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19/08/2022

### Trade Remedies Authority

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## RE: TD0013 Transition anti-dumping review Aluminium Road Wheels from China

**PUBLIC COPY**

Dear Sir,

We are a UK company that specializes in aluminium road wheels and have recently become aware of the upcoming anti-dumping review.

- 1/ We manufacture forged aluminium road wheels in our own wholly owned UK factory.
- 2/ As well as other countries, we import cast aluminium road wheels from China.
- 3/ We operate in both OEM and aftermarket segments.

### **Forged wheels**

Removing the ADD on forged wheels would be significantly detrimental to our business. As one of only two manufacturers of forged wheels in the UK, this is a growth area for us particularly with the ongoing demand for lightweight wheels for EV's and supercars.

### **Cast wheels**

Removing the ADD on cast wheels however, would remove a significant obstacle caused by the UK leaving the EU. Prior to leaving the EU, we used to export significant quantities of Chinese manufactured commodity wheels to various EU countries regardless of the ADD.

Since leaving the EU, we can no longer compete in mainland Europe as the ADD is effectively being applied twice:

- When we import the wheels to the UK, we pay duty+ADD on arrival in the UK.
- When we sell the wheel into the EU, we cannot reclaim the UK paid duty+ADD and yet the receiving EU member state applies it again on our selling price.

The only way to prevent this is to either use a bonded warehouse or have a second warehouse in the EU. Neither option is practical or affordable for a relatively small niche industry.

In response to your questions:

*1. To what extent do cast wheels directly compete with forged wheels and to what extent would an OEM view forged and cast wheels as interchangeable when making purchasing decisions? For example, would an OEM purchaser directly compare forged wheels and cast wheels to meet a purchasing/supply requirement and if so, in what circumstances could this happen?*

From my experience, an OEM chooses a forged wheel almost solely due to the performance of the product (strength, aesthetics and weight reduction) - the gap in pricing is too significant to consider otherwise (5x to 8x). I don't believe an OEM that has decided to go the route of forged wheels would change to cast even if the cast wheels were discounted by 50%.

*2. If we were to maintain measures on forged wheels only, do you consider that you would you suffer prejudice and if so, how would this manifest itself?*

From the point of view of our business, the best overall outcome would be to maintain measures on forged wheels only. This would result in maintaining the status quo for the manufacturing side of our business and allowing us to regain some competitiveness on the post-brexit wholesale side of our business in the EU.

*3. If you think there are differences in the above factors in the aftermarket, then please provide a description of this difference.*

Within the scope discussed above, I feel there is little to differentiate in factors affecting OEM vs aftermarket segments.

Sincerely

XXXXX XXXXXXXX  
Director  
360 Wheels Ltd