets	(100)	28	(12)	(1 219)
Return on net assets (product) (%)	100	56	(103)	(13)

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

The Applicant stated that it experienced material injury in the form of negative or decreasing return on net assets over the period of investigation. The Applicant further stated that it is expected that the expiry of anti-dumping duty would lead to the Applicant selling the subject product at a loss. This loss would significantly impact the Applicant's net assets, leading to a further decline in the return on net assets, which would limit the Applicant's ability to raise capital necessary for maintenance or expansion or to sustain business operations. This shows that the expiry of the anti-dumping duty would lead to a continuation in material injury in the form of declining returns on investment

5.3.7 Utilisation of production capacity

The following table provides the Applicant's capacity and production for the subject product for the period 01 May 2022 to 30 April 2025, and estimates in

the event the duty expires:

Table 5.3.7: Production capacity

HS 7312.10.17 (kg)	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Applicant Capacity kg	100	100	100	100
Applicant Actual Production kg	100	106	131	78
Capacity utilization (%)	100	106	131	78

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

The table above indicates that if the anti-dumping duty expires, the Applicant would experience a decrease in capacity utilisation.

The Applicant stated that if the anti-dumping duty expires, the Applicant sales volumes are expected to decline, as downstream users are likely to increase their imports. Consequently, the Applicant will be forced to reduce its production volumes, since they cannot maintain current levels of production with a decrease in sales.

This would lead to a significant reduction in capacity utilisation, a significant increase in per unit costs (and consequently a decline in profitability), which is not sustainable. In the long term, the Applicant would not be able to sustain operations at its plant whilst facing unfair competition from dumped imports and would likely have to consider closing the plant permanently and retrenching all employees. This shows that the expiry of the anti-dumping duty would lead to a recurrence of material injury in the form of a decline in capacity utilisation.

5.3.8 Actual and potential negative effects of cash flow

The following table provides the Applicant's cash flow for period 1 May 2022 to 30 April 2025, and estimates in the event duty expires:

Table 5.3.8: Cash flow

Rands	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Cash flow: incoming	100	94	95	95
Cash flow: outgoing	(100)	(96)	(102)	(113)
Net cash flow	100	93	95	94

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

The Applicant stated that if the anti-dumping duty expires, the Applicant sales volumes are expected to decline as downstream users can be expected to increase their imports. At the same time, increased unfair competition from dumped imports would prevent the Applicant from increasing prices in line with increased costs and the Applicant may also lower prices or offer additional discounts as a consequence of the increase in dumped imports. The Applicant would also continue to face increased expenses as a result of inflationary pressures and fixed costs will not decrease as volumes decrease, which would lead to increased outgoing cashflow per unit sold.

The combined effect of reduced sales volumes and low or decreasing prices would result in a significant decrease in the Applicant's sales value, which would result in a decrease the net cash flow.

5.3.9 Inventories

The Applicant provided the following levels of inventory for the period 01 May 2022 to 30 April 2025, and estimates in the event the duty expires:

Table 5.3.9: Inventories

HS 7312.10.17 R/kg	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Volume (kg)	100	176	175	213
Value (R)	100	178	181	276

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

The Applicant stated that it is likely that it would not be able to reduce production volumes by as much as sales volumes (as it will not be clear by how much sales volumes would decrease). This means that it is likely that the Applicant may

produce stock which it is unable to sell, resulting in increased inventory volume going forward. Even if the absolute volume of inventories were to remain similar to current levels, this would still be an increase relative to sales volumes.

5.3.10 Employment

The following table shows the Applicant's employment level for the period 01 May 2022 to 30 April 2025, and estimates in the event duty expires:

Table 5.3.10: Employment

No. of employees	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Direct labour units: production	100	86	77	77
Indirect labour units: production	100	96	90	90
Total labour units: production	100	89	81	81

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

The information above indicates that there is a declining trend of the total number of production employees from 100 index points 2022 to 81 points in 2025.

The Applicant stated that it experienced material injury in the form of a decrease in total number of employees over the period of investigation. In the short term the Applicant would not be able to reduce their number of production employees whilst continuing to operate the plant. As such, the expiry of anti-dumping duty would not have an immediate impact on employment in the short term. However, in the long term, the Applicant would not be able to sustain operations at its plant whilst facing unfair competition from dumped imports and would likely have to consider closing the plant permanently and retrenching all employees. This shows that the expiry of the anti-dumping duty would lead to a continuation of material injury in the form of decreased employment.

5.3.11 Wages

Using the production wages and employment figures sourced from the Applicant, its production wages per employee in respect of the subject product is as follows:

Table 5.3.11: Wages

Rands	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Direct Wages: Production	100	97	103	109
Indirect Wages: Production	100	81	77	82
Total wages: Production	100	90	92	98

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

The information in the table above indicates there was a decrease trend in the total remuneration of employees directly involved in the production. The total production remuneration decreases over the POI from 100 index points in 2022, to 92 points in 2025.

If the current anti-dumping duty expires, the Applicant stated that it would not be able to significantly reduce their number of production employees in the short-term whilst continuing to operate the plant. At the same time, the Applicant would have to continue paying increased wages to employees. This would lead to an increase in wages, which, when combined with expected lower sales volumes, would result in increased costs and reduced profitability and return on investment. However, in the long term, the Applicant would not be able to sustain operations at its plant whilst facing unfair competition from dumped imports and would likely have to consider closing the plant permanently and retrenching all employees.

5.3.12 Growth

The following table provides the Applicant's growth information for the period 1 May 2022 to 30 April 2025, and estimates in the event the duty expires:

Table 5.3.12: Growth

HS 7312.10.17 (kg)	May 2022-April 2023	%	May 2023-April 2024	%	May 2024-April 2025	%	2026 Estimates	%
Applicant's sales volume(kg)	100	0	102	100	139	1987	69	2732
Alleged dumped imports: China	1 445	0%	644 296	444 487%	240 401	(62.69%)	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [INCREASE FROM NCY2025]
Other countries	26 417	0%	22 860	(13,46%)	293 963	1185,91%	293 963	0%
Total imports	27 862	0%	667 156	2294,51%	534 364	(19,90)	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2025]	[CONFIDENTIAL] [POSITIVE] [DECREASE FROM NCY2023] [INCREASE FROM NCY2025]
Total SACU Market	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [UNCHANGED FROM NCY2023]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [INCREASE FROM NCY2024]	[CONFIDENTIAL] [POSITIVE] [INCREASE FROM NCY2023] [UNCHANGED FROM NCY2025]	[CONFIDENTIAL] [DECREASE FROM NCY2023] [DECREASE FROM NCY2025]

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

The Applicant stated that if the anti-dumping duty expires, the Applicant's sales volumes are expected to decline as downstream users can be expected to increase their imports. Even if the SACU market does not decrease in size, the Applicant is expected to lose a significant portion of its market share to dumped

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imports, if the anti-dumping duty expires. This loss of market share would be even greater if the SACU market decreases in size. This clearly shows that the expiry of the anti-dumping duty would lead to a recurrence or continuation of material injury.

5.3.13 Ability to raise capital or investments

The following table provides the Applicant's ability to raise capital and investment for the period 1 May 2022 to 30 April 2025, and estimates in the event the duty expires:

Table 5.3.13: Ability to raise capital or investments

Rands	May 2022-April 2023	May 2023-April 2024	May 2024-April 2025	2026 Estimates
Total capital/investment in the subject product	100	124	154	154
Capital expenditure during year on subject product	100	174	255	0

The Applicant stated that it has a strong ability to raise funds through group financing. With the combined cash flow of the Scaw SA Group and the Barnes Group, W&S is able to secure funding quickly when required. If the anti-dumping duty expires, the Applicant would not be able to achieve returns on its investment, which would limit the Applicant's ability to raise capital for future investments in maintaining or expanding capacity as needed. This clearly shows that the expiry of the anti-dumping duty would lead to a recurrence of material injury.

5.4 SUMMARY – CONTINUATION OR RECURRENCE OF MATERIAL INJURY

Commission's consideration

Although the anti-dumping duty may have contributed to moderating the impact of dumped imports from China, the domestic industry continued to experience injury, as evidenced by the deterioration of several key performance indicators despite improvements in others.

The Commission further noted that the Applicant experienced injury from 2023 to 2025 with respect to certain indicators. In particular, there has been price suppression, with selling prices decreasing. Additionally, employment and profits have also declined.

Despite these challenges, some indicators show performance improvements due to the duties in place. The Applicant holds a significant market share, while the alleged dumped imports account for only 1.67% and other imports account for 2.04%. Notably, sales volumes have increased by 39 index points, output has risen by 31 index points, the ability to raise capital has increased, and productivity has improved by 62 index points.

Given that the imports include other products, it is unclear if the injury suffered by the Applicant is solely due to these imports. However, if the duties were to be terminated, it is highly likely that there would be a decline in sales volumes, output, productivity, and further decreases in employment, investment and profits as well an increase in wages.

The Commission made a final determination that the expiry of the anti-dumping duty on the subject product originating in or imported from China would likely lead to the continuation or recurrence of material injury in the SACU industry.

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6. SUMMARY OF FINDINGS

6.1 Continuation of dumping

From the information available, it is evident that the expiry of the anti-dumping duty imposed on the subject product would likely lead to the continuation of dumping of the subject product originating in or imported from China.

6.2 Continuation of material injury

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

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7. FINAL DUTIES

7.1 Amount of duties

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

Item	Tariff heading	Description	Imported from or originating in	Rate of anti-dumping duties	Calculated dumping margin
215.02	7312.10.17	Stranded wire, of iron or steel, not electrically insulated, of a diameter of 12,7 mm or more (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord)	China	113.25%	215.40%

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

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8. FINAL DETERMINATION

The Commission made a final determination that the expiry of the anti-dumping duty on stranded wire originating in or imported from China would likely lead to the continuation of dumping and the continuation or recurrence of material injury.

No responses were received from the manufacturers/exporters of the subject product in China and therefore the determination of the likelihood of the continuation of dumping and continuation or recurrence of material injury is based on the best information available, being that provided by the Applicant. In these circumstances, it is the Commission's practice to recommend that the anti-dumping duties be maintained at their current levels unless compelling reasons, beyond the evidence considered during the investigation, warrant a deviation from this practice.

Therefore, the Commission made a final determination to recommend to the Minister that the current anti-dumping duty on the subject product originating in or imported from China be maintained as follows:

Item	Tariff heading	Description	Imported from or originating in	Rate of anti-dumping duties
215.02	7312.10.17	Stranded wire, of iron or steel, not electrically insulated, of a diameter of 12,7 mm or more (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord)	China	113.25%

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