



**Post-Hearing Statement by the Department of Trade and
Industry on Behalf of the Government of the Republic of
South Africa**

On the Occasion of the

**U.S. International Trade Commission’s Investigation on “U.S.
Trade and Investment with Sub-Saharan Africa”**

1. Introduction

South Africa (SA) would like to thank the USITC for the opportunity to make oral submission at the recent public hearing and would like to take this opportunity provide this written statement and to also respond to some of the issues that were raised at the Hearing particularly the matter relating to anti-dumping duties on bone-in chicken pieces from the United States (U.S.). Accordingly, this issue is treated comprehensively as an annex to this written statement. This statement is classified into the following parts: current relationship between South Africa and the United States, a summary of SA's development status and current challenges, benefits under AGOA, the utilisation and the challenges.

2. Overview of South Africa- U.S. Trade Relations

- 2.1. The U.S. is an important trading partner for South Africa (SA). In 2016, the U.S. was ranked as the third biggest source of imports globally for South Africa and was ranked 3rd as an export destination for South African products after China and Germany.
- 2.2. In Rand terms, bilateral trade between South Africa and the US has shown tremendous growth in the past few years, growing from R56.7 billion in 2010 to R153.3 billion in 2016. Both exports and imports have recovered beyond their pre-crisis levels in 2008. South Africa's exports to the US grew from R64.4 billion in 2012 to R80.4 billion in 2016. Similarly, the US exports to South Africa grew from R61.0 billion to R72.9 billion in 2016. South Africa enjoyed a trade surplus against the U.S. since 2011 with the exception of 2014 where South Africa experienced a deficit of R1.3 billion.
- 2.3. However, in dollar terms, due to currency fluctuations, bilateral trade between South Africa and the US has declined from US\$13 billion in 2010 to US\$10.4 billion in 2016. South Africa's exports to the US decreased from US\$7.9 billion in 2012 to US\$5,5 billion in 2016. Similarly, the US exports to South Africa decreased from US\$7.4 billion to US\$4.9 billion in 2016. South Africa enjoyed a trade surplus against the U.S. since 2011 with the exception of 2014 where South Africa experienced a deficit of US\$85 million.
- 2.4. However, in terms of manufactured exports, the U.S. continues to enjoy a trade surplus. In 2016, the United States enjoyed trade surplus in the following sectors: agriculture (US\$5.3 million), manufacturing (US\$1.0 billion), other manufacturing (US\$58 million) and others sectors (US\$292 000). The trade surplus that South Africa enjoys is mainly due to exports of primary products and commodities. In 2016, South Africa enjoyed a

trade surplus only in mining amounting to US\$1.4 billion. This leaves the country vulnerable to global shocks and fluctuations in price of commodities. It is for this reason that the South African Government prioritises industrial development, diversification and structural transformation as critical to promoting inclusive growth and sustainable development. The aim of this agenda is to promote the participation of all in the formal economy, especially historically disadvantaged individuals that were denied access by apartheid.

2.5. The industrial development agenda therefore aims to change the structure of trade to more value added products, boosting productive activity and create jobs.

2.6. The key factors that underpin the growth in US-SA trade include:

- strong industry-to-industry linkages resulting in mutually-beneficial trade relations;
- conducive investment and business climate;
- leveraging South Africa as one of the gateways to the rest of Africa;
- Regional integration agenda that the African market is embarking on with a view to create a market of over 1 billion people and a GDP of US\$ 2.6 trillion. Such integration initiatives would also serve to address the challenges of small and fragmented markets which are an unfortunate feature of the Africa region. Regional integration initiatives coupled with the growing middle class in the African continent suggests that Africa would be a more viable investment destination that offers opportunities for establishing mutually beneficial trade and investment relations with all trading partners, including the US.

2.7. Annex 1 shows SA's key exports to the US which are mainly primary products, while the imports from the US are manufactured products. There is therefore a need to continue the focus on changing the structure of trade to more value added products. This highlights the importance of industrialisation and the implementation of a high impact industrial action plan as prioritised in South Africa's Nine-Point Plan.

3. SA-US investment relations

3.1. In Rand terms, bilateral direct investments between SA and the US increased by more than 100% from R99.6 billion in 2012 to about R215 billion in 2016. Total bilateral investment (FDI, portfolio and other investments) stood at R2.2 trillion in 2016.

3.2. In dollar terms, bilateral direct investments between SA and the US increased by 20% from US\$12.1 billion in 2012 to about US\$14.6 billion in 2016. Total bilateral investment (FDI, portfolio and other investments) stood at US\$149.5 billion in 2016.

- 3.3. SA has also invested in the US contributing to the creation of jobs and productive capacity. In 2016, South African investments to the US accounted for about 19% of total South African investments to the world. The investments are in sectors such as beverages, mining, oil, steel, furniture (mattresses), information communication technology, and heavy-duty trucks.
- 3.4. According to the South African Reserve Bank data, U.S. direct investments flows to South Africa increased from R62.3 billion in 2010 to over R126.6 billion in 2016. In dollar terms, US direct investments flows to South Africa increased from US\$8.5 billion in 2010 to over US\$8.6 billion in 2016. In 2016, the U.S. investments into South Africa accounted for about 22.4% of total inward investments from the world. There are over 800 U.S. companies doing business in South Africa. Software & IT services are the top sector accounting for almost one-quarter of FDI, followed by Business Services, communications, industrial machinery, equipment & tools, automotive and pharmaceuticals. Therefore, U.S. companies are involved in both manufacturing and the services sectors but their target market is largely Africa, Middle East and Europe.

4. Importance of AGOA to South Africa-U.S. economic relationship

- 4.1. The African Growth and Opportunity Act (AGOA) has been the cornerstone of the Sub-Saharan Africa – United States commercial relations and has generated tremendous goodwill for the U.S. in the continent.
- 4.2. For South Africa, AGOA underpins strong and growing mutually beneficial trade and investment relationship between South Africa and the U.S.
- 4.3. The benefits of AGOA are two-way. Estimates by the Brookings Institute indicate that AGOA created 100 000 jobs in the U.S. In South Africa, AGOA is estimated to have created 62 000 jobs.
- 4.4. AGOA promotes intra African trade and industrialization that in turn promotes the development of regional value chains. For instance, the Trade and Industrial Policy Strategies (TIPS) report indicates that the South African garment manufacturing firms have been opening operations in Lesotho producing garments almost entirely for the U.S. market. South Africa in turn exports some trims (zips, buttons, sewing thread, wadding, tapes and elastics) to Lesotho. As a result, Lesotho's textiles industry has expanded. Another example is in the automotive sectors, wherein Lesotho produces car seats that are used by the South African auto manufacturers to produce vehicles for export.

- 4.5. According to statistics by Trade Map, Lesotho exported US\$21.3 million worth of parts seats to South Africa. South Africa was the only export market for Lesotho for parts of seats. Similarly, Botswana exported US\$106 million worth of ignition wiring sets to South Africa, which equalled 93% of total ignition wiring sets exported by Botswana to the world. This implies that the automotive industry in South Africa serves as one of the anchors for regional value chains in Sub-Saharan Africa.
- 4.6. In the clothing and textile value chains, South Africa exported US\$13.2 million worth of parts of garments or clothing accessories to Lesotho, which are equivalent to 68% of total parts of garments imported by Lesotho from the world. This shows that textile and clothing provide another sector where regional value chains exists in the region.
- 4.7. AGOA has also promoted the development of intra-industry linkages between South Africa and the U.S. in manufacturing and agriculture sector. For example, American global automotive corporations have built strong business links with their South African operations. Increased South African component and vehicle exports has assisted automotive industry development in South Africa and has contributed to employment creation and retention in both South Africa and the U.S. (800 employees Ford US due to Ford engine manufacture in SA). In 2016, South Africa exported US\$33 million worth of automotive components to the U.S.; while the country imported US\$135 million worth of automotive components from the U.S.
- 4.8. In most sectors, South Africa's exports to the U.S. account for less than 1% of total US imports, thus South Africa exports do not pose a threat to the U.S. industry and jobs especially given the fact that our production seasons are different. It is therefore important to consider the exemption of South Africa from restrictive actions that the U.S. plans to take for national security reasons to protect U.S. jobs.
- 4.9. The share of SA exports in total US imports from the rest of the world was 0.3% in 2016. The highest share recorded was 0.5% 2013. South Africa was ranked 42nd as a supplier to the U.S. in 2016. This implies that South Africa is not a significant exporter to the U.S., therefore, would not pose much of a threat to local production in the U.S.
- 4.10. In relation to Sub-Saharan Africa (SSA), AGOA is estimated to have created 350,000 direct jobs and 1.3 million in indirect employment.
- 4.11. Further, the US Chamber indicated that 86% of exports to the U.S. by African countries still consist of petroleum. Even for South Africa, a significant portion of our exports (40%) are still commodities.

4.12. Sub-Saharan Africa exports to the United States under AGOA including, the Generalised System of Preferences (GSP) have declined in recent years to the level below 2001. The decline in exports can be attributed largely to the decrease in commodity prices, as well as the fact that the US is now self-sufficient in shale gas. This is a clear demonstration of Africa's vulnerability to relying on exports of primary products.

4.13. Utilisation of AGOA and the challenges

4.13.1. In 2016, of the 1 835 tariff lines under AGOA, South Africa utilised only 240 tariff lines, which is equivalent to 13% utilization rate. Similarly, South Africa utilised 537 of the 3400 tariff lines available duty-free under GSP for developing countries, which translated to 15% utilization rate.

4.13.2. Sub-Saharan African countries (inclusive of South Africa) utilised 535 tariff lines under AGOA and 693 tariff lines under GSP for developing countries, which translated into a utilization rate of 29% and 20%, respectively.

4.13.3. Therefore, this strengthens the need for Africa to industrialise and attract investments in productive sectors. The key challenge for many African countries in accessing global markets is not necessarily tariffs as can be seen from the low utilisation rate of AGOA but mainly lack of productive capacity and supply-side constraints.

4.13.4. In order to increase utilization of AGOA, South Africa has established targeted engagements with key exporters to the US market to understand the challenges in accessing the US market. Some of the known challenges speak to:

4.13.5. Supply-side factors as mentioned above (poor/inadequate infrastructure - transport and energy). According to the Africa Infrastructure Country Diagnostic (AICD) Study of November 2009; Africa's infrastructure deficit is suppressing per capita economic growth by 2% each year, reducing the productivity of firms by as much as 40%.

4.13.6. Productive capacity constraints. Most countries have a limited productive base as exporters of primary products. There is a need to prioritise industrial development and diversification so as to move up the value-chain.

4.13.7. Lack of capacity to meet stringent US SPS measures. Most SSA countries produce basic agricultural products but those products are denied market access due to the stringent regulatory measures in the US.

4.13.8. One of the reasons why SA/SSA countries are not able to fully take advantage of AGOA benefits is that products of export interest to SSA are not included under AGOA. A case in point for South Africa would be products such as canned fruit products (pears).

4.14. South Africa is in the process of developing the AGOA Utilisation Strategy. However, government has undertaken work at a provincial and local government level to promote AGOA in South Africa.

5. Development and Challenges in South Africa

5.1. South Africa is a developing country with a population of 56.5 million people. It has a young Constitutional democracy (24 years) and has managed to build strong institutions, well-developed infrastructure, and continue to maintain the rule of law.

5.2. South Africa is mainly an exporter of primary products and commodities, which leaves the country vulnerable to global shocks. The key priority for the country is to industrialise, diversify the productive base and move up the value chain.

5.3. . Reliance on primary products leaves the country vulnerable to global shocks. The key policy instruments to promote economic growth, sustainable development and integrate South Africa into the global economy include the National Development Plan, New Growth Path, the National Industrial Policy Framework and the Industrial Policy Action Plan and the Trade Policy and Strategy Framework.

5.4. As a young democracy, South Africa also has its challenges. These include an unemployment rate of 27.7% with higher levels of unemployment among the youth. It also has a growing inequality and poverty, as well as a challenge with skills, especially among the youth. One of the priorities of Government is education.

5.5. It should be noted that in a short space of time, progress has been made since 1994 to provide services to a majority of the people that were excluded from the main stream economy with over 80% of South Africans having access to electricity, housing etc. The country has also been able to grow the middle class.

5.6. South Africa has well developed policies that are developed through a participative and transparent process with the aim of promoting inclusive growth and sustainable development.

5.7. South Africa is a relatively open economy, accounting for 0.5% of global trade and is only moderately protected by tariffs:

- The simple average MFN applied tariff is 8.0% (down from 23% in the 1990s). -NAMA: 7.8%; Agriculture: 8.9%).
- 56% of duties are set at 0%. 96.6% of tariff lines bound; South Africa replaced all remaining quantitative controls and formula duties with ad valorem duties.
- The South African tariff book consist of 7 743 tariff lines (down from more than 12 000 in the 1990s). South Africa has fully implemented HS2017 on 1 January 2017. Compared to many of our partners, the tariff regime is transparent and not overly complex (e.g. comparatively few NTBs). In comparison: China has 8 238 tariff lines; United States of America has 10 711 tariff lines; EU has 9 376 tariff lines; India has 11 328 tariff lines; Brazil has 10 031 tariff lines; Malaysia has 9 417 tariff lines; and Indonesia has 10 012 in their respective tariff books, compared to that of South Africa.

5.8. The services sectors are open: WTO Services commitments are comparable to many OECD countries and exceed those of other developing countries.

ANNEX 1: South African Government's Statement on the current anti-Dumping duties on US bone-in chicken

Introduction

South Africa's judicial system is robust and comparable to the highest international standards. The rule of law obtains at all times in South Africa. The matter of anti-dumping duties placed on certain chicken products from the USA has some specific features but, at all times, the South African authorities followed due process and law.

Methodology used by ITAC in calculating anti-dumping duties on chicken pieces from the United States

It must be underlined that the methodology ITAC used in calculating the anti-dumping duties on chicken pieces from the United States is fully in line and consistent with the legal requirements of the WTO Anti-dumping Agreement. It should also be noted that WTO Dispute Panel recently addressed another anti-dumping case in which the same methodology utilised by ITAC in respect of US chicken imports was considered, and the Panel did not rule that the practice was in violation of the WTO Anti-dumping Agreement. In the Report of the Panel in the dispute concerning *“China – Anti-dumping and Countervailing duty measures on broiler products from the United States”*, the panel stated the following in paragraph 7.167: *“Of the two types of methodologies for doing so that were discussed in this case – one based on relative sales value (“value-based allocation”) and one based on the weight of the product (“weight-based allocation”), the Panel is of the view that neither method is in principle inherently unreasonable.”*

Sunset Review Process

Within five years from the imposition of definitive anti-dumping duties, ITAC is obliged to initiate a sunset review of anti-dumping duties, if the aforementioned sunset review is not launched such duties will lapse five years after they were imposed.

It should be noted that US chicken producers failed to provide dumping information during the original anti-dumping investigation conducted by ITAC's predecessor, the Board on Tariff and Trade (BTT), as well as in subsequent sunset reviews undertaken by ITAC. In accordance with its regulations and consistent with the practice in the USA and in other jurisdictions, the BTT and ITAC used the best information available to determine the dumping margin. ITAC completed the

last sunset review of the anti-dumping duties on chicken pieces in 2012, and the duties were extended for another five years. In 2017, ITAC conducted another sunset review and no U.S. producer was a cooperating party in the sunset review.

US trade in bone-in chicken since the TRQ

On 18 December 2015, the Government of South Africa implemented the agreement that waived anti-dumping duties on imports of 65 000 tons bone-in chicken pieces from the United States. The data shows that the United States exported 22 154 metric tons of bone-in chicken pieces to SA in 2016. Further, between Q1-Q3, the U.S. exported 59 659 MT of bone-in chicken pieces to SA, which demonstrate an increase in utilization of the quota.

Table: South Africa's Imports of Bone-in Chicken Pieces from the U.S. (volume)

Quarter	1Q2016	2Q2016	3Q2016	4Q2016	1Q2017	2Q2017	3Q2017
H02071490: Other	-	-	-	-	-	-	-
H02071491: Cuts and offal, frozen:	-	-	-	-	-	-	-
H02071493: Cuts and offal, frozen:	7,563,005	3,547,543	2,029,779	4,451,767	25,642,278	11,348,254	5,248,772
H02071495: Cuts and offal, frozen:	-	-	53,839	400,330	898,061	652,379	344,043
H02071496: Cuts and offal, frozen:	-	-	-	762	-	-	26,127
H02071497: Cuts and offal, frozen:	25,401	401,213	79,774	213,060	1,361,514	482,391	462,999
H02071498: Cuts and offal, frozen:	1,983,511	257,415	133,964	724,300	6,164,283	3,690,469	3,307,447
H02071499: Cuts and offal, frozen:	26,300	236,115	26,420	-	-	-	27,020
Utilised Quota: KGs	9,598,217	4,442,286	2,323,776	5,790,219	34,066,136	16,173,493	9,416,408
Utilised Quota: Metric tons	9,598	4,442	2,324	5,790	34,066	16,173	9,416
Allocated Quota	16,250	16,250	16,250	16,250	16,250	16,250	16,250
Unutilised Quota	6,652	11,808	13,926	10,460	(17,816)	77	6,834

Source: the dti

In terms of the Guidelines, 50% of the quota is allocated to historically disadvantaged individual, in order to contribute to development and transformation of the poultry industry. The data of utilization of the quota per beneficiary is not available due to confidentiality of information maintained by the South Africa Revenue Services. However, the utilization of the quota in 2017 was close to 60 000 MT, which clearly indicates that HDIs are also utilizing the quota.

In terms of the Agreement between the South Africa Poultry Association (SAPA), USA Poultry and Egg Export Council, and the National Chicken Council, there was an undertaking that the U.S. poultry industry will contribute towards the development of HDI poultry farmers, which should contribute to an increase in utilization of the quota.

There are allegations that the HDIs are unable to utilize the quota and they are involved in selling the quota. In terms of the “Guideline Pertaining to a Temporary Rebate Provision which provides for Rebate of the Full Anti-Dumping duty on Bone-in Cuts of the Species Gallus Domesticus, Frozen, Classifiable in Tariff subheading 020714.9 and imported or originating in the United States of America in terms of the Customs and Excise Act that was published in Government Gazette dated 18 December 2015:

- Paragraph 9 “ Rebate permits may not be transferred in any manner by holder thereof to any other person”.
- Further Paragraph 16.4, “Contraventions of the provisions of the ITA Act and/or the Customs and Excise Act will result in the withdrawal or cancellations of the rebate permit and/or the seizure of products being imported under the said permit and/or may result in criminal prosecution in terms of ITA Act and/or the Customs and Excise Act”. Therefore, the U.S. poultry industry or any other stakeholder is requested assist with submission of information on the alleged selling the quota. The position of the Government of South Africa is to support real transformation in the sector and full and effective participation of HDIs in the formal economy.
- The meat imported in terms of this rebate item may not be removed outside the Republic for consumption in any of the BLNS countries;
- The permit is not transferrable and may not be used to obtain meat to the benefits of any entity or person not named in the permit issued by ITAC.
- This rebate item shall be suspended if any benefits that South Africa enjoyed under AGOA as at 1 November 2015 are suspended, and shall remain suspended for as long as those benefits under AGOA remain suspended.

Prior to publishing in the Government Gazette, the Guidelines were consulted with the US poultry industry and the U.S. Government, as well as published for public comment.

The South African Government continues to engage with the U.S. Government on the implementation of the quota and address any issues that arise. To this end, letters were exchanged between the Deputy Director General at the Department of Trade and Industry and the Assistant USTR for Africa Affairs to facilitate implementation of the quota. South Africa as a market based economy has done everything that is necessary in terms of regulations to facilitate the utilization of the quota and the market is therefore expected to take advantage of the opportunities created by the quota. There has been utilization of the quota as is visible in 2017 in line with the conditions agreed to by the U.S. and South African Government.

Annex 1: SA-US trade

Figure 1: SA Exports to the US

Year	SA Exports to US (R)									
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
H01: LIVE ANIMALS	2,629,392	3,229,186	3,456,161	2,666,250	3,781,798	1,736,379	4,458,773	9,343,990	23,284,963	29,587,060
H02: MEAT AND EDIBLE MEAT OFFALS	518,154	581,119	936	1,674	43,152	8,485	86,185	4,978	43,929	-
H03: FISH AND CRUSTACEANS, MOLLUSCS AND OTHER AQUATIC INVERTEBRATES	219,373,736	207,097,903	174,744,872	186,554,495	189,210,297	228,371,786	295,855,242	330,216,635	324,584,962	387,792,753
H04: DAIRY PRODUCE; BIRDS EGGS; NATURAL HONEY; EDIBLE PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED	60,435	560,670	197,708	89,646	38,102	84,804	88,103	96,595	447,492	403,280
H05: PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED OR	11,966,501	21,491,749	21,044,751	21,268,546	31,038,718	29,148,372	27,149,904	19,744,985	39,109,921	61,739,396
H06: LIVE TREES AND OTHER PLANTS; BULBS, ROOTS AND THE LIKE; CUT FLOWERS AND	28,251,354	27,968,100	17,650,132	24,236,919	20,896,337	21,320,979	24,663,257	29,198,312	35,517,171	41,731,894
H07: EDIBLE VEGETABLES AND CERTAIN ROOTS AND TUBERS	6,191,808	5,470,049	1,775,378	2,688,996	3,679,741	2,825,014	4,866,419	2,905,351	13,869,427	13,024,343
H08: EDIBLE FRUIT AND NUTS; PEEL OF CITRUS FRUIT OR MELONS	333,294,571	378,955,544	401,475,347	604,225,526	512,255,838	669,956,780	825,561,792	962,053,255	1,552,689,056	1,462,016,763
H09: COFFEE, TEA, MATE AND	27,259,055	33,220,881	30,458,353	24,181,340	26,329,490	34,749,699	52,692,424	58,296,696	91,284,746	96,719,314
H10: CEREALS	420,527	301,618	455,036	159,711	253,268	112,975	367,571	7,433,419	5,031,620	12,356,028
H11: PRODUCTS OF THE MILLING INDUSTRY; MALT; STARCHES; INULIN; WHEAT GLUTEN	208,416	624,579	492,276	401,375	718,608	491,607	463,896	2,800,102	4,687,902	14,074,

Source: the dti

Figure 2: SA Imports from the US

SA Imports from US ®										
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
H84: NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES, PARTS THEREOF	11,437,220,092	15,674,548,086	11,244,125,191	11,401,136,399	13,576,209,404	15,811,897,506	16,770,261,056	17,166,776,677	17,528,286,112	15,360,338,929
H87: VEHICLES (EXCLUDING RAILWAY OR TRAMWAY ROLLING-STOCK)	5,238,782,666	5,835,424,288	3,476,848,930	4,406,337,645	6,523,546,498	9,629,227,361	8,019,298,914	10,016,959,498	8,689,873,990	6,968,807,250
H90: OPTICAL PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING,	3,355,832,407	4,382,989,842	3,845,678,227	3,770,259,263	4,038,910,313	4,547,802,003	5,179,639,241	5,496,439,775	6,209,435,677	6,784,670,009
H88: AIRCRAFT, SPACECRAFT AND PARTS THEREOF	3,121,435,350	5,377,908,341	3,101,504,876	1,866,838,561	5,683,213,419	3,553,612,796	2,527,317,152	6,105,679,681	7,092,481,318	6,648,843,936
H85: ELECTRICAL MACHINERY AND EQUIPMENT	3,811,395,141	5,667,430,889	4,282,617,830	3,538,330,971	3,481,462,202	4,461,742,794	4,654,116,037	5,177,609,103	5,570,802,285	5,510,952,446
H38: MISCELLANEOUS CHEMICAL PRODUCTS	1,306,391,311	1,655,966,684	1,719,246,386	1,617,933,054	1,857,648,532	2,261,403,604	2,701,626,955	3,063,732,950	4,013,501,629	3,720,679,209
H30: PHARMACEUTICAL PRODUCTS	979,406,797	1,376,379,712	1,397,934,458	1,936,019,342	1,782,897,291	2,288,956,084	2,799,129,401	2,628,570,136	3,818,990,150	3,319,776,212
H39: PLASTICS AND ARTICLES THEREOF	1,256,124,686	1,558,338,041	1,163,526,223	1,193,861,504	1,427,527,846	1,732,056,582	2,108,311,826	1,980,358,945	2,076,430,273	2,194,150,615
H27: MINERAL FUELS, MINERAL OILS AND PRODUCTS OF THEIR DISTILLATION	1,319,813,994	3,490,491,713	2,028,851,451	2,288,805,227	4,424,865,086	2,314,710,262	2,447,781,515	1,842,487,921	2,493,595,239	2,021,407,652
H98: SPECIAL CLASSIFICATION PROVISIONS (Vehicles parts)	1,506,907,630	1,672,772,935	746,070,407	753,072,238	1,629,461,485	1,721,739,851	1,638,661,520	2,425,976,153	1,814,961,207	1,844,045,264
H40: RUBBER AND ARTICLES THEREOF	724,806,327	847,013,920	628,857,307	697,627,856	944,743,160	1,173,681,218	1,235,413,401	1,374,599,367	1,520,055,144	1,406,296,256

Source: the dti

Annex 2: South Africa's Exports to the US under AGOA

Top ten products to United State from South Africa (US\$' 000)

HS4 Description	HS6 Description	Realistic Export Potential to the US`000 US\$	Total Exports from RSA to the US`000 US\$	US imports from Top 6 (Excl RSA)`000 US\$	US imports from Rest (Excl RSA)`000 US\$	US total imports `000 US\$
Automotive		42 821 179	4 835 768	256 927 071	18 671 942	280 434 782
Vehicles princ. designed for the tpt. of persons	Vehicles princ. designed for the tpt. of persons, with spark-ignition int. comb. recip. piston engine, of a cyl. cap. >1500cc but not >3000cc	14 049 623	4 524 637	84 297 740	6 138 543	94 960 920
Vehicles princ. designed for the tpt. of persons	Vehicles princ. designed for the tpt. of persons, with spark-ignition int. comb. recip. piston engine, of a cyl. cap. >3000cc	9 267 806	43 088	55 606 836	2 939 055	58 588 979
Dumpers designed for off-highway use	Motor vehicles for the tpt. of gds, with spark-ignition int. comb. piston engine, g.v.w. not >5tonnes	2 067 815	706	12 406 889	2 277	12 409 873
Brakes & servo-brakes & parts thereof (excl. mounted brake linings)	Parts & accessories of the motor vehicles	2 012 972	98 680	12 077 834	1 907 957	14 084 471
Brakes & servo-brakes & parts thereof (excl. mounted brake linings)	Parts & accessories of bodies (incl. cabs) of the motor vehicles	1 891 723	8 387	11 350 335	1 327 639	12 686 361
Brakes & servo-brakes & parts thereof (excl. mounted brake linings)	Gear boxes for the motor vehicles	1 502 358	10 825	9 014 146	553 624	9 578 595
Spark ignition recip. piston engines of a kind used for the propulsion	Spark ignition recip. piston engines of a kind used for the propulsion of vehicles	1 336 808	658	8 020 846	739 068	8 760 571

Pedestrian controlled tractors	Road tractors for semi-trailers	1 181 653	3	7 089 916	1 142	7 091 060
Vehicles princ. designed for the tpt. of persons	Vehicles princ. designed for the tpt. of persons, with spark-ignition int. comb. recip. piston engine, of a cyl. cap. >1000cc but not >1500cc	946 625	15	5 679 748	464 799	6 144 562
Dumpers designed for off-highway use	Motor vehicles for the tpt. of gds, with C-I int. comb. piston engine (diesel/semi-diesel), g.v.w. >5tonnes but not >20tonnes	788 547	11	4 731 285	5 827	4 737 123

Source: USITC data