

Anti-Dumping Questionnaire (Producer) Case TD0013: Certain Aluminium Road Wheels exported from the People's Republic of China

Period of Investigation (POI):	1 July 2020 to 30 June 2021
Injury period:	1 July 2017 to 30 June 2021
Deadline for response:	17 December 2021
Contact details:	TD0013@traderemedies.gov.uk
Completed on behalf of:	Rimstock Ltd

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

- Confidential
 Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex.

Please note that, as set out on page 3 and in Section H (Next Steps), you will have to provide both **Confidential** and **Non-Confidential** versions of the questionnaire, annexes, and any additional documents you append.

All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **Friday 17 December 2021**.

Table of Contents

Introduction	1
Preparing confidential and non-confidential copies.....	3
Providing information from subsidiaries or associated parties	4
What happens next	4
Verifying the information you supply.....	5
The scope of this review	6
Goods subject to review	6
Like goods.....	6
Product Control Numbers	6
SECTION A: Company structure and operations	8
A1 Identity and contact details.....	8
A2 About your company	8
A3 Organisational structure	9
A4 Board members and principal shareholders	10
A5 Operational links with other companies or persons	11
A6 Accounting practices	11
SECTION B: About your goods	15
B1 Understanding your like goods.....	15
B2 Understanding the UK market.....	16
SECTION C: Costs and production	18
C1 Cost to make and sell	18
C2 Cost and sales reconciliation	19
C3 Production process	20
C4 Joint products and by-products	21
C5 Raw material (RM) and major input purchases	21
C6 Purchases of like goods (from third countries) and/or goods subject to review	22
SECTION D: Sales	23
D1 – Domestic sales	23
D2 – Export sales	23
D3 Sales reconciliation	24
D4 Distribution channels and price setting.....	25
D5 Captive use.....	27
SECTION E: Injury to your company	28
SECTION F: Dumping	34
F1 Dumping.....	34
F2 Likelihood of dumping	34
F3 Adjustments	35
F4 Particular market situation.....	35
SECTION G: Economic Interest Test	37
SECTION H:	42
Next steps	42
Next steps	42
SECTION I:	43
Checklist and appendices	43

Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

This transition review will consider whether the anti-dumping measure (a customs duty on imports that protects against dumping) for certain aluminium road wheels from the People's Republic of China is necessary or sufficient to offset dumping and whether there would be injury to the UK industry if this measure was removed.

Why should I take part?

We are asking domestic producers of certain aluminium road wheels to complete this questionnaire to inform our review of whether the current anti-dumping measure should be maintained, varied or revoked.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by **Friday 17 December 2021**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at TD0013@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (as amended)*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annexes and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is "zero", "no" or "none", please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a

corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.

- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, TD0013, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Please ensure that you remove or redact any personal data (including but not limited to names, signatures, contact details, and job titles) from the non-confidential version of the questionnaire, which is to be uploaded to the public file by TRA. Where personal data has been removed, please note this in the non-confidential summary/version of the questionnaire.

- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, research and development, distribution, and/or supply of the like goods and/or goods subject to review.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

- If any of your subsidiaries or associated companies are also a UK producer of the like goods, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process we may conduct verification visits. If we need to verify information that you provide by visiting your premises the Case Team will contact you to arrange this.

Visits can last several days during which we will want to speak to management and staff to help establish the completeness, relevance, and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification. In some circumstances, verification visits may be conducted remotely.

Please indicate any dates when you would be unable to host a verification visit.

1 week notice required to ensure available resources
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Appendix reference: N/A

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this review

Goods subject to review

This review covers **certain aluminium road wheels** exported from **the People's Republic of China**, described as: aluminium road wheels of motor vehicles per commodity code headings 8701 to 8705, whether or not with accessories and whether or not fitted with tyres.

These **certain aluminium road wheels** are currently classifiable within the following UK commodity codes:¹

8708 701015
8708 701050
8708 705015
8708 705050

These commodity codes are only given for information.

In this questionnaire these goods will be referred to as 'the goods subject to review'. Any reference to 'goods subject to review' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This questionnaire asks for information about your company's production and sales of goods which are **like** the goods subject to review. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China (PRC) which are like the goods subject to review in all respects, or with characteristics closely resembling them. Like goods also includes PRC produced goods that are sold into their domestic market.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

¹ For more information on UK commodity codes visit: <https://www.uktradeinfo.com/find-commodity-data/help-with-classifying-goods/>

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

Manufacturing Process	High Pressure Casting (CH), Low Pressure Casting (CL), Cast Flow Formed (CF), Forged (FO)
Diameter	In 1-inch steps, e.g. a 20" wheel (20), a 17" wheel (17)
Width	In 0.1-inch steps, e.g. An 8.5" wide wheel (085)
Finishing	Unfinished (UN), painted (PA), machined & painted (MP), polished (PO)
Sales market	Original equipment manufacturers (O), Aftermarket (A), Motorsport (M)

Example:

A forged wheel of diameter 22" and width 11", machined & painted finish and sold in the OEM market would have the PCN: FO22110MPO

In this questionnaire and the corresponding annexes you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please do not use any spaces, dashes, or other means of separation, and ensure you follow the order of characteristics outlined in the table above.

Please review the PCN structure for this investigation shown in the table above. Please include any comments on the PCN structure in the box provided.

Structure is fine, due to the complexity of our product range it will be easier to create a table showing all of the potential combinations that we make, buy and sell

SECTION A: Company structure and operations

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	Rimstock Ltd
Legal structure (e.g. limited company, sole trader):	Limited Company
Year of establishment:	1985
Other operating names:	
Company registration number:	1879593
Place of registration:	Cardiff UK
Name (point of contact):	██████████
Position:	MD
Address:	Ridgacre Road, West Bromwich
Telephone No:	██████████
Email:	████████████████████
Website:	www.rimstock.com

A2 About your company

1. Describe the role of your company in the UK market for the like goods (e.g. producer, producer/exporter, producer/importer, or producer/distributor).

Producer/Distributor/Importer/Exporter Appendix 36 is an Information Memorandum pack containing broad company data Appendix not included in Non Confidential submission due to commercially sensitive data.
Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past five years, for example, mergers, acquisitions, and/or sales.

Date	Legal form	Explanation of change
25/1/17	PLC to Ltd	Control of Business

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+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

Customer and market quality standards driven by extensive design, development and testing

Appendix reference: N/A

4. Please describe all the other products (not including the goods under review) produced or sold by your company in the UK.

N/A

Appendix reference: N/A

5. State whether your company is a member of any representative organisations (e.g. trade bodies, associations, Chambers of Commerce). If so, provide a copy of the relevant documentation.

Aluminium Federation

Appendix reference: Appendix 26

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'Related Persons' in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure and all sites/locations and departments which are involved in the production, sales, research and development, supply, and distribution of the like goods for domestic and export markets. Clearly indicate the different production stages carried out by your company.

Group Ownership Structure & Org Chart in appendix. All forging, machining and finishing processes take place at the Ridgacre Road site

Appendix reference:

2. Please complete **Annex 1 – Associated companies.**

- Include your company's worldwide corporate structure and affiliations, including parent companies, subsidiaries, and/or other associated companies.
- If your company is the subsidiary of another company, please give the name of this company, as well as that of your company's ultimate controlling entity, their registration number(s), and place(s) of registration.
- Please provide the name, address, email address, and telephone number for an appropriate representative from each company identified.
- Please list the activities carried out by each company (e.g. manufacturing, administration, sales).
- Indicate the shareholdings you have in each company and the shareholdings that each company has in your company.
- Where there are no associated companies, please state this

A4 Board members and principal shareholders

1. Please complete **Annex 2 – Shareholdings**, providing a list of all your company's shareholders that owned more than 5% of its shares during the period of investigation (POI), 1 July 2020 to 30 June 2021. Where known, provide details of their activities. Also include, for the last five years:

- your company's registered capital;
- the scope of business; and
- the composition of the Board of Directors and/or shareholders, including their roles and rights.

Please provide this information for your company and for all its predecessor legal entities.

2. Explain your procedure for appointing the members of the Board of Directors.

Effective board function is created by ensuring all key stakeholders are represented, in this case one member per investor plus one from site management, site historically has had two members.

Appendix reference: N/A

3. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):

- articles of association and all related documents;
- business licence; and
- proof of registration of the company with the competent authorities.

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment of the company until the present should be available upon request during any verification visit.

Companies House Cert of Incorporation as Appendix 4
Appendix reference: Appendix 4

A5 Operational links with other companies or persons

1. Please indicate if your company has established long term agreements with any company/companies located in the UK, the People’s Republic of China, or in third countries for the production (e.g. sub-contracting), supply, and/or sale of the like goods, or other licensing, technical patent, or compensatory agreements.

Include:

- the name and address of the company;
- an explanation of the nature of the agreement; and
- if your company has long-term agreements with other companies for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Company name and address	Nature of agreement	Company registration number	Place of registration
[REDACTED]	Trading		
[REDACTED]	Trading		

Appendix reference: N/A

This is a pure buyer/seller trading agreement with no party having ownership or control of the other.

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company’s accounting records are kept and can be verified by the TRA. If records are maintained in different locations please indicate which records are kept at which location. If records are digital and do not have a physical location please mark as N/A.

Records address	What records are held?
Ridgacre Road, West Bromwich	All Financial Accounts

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to:

- the financial period
- the company's legal form as per Section A2 – About your company
- your accounting practices over the last five financial years
- your accounting practices applied to the POI (1 July 2020 to 30 June 2021), which differs from your financial statements

Please describe these changes, with reference to any re-statements to your financial accounts including dates and reasons for them.

- The financial period
 - Calendar year, 1 January to 31 December
- The company's legal form as per Section A2 – About your company
 - Limited Company – Number 01879593
- Your accounting practices over the last five financial years
 - Change of address January 2021 after closure of 1 factory site following Covid
 - Accounting year shortened / changed to be Calendar year (29 March 2020 to 31 December 2019)
 - Registration change from PLC to Limited status, 25/01/2017
- Your accounting practices applied to the POI (1 July 2020 to 30 June 2021), which differs from your financial statements
 - Any changes as detailed above

Appendix reference:

3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your annual reports covering the injury period 1 July 2017 to 30 June 2021. This may include a statement of financial position; statement of profit and loss and other comprehensive income; statement of changes in equity; cash-flow statement; notes to the accounts and all reports; and auditor's opinion on these documents.

Annual filings 2017 to 2019 in appendices, 2020 and 2021 accounts not yet finalised
[application-pdf](#) To March 2017
[application-pdf](#) To March 2018
[application-pdf](#) To March 2019

Appendix reference:

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period 1 July 2017 to 30 June 2021.

Unaudited 2020 plus Mgmt Accounts to June 2021

No copy added to the non confidential file due to the commercial sensitivity of the data

Appendix reference: [REDACTED]

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI (1 July 2020 to 30 June 2021) and the most recent financial year. This includes:
- the trial balance which covers the 1 January 2020 to 30 June 2020;
 - the trial balance which covers the 1 January 2020 to 31 December 2020;
 - the trial balance which covers the 1 January 2021 to 30 June 2021.

Please see appendix [REDACTED]

No copy added to the non confidential file due to the commercial sensitivity of the data

Appendix reference: [REDACTED]

6. For your company and any associated parties involved in the production, marketing or sales of the like goods or the goods subject to review, please attach copies of relevant management reports (e.g. profit and loss statement) for the profit centre that includes goods subject to review and like goods. Please provide these reports for the (i) POI (1 July 2020 to 30 June 2021) and (ii) most recently completed financial year.

P+L For IP in Appendix [REDACTED]

No copy added to the non confidential file due to the commercial sensitivity of the data

Appendix reference: [REDACTED]

7. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for your most recently completed financial year.

N/A

Appendix reference:

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g. costing, debtors, creditors) and other systems (e.g. sales and production) integrate with the general ledger. Please provide a

description of how it links to the management accounting system, including any manual interventions. Please also attach:

- your company's chart of accounts;
- your company's cost centres;

Accounting system utilised Microsoft Dynamics NAV 2017 Version 10.0.18609.0
Full integrated system encompassing debtors and creditors with the one accounting system.
Production tracked across the system using part numbers as items move through WIP.
Standard sales order process utilised to fulfil and account for sales and update stock balances.
Production planning managed outside of the Navision system, with no direct link, but planned against known or expected sales orders. Default approach is make to order.
Items collected and despatched to Customer and updated with Navision to reflect sales.
Sales factoring agreement in place for most UK based customers by value.

Sheet attached with Chart of accounts and utilised coding dimensions. Chart and dimensions mean cost centres are not required.

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

9. Describe your accounting policies, where applicable, for:

- the recognition and/or timing of income and the impact of discounts and rebates, sales returns, warranty claims and intercompany transfers;
- the depreciation and amortisation method, and the periods used by your company for each class of asset such as intellectual property, plants, buildings, machinery, and equipment (including average useful life and the methods for calculating this);
- the accounting treatment of general expenses and the extent to which these are allocated to the cost of goods;
- the accounting treatment of finance costs and how these are allocated to the cost of goods;
- costing methods (for example, by tonnes, units, revenue, activity, direct costs, standard costing, etc.) and allocation of costs shared with other goods or processes;
- your inventory valuation methods for raw material, work-in-process, and finished goods, for example First in First Out (FIFO), Last in First Out (LIFO), current cost, standard cost, or weighted average cost;
- aging/obsolete inventories, your write-off and/or write-down process(es);
- valuation methods for scrap, by-products or joint products;
- valuation methods for damaged or sub-standard goods generated at the various stages of production;
- valuation and revaluation of fixed assets, and the subsequent treatment of excess depreciation/amortisation;

- treatment of any subsidies or grants;
- treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items;
- losses arising from transactions and from the translation of balance sheet items; and
- restructuring costs, costs of plant closure, expenses for equipment not in current use, and/or plant shutdowns.

Recognition principles for wheels and parts are at point of collection where customers utilise their own transport (a majority by value) or at point of delivery for other customers. This represents c88% of sales value for 2020.

Design sales are held as cost on the balance sheet until invoiced to the customer against agreed stages (mostly with design delivery). These are not run as long-term contracts, with the design and testing phase typically running 6-9 months.

Depreciation and amortisation as per statutory accounts (page 20 of 2019 pack), in summary Freehold property 50 years, Long-term leasehold 50 years or period of lease if shorter, Plant and machinery 3-26 years and motor vehicles 3-6 years, all straight-line basis. Properties are revalued using market-based valuations.

Costs are allocated between direct and indirect based upon their function as detailed within the chart of accounts and management accounts.

Finance costs included in overheads as an indirect cost.

Wheels and WIP valued at standard cost with NRV review for finished wheels at year end. Wheels and WIP from the vast majority of stock value. Any other items of stock valued at standard cost with latest cost reviewed at year end to validate.

Inventory reviewed for obsolescence at stock check. Obsolete stock sold in after market where available or sold as scrap material. Aluminium scrap generated by the forging, forming, CNC and reject process sold on a regular basis (typically bi-weekly) so recognised as by-product revenue at current market rates. Scrap rates linked to raw material purchase rates assessed on a weekly basis.

Revaluation of properties linked to periodic arm's length valuation reports at market rates. Valuation performed annually as part of funding requirements. Details of valuation process details on statutory accounts.

Subsidies or grants recognised as deferred income where applicable. Full details provided in statutory accounts.

Foreign gains and losses recognised at spot rates and are generated from on-going transactions and recorded in cost of sales. Full details provided in statutory accounts.

Entries for losses arising from balance sheet translation items, where relevant, are included within the statutory accounts. No material entries within the management accounts.

Foundry closure at the end of Q1 2020 had a material impact on the management accounts and the full treatment will be detailed within the 2020 statutory accounts now due. Foundry never reopened following lockdown closure.

Appendix reference:

SECTION B: About your goods

B1 Understanding your like goods

The goods concerned in **this review** are defined above in **'the scope of this review'**.

We use a PCN to help us compare the goods subject to review and the domestic like goods. When you are completing this section, you must apply the PCN system set out at the link above to describe your goods consistently throughout your responses. If you don't use the PCN table correctly this could limit the TRA's ability to use the information you provide.

1. a) Please detail the goods that you manufacture in the UK which are like the goods subject to review. Indicate the degree of physical, commercial, and functional likeness.
- b) Please also provide details of your UK manufactured like goods and the goods subject to review regarding their production processes, interchangeability, raw materials used, degree of model differentiation, tariff classifications, channels of distribution and sale, pricing, and other relevant characteristics.

If your company manufactures a range of like goods list this information for each individual make and model in the range. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price explain those differences and the effect they have.

All UK manufactured parts are FO products in varying diameters, widths and finishes. Wheel produced using different manufacturing processes will be interchangeable assuming that the mounting interfaces are the same. All products are manufactured using T6082 Aluminium.

Appendix reference:

2. Explain the internal coding system your company uses to classify your range of UK manufactured like goods. If your company uses multiple internal reference codes across departments, cross-reference each one. Cross-reference your internal coding system with any sales (invoice codes) made via associated companies.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each model where available.

Numbering system in appendices as already provided to TRA 05/10/21

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

3. Please complete **Annex 3 – PCN comparison**, indicating which of your UK manufactured like goods (by make or model) are comparable to each of the goods subject to review.

Please substantiate your answers by providing details on any likeness and/or differences you have identified between the goods subject to review and the like goods. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers, or any other relevant documentation.

Specific product costings can be discussed during audit.

Appendix reference:

4. If you have identified differences in **Annex 3 – PCN comparison** between the goods subject to review and the goods that you manufacture, please estimate the difference in cost to make and sales price. Explain those differences and the effect they have in the text box below.

Where applicable this should be on a per unit basis. Describe how you established your estimations and substantiate with evidence where possible.

This is not a question that can be easily answered using this document or the annex document. The goods subject to review will vary in manufactured cost, and sales price, depending upon manufacturing process, wheel diameter, wheel width, wheel finish, volume produced and the specific application, and the application is very important. This should be discussed during audit.

Appendix reference:

5. If you have identified differences in **Annex 3 – PCN comparison** between the goods subject to review and the like goods that you manufacture, please give details of how these products could be differentiated at the UK border.

You would need a product expert to determine the manufacturing process employed, diameter, width and finish are reasonably simple to determine, volume of sales/production could not be determined as the products can be sold globally and the application (wheel load/strength) would not be determinable without specific wheel design knowledge and product testing. It is therefore only workable, in my opinion, if all aluminium based road wheels are classified under the same tariff.

Appendix reference:

B2 Understanding the UK market

1. Please explain the end use of the goods subject to review and the UK manufactured like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

Aluminium road wheels are used for motor vehicles, trailers and caravans. This can be for original fitment by the vehicle producer or as a post production upgrade. The products can also be used for motorsport applications.

Appendix reference:

2. Provide a general description of the UK market for the goods subject to review and the UK manufactured like goods, including the nature and conditions of competition within the overall market. In your answer please refer to:
- the nature of competition within the overall market;
 - the degree of price sensitivity;
 - the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
 - the degree of competition between the goods subject to review and the UK manufactured like goods;
 - market segmentation;
 - government regulation or tax;
 - developments in technology affecting the characteristics, demand or the production process of the goods;
 - other commercially significant goods which could be substituted for your goods and the goods subject to review.
 - any other factors that influence the market (e.g. seasonality).

All UK vehicle producers will fit alloy wheels of one form or another and the majority will offer forged wheels within their vehicle ranges. Around 95% of Rimstock's forged wheel production is used for OE applications where price is still the most critical determining factor when it comes to sourcing. Current competition largely comes from two European producers and one Taiwanese producer, I would suggest that the current anti dumping tariffs preclude many Chinese suppliers.

The market is not regulated and is reasonably stable from a technology development perspective, new raw materials may offer differences in the future but currently none are available. The alloy wheel could be replaced with steel but this would be a reverse in market trend and very unlikely, carbon fibre is an option but price wise is more than double that of forged alloy and is not widely accepted in the road use market place due to there being no repair or refurbishment process in the case of minor damage.

The market is driven by style as opposed to seasonality and the market size generally controlled by the OEM vehicle production volumes.

Appendix reference:

3. Provide details on the similarities and differences between the goods subject to review and the UK manufactured like goods. In your answer please refer to:
- distribution and marketing;
 - general users/consumers/customers;
 - the degree of competition between the goods subject to review and the UK manufactured like goods;

There is no difference in the technical nature or application of Chinese produced products compared with those manufactured in the UK. This assumes that they are manufactured to the same specification and not simply made to be cosmetically similar.

Appendix reference:

SECTION C: Costs and production

C1 Cost to make and sell

1. Complete **Annex 4 – Cost to make and sell**

- Report your total cost to make and sell the like goods domestically.
- Please clearly separate your costs to make (direct manufacturing costs and indirect costs), from your cost to sell (administrative, selling and general expenses (AS&G)).
- All values entered in the table should be totals for the POI (1 July 2020 to 30 June 2021) by PCN.
- Report your total production and the total manufacturing costs for your like goods in the final row.
- All figures should be reported net of tax.
- When stating labour costs, please ensure you include all labour costs, directly or indirectly incurred by any activity related to the like goods.
- Include revenue (or related value for internal re-use) for any by-products (including scrap) produced during the production process

Note that headings of each column (e.g. raw materials, energy) can be adapted to suit the naming conventions of your own cost accounting system.

2. Please list, and explain, your labour, manufacturing overheads and AS&G costs for domestically sold UK manufactured like goods. Describe the individual components of these costs and provide detail on how these costs are paid.

Appendix [redacted] contains all necessary details. Wages are paid via bank transfer on a monthly basis, all supplier costs and finance costs are paid monthly or on a pro-forma basis due to poor payment history driven by ongoing trading losses and the impact on cashflow.
No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [redacted]

3. Please list all inputs (e.g. raw materials, energy, labour) to the production of the like goods. Indicate the source of your inputs and whether they are imported or domestically sourced.

Aluminium, Paint, Electricity, Gas, Production consumables, Production equipment, Direct labour, Indirect labour, staff.

Appendix reference:

4. If your company is vertically integrated or some of the inputs (e.g. raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement and attach documentation demonstrating any agreements you have.

N/A

Appendix reference:

5. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI (1 July 2020 to 30 June 2021), please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised/depreciated in your accounts.

No extraordinary costs were incurred but legacy costs as a result of Covid were incurred and production levels were lower than normal due to reduced demand.

Appendix reference:

6. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

Throughout the IP the business could not support itself based on normal trading. Funding for new equipment was either provided by shareholder investment, government supported financing (CBILS) or commercially available financing, often directly from equipment vendors. Significant working capital shortfalls were funded by existing investors.

Appendix reference:

7. Please state the cost allocation method used for each PCN for the POI (1 July 2020 to 30 June 2021), including an explanation of the allocation under each subheading.

Rimstock only manufactured FO wheels during this period of time and therefore all costs were allocated to this product group. First deliveries of semi finished wheels arrived from India on Friday 25th June 2021.

Appendix reference:

C2 Cost and sales reconciliation

1. In **Annex 5 – Cost reconciliation**, please only fill in the white cells. Insert additional columns or rows as required. Please include reference to the source documents of the inserted data.
- Please give the total cost of goods made and sold as shown on your audited financial statement of the most recent accounting period.
 - If the POI (1 July 2020 to 30 June 2021) and your accounting period are different, please enter the difference in cost of goods sold between the periods as per the management accounts.
 - Please provide your company's total cost of goods sold over the period, as shown on your management accounts.
 - Please give the change in finished goods inventory over the period. This usually relates to the difference between the cost of goods sold and cost of production.
 - Please provide the company's total cost of production over the POI (1 July 2020 to 30 June 2021) as shown on your management accounts.
 - You may manufacture other products that are not the like goods under consideration. Please provide the cost of production and the production quantity of the other products that are not under consideration over the period. Please provide the names of each product group that you have determined to be not the like goods. Please add more rows if required.
 - For the cells under 'Cost of production for the goods under consideration', please enter the total cost of production and production quantity.

C3 Production process

1. Please provide a written summary and a diagram/flow chart of your production process for the like goods that you produce in the UK.

See appendix [REDACTED] for full details

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

All processes take place for FO wheels in the UK, approx. [REDACTED] of CL wheels are all imported in a finished state for resale and the remaining [REDACTED] have final machining and painting in the UK. From a product costing perspective the actual stock value of the wheel reduces throughout the process until it becomes a saleable wheel post painting. This is driven by the high cost of solid raw material, that has a market value, and during the machining operations the solid material is reduces

and the swarf/waste produced has a lower value. Roughly we only sell [REDACTED] of the initial raw material to the end customer, [REDACTED] is waste material.

From a commercial perspective it could be argued that most value is added in the forging and flow forming processes as these are more technically specialised.

To replicate a facility on a like for like basis including capacity would be around [REDACTED]. As we grow our annual capacity during 2021 to 2025 from [REDACTED] we will need to invest approximately [REDACTED].

Please note that currently heat treatment is carried out on a sub contract basis by [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Appendix reference:

3. Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Rimstock Ltd	Ridgacre Road, West Bromwich, B71 1BB

Appendix reference:

+Add additional rows as required

C4 Joint products and by-products

1. Please explain any waste, scrap, or by-products related to the production of the like goods. Please explain:
- how you differentiate your waste, scrap, and by products;
 - what you do with your waste, scrap, and by-products;
 - how any income or cost from waste, scrap, or by-products is recorded and allocated across products.
 - the average waste, scrap, and by-product ratio resulting from the production process of the like goods.

Raw Material is 6082 Aluminium

[REDACTED] is sold within the final product

[REDACTED] wet swarf

[REDACTED] dry swarf

10% solid waste
All waste sales revenue is allocated to the FO product group

Appendix reference:

2. If there are joint products please explain how your costs of production (per unit) differ between the like goods and its joint products. Comment on the reason for this difference and explain your method(s) of calculation.

N/A

Appendix reference:

C5 Raw material (RM) and major input purchases

Please complete **Annex 6 – Raw materials and input purchases**, detailing the principal purchases used in the production of the like goods during the POI (1 July 2020 to 30 June 2021) by your company.

- Please provide a complete breakdown for any inputs that account for more than 5% of the cost to make and sell of your like goods. Please include all purchases and any internal transfer costs of these materials used during the POI (1 July 2020 to 30 June 2021).
- For each reported purchase/internal transfer transaction, describe the raw material and its characteristics (e.g. grade, purity).
- If your energy costs constitute more than 1% of your production costs, please also include energy purchases in the annex.
- All figures should be reported net of tax.

Please provide an invoice and any supporting documents for two of your purchases stated within **Annex 6 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

Complete and supported by invoices
No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

C6 Purchases of like goods (from third countries) and/or goods subject to review

1. Complete **Annex 7 – Purchases of like goods** and/or goods subject to review. This should include information relating to your company's total annual purchases

of the like goods and/or goods subject to review over the injury period 1 July 2017 to 30 June 2021. All figures should be reported net of tax. Please list for each year every country you have purchased from in a separate row.

2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods subject to review.

Cast wheels, CL, are purchased from Italy and India to support ongoing an new customer contracts for specific applications only. This is an necessary part of our short term business model as we grow volume on forged, FO, products. CL may figure in the longer term depending upon profitability, however it is unlikely to represent more than ■ of turnover.

Appendix reference:

SECTION D: Sales

D1 – Domestic sales

1. Please complete **Annex 8 – Transaction by transaction (T by T) domestic sales**
 - These should include all your domestic sales and returns of the like goods and/or goods subject to review for the POI (1 July 2020 to 30 June 2021). Include the like goods you have produced, purchased and resold, and/or goods subject to review that you have purchased and resold.
 - Please report returns as negative (-) sales figures.
 - Please ensure that you correctly categorise each sale by PCN.
 - For transactions or invoices that consist of multiple PCNs the same invoice number should be referenced. All information in a row should refer to the individual PCN displayed in the first column of that row.
 - Where one of the dates requested falls outside the period of investigation, but another date falls within it, both dates should be provided for the relevant domestic sale transaction.
 - All figures should be reported net of tax.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

D2 – Export sales

1. Please complete **Annex 9 – Export sales.**
 - These should include all your export sales of like goods for the POI (1 July 2020 to 30 June 2021).
 - Please ensure that you correctly report your total volume and total value for your export sales per PCN.
 - All figures should be reported net of tax.
2. Please provide a list of associated customers who purchase your like goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

[REDACTED]. Specific wheel contracts are in place with these customers, no volume is guaranteed and the customer can resource the products elsewhere if they wish.

Appendix reference:

D3 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 10 – Sales reconciliation** starting from the bottom of the table.

Sales revenue and quantity of **like goods** during POI (1 July 2020 to 30 June 2021):

- For your like goods, enter the sales revenue and quantity for domestic and export sales during the POI (1 July 2020 to 30 June 2021) as reported in Annex 8 and Annex 9.

Sales revenue and quantity of **all goods** during POI (1 July 2020 to 30 June 2021):

- If you produce goods other than the like goods, please provide the sales revenue and quantity of each of these goods during the POI (1 July 2020 to 30 June 2021). Please note that the headings (e.g. 'Sales revenue/quantity of good A during the POI (1 July 2020 to 30 June 2021)', 'Sales revenue/quantity of good B during the POI (1 July 2020 to 30 June 2021)', etc.) should be adapted to reflect the names of the goods.

Total sales revenue/quantity of **all goods** during the POI (1 July 2020 to 30 June 2021) as stated in your management accounts:

- Please provide the total sales revenue and total quantity of all your goods during the POI (1 July 2020 to 30 June 2021) as shown on your management accounts.
- If this figure does not reconcile with the totals of the sales revenue and quantity data below, the table will show a variance. Please use the text box below to provide an explanation for any shown variance.

Please answer here

Appendix reference:

Difference in total sales revenue of **all goods** between POI (1 July 2020 to 30 June 2021) and accounting periods:

- If the POI (1 July 2020 to 30 June 2021) and your accounting period are different, please enter the difference between the total sales revenue of all goods during the POI (1 July 2020 to 30 June 2021) and the total sales revenue of all goods during the accounting period as per your management accounts.

Total sales revenue of all goods as per Income Statement

- Please provide the total company sales revenue of all goods as shown on your Income Statement of the accounting period that covers the majority of the POI (1 July 2020 to 30 June 2021).
- If this figure does not reconcile with the sum of the total sales revenue of all goods during the accounting period as per your management accounts, the table will show a variance. Please use the text box below to provide an explanation for any shown variance.

Please answer here

Appendix reference:

- Please use the text box below to reference any source documentation for the data.

Please answer here

Appendix reference:

- Additionally, please provide quantitative estimates (e.g. projections or forecasts) for the sales revenue and quantity of like goods and of all other goods you produce on the UK market for the next five years.

Assumes current level of tariff remains in place.

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: Appendix 14

D4 Distribution channels and price setting

1. Attach copies of distributor or agency agreements that you have relating to the sale of the like goods.

N/A

Appendix reference:

2. Provide copies of price lists for the like goods for the POI (1 July 2020 to 30 June 2021).

N/A

Appendix reference:

3. If any price reductions have been applied to any of your sales of like goods over the POI (1 July 2020 to 30 June 2021), please provide a description. This includes discounts, rebates, credit terms, allowances, and commissions.
- Explain the terms and conditions that must be met for any price reduction.
 - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
 - If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

Rimstock offers no discounts or rebates, all contract payment terms are agreed within the business nomination process and are agreed for the term of the contracts.

Appendix reference:

4. Please provide details of your distribution network for the like goods, if you have one. Do your sales usually include delivery? How do you calculate delivery costs and prices? Does this vary between customers?

N/A

Appendix reference:

5. Attach sales contracts for the top five customers by volume in **Annex 8 – T by T domestic sales** that you have sold the like goods to in the POI (1 July 2020 to 30 June 2021).

Contract packs in appendices

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

6. Select examples of domestic sales of the like goods to two different customers included in **Annex 8 – T by T domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation, and all other relevant documents.

Please answer here

Appendix reference:

D5 Captive use

1. Complete **Annex 11 – Captive sales and use**. This should include transaction-by-transaction information for the POI (1 July 2020 to 30 June 2021) detailing your company's individual transfers of the finished like goods for internal or captive use. You will need to use the PCN table to categorise each of these transfers by PCN. In the destination column, indicate any transfers for captive use that have not remained on your manufacturing site. In the "use" column, specify how the like goods were used and in the "value" column please assign a market value to the like goods transferred.
2. Please comment on whether your captive use of the like goods would be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please attach evidence to support your answer where possible.

Rimstock has no captive sales or opportunity for similar in the future.

Appendix reference:

SECTION E: Injury to your company

Analysis of Injury explained

When we are asked to investigate imports of goods which may be dumped, the TRA will need to establish whether UK industries producing similar goods are being injured by the imports.

The Taxation (Cross-border Trade) Act 2018 defines injury to a UK industry that produces particular goods as either 'material injury or threat of material injury to the industry' or 'material retardation of the establishment of the industry'.

During this transition review we will specifically be looking at whether injury to the UK industry (i.e. the production of certain aluminium road wheels) would occur if the anti-dumping amount were no longer applied to those goods.

This section allows us to gather information to enable us to draw conclusions on UK injury. Please provide comments in the boxes below and substantiate with evidence. For more information please refer to the following guidance.²

1. Is your company suffering from injury? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes, or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence. Please estimate the date when the injury began to affect your company. Explain how it has developed since this date.

Rimstock is suffering no injury as the products produced have historically been protected by the EU Chinese anti dumping tariff. However in 2020 the business closed it's cast wheel foundry due to the price point for wheels in Europe continuing to drop which may have been a consequence of wheels being dumped into the market from China.

Appendix reference:

2. Would your company suffer from injury if the existing anti-dumping measure on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. If your company is already suffering injury, would the nature or source of the injury change if the measures were to no longer apply?

² <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/how-we-assess-injury>

Injury can relate to the prices, volumes, or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence.

Rimstock will face price down pressure as a result of the existing tariff being removed. Our forecasted profitability in 2025 when at maximum capacity post investment is barely higher than the size of the current EU imposed tariff, even after considerable productivity improvements have been made. Huge capacity exists in China and the removal of the tariff effectively reduces their landed selling price by 22.3% plus any normal import duty impact from the tariff removal. If this were to happen Rimstock could lose it's entire UK order book. Appendix 28 shows future forecasted sales volumes and financials, if UK volumes dropped to zero then volumes drop to 2023 levels with the corresponding reduction in EBITDA of over [REDACTED] per year. If all sales were into Continental Europe then the business would relocate to Continental Europe and the move would pay back within two years. No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

3. Please provide details if your cost of production of the like goods has changed significantly during the injury period 1 July 2017 to 30 June 2021. If so, please explain the cause(s) and, where possible, substantiate with evidence. How would your costs to make and sell change in the next five years if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature and degree of the change and provide supporting evidence. If possible, please provide annual cost of production estimates (e.g. projections or forecasts) for the next five years and use the text box below to explain the methods used to calculate these estimates.

Energy and raw material price inflation have driven up costs and reduced our ability to compete. Manufacturing costs would not increase as a result of tariff removal but as stated above selling prices would fall.

Appendix reference:

4. Please complete **Annex 12 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period 1 July 2017 to 30 June 2021. For the following injury factors listed in the annex, please explain in the text box below:
- How you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods;
 - How you calculated and apportioned your finance costs (e.g. interest) incurred for the like goods;
 - How you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period 1 July 2017 to 30 June 2021. If so, please explain.
 - How you estimated your percentage of market share for the like goods;

- How you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations;
- How you set your wages, and the causes of any significant variations; and,
- How your total employees involved in the UK manufacture of like goods are split across different sites/locations.

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Appendix reference:

5. Please explain whether any of the indicators listed in **Annex 12 – Injury** would be affected if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 12 Injury** to provide estimates for the next five years (e.g. projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

Every measure other than export sales would be negatively impacted by tariff removal. I would also suspect that export sales alone would be insufficient to support the overheads of the business so these would also reduce as the business could enter an administration scenario.

Appendix reference:

6. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Please see data in Appendix 14 Sales Forecast for projections based upon tariff remaining in place. As stated in previous questions selling prices would drop and all margin would be effectively wiped out and the business would probably be unsustainable.

Appendix reference:

7. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this. Would your sales price for your like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Sales prices are effectively set by the customers via a competitive tender process, we rarely achieve the level of profitability that we desire. As stated in previous questions selling prices would drop as customers would invite more Chinese suppliers to enter the tender process. I'm not sure what evidence you require other than the margins shown in the forecasts and their proximity to the current tariff level.

Appendix reference:

8. Complete Annex 13 – Investments.

- Please include information relating to all company-wide investments, which includes investments that relate to the like goods, and investments that relate to like goods only.
- The last row should show aggregate investment totals per year.
- For each investment category, indicate the amount of investment (apportioned, where applicable) and explain what the investment is for.
- Where possible, add columns in **Annex – 13 Investments** to provide estimates (e.g. projections or forecasts) for future years assuming the measure is retained.
- For the investments you have made during the injury period 1 July 2017 to 30 June 2021, please also provide the depreciation incurred company-wide and for the like goods.

Please provide details of your typical source(s) of finance (e.g. loans, debt, share issues, bond issues, etc.) for each category of investment relating to your company-wide investments.

Table completed and additional sheet included linking totals back to individual Assets. Annex completed from detail table provided.

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

9. Please describe any changes in your company's level and trends of returns on investment over the injury period 1 July 2017 to 30 June 2021. Please explain the nature and cause of this change and substantiate with supporting evidence (e.g. funding proposals, loan approvals, or other relevant financial documents). Please also explain whether your company's ability to make investments and/or ability to raise capital would be affected in the next five years if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g. company investment plans, etc.) and if you have provided estimates explain how you calculated them.

[REDACTED]

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Appendix reference:

10. Please complete **Annex 14 – Return on fixed assets** related to the production of the like goods.

- Indirectly related assets are used in the upstream process for the production of the like goods. For these assets, please explain in the text box below how you apportion the corresponding values to the production of the like good.
- If you can't provide information for indirectly related assets, explain the reasons for this. Please describe the effects this has on the level and trend of return of the like goods.

All production is related to like goods so no split is required

Appendix reference:

11. Please complete **Annex 15 – Cash flow for the like goods**.

- Ensure the depreciation you state for the POI (1 July 2020 to 30 June 2021) in this annex matches the figure stated in **Annex 5 – Cost reconciliation**.
- The figures for inventory should relate to the numbers in the section on stocks in **Annex 12 – Injury**.
- If you have an alternative cash flow calculation for the injury period 1 July 2017 to 30 June 2021, please attach it and explain how it has been calculated in the box below.

All production is related to like goods so no split is required

Appendix reference:

12. Explain any variances between your actual and forecasted budgets over the injury period 1 July 2017 to 30 June 2021, with reference to your cash flow statements. Would your actual and forecasted budgets be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Anti-dumping measures have successfully averted the import of like goods during the injury period. Given the 100% success of avoidance of anti-dumping for these like goods, calculating the potential impact is binary. Binary as in we have survived as a business, but given our financial performance, of course exacerbated by Covid, it is certain that without anti-dumping measures opposing overseas government subsidised imports, Rimstock would have ceased trading during the injury period.

Appendix reference:

13. Please complete **Annex 16 – Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for the like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation? Would your forward sales contracts be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

All contracts are new or ongoing examples attached, this is the industry norm, each contract is for a specific wheel design and application so it is difficult to judge on a like for like basis. However, if pricing were normalised for volume, complexity, material content, raw material inflation and application then we would see a downward price trend within Europe. This has largely been driven by a Far Eastern competitor that we believe receives government support for exports, material pricing and maybe more. This competitor has lowered the average selling price somewhere in the [REDACTED] region. As stated previously the removal of Chinese AD tariff would just compound this situation as more Far Eastern capacity would then be competitively priced with the UK.
No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

14. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods subject to review. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at dumped prices;
- contraction in demand or changes in patterns of consumption;
- restrictive trade practices of, and competition between, third country and UK producers;
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

Would the cause(s) or degree of injury change if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

The current tariffs have supported the business of late but we still believe that dumping into Europe has still been an issue on cast wheels over the last few years, as reported in the EU ADT report referenced elsewhere in this document. Rimstock closed it's foundry in 2020 as the price point for cast wheels within Europe had dropped to a level that was unsustainable unless utilising excess capacity over and above the break even point. Whilst difficult to prove that this was wholly due to the importation of Chinese wheels it no doubt contributed to the situation.

Appendix reference:

15. Is your company under threat of injury? If so, please describe the threat, its cause and how the injury is clearly foreseen and imminent. Please describe the nature and immanency of any threat and substantiate your claims with evidence.

Further to the comments made in Q2 above the growing levels of excess capacity being seen in China and wheel designs that could be utilised immediately in Europe then even with a tariff in place it may still be economic to import wheels from China, so in answer to the immediacy question of the threat then within six months of tariffs being removed then the market price point would lower. We are also witnessing more issues of Chinese companies setting up facilities in Africa or Europe, Dicastal in Morocco for instance, allowing Chinese companies to work around current rules. Rimstock recently lost all of it's forged wheel business with Lotus to a Chinese wheel maker that imports its products via Taiwan, or has established a manufacturing footprint there.

Appendix reference:

16. Has there been any material retardation of the aluminium road wheels industry during the injury period (1 July 2017 to 30 June 2020) or the POI (1 July 2020 to 30 June 2021) and would this retardation change if the existing anti-dumping measure on the goods subject to review no longer applied? Please provide evidence to substantiate your claims.

Yes but due to global pandemic and semi conductor shortages as opposed to a reduced demand, without these issues demand would have been at worst consistent to pre 1/7/17.

Appendix reference:

17. Would there be any other effects on your industry and/or company if the existing anti-dumping measure on the goods subject to review no longer applied? Please substantiate your claims with evidence.

Yes, all negative as stated in previous questions.

Confidential

Non-Confidential

Appendix reference:

SECTION F: Dumping

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

F1 Dumping

1. Do you have any information about the normal value of the goods subject to review in the People's Republic of China? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods subject to review in the People's Republic of China.

<p>The best source of information available in my opinion is the 2017 EU Anti Dumping Tariff findings.</p> <p><u>COMMISSION IMPLEMENTING REGULATION (EU) 2017/ 109 - of 23 January 2017 - imposing a definitive anti-dumping duty on imports of certain aluminium road wheels originating in the People's Republic of China following an expiry review pursuant to Article 11(2) of Regulation (EU) 2016/ 1036 of the European Parliament and of the Council (europa.eu)</u></p> <p>The link below relates to the latest expiry review running in 2022</p> <p><u>https://trade.ec.europa.eu/tdi/case_history.cfm?id=1509&init=1509&publication=4080&action=readfile</u></p> <p>Appendix shows indicative product pricing FOB in China, taken from Made In China website. These prices are considerably lower than manufacturing costs in Europe & UK</p>
<p>Appendix reference: App 30</p>

2. Do you have any information about the export price to the UK of the goods subject to review from the People's Republic of China? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods subject to review from the People's Republic of China.

<p>See answer to Q1, EU report contains details of pricing in China and Europe</p>
<p>Appendix reference: App 30</p>

F2 Likelihood of dumping

1. Do you have any information about the capacity and capacity utilisation among exporters of the goods subject to review during the POI (1 July 2020 to 30 June 2021)? Please provide estimates and substantiate with evidence where possible.

We are aware of increased capacity and increased automation, which reduces manufacturing cost, at one wheel maker in China. As the market in China can be volatile our concern is that during periods of decline the excess capacity would be used to offer low cost product into the UK. The EU report referenced above indicated that in the last review period Chinese excess wheel capacity was between 40M and 60M wheels per annum, which at the time was around 60% of the total European demand, and that Chinese domestic prices were lower than EU. It also explains that whilst Chinese wheel makers historically focused on aftermarket products they are now transitioning to OE supply. Appendix 34 shows a snip from Made In China.com – 1,000,000 annual capacity available, there are multiple offerings on this website and all offer high levels of free capacity for immediate usage

Appendix reference: App 34

2. Do you know how capacity and capacity utilisation among exporters of the goods subject to review have changed during the POI (1 July 2020 to 30 June 2021), or might change in the next 5 years? Please provide evidence if available.

We are aware of ongoing investment in three wheel makers.
Appendices show new equipment installation in GKO China

Appendix reference: App 31 & 32

3. Please provide any additional information that might inform our assessment of whether imports of the goods subject to review are likely to be dumped if the measure is removed. This could include:
- exports of like goods to third countries by exporters of the goods subject to review,
 - conditions for the exporters of the goods subject to review in their domestic market,
 - a particular market situation which would include information on raw material markets and prices. Of particular interest would be information in respect of any restrictions concerning raw materials used for the production of the goods subject to review,
 - attractiveness of the UK market for goods subject to review compared to the market in third countries, and
 - any other relevant factor.
- Please provide supporting evidence where possible.

No additional information available.

Appendix reference:

F3 Adjustments

1. If you are aware of any factors that could mean costs or profits of the goods subject to review are not substantially determined by market forces, please provide details and any supporting evidence.

No, raw material and energy pricing plus customer price expectations are the key drivers.

Appendix reference:

F4 Particular market situation

1. Do you have knowledge of any market distortions in the People's Republic of China that would affect either the production of the aluminium road wheels entering their domestic market (like goods) or those entering the export market into the UK (goods subject to review)?

We are aware of subsidies around raw material pricing to support businesses and possibly further enhancements for those exporting finished products as opposed to raw materials. The link below references the aluminium market distortions in China.

[https://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=TAD/TC\(2018\)5/FINAL&docLanguage=En](https://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=TAD/TC(2018)5/FINAL&docLanguage=En)

Appendix reference:

2. Please describe how any market distortions within the People's Republic of China (PRC) have affected the price of like goods (in the PRC) and/or goods subject to review, including any raw materials and inputs, during the POI (1 July 2020 to 30 June 2021). Provide examples and evidence to support your response, including any evidence concerning the following:
 - situations/distortions in the domestic market of the exporting country where prices of the like goods are artificially low; and
 - situations/distortions in the domestic market of the exporting country where prices of the like goods reflect non-commercial factors.

Please see again the EU Anti Dumping Tariff reports for extensive insights into the wheel market and capacity in PRC. The link below is a comprehensive review of the aluminium supply chain and considers that there are market distortions within that supply chain in PRC.

Confidential

Non-Confidential

Appendix reference:

SECTION G: Economic Interest Test

The economic interest test (EIT) helps the TRA assess the economic impact of a measure compared to what would happen if it no longer applied. There are six factors which the TRA must consider as part of the economic interest test:

- i) The injury caused by the dumped goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA consider relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

1. Please provide the names, legal addresses, and telephone numbers of all known domestic companies that produce the like goods and/or are involved in the importation, distribution, and/or sale of the goods subject to review.

Rimstock is the only volume producer of OE wheels in the UK. There are many importers and distributors but we do not have satisfactory data on this as they are not within our supply chain and are not competitors.

Appendix reference:

2. Please provide an overview of your supply chain for the like goods, from raw materials through to final customers. Where possible, please describe the number, location, and size of UK producers at each stage.

N/A as stated Rimstock has no competitors that manufacture in the UK.

Appendix reference:

3. Please provide total annual employment figures in FTE (full-time equivalents) for the injury period 1 July 2017 to 30 June 2021 for all your company's business activities relating to production of the like goods. Where possible, provide sub-totals for each of your company's sites or facilities. Please indicate how these employment figures would be affected if the existing anti-dumping measure no

longer applied? Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for the next five years and explain the method used to calculate them.

Annex 17 contains the necessary data. Removal of the ADT would reduce sales and therefore production and growth based on the lowering of the market price to an unsustainable level. Future growth plans to expand production and employment would also be cancelled.

Appendix reference:

4. Please provide the median annual gross wages for all your company's sites involved in the production of the like goods during the injury period 1 July 2017 to 30 June 2021. If you are unable to provide median figures, please provide mean figures. How would these figures be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please substantiate your claims with evidence. Where possible, please provide estimates for the next five years (e.g. projections or forecasts) and explain the assumptions made.

Median salary data in annex 17

Appendix reference:

5. Please state your share of the domestic market for certain aluminium road wheels based on sales volumes (including imports of the goods subject to review and like goods as well as domestically produced like goods). Indicate how this share would be affected if the existing anti-dumping measure no longer applied? Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for future years and explain the method used to calculate them.

Domestic market for alloy road wheels is in excess of 1m per annum. Current production volumes put our share at less than ■. Growth plans would grow this to between ■ based upon increasing production capacity and capability. Recent contract wins and the level of RFQ's indicate that Rimstock are in a position to utilise the new capacity.

Appendix reference:

6. Please comment on how significant production of the like goods is in relation to your company's entire UK production. Within your response, please state the share of total production value represented by the like goods during the injury period 1 July 2017 to 30 June 2021 and the POI (1 July 2020 to 30 June 2021).

Rimstock only makes like goods, we have no other product lines.

Appendix reference:

7. For the like goods and/or goods subject to review, please state (by value) the proportion of your total sales that was exported during the injury period 1 July 2017 to 30 June 2021 and the POI (1 July 2020 to 30 June 2021).

Data in attached appendix

No copy added to the non confidential file due to the commercial sensitivity of the data.

Appendix reference: [REDACTED]

8. Please indicate who the consumers of the like goods are, which industry and level of trade they relate to and whether they are companies or private individuals. Are the like goods considered to be an intermediate and/or final good?

As 99.9% of all trade is B2B. Customers are OEM for FO products, Aftermarket Distribution and Specialist Low Volume Vehicle Builders for CL products, and Motorsport Customers for a small Fo volume and medium CL volume.

Appendix reference:

9. Would any other industries, markets or products be affected if the existing anti-dumping measure on the goods subject to review no longer applied?

Yes as our whole supply chain and it's employees would be negatively impacted as manufacturing would reduce in the UK. Business viability would be questionable which puts at risk between [REDACTED] roles in the current time period, Rimstock volume is scheduled to grow by over [REDACTED] in the next four years and the associated job creation would also be lost. Our sourcing supports many small local businesses that are reliant on our scheduled and project based work, it is difficult to estimate the exact number of roles affected but it is likely to equal those affected in Rimstock, and again those businesses also won't benefit from our projected growth.

Appendix reference:

10. Please describe how you would expect the following to be affected if the existing anti-dumping measure on the goods subject to review no longer applied:

- market price of the like goods in the UK;
- total UK output of the like goods;
- total imports of the goods subject to review to the UK; and
- total exports from the UK.

Where possible, please provide estimates for the next five years (e.g. projections or forecasts) to support your claims.

Price would reduce, Output would reduce. Imports would increase, Exports would reduce as Rimstock would unlikely be viable on Continental European volumes alone.

Appendix reference:

11. Do you know of any related industries that would be affected if the existing anti-dumping measure on the goods subject to review no longer applied?

Please consider in particular:

- upstream industries – those who produce inputs needed for the like goods or goods subject to review
- downstream industries – those who purchase the like goods or goods subject to review

See answer to Q9

Appendix reference:

12. Please comment on the substitutability between domestically produced forged wheels and imported cast wheels?

Forged wheels can be substituted with cast wheels, as demonstrated by the fact that most vehicle programmes offer the consumer the choice of product. If cast wheel prices dropped following the removal of tariffs then I would expect this to then see a reduction in forged products as the margins that the car manufacturers make on the product would increase. Generally lower purchased part prices don't flow through the end user.

Appendix reference:

13. Please comment on the whether there is a particular price point at which consumers switch from forged to cast wheels?

Not really a simple answer, certain applications cannot use current cast technology as the product weight and dimensions don't allow them to fit the same vehicles, cast wheels are generally heavier due to lower strength meaning thicker material sections resulting in a clash within the vehicle packaging. Forged wheels are generally fitted to high performance and luxury vehicles whereas the inferior cast product is fitted elsewhere in the market. Forged wheels are often used as an upsell opportunity for the OEM's.

Appendix reference:

14. To what extent would you expect any changes in prices for the goods subject to review or like goods to be passed onto final consumers? Please specify whether this differs for forged versus cast wheels.

I wouldn't be able to in the current economic climate.

Appendix reference:

15. Please explain any effects on your plans for future investment or expansion in the UK if the existing anti-dumping measure no longer applied. Please state how this would affect different sites/locations of your company and support your claims with evidence.

I would scale back investment [REDACTED] this would reduce the business longevity and reduce labour growth plans.

Appendix reference:

16. As a public body, the TRA has an obligation under the *Equality Act 2010* to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:
- age,
 - disability,
 - gender reassignment,
 - marriage or civil partnership,
 - pregnancy and maternity,
 - race,
 - religion or belief,
 - sex, and
 - sexual orientation.

If you have any information that could assist us in our consideration of whether the continuation of the existing measure might disproportionately affect any of these groups, please provide it in the box below.

I see no reason as to how the existing affects any of the above items.

Appendix reference:

17. Please explain how continuing a trade remedy measure could affect the following aspects of the competitive market environment and structure for the goods subject to review and/or like goods in the UK:
- the range of suppliers of this type of goods in the UK;

- the ability of suppliers to compete in this market;
- the incentives for suppliers to compete vigorously;
- consumer choices and availability of information.

Please provide evidence to support your answer.

Maintaining the tariff will sustain the existing non Chinese supply chains, the market is already very competitive with regards to OE supply and more entrants are likely to lower the pricing which will limit the ability of UK/European suppliers to compete. UK & European suppliers are given no incentives by governments to maintain production or assist with investment unless creating new products and processes which is limited with a fully evolved product such as a wheel.

Appendix reference:

18. Please describe the nature and degree of any regional impacts that you would expect to see if the existing anti-dumping measure on the goods subject to review no longer applied.

I presume this question relates to regional impacts within the UK? As the only significant supplier of the product under review then the most significant impact would be in the West Midlands. As discussed previously I would expect a negative impact from tariff removal and therefore a down grading of the business plan and any future recruitment.

Appendix reference:

19. If there are any additional economic factors that you consider to be relevant for the economic interest test in this review, please provide details here along with any supporting evidence.

Please answer here

Appendix reference:

SECTION H: Next steps

Next steps

Once you have completed all parts of the questionnaire, any corresponding spreadsheet annexes and any appendices, they should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **Friday 17 December 2021**. The checklist in Section I of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and spreadsheet annex(es) must be submitted. You can find guidance on how to complete confidential and non-confidential versions in our guidance on [how to submit information](#).

SECTION I: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	✓
Section B – About your goods	✓
Section C – Costs and production	✓
Section D – Sales	✓
Section E – Injury to your company	✓
Section F – Dumping	✓
Section G – Economic Interest Test	✓
Section H – Next steps	✓

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title

+Add additional rows as required