

REPORT NO. 632

SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON WIRE ROPES AND CABLES OF A DIAMETER EXCEEDING 32 MM ORIGINATING IN OR IMPORTED FROM GERMANY AND THE UNITED KINGDOM (UK) AND ON STRANDED WIRE OF A DIAMETER EXCEEDING OR EQUAL TO 12.7MM ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA (PRC): FINAL DETERMINATION

The International Trade Administration Commission of South Africa herewith presents its **Report No. 632: SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON WIRE ROPES AND CABLES OF A DIAMETER EXCEEDING 32 MM ORIGINATING IN OR IMPORTED FROM GERMANY AND THE UNITED KINGDOM (UK) AND ON STRANDED WIRE OF A DIAMETER EXCEEDING OR EQUAL TO 12.7MM ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA (PRC): FINAL DETERMINATION**

A handwritten signature in dark ink, appearing to read 'Dumisani Mbambo', is written over a horizontal line.

Dumisani Mbambo
DEPUTY CHIEF COMMISSIONER

PRETORIA
20 / 07 / 2020

INTERNATIONAL TRADE ADMINISTRATION COMMISSION OF SOUTH AFRICA

SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON WIRE ROPES AND CABLES OF A DIAMETER EXCEEDING 32 MM ORIGINATING IN OR IMPORTED FROM GERMANY AND THE UNITED KINGDOM (UK) AND ON STRANDED WIRE OF A DIAMETER EXCEEDING OR EQUAL TO 12.7MM ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA (PRC): FINAL DETERMINATION

SYNOPSIS

On 8 June 2018, the International Trade Administration Commission of South Africa (the Commission) notified interested parties through Notice No. 326 of 2018 in *Government Gazette* No. 41685, that unless a substantiated request is made indicating that the expiry of the anti-dumping duties against imports of wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC would likely lead to the continuation or recurrence of dumping and injury and that the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC will expire on 7 August 2019.

A detailed response to the Commission's sunset review questionnaire was received from Scaw South Africa (Pty) Ltd (Scaw), on the 4th of April 2019. After all deficiencies were identified and addressed, an updated final application was received on 25 June 2019.

On 26 July 2019, the Commission initiated a sunset review of the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the United Kingdom and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC through Notice No. 394 of 2019 which was published in *Government Gazette* No. 42593.

The investigation was initiated after the Commission considered that the expiry of the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the United Kingdom and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC would likely lead to the continuation or recurrence of dumping and the recurrence of material injury.

On initiation of the investigation, known producers/exporters and associations of the subject product in the European Union, Germany, the UK and the PRC were sent relevant questionnaires to complete. Known importers/of the subject product were also sent questionnaires to complete. No properly documented responses were received from any of the interested parties identified in the investigation.

A response to the exporter's questionnaire was received from Casar Drahtseilwerk SAAR GMBH (Casar). A deficiency letter was sent to the respondent. Subsequent to receiving an updated response on 18 September 2019, it was still found to be deficient.

Casar was advised on 11 November 2019 of the deficiencies that still exist and that the Commission may therefore decide not to take its information into account for purposes of its final determination. The Commission made a decision not to take Casar's information into account for purposes of its final determination as Casar's response was deficient.

On 25 July 2019 an exporter's questionnaire was received from Diepa Drahtseilwerk Dietz GMBH & CO.KG (Diepa). A deficiency letter was sent to Diepa. On 22 October 2019 a request for extension to address the deficiencies was received. As the Anti-Dumping Regulations (ADR's) do not provide for extension on deficiencies, its request for extension was therefore denied.

Diepa was advised on 11 November 2019 of the deficiencies that still exist and that the Commission may therefore decide not to take its information into account for purposes of its final determination. The Commission made a decision not to take

Diepa's information into account for purposes of its final determination as Diepa's response was deficient.

No responses were received from any importers of the subject product.

On 13 December 2019, the Commission sent out "Essential facts" letters to all interested parties stating the Commission's is considering to make a final determination that the expiry of duties would likely lead to the continuation or recurrence of dumping the recurrence of material injury. The deadline for comment was 27 December 2019. No requests for extension were received.

On 20 December 2019, comments to the Commission's essential facts letter were received from the Applicant. The Applicant stated that they agreed with the final determination the Commission is considering.

On 20 December 2019, comments to the Commission's essential facts letter were received from the European Commission Directorate-General for Trade.

On 23 January the Commission received a letter from the Applicant in response to the comments made by the European Commission Directorate-General for Trade.

No response to the Commission's essential facts letter was received from Casar or Diepa.

After considering all parties' comments, the Commission made a final determination that the expiry of the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC would likely lead to the continuation or recurrence of dumping and the recurrence of material injury.

The Commission therefore decided to recommend to the Minister of Trade and Industry that the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm

originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC be maintained at 93 per cent; 76,17 per cent and 113,25 per cent respectively.

The Commission further decided to recommend to the Minister of Trade and Industry that the anti-dumping duty on the subject product may not be rebated.

1. APPLICATION AND PROCEDURE

1.1 LEGAL FRAMEWORK

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

1.2 APPLICANT

The application was lodged by Scaw South Africa (Pty) Ltd (Scaw) (the Applicant), the only producer of the subject products in the SACU.

1.3 INVESTIGATION PROCESS

On 8 June 2018, the International Trade Administration Commission of South Africa (the Commission) notified interested parties through Notice No. 326 of 2018 in *Government Gazette* No. 41685, that unless a substantiated request is made indicating that the expiry of wire ropes and cables of a diameter exceeding 32 mm originating in or imported from the UK and Germany and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC would likely lead to the continuation or recurrence of dumping and injury and the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from the UK and Germany and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC will expire on 7 August 2019.

Whilst completing the questionnaire for this sunset review, the Applicant realised that tariff subheadings applicable to the existing anti-dumping duties were not amended to reflect the tariff position in schedule 1 of the Customs and Excise Act. Scaw requested ITAC to approach SARS to amend the tariff subheadings to which the existing anti-dumping duties apply to ensure that they apply the correct tariff subheadings. The Commission made a decision to recommend to the Minister of Trade and industry that the tariff subheadings

applicable to the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating or imported from the Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC be amended. This amendment was published in the *Government Gazette* on 4 October 2019.

On 4 April 2019, a detailed response to the Commission's sunset review questionnaire was received from Scaw. The information submitted by the Applicant was verified on 13 June 2019. A verification report was sent to the Applicant on 18 June 2019. After all deficiencies were identified and addressed, a properly documented application was received on 05 July 2019.

Notice of initiation of the investigation was published in the *Government Gazette* on 26 July 2019, and the deadline for comments was 04 June 2019. Essential facts letters were sent to interested parties on 13 December 2019, and the deadline for comments was 27 December 2019. Comments on the Commission's essential facts letters were received from the Applicant and the European Commission Directorate-General for Trade.

1.4 INVESTIGATION PERIOD

The investigation period for dumping is from 1 November 2017 to 31 October 2018, and the injury investigation involves evaluation of data for the period 1 April 2015 to 31 October 2018, as well as an estimate in the event that the anti-dumping duties expire.

1.5 PARTIES CONCERNED

1.5.1 SACU industry

The application was lodged by Scaw, being the only producer of the subject product in 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" under the provisions of the Anti-Dumping Regulations.

1.5.2 Foreign Manufacturers/Exporters

No properly documented responses were received from any manufacturer/exporter in Germany, the UK and the PRC.

1.5.3 Importers

No responses were received from any of the interested parties in the investigation.

1.6 Comments

After considering all the information available, the Commission issued essential facts letters advising that it was considering making a final determination that the expiry of the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC would likely lead to the continuation or recurrence of dumping and the recurrence of material injury. Responses to the Commission's essential facts letters were received from the Applicant and the European Commission Directorate-General for Trade.

Comments by the Applicant on the Commission's Essential facts letter

The Applicant stated that it agrees with, supports and welcomes the Commission's proposed final determination inter alia that the information submitted by Casar and Diepa not be taken into account. The Applicant further stated that it agrees with, supports and welcomes the Commission's proposed final determination inter alia that the expiry of the anti-dumping duties would likely lead to the continuation or recurrence of material injury.

Comments by the European Commission Directorate-General for Trade ("ECDGT") on the Commission's Essential facts letter

The ECDGT stated that neither the export prices nor the domestic prices used, or any of the adjustments made in the dumping calculations were disclosed. It further stated that since Eurostat data is public, the Commission should

disclose the exact calculation of the dumping margins which would support the argument that dumping continues or is likely to recur. The ECDGT states that dumping and recurrence of material injury is not clear in the essential facts letter.

The ECDGT further stated that the essential facts letter does in no way allow a minimum understanding of the facts supposedly underlying the Commission's consideration. The ECDGT also states the following:

- *The source of information is not identified;*
- *None of the indicators is analyzed over the investigation period stated in the notice of initiation;*
- *All data is simply indicated as decrease, increase or N/A which does not allow for any quantitative or qualitative assessment of the indicators;*
- *Several data is non confidential and should have been disclosed. Confidential data should have been indexed;*
- *There has been no analysis whatsoever of the development of various indicators or if the relationship between the various developments or of the argumentation on the basis of which the Commission could conclude that injury would occur.*

Commission's consideration:

The Commission took note of the Applicant's and the ECDGT's comments to its essential facts letter. It should be noted that the essential facts letter does not contain the calculations for the dumping margin and merely outlines the methodology used in calculating dumping. The Commission is of the view that since no properly documented responses were received from manufacturers in Germany, and it was stated in the essential facts letter that it is considering making a final determination using the best information available, that is the information as contained in the Application. A copy of the non-confidential version of the Application was sent to all interested parties at initiation and is available for all interested parties to view.

Further, the Commission noted that a non-confidential summary of the injury information was included in the essential facts letter, in addition to the non-confidential version of all injury information, which has been made available to all interested parties.

Comments by the Applicant on the Comments by the European Commission Directorate-General for Trade (“ECDGT”)

The Applicant stated that despite being informed of the initiation of the investigation and being provided with a complete copy of the application on 26 July 2019, the ECDGT has shown no interest in responding to the information submitted by it. The Applicant further stated that to the best of their knowledge the ECDGT made no attempt to access the public file in order to keep apprised of developments.

The Applicant further stated that the ECDGT has elected to raise procedural issues (non-substantive) at a late stage of the investigation in an attempt to support exporters or producers in the EU that have either failed to respond at all to the investigation or have provided responses that remain deficient despite the numerous opportunities being given to remedy the deficiencies.

The Applicant also stated that although the Commission’s essential facts letter only indicates “increase”, “decrease” or “N/A”, the essential facts letter must be read with the application submitted by it in which the full underlying data is set out in great detail. Consequently, other interested parties including the ECDGT are in a position to make qualitative and quantitative assessment of the indicators. All non-confidential data and non-confidential summaries of confidential information have been disclosed in the non-confidential version of the application.

1.7 Final determination

Taking all comments received into account, the Commission made a final determination that the expiry of the anti-dumping duties on the subject product would likely lead to the continuation or recurrence of dumping and the recurrence of material injury.

The Commission therefore decided to recommend to the Minister of Trade and Industry that the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC be maintained.

The Commission further decided to recommend to the Minister of Trade and Industry that the anti-dumping duty on the subject product may not be rebated.

2. PRODUCTS, TARIFF CLASSIFICATION AND DUTIES

2.1 Product

2.1.1 Description

Stranded wire:

Pre-stressed Concrete Strand (also called PC Strand, Stay Cable or Stranded Wire) of a diameter equal to or greater than 12.7mm is a high tensile and low relaxation strand which is formed by twisting together several pre-stressed 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 pre-stressed concrete structures, such as bridges, high-rise buildings and various industrial facilities where heavy lifting, support and tension is required.

Ropes and Cables (coated and uncoated):

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

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

diameter, rope diameter, number of wires, sizes of wires, wire finish (black or galvanised), wire tensile grade, type of lubricant and strand or rope length.

2.1.2 Like product

In the original investigation the Commission found that the SACU product and the imported product are “like products” for purposes of comparison in terms of Article 2.6 of the Anti-dumping Agreement.

2.1.3 Tariff classification

The subject product is classifiable as follows:

Table 2.1.3: Tariff classification

Tariff heading/ subheading	Description	Statistic al unit	Rate of duty				
			General	EU ¹	EFTA ²	SADC ³	MERCOSUR ⁴
7312	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated:	kg					
7312.10	Stranded wire, ropes and cables:	kg					
7312.10.10	Stranded wire, of wire which is plated, coated or clad with copper- zinc base alloys (brasses)	kg	free	free	free	free	free
7312.10.15	Stranded wire, of wire which is plated, coated or clad with tin	kg	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	15.00%	free	free	free	15.00%
7312.10.20	Other stranded wire	kg	5.00%	free	free	free	5.00%

¹ European Union

² European Free Trade Association

³ Southern Africa Development Community

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

7312.10.23	Ropes and cables, of wire which is not plated, coated or clad, of a diameter not exceeding 13 mm (excluding that of wire of stainless steel and that identifiable as conveyor belt cord)	kg	5.00%	free	free	free	5.00%
7312.10.24	Ropes and cables, of wire which is not plated, coated or clad, of a diameter exceeding 13 mm (excluding that of wire of stainless steel and that identifiable as conveyor belt cord)	kg	15.00%	free	free	free	15.00%
7312.10.25	Other ropes and cables, of wire which is not plated, coated or clad	kg	5.00%	free	free	free	5.00%
7312.10.27	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)	kg	5.00%	free	free	free	5.00%
7312.10.30	Ropes and cables, of wire which is plated, coated or clad with zinc, of a diameter exceeding 13 mm (excluding that of wire of stainless steel and that identifiable as conveyor belt cord)	kg	15.00%	free	free	free	15.00%
7312.10.40	Other ropes and cables, of wire which is plated, coated or clad with zinc	kg	5.00%	free	free	free	5.00%
7312.10.90	Other	kg	15.00%	free	free	free	15.00%

2.1.4 Other applicable duties

The subject product attracts the following anti-dumping duties:

Table 2.1.4: Other applicable duties

Item	Tariff heading	Description	Imported from or originating in	Rates 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 or tin and that identifiable as conveyor belt cord)	The People's Republic of China	113.25%
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%
215.02	7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%

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

2.1.5 Rebate provisions

The following rebate provisions are currently applicable:

Table 2.1.5: Rebate provisions on the imported product

Rebate Item	Tariff heading/ subheading	Rebate Code	Article Description	Extent of Rebate
460.15	7312.10.20	01.06	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

3. INDUSTRY STANDING

The application was lodged by Scaw, on behalf of the SACU industry. Scaw is the only producer of stranded wire, coated ropes and cables or non-coated ropes and cables in 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 Section 7 of the Anti-Dumping Regulations.

4. CONTINUATION OR RECURRENCE OF DUMPING

The margin of dumping is calculated by subtracting the export price from the normal value of the product (after all adjustments have been made). The margin is then expressed as a percentage of the f.o.b. export price. If the margin is less than two percent, it is regarded as de *Minimis* in terms of ADR 12.3 no anti-dumping duty will be imposed.

4.1 METHODOLOGY FOR ALL MANUFACTURERS/EXPORTERS FROM THE PRC

4.1.1 Normal Value

As no properly documented responses were received from manufacturers in the PRC, the Commission made a final determination using the best information available, being that submitted by the Applicant for purposes of the calculation of a dumping margin for the PRC.

Due to the inability to obtain domestic selling prices in the PRC, exports to a third country, being Italy, were used in determining a normal value. Selling prices were obtained from Eurostat (a reputable data and information service). International trade in goods statistics (ITGS) published by Eurostat measure the value and quantity of Goods traded between the EU member states (intra-EU trade) and goods traded by the EU member states with non-EU countries (extra-EU trade). Eurostat international trade in goods statistics are the official harmonized source of information about exports, imports and trade balances in the EU.

Adjustments

The Applicant claimed a freight adjustment to calculate the normal value on an ex-factory basis, using information provided by Global Links Logistics and Oanda Corporation.

4.1.2 Export Price

As no properly documented responses were received from any manufacturer/exporter in the PRC, the Commission made a final determination to use the best information available, being that provided by the Applicant.

The export selling price was therefore calculated based on the import statistics obtained from the South African Revenue Services (SARS) for the period 01 November 2017 to 31 October 2018.

Adjustments

The Applicant used information provided by Global Link Logistics and Oanda Corporation (for the exchange rate information) to make an internal freight adjustment to calculate the ex-factory cost.

4.1.3 Margin of Dumping

The dumping margin for the PRC was calculated as follows:

Country	Margin of dumping
PRC	75.99%

4.2 METHODOLOGY FOR ALL MANUFACTURERS/EXPORTERS FROM GERMANY

4.2.1 Normal Value

As no properly documented responses were received from manufacturers in Germany, the Commission made a final determination using the best information available, being that submitted by the Applicant for purposes of the calculation of a dumping margin for Germany.

Selling prices were obtained from Eurostat (a reputable data and information service). International trade in goods statistics (ITGS) published by Eurostat

measure the value and quantity of Goods traded between the EU member states (intra-EU trade) and goods traded by the EU member states with non-EU countries (extra-EU trade). Eurostat international trade in goods statistics are the official harmonized source of information about exports, imports and trade balances in the EU.

Adjustments

The Applicant used information provided by Global Link Logistics and Oanda Corporation (for the exchange rate information) to make an internal freight adjustment to calculate the ex-factory cost.

4.2.2 Export Price

As no properly documented responses were received from any manufacturer/exporter in Germany, the Commission made a final determination to use the best information available, being that provided by the Applicant.

The Applicant used FOB prices taken from Eurostat for the subject product for the period 01 November 2017 to 31 October 2018.

Adjustments

The Applicant used information provided by Global Link Logistics and Oanda Corporation (for the exchange rate information) to make an internal freight adjustment to calculate the ex-factory cost.

4.2.3 Margin of Dumping

The dumping margin for Germany was calculated as follows:

Country	Margin of dumping
Germany	45.79%

Comments by the European Commission Directorate-General for Trade (“ECDGT”) on the Commission’s Essential facts letter

The ECDGT stated that neither the export prices nor the domestic prices used, or any of the adjustments made in the dumping calculations were disclosed. It further stated that since Eurostat data is public, the Commission should disclose the exact calculation of the dumping margins which would support the argument that dumping continues or is likely to recur. The ECDGT states that dumping and recurrence of material injury is not clear in the essential facts letter.

Commission’s Consideration

The essential facts letter does not contain the calculations for the dumping margin and merely outlines the methodology used in calculating dumping. Since no properly documented responses were received from manufacturers in Germany, and it was stated in the essential facts letter that the Commission is considering making a final determination using the best information available, that is the information as contained in the Application. A copy of the non-confidential version of the Application was sent to all interested parties at initiation and is available for all interested parties to view.

Comments by the Applicant on the Comments by the European Commission Directorate-General for Trade (“ECDGT”)

The Applicant stated that despite being informed of the initiation of the investigation and being provided with a complete copy of the application on 26 July 2019, the ECDGT has shown no interest in responding to the information submitted by it. The Applicant further stated that to the best of their knowledge the ECDGT made no attempt to access the public file in order to keep apprised of developments.

The Applicant also stated that the ECDGT has elected to raise procedural issues (non -substantive) at a late stage of the investigation in an attempt to support exporters or producers in the EU that have either failed to respond at

all to the investigation or have provided responses that remain deficient despite the numerous opportunities being given to remedy the deficiencies.

4.3 METHODOLOGY FOR ALL MANUFACTURERS/EXPORTERS FROM THE UK

4.3.1 Normal Value

As no properly documented responses were received from manufacturers in the UK, the Commission made a final determination using the best information available, being that submitted by the Applicant for purposes of the calculation of a dumping margin for the UK.

Selling prices were obtained from Eurostat (a reputable data and information service). International trade in goods statistics (ITGS) published by Eurostat measure the value and quantity of Goods traded between the EU member states (intra-EU trade) and goods traded by the EU member states with non-EU countries (extra-EU trade). Eurostat international trade in goods statistics are the official harmonised source of information about exports, imports and trade balances in the EU.

Adjustments

The Applicant used information provided by Global Link Logistics and Oanda Corporation (for the exchange rate information) to make an internal freight adjustment to calculate the ex-factory cost.

4.3.2 Export Price

As no properly documented responses were received from any manufacturer/exporter in the UK, the Commission made a final determination to use the best information available, being that provided by the Applicant.

The Applicant used FOB prices taken from Eurostat for the subject product for the period 01 November 2017 to 31 October 2018.

Adjustments

The Applicant used information provided by Global Link Logistics and Oanda Corporation (for the exchange rate information) to make an internal freight adjustment to calculate the ex-factory cost.

4.3.3 Margin of Dumping

The dumping margin for the UK was calculated as follows:

Country	Margin of dumping
The UK	70.54%

4.4 FINAL DETERMINATION: DUMPING

The Commission made a final determination that the expiry of the duties would likely lead to the continuation or recurrence of dumping of the subject product originating in or imported from Germany, the UK and the PRC.

5. CONTINUATION OR RECURRENCE OF MATERIAL INJURY

5.1 DOMESTIC INDUSTRY – MAJOR PROPORTION OF PRODUCTION

The following injury analysis relates to Scaw being only producer of the subject product in the SACU. The Commission decided that this constitutes “a major proportion” of the total domestic production, in accordance with the Anti-Dumping Regulations.

5.2 IMPORT VOLUMES AND THE EFFECT ON PRICES

The material injury information is provided for the three groups of products subject to the current anti-dumping duties, being stranded wire; uncoated ropes and cables; and coated ropes and cables, separately.

The Applicant submitted material injury information for three financial years (1 April 2015 to 31 March 2018) and for a period of seven months (1 April to 31 October 2018). This was done to provide recent information and to allow for meaningful trend analysis of material injury indicators. Information for each of the injury indicators are therefore provided for (i) the three financial years and (ii) for the corresponding seven month periods during the period of investigation, in order to allow for comparison. The Applicant also provided estimates for 2020, should the anti-dumping duties expire.

5.2.1 Import volumes

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

Table 5.2.1 (a)(i): Import volumes: Stranded wire (Financial Years)

Import Volumes (kg) 7312.10.17 or 7312.10.20	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
PRC	1 198 410	2 408 595	2 277 610	Increased
Other	446 361	705 324	2 899 861	Decreased
Total	1 644 771	3 113 919	5 177 471	Increased
PRC imports as a % of total imports	72.86%	77.35%	43.99%	Increased

Table 5.2.1 (a)(ii): Import volumes Stranded wire: (7 Month periods)

Import Volumes (kg) 7312.10.17 or 7312.10.20	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018 – 31 October 2018
PRC	550 990	1 055 834	1 494 200	1 085 304
Other	335 315	360 272	1 296 956	1 118 921
Total	886 305	1 416 106	2 791 156	2 204 225
PRC imports as a % of total imports	62.17%	74.56%	53.53%	49.24%

Table 5.2.1 (b)(i): Import volumes: Non-coated ropes and cables (Financial years)

Import Volumes (kg) 7312.10.24 or 7312.10.25	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Germany	802 448	525 719	535 230	Increased
UK	111 975	53 822	178 149	Increased
Other	3 115 995	2 726 572	2 936 819	Decreased
Total	4 030 418	3 306 112	3 650 198	Increased
Imports from Germany as a % of total imports	19.91%	15.90%	14.66%	Increased
Imports from the UK as a % of total imports	2.78%	1.63%	4.88%	Increased

Table 5.2.1 (b)(ii): Import volumes: Non-coated ropes and cables (7 Month periods)

Import Volumes (kg) 7312.10.24 or 7312.10.25	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018 – 31 October 2018
Germany	569 001	194 631	444 984	365 662
UK	86 977	3 003	174 736	216 804
Other	1 876 899	1 478 246	1 033 994	1 173 770
Total	2 532 877	1 675 879	1 653 714	1 756 235
Imports from Germany as a % of total imports	22.46%	11.61%	26.91%	20.82%
Imports from the UK as a % of total imports	3.43%	0.18%	10.57%	12.34%

Table 5.2.1 (c)(i): Import volumes: Coated ropes and cables (Financial Years)

Import Volumes (kg) 7312.10.40 or 7312.10.90	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Germany	49 006	84 338	208 133	Increased
UK	422 832	340 622	365 710	Increased
Other	9 013 156	7 700 318	8 395 285	Decreased
Total	9 484 993	8 125 278	8 969 128	Increased
Imports from Germany as a % of total imports	0.52%	1.04%	2.32%	Increased
Imports from the UK as a % of total imports	4.46%	4.19%	4.08%	Increased

Table 5.2.1 (c)(ii): Import volumes: Coated ropes and cables (7 month periods)

Import Volumes (kg) 7312.10.40 or 7312.10.90	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018 – 31 October 2018
Germany	39 938	53 098	139 098	50 011
UK	258 535	225 915	179 782	119 454
Other	5 867 796	4 219 277	4 705 550	4 298 395
Total	6 166 269	4 498 290	5 024 430	4 467 861
Imports from Germany as a % of total imports	0.65%	1.18%	2.77%	1.12%
Imports from the UK as a % of total imports	4.19%	5.02%	3.58%	2.67%

The Applicant stated that as demonstrated above, the expiry of anti-dumping duties will lead to a continuation or recurrence of dumping and dumped imports of the subject products will enter the SACU market at very low dumped prices. The Applicant further stated that the expiry of the duties will also lead to a

continuation or recurrence of injury as dumped imports at low prices (significantly cheaper than the product produced and sold by Scaw) will cause, inter alia, a rapid and significant increase in the volume and market share of dumped imports and a reduction in Scaw's SACU sales and production volumes.

5.2.2 Effect on Domestic Prices

5.2.2.1 Price undercutting

Price undercutting is the extent to which the price of the imported product is lower than the price of the SACU product.

Stranded wire

Table 5.2.2.1 (a)(i): Price undercutting (Financial Years)

R/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's ex-factory selling price	100	113	122	128
Landed cost of imports from the PRC	20.27	18.66	19.42	20.30
Undercutting per kg	Negative	Negative	Negative	Negative
Undercutting per %	Negative	Negative	Negative	Negative

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.1 (a)(ii): Price undercutting (7 month periods)

R/kg	1 April 2015– 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018– 31 October 2018
Applicant's ex-factory selling price	100	111	119	139
Landed cost of imports from the PRC	16.73	20.64	17.99	20.30
Undercutting per kg	Negative	Negative	Negative	Negative
Undercutting per %	Negative	Negative	Negative	Negative

Tables indexed due to confidentiality using April 2015–October 2015 as a base year

Non-coated ropes and cables

Table 5.2.2.1 (b)(i) : Price undercutting (Financial Years)

R/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's ex-factory selling price	100	99	110	112
Landed cost of imports from Germany	36	34	31	38
Undercutting per kg (Germany)	Negative	Positive	Positive	Positive
Undercutting Margin % per kg (Germany)	Negative	Positive	Positive	Positive
Landed cost of imports from the UK	46	38	32	60
Undercutting per kg (UK)	Negative	Negative	Positive	Negative
Undercutting Margin % per kg (UK)	Negative	Negative	Positive	Negative

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.1 (b) (ii): Price undercutting (7 month periods)

R/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018 – 31 October 2018
Applicant's ex-factory selling price	100	100	107	120
Landed cost of imports from Germany	36	34	30	38
Undercutting per kg (Germany)	Negative	Positive	Positive	Positive
Undercutting Margin % per kg (Germany)	Negative	Positive	Positive	Positive
Landed cost of imports from the UK	46	73	32	60
Undercutting per kg (UK)	Negative	Negative	Positive	Negative
Undercutting Margin % per kg (UK)	Negative	Negative	Positive	Negative

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.2.1 (c)(i): Price undercutting (Financial Years)

R/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's ex-factory selling price	100	108	108	116
Landed cost of imports from Germany	112	81	89	92
Undercutting per kg (Germany)	Negative	Negative	Negative	Negative
Undercutting Margin % per kg (Germany)	Negative	Negative	Negative	Negative
Landed cost of imports from the UK	57	56	40	85
Undercutting per kg (UK)	Negative	Negative	Positive	Negative
Undercutting Margin % per kg (UK)	Negative	Negative	Positive	Negative

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.1 (c)(ii): Price undercutting (7 month periods)

R/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's ex-factory selling price	100	111	115	109
Landed cost of imports from Germany	101	82	90	92
Undercutting per kg (Germany)	Negative	Negative	Negative	Negative
Undercutting Margin % per kg (Germany)	Negative	Negative	Negative	Negative
Landed cost of imports from the UK	59	56	43	85
Undercutting per kg (UK)	Negative	Negative	Positive	Negative
Undercutting Margin % per kg (UK)	Negative	Negative	Positive	Negative

Tables indexed due to confidentiality using April 2015-October 2015 as a base year

The Applicant stated that given the high anti-dumping duties currently imposed on the subject products, it is highly probable that imports of the subject products originating in China, Germany and the UK (other than imports from producers exempt from the anti-dumping duties) have ceased or that there are only minimal imports of these products. The Applicant stated that this is supported by its knowledge of the market.

The Applicant also stated that according to its market knowledge, imports of the subject products of the diameter covered by the anti-dumping duties are available from China, Germany and the UK at prices lower than Scaw SACU Sales Ex-Factory Price (Locally Manufactured). If the anti-dumping duties expire, these products will undercut Scaw SACU Sales Ex-Factory Price (Locally Manufactured) in the SACU market, leading to a continuation or recurrence of injury, including price suppression and depression, decline in profitability and return on investment (including significant losses).

5.2.2.2 Price depression

The tables below show the Applicant's price depression for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.2.2 (a)(i) (Financial Years)

R/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's ex-factory selling price (R/kg)	100	113	122	128

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.2 (a)(ii) (7 month periods)

R/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 Apr 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's ex-factory selling price (R/kg)	100	111	119	139

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.2.2 (b)(i) (Financial Years)

R/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's ex-factory selling price (R/kg)	100	99	110	112

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.2 (b)(i) (7 month periods)

R/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 Apr 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's ex-factory selling price (R/kg)	100	100	107	120

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.2.2 (c)(i) (Financial Years)

R/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's ex-factory selling price (R/kg)	100	108	108	116

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.2 (c)(ii) (7 month period)

R/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's ex-factory selling price (R/kg)	100	111	115	109

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that it experienced price depression in coated ropes and cables in FY2018 and will be forced to lower prices of stranded wire and non-coated ropes and cables and coated ropes and cables by 7.00% and 7.50% respectively if the duties expire as dumped imports will then be considerably cheaper than the product manufactured and sold by it. The expiry of the anti-dumping duties will therefore lead to a continuation or recurrence of injury in the form of price depression.

5.2.2.3 Price suppression

The tables below show the Applicant's price suppression for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.2.3 (a)(i) (Financial Years)

Rand/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's SACU Sales Ex-Factory Price	100	113	122	128
Total production cost per kg	100	100	112	142
Gross profit per kg	100	162	161	73
Gross profit margin (%)	100	144	132	57
Cost as % selling price	100	88	92	108

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.3 (a)(ii) (7 month period)

Rand/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's SACU Sales Ex-Factory Price	100	111	119	139
Total production cost per kg	100	97	107	131
Gross profit per kg	100	182	182	182
Gross profit margin (%)	100	163	152	130
Cost as % selling price	100	89	90	92

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.2.3 (b)(i) (Financial Years)

Rand/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's SACU Sales Ex-Factory Price	100	99	110	112
Total production cost per kg	100	92	102	114
Gross profit per kg	100	463	588	1
Gross profit margin (%)	100	468	533	0
Cost as % selling price	100	98	95	107

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.3 (b)(ii) (7 month periods)

Rand/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's SACU Sales Ex-Factory Price	100	100	107	120
Total production cost per kg	100	107	100	118
Gross profit per kg	100	43	161	135
Gross profit margin (%)	100	43	150	113
Cost as % selling price	100	108	97	100

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.2.3 (c)(i) (Financial Years)

Rand/kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's SACU Sales Ex-Factory Price (100	108	108	116
Total production cost per kg	100	112	124	133
Gross profit per kg	(100)	(163)	(331)	(338)
Gross profit margin (%)	(100)	(151)	(308)	(291)
Cost as % selling price	100	105	116	116

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.2.3 (c)(ii) (7 month periods)

Rand/kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's SACU Sales Ex-Factory Price (100	111	115	109
Total production cost per kg	100	121	126	140
Gross profit per kg	100	(45)	(61)	(379)
Gross profit margin (%)	100	(40)	(53)	(346)
Cost as % selling price	100	109	111	127

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant indicated that it has experienced price suppression for stranded wire in FY2018 and FY2019 (April - October), for non-coated ropes and cables in FY2018 and for coated ropes and cables (throughout the period of investigation. The Applicant stated that an expiry of the anti-dumping duties will lead to a continuation or recurrence of injury in the form of price suppression, as it will be forced to lower its prices in order to compete with the significantly cheaper dumped imports.

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

5.2.3.1 Actual and potential decline in volumes

The tables below show the Applicant's sales volumes for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.3.1 (a)(i): Sales volumes (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's sales volume in SACU	100	121	126	64
Other SACU producers sales volume in SACU	0	0	0	0
Total SACU sales volume	100	121	126	64

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.1 (a)(ii): Sales volumes (7 month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's sales volume in SACU	100	127	136	125
Other SACU producers sales volume in SACU	0	0	0	0
Total SACU sales volume	100	127	136	125

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.1 (b)(i): Sales volumes (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's sales volume in SACU	100	131	125	97
Other SACU producers sales volume in SACU	0	0	0	0
Total SACU sales volume	100	131	125	97

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.1 (b)(ii): Sales volumes (7 month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 Apr 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's sales volume in SACU	100	118	113	125
Other SACU producers sales volume in SACU	0	0	0	0
Total SACU sales volume	100	118	113	125

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.1 (c)(i): Sales volumes (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's sales volume in SACU	100	81	98	48
Other SACU producers sales volume in SACU	0	0	0	0
Total SACU sales volume	100	81	98	48

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.1 (c)(ii): Sales volumes (7 months periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's sales volume in SACU	100	91	89	75
Other SACU producers sales volume in SACU	0	0	0	0
Total SACU sales volume	100	91	89	75

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that if the anti-dumping duties expire, its SACU sales volume (locally manufactured) for stranded wire will decrease sharply, to almost half the FY2018 figure, which will result in a significant loss in market share for it and a significant decrease in profits. It's SACU sales volume (locally manufactured) for non-coated ropes and cables declined in FY2018. If the anti-dumping duties expire, its SACU sales volume (locally manufactured) will decline even further, causing its market share (volume) to decline to a record low.

The Applicant further stated that its SACU sales volume (locally manufactured) for coated ropes and cables declined in FY2017 and, despite an increase, remained below FY2016 levels in FY2018. If the anti-dumping duties expire, its SACU sales volume (locally manufactured) will decline to less than half of FY2018 levels, resulting in a significant loss of market share.

The tables below show the Applicant's sales values for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.3.1 (d)(i): Sales values (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's SACU Sales	100	136	154	82
Other SACU producers sales	0	0	0	0
Total SACU sales	100	136	154	82

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.1 (d)(ii): Sales values (7 month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's SACU Sales	100	136	154	82
Other SACU producers sales	0	0	0	0
Total SACU sales	100	136	154	82

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.1 (e)(i): Sales values (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's SACU Sales	100	130	138	108
Other SACU producers sales	0	0	0	0
Total SACU sales	100	130	138	108

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.1 (e)(ii): Sales values (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's SACU Sales	100	118	121	149
Other SACU producers sales	0	0	0	0
Total SACU sales	100	118	121	149

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.1 (f)(i): Sales values (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Applicant's SACU Sales	100	87	105	55
Other SACU producers sales	0	0	0	0
Total SACU sales	100	87	105	55

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.1 (f)(ii): Sales values (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Applicant's SACU Sales	100	101	102	82
Other SACU producers sales	0	0	0	0
Total SACU sales	100	101	102	82

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that its SACU sales net ex-factory value (locally manufactured) for non-coated ropes and cables declined in FY2018. If the anti-dumping duties expire, its SACU sales net ex-factory value (locally manufactured) will decline even further, causing its market share (value) to decline to a record low.

The Applicant further stated that its SACU sales net ex-factory value (locally manufactured) for coated ropes and cables declined in FY2017. If the anti-dumping duties expire, its SACU sales net ex-factory value (locally manufactured) will decline to almost half of FY2018 levels, resulting in a significant loss of market share.

5.2.3.2 Profit

The tables below show the Applicant's gross and net profits for sales of the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.3.2(a)(i): Profit (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Sales Volume (kg)	100	121	126	64
Total gross profit	100	196	203	47
Total Net profit	100	214	217	50

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.2(a)(ii): Profit (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Sales Volume (kg)	100	127	136	125
Total gross profit	100	230	247	228
Total Net profit	100	230	248	251

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.2(b)(i): Profit (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Sales Volume (kg)	100	131	125	97
Total gross profit	100	608	736	1
Total Net profit	(100)	(42)	96	(387)

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.2(b)(ii): Profit (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Sales Volume (kg)	100	118	113	125
Total gross profit	100	50	182	168
Total Net profit	100	(39)	185	157

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.2(c)(i): Profit (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Sales Volume (kg)	100	81	98	48
Total gross profit	(100)	(132)	(324)	(161)
Total Net profit	(100)	(130)	(255)	(133)

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.2(c)(ii): Profit (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Sales Volume (kg)	100	91	89	75
Total gross profit	100	(41)	(54)	(284)
Total Net profit	100	(560)	(656)	(1,459)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that although net profit for stranded wire improved throughout the period under consideration, it is important to remember that both net profit per unit and net profit percentage declined continuously from FY2017 onwards. Thus, despite the increase in net profit, it continues to suffer significant material injury. If the anti-dumping duties expire, the combination of lower sales volumes, increased costs and lower prices will result in a significant decline in net profit for stranded wire.

The Applicant also stated that net profit for non-coated ropes and cables improved in FY2017 and FY2019 (April - October), but declined significantly in FY2018 and, if the anti-dumping duties expire, the combination of lower sales volumes and lower prices will to result in significant losses going forward.

The Applicant stated that it has made losses on sales of coated ropes and cables throughout the period of investigation and the combination of lower sales volumes and lower prices will result in even greater losses going forward if the anti-dumping duties expire.

5.2.3.3 Output

The tables below show the Applicant's production volumes of the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.3.3(a)(i): Output (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total Production Volume	100	118	150	96

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.3(a)(ii): Output (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total Production Volume	100	131	163	148

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.3(b)(i): Output (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 - 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total Production Volume	100	107	113	80

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.3(b)(ii): Output (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total Production Volume	100	95	99	94

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.3(c)(i): Output (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total Production Volume	100	65	69	52

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.3(c)(ii): Output (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total Production Volume	100	63	57	55

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that its total production volume for stranded wire and non-coated ropes and cables improved throughout the period of investigation, whilst its total production volume for coated ropes and cables declined in FY2017 and improved slightly in FY2018. However, its total production volume for all the subject products will decline significantly if the anti-dumping duties expire as it will be forced to reduce production volumes as the flood of dumped imports will not allow for sales in sufficient volumes in the SACU market.

5.2.3.4 Market share

The tables below show the Applicant's market share of the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.3.4(a)(i): Market share (Volumes) (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Sales Volume (kg)	100	121	126	64
Dumped Imports Volume (China)(kg)	1 198 410	2 408 595	2 277 610	7 961 538
Non-Dumped Imports Volume(kg)	446 361	705 324	2 899 861	1 350 515

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.4(a)(ii): Market share (Volumes) (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Sales Volume (kg)	100	127	136	125
Dumped Imports Volume (China)(kg)	550 990	1 055 834	1 494 200	1 085 304
Non-Dumped Imports Volume(kg)	335 315	360 272	1 296 956	1 118 921

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.4(b)(i): Market share (Volumes) (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Sales Volume (kg)	100	131	125	97
Dumped Imports Volume (Germany) (kg)	802 448	525 719	535 230	1 625 584
Dumped Imports Volume (UK) (kg)	111 975	53 822	178 149	710 197
Non-Dumped Imports Volume (kg)	3 115 995	2 726 572	2 936 819	2 926 462

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.4(b)(ii): Market share (Volumes) (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Sales Volume (kg)	100	118	113	125
Dumped Imports Volume (Germany) (kg)	569 001	194 631	444 984	365 662
Dumped Imports Volume (UK) (kg)	86 977	3 003	174 736	216 804
Non-Dumped Imports Volume (kg)	1 876 899	1 478 246	1 033 994	1 173 770

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.4(c) (i): Market share (Volumes) (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Sales Volume (kg)	100	81	98	48
Dumped Imports Volume (Germany) (kg)	49 006	84 338	208 133	261 382
Dumped Imports Volume (UK) (kg)	422 832	340 622	365 710	728 832
Non-Dumped Imports Volume (kg)	9 013 156	7 700 318	8 395 285	8 369 586

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.4(c)(ii): Market share (Volumes) (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Sales Volume (kg)	100	91	89	75
Dumped Imports Volume (Germany) (kg)	39 938	53 098	139 098	50 011
Dumped Imports Volume (UK) (kg)	258 535	225 915	179 782	119 454
Non-Dumped Imports Volume (kg)	5 867 796	4 219 277	4 705 550	4 298 395

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that given the high anti-dumping duties currently imposed on the subject products, it is highly probable that imports of the subject products originating in China, Germany and the UK (other than imports from producers exempt from the anti-dumping duties) have ceased or that there are only minimal imports of these products. This is supported by its knowledge of the market.

The Applicant state that the import statistics from SARS for the subject products are unreliable because the tariff subheadings are broad and cover a wide range of products and not only the products which are the subject of the anti-dumping duties. As a result, the import volumes in these statistics is higher than they would be if only the subject products were included. This means that the market share figures provided above for it and imports are significantly under- and overstated respectively. If the anti-dumping duties expire, dumped import

volumes will increase significantly and as a result its market share (volume) will decline significantly, to approximately half the level of FY2016 to FY2018 for stranded wire and to approximately one third the level of FY2016 to FY2018 for non-coated ropes and cables and coated ropes and cables.

5.2.3.5 Productivity

The tables below show the Applicant's productivity with regards to the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded Wire

Table 5.2.3.5 (a)(i): Productivity (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Total Production Volume (kg)	100	118	150	96
Total Number of Production Employees (employees)	100	106	99	95
Production per Employee (kg)	100	112	151	101

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.5 (a)(ii): Productivity (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Total Production Volume (kg)	100	131	163	148
Total Number of Production Employees (employees)	100	107	101	98
Production per Employee (kg)	100	123	160	151

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.5 (b)(i): Productivity (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Total Production Volume (kg)	100	107	113	80
Total Number of Production Employees (employees)	100	104	102	80
Production per Employee (kg)	100	102	111	100

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.5 (b)(ii): Productivity (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Total Production Volume (kg)	100	95	99	94
Total Number of Production Employees (employees)	100	108	105	101
Production per Employee (kg)	100	89	94	93

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.5 (c)(i): Productivity (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Total Production Volume (kg)	100	65	69	52
Total Number of Production Employees (employees)	100	104	102	81
Production per Employee (kg)	100	63	68	64

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.5 (c)(ii): Productivity (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Total Production Volume (kg)	100	63	57	55
Total Number of Production Employees (employees)	100	106	104	100
Production per Employee (kg)	100	59	55	55

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that it has managed to improve productivity for stranded wire and non-coated ropes and cables, but cutbacks in production forced a decline in coated ropes and cables. However, if the anti-dumping duties expire, productivity will decline for all the subject products, to levels approximately equal to or below the lowest levels in the period of investigation.

5.2.3.6 Return on investment

The tables below show the Applicant's return on investment for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.6(a)(i): Return on investment (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Net Profit (R)	100	214	217	50
Net Profit (Total Sales) (Whole Company (Stranded Wire)) (R)	100	852	-236	652
Net Assets (R)	100	120	97	30
Net Assets (Whole Company (Stranded Wire)) (R)	100	103	75	30
Return on Net Assets (%)	100	179	224	166
Return on Net Assets (Whole Company (Stranded Wire)) (%)	100	825	-316	2,194

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.6(a)(ii): Return on investment (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Net Profit (R)	100	230	248	251
Net Profit (Total Sales) (Whole Company (Stranded Wire)) (R)	100	527	306	399
Net Assets (R)	100	131	112	28
Net Assets (Whole Company (Stranded Wire)) (R)	100	103	79	21
Return on Net Assets (%)	100	176	221	892
Return on Net Assets (Whole Company (Stranded Wire)) (%)	100	511	386	1,883

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.6(b)(i): Return on investment (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Net Profit (R)	(100)	(42)	96	(387)
Net Profit (Total Sales) (Whole Company (Stranded Wire)) (R)	(100)	(42)	(84)	(80)
Net Assets (R)	100	76	59	16
Net Assets (Whole Company (Stranded Wire)) (R)	100	37	(7)	(175)
Return on Net Assets (%)	(100)	(55)	163	(2,437)
Return on Net Assets (Whole Company (Stranded Wire)) (%)	(100)	(113)	1,143	46

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.6(b)(ii): Return on investment (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Net Profit (R)	100	(39)	185	157
Net Profit (Total Sales) (Whole Company (Stranded Wire)) (R)	(100)	(40)	(59)	(94)
Net Assets (R)	100	74	57	29
Net Assets (Whole Company (Stranded Wire)) (R)	100	38	3	(80)
Return on Net Assets (%)	100	(52)	323	544
Return on Net Assets (Whole Company (Stranded Wire)) (%)	(100)	(106)	(1,977)	117

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.6(c)(i): Return on investment (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Net Profit (R)	(100)	(130)	(255)	(133)
Net Profit (Total Sales) (Whole Company (Stranded Wire)) (R)	(100)	(42)	(84)	(80)
Net Assets (R)	100	54	11	(118)
Net Assets (Whole Company (Stranded Wire)) (R)	100	37	(7)	(175)
Return on Net Assets (%)	(100)	(239)	(2,231)	112
Return on Net Assets (Whole Company (Stranded Wire)) (%)	(100)	(113)	1,143	46

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.6(c)(ii): Return on investment (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Net Profit (R)	100	(560)	(656)	(1,459)
Net Profit (Total Sales) (Whole Company (Stranded Wire)) (R)	(100)	(40)	(59)	(94)
Net Assets (R)	100	54	22	(45)
Net Assets (Whole Company (Stranded Wire)) (R)	100	38	3	(80)
Return on Net Assets (%)	100	(1,035)	(3,009)	3,254
Return on Net Assets (Whole Company (Stranded Wire)) (%)	(100)	(106)	(1,977)	117

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that returns on stranded wire have improved continuously, but this will decline significantly if anti-dumping duties expire as the cheaper dumped imports will significantly erode its sales volumes, which it will be forced to continue to sell at even further suppressed prices.

The Applicant stated that it has experienced negative returns on coated ropes and cables throughout the period of investigation, whilst returns on non-coated ropes and cables have been minimal. If the anti-dumping duties expire, the combination of reduced sales volumes and lower prices with rising costs will mean that it will experience significant negative returns on both of these products.

5.2.3.7 Utilization of production capacity

The tables below show the Applicant's utilization of production capacity for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.7(a)(i): Production capacity (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Production Capacity (kg)	100	100	100	100
Scaw Total Production Volume (kg)	100	118	150	96
Scaw Capacity Utilisation (%)	100	118	150	96

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.7(a)(ii): Production capacity (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Production Capacity (kg)	100	100	100	100
Scaw Total Production Volume (kg)	100	131	163	148
Scaw Capacity Utilisation (%)	100	131	163	148

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.7(b)(i): Production capacity (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Production Capacity (kg)	100	100	100	100
Scaw Total Production Volume (kg)	100	107	113	80
Scaw Capacity Utilisation (%)	100	107	113	80

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.7(b)(ii): Production capacity (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Production Capacity (kg)	100	100	100	100
Scaw Total Production Volume (kg)	100	95	99	94
Scaw Capacity Utilisation (%)	100	95	99	94

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables**Table 5.2.3.7(c)(i): Production capacity (Financial Years)**

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw Production Capacity (kg)	100	100	100	100
Scaw Total Production Volume (kg)	100	65	69	52
Scaw Capacity Utilisation (%)	100	65	69	52

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.7(c)(ii): Production capacity (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw Production Capacity (kg)	100	100	100	100
Scaw Total Production Volume (kg)	100	63	57	55
Scaw Capacity Utilisation (%)	100	63	57	55

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

5.2.3.8 Actual and potential negative effects of cash flow

The tables below show the Applicant's actual and potential negative effects on cash flow for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.8(a) (i): Cash flow (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Incoming Cash Flow (R)	100	78	127	425
Outgoing Cash Flow (R)	(100)	(78)	(127)	(440)
Net Cash Flow (R)	100	624	(138)	(16,167)
Incoming Cash Flow (Whole Company (Stranded Wire)) (R)	100	78	127	425
Outgoing Cash Flow (Whole Company (Stranded Wire))(R)	(100)	(78)	(127)	(440)
Net Cash Flow (Whole Company (Stranded Wire))(R)	100	624	(138)	(16,167)

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.8(a) (ii): Cash flow (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Incoming Cash Flow (R)	100	57	69	101
Outgoing Cash Flow (R)	(100)	(56)	(69)	(102)
Net Cash Flow (R)	100	630	0	(541)
Incoming Cash Flow (Whole Company (Stranded Wire)) (R)	100	57	69	101
Outgoing Cash Flow (Whole Company (Stranded Wire))(R)	(100)	(56)	(69)	(102)
Net Cash Flow (Whole Company (Stranded Wire))(R)	100	630	0	(541)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.8(b) (i): Cash flow (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Incoming Cash Flow (R)	100	72	68	13
Outgoing Cash Flow (R)	(100)	(72)	(68)	(13)
Net Cash Flow (R)	(100)	(39)	312	0
Incoming Cash Flow (Whole Company (Ropes and Cables)) (R)	100	139	128	222
Outgoing Cash Flow ((Whole Company (Ropes and Cables)) (R)	(100)	(139)	(128)	(222)
Net Cash Flow (Whole Company (Ropes and Cables)) (R)	(100)	296	(104)	0

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.8(b) (ii): Cash flow (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Incoming Cash Flow (R)	100	61	87	104
Outgoing Cash Flow (R)	(100)	(61)	(87)	(104)
Net Cash Flow (R)	(100)	20	117	(663)
Incoming Cash Flow (Whole Company (Ropes and Cables)) (R)	100	111	137	175
Outgoing Cash Flow ((Whole Company (Ropes and Cables)) (R)	(100)	(111)	(137)	(175)
Net Cash Flow (Whole Company (Ropes and Cables)) (R)	(100)	327	(90)	(177)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.8(c) (i): Cash flow (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Incoming Cash Flow (R)	100	67	84	103
Outgoing Cash Flow (R)	(100)	(67)	(84)	(103)
Net Cash Flow (R)	(100)	(209)	382	0
Incoming Cash Flow (Whole Company (Ropes and Cables)) (R)	100	139	128	222
Outgoing Cash Flow ((Whole Company (Ropes and Cables)) (R)	(100)	(139)	(128)	(222)
Net Cash Flow (Whole Company (Ropes and Cables)) (R)	(100)	296	(104)	0

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.8(c) (ii): Cash flow (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Incoming Cash Flow (R)	100	61	91	67
Outgoing Cash Flow (R)	(100)	(61)	(91)	(67)
Net Cash Flow (R)	(100)	24	141	(41)
Incoming Cash Flow (Whole Company (Ropes and Cables)) (R)	100	111	137	175
Outgoing Cash Flow ((Whole Company (Ropes and Cables)) (R)	(100)	(111)	(137)	(175)
Net Cash Flow (Whole Company (Ropes and Cables)) (R)	(100)	327	(90)	(177)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that its divisions that produce stranded wire, non-coated ropes and cables and coated ropes and cables do not have their own bank accounts, so net cash flow will always be minimal or equal to zero.

5.2.3.9 Inventories

The tables below show the Applicant's inventory levels for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.9 (a) (i): Inventories (Financial Years)

	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Inventory Volume (kg)	100	93	97	115
Inventory Value (R)	100	124	153	222

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.9 (a) (ii): Inventories (7 Month periods)

	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Inventory Volume (kg)	100	106	107	136
Inventory Value (R)	100	131	165	170

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.9 (b) (i): Inventories (Financial Years)

	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Inventory Volume (kg)	100	76	86	58
Inventory Value (R)	100	106	125	76

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.9 (b) (ii): Inventories (7 Month periods)

	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Inventory Volume (kg)	100	68	81	51
Inventory Value (R)	100	93	113	86

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.9 (c) (i): Inventories (Financial Years)

	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Inventory Volume (kg)	100	50	56	29
Inventory Value (R)	100	77	93	59

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.9 (c) (ii): Inventories (7 Month periods)

	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Inventory Volume (kg)	100	45	53	34
Inventory Value (R)	100	70	84	64

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that the expiry of the anti-dumping duties is not expected to significantly affect inventory volumes for stranded wire, non-coated ropes and cables and coated ropes and cables as sales and production volumes will decrease proportionately and it does not hold significant levels of finished goods inventories for these products.

5.2.3.10 Employment

The tables below show the Applicant's employment levels for the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.10 (a)(i): Employment (Financial Years)

No. of employees	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Number of Direct Production Employees (employees)	100	107	98	93
Number of Indirect Production Employees (employees)	100	103	103	101
Total Number of Production Employees (employees)	100	106	99	95
Number of Selling and Administrative Employees (employees)	100	94	94	90

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.10 (a)(ii): Employment (7 Month periods)

No. of employees	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Number of Direct Production Employees (employees)	100	108	100	95
Number of Indirect Production Employees (employees)	100	106	106	106
Total Number of Production Employees (employees)	100	107	101	98
Number of Selling and Administrative Employees (employees)	100	85	85	85

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.10 (b)(i): Employment (Financial Years)

No. of employees	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Number of Direct Production Employees (employees)	100	104	102	75
Number of Indirect Production Employees (employees)	100	104	101	97
Total Number of Production Employees (employees)	100	104	102	80
Number of Selling and Administrative Employees (employees)	100	93	105	105

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.10 (b)(ii): Employment (7 Month periods)

No. of employees	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Number of Direct Production Employees (employees)	100	108	106	101
Number of Indirect Production Employees (employees)	100	107	103	100
Total Number of Production Employees (employees)	100	108	105	101
Number of Selling and Administrative Employees (employees)	100	89	100	100

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.10 (c)(i): Employment (Financial Years)

No. of employees	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Number of Direct Production Employees (employees)	100	103	101	76
Number of Indirect Production Employees (employees)	100	104	102	97
Total Number of Production Employees (employees)	100	104	102	81
Number of Selling and Administrative Employees (employees)	100	94	104	104

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.10 (c)(ii): Employment (7 Month periods)

No. of employees	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Number of Direct Production Employees (employees)	100	106	104	100
Number of Indirect Production Employees (employees)	100	108	105	100
Total Number of Production Employees (employees)	100	106	104	100
Number of Selling and Administrative Employees (employees)	100	90	100	100

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that the total number of production employees increased in FY2017 and has declined continuously thereafter. If the anti-dumping duties expire, it will further reduce its total production volume, resulting in a significant decline in total number of production employees. This clearly shows that the expiry of the anti-dumping duties will lead to the continuation or recurrence of injury in the form of reduced employment.

5.2.3.11

Wages

The tables below show the Applicant's wages for production employees in relation to the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.11(a)(i) : Wages (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total Remuneration to Production Employees (R)	100	112	106	113
Total Remuneration per Production Employee (R)	100	106	107	119

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.11(a)(ii) : Wages (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total Remuneration to Production Employees (R)	100	113	102	119
Total Remuneration per Production Employee (R)	100	105	101	122

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.11(b)(i) : Wages (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total Remuneration to Production Employees (R)	100	112	124	101
Total Remuneration per Production Employee (R)	100	107	121	126

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.11(b)(ii) : Wages (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total Remuneration to Production Employees (R)	100	116	119	128
Total Remuneration per Production Employee (R)	100	107	113	126

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.11(c)(i) : Wages (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total Remuneration to Production Employees (R)	100	111	123	102
Total Remuneration per Production Employee (R)	100	107	121	126

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.11(c)(ii) : Wages (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total Remuneration to Production Employees (R)	100	114	118	126
Total Remuneration per Production Employee (R)	100	108	113	126

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that total remuneration per production employee has increased throughout the period of investigation and, despite lower production and sales volumes, will continue to increase for coated ropes and cables and non-coated ropes and cables but not for stranded wire (even if anti-dumping duties expire). However, if the anti-dumping duties expire, total remuneration to production employees will decline for all the subject products as it will be forced to reduce its total production volume, resulting in a further decline in total number of production employees.

5.2.3.12 Growth

The tables below show the Applicant's growth in relation to the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.12 (a)(i): Growth (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw SACU Sales Volume (kg)	100	121	126	64
Percentage growth from previous year (Scaw SACU Sales Volume) (%)	0.00	100	19	(235)
Dumped Imports Volume (China) (kg)	1 198 410	2 408 595	2 277 610	Increase
Percentage growth from previous year (Dumped Imports Volume (China)) (%)	0.00%	100.98%	(5.44%)	Increase
Non-Dumped Imports Volume (kg)	446 361	705 324	2 899 861	Decrease
Percentage growth from previous year (Non- Dumped Imports Volume) (%)	0.00%	58.02%	311.14%	Decrease

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.12 (a)(ii): Growth (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw SACU Sales Volume (Locally Manufactured)(kg)	100	127	136	125
Percentage growth from previous year (Scaw SACU Sales Volume) (%)	0	100	27	(29)
Dumped Imports Volume (China) (kg)	550 990	1 055 834	1 494 200	1 085 304
Percentage growth from previous year (Dumped Imports Volume (China)) (%)	0.00%	91.62%	41.52%	(27.37%)
Non-Dumped Imports Volume (kg)	335 315	360 272	1 296 956	1 118 921
Percentage growth from previous year (Non-Dumped Imports Volume) (%)	0.00%	7.44%	259.99%	(13.73%)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.12 (b)(i): Growth (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw SACU Sales Volume (Locally Manufactured)(kg)	100	131	125	97
Percentage growth from previous year (Scaw SACU Sales Volume) (%)	0	100	(15)	(73)
Dumped Imports Volume (Germany)(kg)	802 448	525 719	535 230	Increase
Percentage growth from previous year (Dumped Imports Volume (Germany)) (%)	0.00%	(34.49%)	1.81%	Increase
Dumped Imports Volume (UK) (kg)	111 975	53 822	178 149	Increase
Percentage growth from previous year (Dumped Imports Volume (UK)) (%)	0.00%	(51.93%)	231.00%	Increase
Non-Dumped Imports Volume (kg)	3 115 995	2 726 572	2 936 819	Decrease
Percentage growth from previous year (Non-Dumped Imports Volume) (%)	0.00%	(12.50%)	7.71%	Decrease

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.12 (b)(ii): Growth (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw SACU Sales Volume (kg)	100	118	113	125
Percentage growth from previous year (Scaw SACU Sales Volume (Locally Manufactured)) (%)	0.00	100	(22)	58
Dumped Imports Volume (Germany)(kg)	569 001	194 631	444 984	365 662
Percentage growth from previous year (Dumped Imports Volume (Germany)) (%)	0.00%	(65.79%)	128.63%	(17.83%)
Dumped Imports Volume (UK) (kg)	86 977	3 003	174 736	216 804
Percentage growth from previous year (Dumped Imports Volume (UK)) (%)	0.00%	(96.55%)	5718.96%	24.08%
Non-Dumped Imports Volume (kg)	1 876 899	1 478 246	1 033 994	1 173 770
Percentage growth from previous year (Non- Dumped Imports Volume) (%)	0.00%	(21.24%)	(30.05%)	13.52%

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.12 (c)(i): Growth (Financial Years)

Kg	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Scaw SACU Sales Volume (Locally Manufactured)(kg)	100	81	98	48
Percentage growth from previous year (Scaw SACU Sales Volume) (%)	0	(100)	109	(274)
Dumped Imports Volume (Germany)(kg)	49 006	84 338	208 133	Increase
Percentage growth from previous year (Dumped Imports Volume (Germany)) (%)	0.00%	72.10%	146.78%	Increase
Dumped Imports Volume (UK) (kg)	422 832	340 622	365 710	Increase

Percentage growth from previous year (Dumped Imports Volume (UK)) (%)	0.00%	(19.44%)	7.37%	Increase
Non-Dumped Imports Volume (kg)	9 013 156	7 700 318	8 395 285	Decrease
Percentage growth from previous year (Non-Dumped Imports Volume) (%)	0.00%	(14.57%)	9.03%	Decrease

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.12 (c)(ii): Growth (7 Month periods)

Kg	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Scaw SACU Sales Volume (kg)	100	91	89	75
Percentage growth from previous year (Scaw SACU Sales Volume (Locally Manufactured)) (%)	0.00	(100)	(30)	(179)
Dumped Imports Volume (Germany)(kg)	39 938	53 098	139 098	50 011
Percentage growth from previous year (Dumped Imports Volume (Germany)) (%)	0.00%	32.95%	161.97%	(64.05%)
Dumped Imports Volume (UK) (kg)	258 535	225 915	179 782	119 454
Percentage growth from previous year (Dumped Imports Volume (UK)) (%)	0.00%	(12.62%)	(20.42%)	(33.56%)
Non-Dumped Imports Volume (kg)	5 867 796	4 219 277	4 705 550	4 298 395
Percentage growth from previous year (Non-Dumped Imports Volume) (%)	0.00%	(28.09%)	11.53%	(8.65%)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated the SACU market for the subject products has grown through the period of investigation and, with the exception of stranded wire (where the market is estimated to decrease in size), is estimated to continue to grow in the coming years. However, if the anti-dumping duties expire, its SACU sales volume (locally manufactured) for all the subject products will decrease whilst dumped imports increases, meaning that these imports will hold a larger share of the market.

5.2.3.13 Ability to raise capital or investments

The tables below show the Applicant's ability to raise capital/investment in relation to the subject products for the injury period beginning 1 April 2015 to 31 March 2018, a seven month period beginning 1 April 2018 to 31 October 2018 and estimates in the event the duties expire:

Stranded wire

Table 5.2.3.13(a)(i): Ability to raise capital or investments (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total capital/investment in the subject product	100	114	120	81
Capital expenditure during year on subject product	100	126	0	0

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.13(a)(i): Ability to raise capital or investments (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total capital/investment in the subject product	100	124	133	117
Capital expenditure during year on subject product	100	233	12	9

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Non-coated ropes and cables

Table 5.2.3.13(b)(i): Ability to raise capital or investments (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total capital/investment in the subject product	100	92	85	70
Capital expenditure during year on subject product	(100)	(241)	(114)	0

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.13(b)(ii): Ability to raise capital or investments (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total capital/investment in the subject product	100	93	85	79
Capital expenditure during year on subject product	100	(522)	(367)	(315)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

Coated ropes and cables

Table 5.2.3.13(c)(i): Ability to raise capital or investments (Financial Years)

Rand	1 April 2015 – 31 March 2016	1 April 2016 – 31 March 2017	1 April 2017 – 31 March 2018	Estimates if duties expire
Total capital/investment in the subject product	100	94	88	78
Capital expenditure during year on subject product	(100)	(145)	(47)	0

Tables indexed due to confidentiality using 2015/2016 as a base year

Table 5.2.3.13(c)(ii): Ability to raise capital or investments (7 Month periods)

Rand	1 April 2015 – 31 October 2015	1 April 2016 – 31 October 2016	1 April 2017 – 31 October 2017	1 April 2018- 31 October 2018
Total capital/investment in the subject product	100	93	88	84
Capital expenditure during year on subject product	100	(348)	(128)	(174)

Tables indexed due to confidentiality using April 2015- October 2015 as a base year

The Applicant stated that it is generally able to raise new capital from its shareholders or, with more difficulty, from external funders, when this is required for capital expenditure. However, it is only able to do so when, inter alia, existing production capacity is being substantially utilised and profit margins are not low, which it is not able to satisfy at present.

The Applicant also stated that if the anti-dumping duties expire, it will face increased difficulties raising capital as, inter alia, profit margins on stranded wire will be reduced and it will be forced to sell non-coated ropes and cables and coated ropes and cables at a significant loss. This will make it difficult for shareholders to provide additional capital and external funders will be unwilling to provide further loans.

Comments by the Applicant on the Commission's Essential facts letter

The Applicant stated that it agrees with, supports and welcomes the Commission's proposed final determination inter alia that the expiry of the anti-dumping duties would likely lead to the continuation or recurrence of material injury.

Comments by the European Commission Directorate-General for Trade (“ECDGT”) on the Commission’s Essential facts letter

The ECDGT stated that the essential facts letter does in no way allow a minimum understanding of the facts supposedly underlying the Commission’s consideration. The ECDGT also states the following:

- The source of information is not identified;*
- None of the indicators is analyzed over the investigation period stated in the notice of initiation;*
- All data is simply indicated as decrease, increase or N/A which does not allow for any quantitative or qualitative assessment of the indicators;*
- Several data is non confidential and should have been disclosed. Confidential data should have been indexed;*
- There has been no analysis whatsoever of the development of various indicators or if the relationship between the various developments or of the argumentation on the basis of which the Commission could conclude that injury would occur.*

Commission’s consideration:

The Commission took note of the Applicant’s and the ECDGT’s comments to its essential facts letter. It should be noted that the essential facts letter does not contain the calculations for the dumping margin and merely outlines the methodology used in calculating dumping. The Commission is of the view that since no properly documented responses were received from manufacturers in Germany, and it was stated in the essential facts letter that it is considering making a final determination using the best information available, that is the information as contained in the Application. A copy of the non-confidential version of the Application was sent to all interested parties at initiation and is available for all interested parties to view.

Further, the Commission noted that a non-confidential summary of the injury information was included in the essential facts letter, in addition to the non-confidential version of all injury information, which has been made available to all interested parties.

Comments by the Applicant on the Comments by the European Commission Directorate-General for Trade (“ECDGT”)

The Applicant stated that although the Commission’s essential facts letter only indicates “increase”, “decrease” or “N/A”, the essential facts letter must be read with the application submitted by it in which the full underlying data is set out in great detail. Consequently, other interested parties including the ECDGT are in a position to make qualitative and quantitative assessment of the indicators. All non-confidential data and non-confidential summaries of confidential information have been disclosed in the non-confidential version of the application.

The Commission must consider making a final determination whether the expiry of anti-dumping duties on the subject product originating in or imported from Germany, the UK and the PRC would likely lead to the recurrence of material injury to the SACU industry with regard to stranded wire; uncoated ropes and cables; and coated ropes and cables.

5.3

CONCLUSION – RECURRENCE OF MATERIAL INJURY

After considering all the information available, the Commission made a final determination that the expiry of the anti-dumping duties would likely lead to the recurrence of material injury.

6. FINAL DUTIES

6.1 Amount of duties

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

Table 6.1

Tariff heading	Description	Imported from or originating in	Rates of anti-dumping duties	Duty Calculated in the current investigation
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 or tin and that identifiable as conveyor belt cord)	The People's Republic of China	113.25%	75,99%
7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%	70,54%
7312.10.24	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%	45,79%
7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%	70,54%
7312.10.30	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International GmbH and Pfeifer Drako)	Germany	93%	45,79%

7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited)	United Kingdom	76.17%	70,54%
7312.10.90	Ropes and cables, of iron or steel, not electrically insulated, of a diameter exceeding 32 mm (excluding that of wire of stainless steel, that of wire plated, coated or clad with copper and that identifiable as conveyor belt cord), (excluding that imported from Bridon International Limited GmbH and Pfeifer Drako)	Germany	93%	45,79%

Since the subject product continued to be imported notwithstanding the duties in place, the Commission made a final determination to recommend to the Minister of Trade and Industry that the current anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC be maintained.

7. SUMMARY OF FINDINGS

7.1 Continuation or recurrence of dumping

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

7.2 Recurrence of material injury

The Commission made a final determination that the expiry of the anti-dumping duties would likely lead to the recurrence of material injury to the SACU industry.

8. RECOMMENDATION

The Commission made a final determination that the expiry of the anti-dumping duties on the subject product would likely lead to the continuation or recurrence of dumping and the recurrence of material injury.

The Commission therefore decided to recommend to the Minister of Trade and Industry that the anti-dumping duties on wire ropes and cables of a diameter exceeding 32 mm originating in or imported from Germany and the UK and on stranded wire of a diameter exceeding or equal to 12.7mm originating in or imported from the PRC be maintained at 93 per cent; 76,17 per cent and 113,25 per cent respectively.

The Commission further decided to recommend to the Minister of Trade and Industry that the anti-dumping duty on the subject product may not be rebated.