

12 July 2022

Ms Kathryn Marnell  
Assistant Director  
Investigations 1  
Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2601

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**Public File**

Dear Ms Marnell

**Re: Investigation No. 595 – Continuation of measures on wire rope exported from South Africa – Particular Market Situation**

I refer to the above investigation and the Anti-Dumping Commission's ("the Commission") inquiries concerning the particular market situation for scrap steel in South Africa.

Bekaert Wire Ropes Pty Ltd (trading as "BBRG Australia") notes the exporter Scaw S.A. ("Scaw") response to Section H of the exporter questionnaire (EPR Document No. 005). In particular, Scaw's response at Section H-3 referenced the Steel Master Plan that the Government of South Africa ("GoSA") has implemented.

BBRG Australia has attached a copy of the Steel Master Plan to this submission.

BBRG Australia understands that the GoSA has imposed an export tax on scrap to discourage the export of scrap steel<sup>1</sup>. This, in turn, increases the supply of scrap steel in South Africa and suppresses selling prices for the raw material used in the manufacture of wire ropes. The objective of the export tax on scrap metal is summarized<sup>2</sup>:

*"Supply of scrap metal: Government has approved an export tax on scrap metal and other measures to help ensure the supply of affordable scrap metal to the domestic consuming industry. In addition, discussions between government and scrap dealers and consumers of scrap have been held to consider measures which can drive local beneficiation of scrap, while supporting the sustainability of the recycling industry. There should be an incentive for recyclers to beneficiate scrap further up the value chain than by simply melting it into ingots or billets for immediate export."*

The South African Steel and Metal Fabrication Master Plan 1.0 is a public document available at the Department of Trade, Industry and Competition, Republic of South Africa ([www.thedtic.gov.za](http://www.thedtic.gov.za)).

It is further noted that a policy directive was issued on 3 July 2020 for the temporary suspension of scrap exports until October 2020.

The South African Steel and Metal Fabrication Master Plan 1.0 are relevant considerations for the Commission in its assessment of the particular market situation for wire rope sold in South Africa in the current Investigation No. 595. BBRG Australia understands that the export tax on scrap exports significantly influences the prevailing price for scrap metal in South Africa during the 2021 investigation period.

BBRG Australia welcomes any questions the Commission may have in respect of this submission. I can be contacted on (02) 4968 6539 or BBRG Australia's representative Mr John O'Connor on (07) 3342 1921.

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<sup>1</sup> With effect from 1 July 2021.

<sup>2</sup> Refer Page 6 of The South African Steel and Metal Fabrication Master Plan 1.0

Your sincerely

*Brad Reed*

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Sales & Marketing Manager