PNEUMATIC TYRES NEW OF RUBBER FOR BUS EXPORTS FROM KWAZULU NATAL

1. Overview

The South African retail market for tyres is worth about R25bn annually. Of the approximately 11 million tyres sold locally each year, about 5 million are imported. About 2 million locally manufactured tyres are exported each year. The tyre industry accounts for 80% of natural and synthetic rubber used in South Africa. The key issues facing South African tyre manufacturers and importers are the government's levy on tyres to fund waste tyre recycling, imports and dumping of low-cost subsidised Chinese tyres, declining labour productivity and rising electricity costs.

2. Description of the Industry

Pneumatic tyres, which are made of reinforced rubber and filled with air, are used on passenger vehicles, as well as vehicles and implements in the commercial, agricultural, mining, construction and transport industries. There are four South African tyre manufacturers, all owned by international tyre companies with extensive global footprints.

These four manufacturers supply tyres to two primary markets:

- South African auto-makers, or original equipment manufacturers (OEMs), that require tyres produced to specification for South African-assembled vehicles that are often, but not always, exported; and
- the replacement market for tyres on vehicles in South Africa, as well as consignments to other parts of Africa and the rest of the world.

The South African Tyre Manufacturers' Conference (SATMC), the association representing these four manufacturers, estimates there are less than 100 tyre importers in South Africa. Approximately half import relatively large quantities of tyres, while the remainder import speciality tyres, such as those designed for vintage cars. The number of tyre importers in South Africa has dropped sharply from an estimated 450 importers in 2007, mainly due to eroding profit margins. The prevailing weak rand in 2013 could further reduce the number of importers in South Africa. Importers are represented by the Tyre Dealers and Fitment Association (TDAFA), a subsidiary of the Retail Motor Industry (RMI).

According to the SATMC, there are about 75 South African retreading companies that remove and replace the worn thread from a tyre, a process that extends the lifespan of a tyre to about 60% of that of a new tyre. It is estimated that about 2 million commercial and industrial tyres are retreaded annually in South Africa. Many small retreaders are located outside major urban areas, their business boosted by the high costs associated with transporting heavy truck tyre casings. There is no industry association specifically for retreaders, and they are represented under the ambit of the TDAFA

3. Industry Supply Chain

Tyre manufacturers source inputs from suppliers of natural and synthetic rubbers, steel and textile fabric. Textile fabric is woven into the side walls of tyres for strength. Synthetic rubber is normally used for passenger tyres, while natural rubber is used for truck tyres. Most of South Africa's imports of natural rubber come from the East, in particular Vietnam and Indonesia. Synthetic rubbers are produced in South Africa by Karbochem, a privately-owned company with operations at Sasolburg and Newcastle. About 80% of Karbochem's synthetic rubber production is supplied to the tyre industry. South African nylon spinners have stopped producing the textile thread used in tyres, and manufacturers now import all of their requirements. The copper-coated steels used in tyre treads are specialised imported products. Local wire manufacturers supply tyre-makers with their other steel requirements.

4. Size of the Industry

About 11 million tyres, including locally produced units and imports, are sold in South Africa annually

There are four main tyre manufacturers in South Africa, Apollo Tyres (formerly Dunlop Tyres), Bridgestone, Continental Tyres and Goodyear compete against an estimated 200 importers of tyres of various brands, more than half of which are from China and Japan.

South African Tyre Manufacturers

- Goodyear SA (Pty) Ltd
- Apollo Tyres SA (Pty) Ltd
- Bridgestone South Africa
- Continental Tyres SA (Pty) Ltd

There are about 75 South African retreaders of tyres, who now focus exclusively on the commercial and industrial markets.

Main South African Retreaders

- Max-T Solutions
- TrenTyre SA (Pty) Ltd
- Leader Thread SA (Pty) Ltd
- Bandag SA (Pty) Ltd

5. Regulations

The following legislation and regulations apply to tyre manufacturers, vehicle fitment centres and retreaders.

• The Consumer Protection Act, which established the National Consumer Commission (NCC) to deal with consumer complaints. The RMI says its

associative members are assisting member companies with regard to complaints lodged with the NCC.

- The Second Hand Goods Act, which requires the registration of dealers in second-hand goods to obtain official certification.
- Waste tyre regulations, which make participation in a waste tyre management plan compulsory for all participants in the tyre supply chain. The Integrated industry waste tyre management plan of Redisa, gazetted on 30 November 2012, spells out the intention to have only one waste tyre management plan in South Africa. See Influencing Factors: Redisa for more information.
- The Import Control Act, which requires new tyre and casing importers to have a valid import permit and ensure they are not sold as second-hand tyres.

The National Regulator for Compulsory Specifications (NRCS) applies compulsory standards to the following categories of pneumatic tyres manufactured and imported into South Africa.

Description	Category		
New pneumatic tyres for passenger cars and	Compulsory Specification:		
their trailers	VC8056 ECE Regulation 30		
New pneumatic tyres for commercial	Compulsory Specification:		
vehicles and their trailers	VC8059 ECE Regulation 54		

6. Barrier to Entry

Massive capital investment in complex technology and labour skills are the biggest barriers to entry in the tyre manufacturing and retreading sectors. The existing four tyre manufacturers dominate the market and are all owned by multinationals, giving them access to global distribution channels and cutting-edge research. Competition for retreading companies comes in the form of cheap imports.

There are opportunities for small entrants in the fitment centre and tyre distribution sector, particularly as franchises develop and alliances are created with capacity for combined negotiation with tyre suppliers. New tyre importers face difficulties breaking into the market because of the high upfront costs of shipping bulk containers, as well as distribution challenges.

7. Product

Description of Product: Pneumatic Tyres new of Rubber for Buses

Description as per product code: 4011201000 - Pneumatic tyres, new, of rubber, of a kind used for buses or lorries, with a load index of <= 121

Product	Trading	Barriers to entry				Trade Agreements		
&code	partners	Tariffs			Non-Tariffs			
H: 4011201000 - Pneumatic tyres, new, of rubber, of a kind used for buses or lorries, with a load index of <= 121		Tariff Regime	Applied tariff	Total ad valorem equivalent tariff	Non Tariffs Measures (NTM) Code	Measures applied by importing country	Preferential tariff for SA	Key Industry Role Players
	Zambia	MFN duties (Applied)	0%	0%	None recorded	None recorded	Rules of Origin	Apollo Tyres
	Zar	Preferential tariff for SA	0%	0%				
		MFN duties (Applied)	16%	16%	None recorded		None recorded	
	Brazil	Preferential tariff for SA	None recorded	None recorded				
	Germany	MFN duties (Applied)	4.5%	4.5%	None recorded	None recorded	Africa Investment Incentive Act of	
		Preferential tariff for SA	None recorded	None recorded			2006	
	bwe	MFN duties (Applied)	15%	15%	None recorded	None recorded	None recorded	
	Zimbabwe	Preferential tariff for SA	None recorded	None recorded			None recorded	
	anl	MFN duties (Applied)	20%	20%	None recorded	None recorded	None recorded	
	Mozambique	Preferential tariff for SA	None recorded	None recorded				

8. Industry Associations

I. Tyre Dealers and Fitment Association (TDAFA)

One of 14 constituent associations of the Retail Motor Industry, the TDAFA is an industry

representative body that works closely with authorities to identify and mitigate risk,

illegal

practices and corruption.

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Website : <u>www.tdafa.co.za</u>

II. Retail Motor Industry (RMI)

An organisation of 7500 members that is the major employer representative of the Motor Industry Bargaining Council. It has six regional offices. Here are contact details for its Johannesburg office:

Representative : SibongileMtaopane Tel No.: +27 11 886 6300 Fax No.: +27 11 886 6719 Email: hilda.boucher@rmi.org.za Website : www.rmi.org.za

III. SA Tyre Manufacturers' Conference (SATMC)
Represents the big four South African tyre manufacturers, Goodyear, Bridgestone, Continental and Apollo.
Chief Executive : Etienne Human
Tel No.: +27 11 791 1449 or +27 11 792 0359
Fax No.: +27 86 503 9880
Email: info@rubbersa.com

IV. National Association of Automobile Manufacturers of South Africa (NAAMSA) The official body representing new vehicle manufacturers, importers, distributors and assemblers of new vehicles.

Director : NicoVermeulen

Tel No.: +27 12 323 2980

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- V. Recycling and Economic Development Initiative of South Africa (REDISA) A not-for-profit organisation whose waste tyre management plan was gazetted in November 2012 as South Africa's single waste tyre management plan. Chief Executive: Hermann Erdmann Tel No.: +27 21 671 7207 Email: atinfo@redisa.org.za Website : www.redisa.org.za
 - VI. Rubber Association of South Africa (RASA)

Rasa offers a technical support system to the rubber industry and users of rubber products. Its mission is to improve the industry's image, improve the quality of rubber products, improve productivity, and raise technical awareness within the industry.

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