**Verification report – Importer**

**Case TD0013: Certain aluminium road wheels from the People’s Republic of China**

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| **Period of Investigation (POI):** | 1 July 2020 – 30 June 2021 |
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| **Injury Period:** | 1 July 2017 – 30 June 2021 |
|  |  |
| **Date of report:** | 14 July 2022 |
|  |  |
| **Case team contact details:** | TD0013@traderemedies.gov.uk |
|  |  |
| **Company verified:** | M-Sport Wheels Limited |

For further details, please see the [Notice of Initiation](https://www.trade-remedies.service.gov.uk/public/case/TD0013/submission/65bff86e-86f7-41b0-a7ec-3584cc728c09/) on the public file.

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# Executive Summary

The Trade Remedies Authority (TRA) is conducting a transition review to determine whether the UK should vary or revoke anti-dumping measures on certain aluminium road wheels from the People’s Republic of China (PRC), pursuant to Part 12 of The Trade Remedies (Dumping & Subsidies) (EU Exit) Regulations 2019 (‘the D&S Regs.’ or ‘the Regulations’) - Statutory Instrument 450/2019.

As part of the review, the TRA sought to assess the completeness, relevance, and accuracy of the information that the importer M-Sport Wheels Ltd provided in its questionnaire response. This covered its company structure and operations, imports, sales, injury, and the economic impact of varying or revoking the measures.

During the verification process, the TRA compared M-Sport Wheels Ltd’s questionnaire responses, including the data annexed to the accompanying evidence, information from open sources, such as Companies House, HM Revenue & Customs (HMRC) and M-Sport Wheels Ltd’s website. A reconciliation was performed between the unaudited financial statements and the financial data provided in the questionnaire annex in order to verify the consistency of the information.

The TRA does not have any concerns to report in respect of M-Sport Wheels Ltd. We were able to verify the information provided in their questionnaire response, annex data and throughout the verification process.

We have concluded that the information is sufficiently accurate for us to be able to rely on for this transition review.

# Purpose of verification

The purpose of the TRA’s verification activity is to provide the assurance considered necessary to make a decision as to whether the information (data) provided by M-Sport Wheels Ltd is verifiable and can be used for the purposes of our review. On concluding verification, we will establish our level of assurance on the relevance, completeness and accuracy of the data that will later be considered in our assessments and analysis to determine whether injury is caused or likely to be caused to the UK industry by dumped imports of the goods subject to review. This will form the basis for establishing appropriate measures where necessary, and to assess whether these are in the UK’s economic interest.

We may carried out verification activity using desk and remote analysis or undertook work on-site. The activity undertaken did not seek to verify all information provided but to undertake the work considered appropriate and possible within the time constraints of the investigation to obtain assurance on which to base a decision.

This verification report documents the work we have completed, the checks the case team has carried out, and conclusions we have reached about the reliability of information provided by M-Sport Wheels Ltd.

# Confidential information

M-Sport Wheels Ltd must indicate whether any information contained in the confidential version of the verification report is considered confidential. It must specify such information, provide reasons as to why the TRA should treat the particular information as confidential, and create a non-confidential version of it (see also [*public guidance*](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information)). The non-confidential version of the verification report will be placed on the public file.

# Verification

Please find below a summary of work that has been completed and the checks that have been carried out by the case team to verify the information provided by the interested party in their questionnaire response.

## A-I. Company structure and associations

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| What information was considered | | |
| * General set-up, including the ownership and management of the company; * Associations; * Accounting practices and policies. | | |
| *Please indicate the confidentiality status of the information summarised above:* | | |
| non-confidential | confidential | |
| *If applicable, please specify what particular information you consider to be confidential, provide reasons as to why we should treat it as such, and create a non-confidential version of it (see also* *[public guidance](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process" \l "how-we-handle-confidential-information)):* | | |
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| How the information was checked | | |
| **General set-up, ownership, locations, and management**  We cross-checked the information provided on M-Sport Wheels Ltd’s general set-up, ownership, year of establishment, location, memberships or accreditations, and number of employees by examining official documents on Companies House, including the Certificate of Incorporation and the company’s unaudited financial reports. During our verification visit, we asked the company to confirm that it had no membership or accreditations, and we counted the number of employees which agreed with the number disclosed in its financial statement. We found the information from those sources to be consistent with the information provided by the company in its questionnaire response.  **Associations**  We reviewed the company’s associations by checking unaudited financial reports published on Companies House, which were also examined to check whether the Director of M-Sport Wheels Ltd was associated with other companies related to the same industry. The findings were compared to the explanations provided by the Director during the onsite verification as well as the importer questionnaire responses. We found the information we retrieved from those sources to be consistent with the information provided by the company in its questionnaire response.  **Accounting Practices and Policies**  The financial statements for M-Sport Wheels Ltd are prepared in accordance with the provisions applicable to companies subject to the small companies regime and in accordance with Section 1A of FRS 102 ‘The financial reporting standard applicable in the UK and the Republic of Ireland’. M-Sport Wheels Ltd is exempt from an audit under section 477 of the Companies Act 2006 relating to small companies. As such the directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts. Detailed accounting policies for the company are included in note four of the unaudited financial statements. As a result, we were able to verify M-Sport Wheels Ltd’s basis for accounts preparation, the financial year convention, the method for valuing stock, the method for depreciating assets, and the method for revenue recognition. There were no discrepancies between those results and M-Sport Wheels Ltd's response to the importer questionnaire.  **Accounting system walkthrough**  During the verification visit, we conducted a walkthrough of the accounting system (Asset 2000) on how import and sales orders were tracked from order to dispatch, This contributed to our understanding of the accounting process and helped us determine whether we could rely on the accounting system for the information provided for sales and import purchases. We were also able to determine whether the procedures were automated or manual and whether segregation of duties was in place for authorising transactions. During the walkthrough we found that due to the nature and size of the organisation, the process for sales and import purchases was manual, and there was no segregation of duties in place for raising sales invoices and payment authorisation for supplier payments. As a result, we could not rely on the accounting system and instead paid special attention when conducting our testing of transactions throughout verification. | | |
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| Exceptions/Findings/Adjustments | | |
| None | | |
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| Conclusions | | |
| The information relating to company structure and associations that we have been provided by the interested party is verifiable and based on the work we have done, we have a reasonable level of assurance that the information can be treated as complete, relevant and accurate, except for the accounting system controls due to the lack of segregation of duties. The data relating to the company can be used by the TRA and special attention was paid to the verification of import and sales data due to the limited reliability we have on their accounting systems controls. | | |
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## A-II. Goods

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| What information was considered | |
| * PCN allocations and internal coding system; * Goods description and comparability to the like goods made and sold in the UK; and * Verification of information supplied in the questionnaire annex in relation to the supplier, the manufacturing process of the supplier and supply chain. | |
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| How the information was checked | |
| **PCN allocations and internal coding system**  We confirmed the correct assignment of commodity codes by comparing M-Sport Wheels Ltd’s products against the codes defined in the Notice of Initiation. A tour of M-Sport Wheels Ltd’s warehousing facilities was undertaken during the on-site verification visit. During the visit, a physical inspection of the goods under review was carried out by the investigators (the inside recesses of cast aluminium road wheels have a rough cast finish, whilst the inside of forged aluminium road wheels have a machined finish). We were able to confirm that M-Sport Wheels Ltd do import the goods concerned, and all products that M-Sport Wheels Ltd import are within scope.  We reviewed the method that M-Sport Wheels Ltd used to determine whether they allocated PCN correctly in line with the PCN structure. Our PCN structure and M-Sport Wheels Ltd's internal codes both held data about the wheel's diameter, width, how the wheel was finished, and the type of wheel. However, their codes did not provide the sales market. We confirmed that all sales are to the aftermarket and they do not supply the OEM (Original Equipment Manufacture) market. We compared the findings with M-Sport’s response to the importer questionnaire and found they were consistent.  **Brochures/Catalogues**  We verified that the products described in the brochures had been sold during the POI by comparing them to the internal coding and PCN structure. From inspection of the warehouse during the onsite verification visit, we are able to confirm M-Sport Wheels Ltd only produces cast aluminium road wheels.  **Verification of supplier information**  During a verification visit, we verified that all goods reported have been sold during the POI were included in M-Sport Wheels Ltd’s product list (MSP015). During this visit, we also confirmed the manufacturing process by obtaining explanations of the supplier's identity and details of  their manufacturing process. We compared these findings with M-Sport Wheels Ltd’s response to the importer questionnaire and found them to be consistent. | |
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| Conclusions | |
| The information relating to the company’s goods that we have been provided by the interested party is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as relevant, complete and accurate and can therefore be used by the TRA for the dumping likelihood assessment, the EIT assessment, and for any other purpose within this review. | |
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## B. Imports and forward orders

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| What information was considered | |
| **Upwards verification**  M-Sport Wheels Ltd submitted their import purchases and administration, selling and general (AS&G) costs for the goods subject to review in their questionnaire responses. The upwards verification is the process of verifying this information submitted by M-Sport Wheels Ltd ‘upwards’ to its audited financial statements. The data submitted is traced 'upwards' to test the completeness and relevance of the financial data provided.  We compared the following import data in M-Sport Wheels Ltd’s questionnaire annex to their trial balance, management accounts, and unaudited financial accounts, to ensure the data we rely on is complete:   * total costs for imports within the POI; * management accounts and trial balance covering 1 January 2020 to 31 December 2020 and 1 January to 30 June 2021 and the unaudited accounts for 2020. * methodology for allocating costs for the goods subject to review; and * list of products imported during the POI.     **Downwards verification**  M-Sport Wheels Ltd submitted their cost and purchase data for the goods subject to the review in their questionnaire responses. The downwards verification is the process of verifying this information by confirming whether it is consistent with M-Sport Wheels Ltd’s source documentation. The volume, value, and other fields of information within the cost and purchase data is traced downwards to validate the accuracy of the data submitted relating to the goods subject to review so that we are able to place reliance on the accuracy of the cost and purchase information submitted.  We identified trends and outliers during analytical review of the import data volume, value, and average unit price supplied in the questionnaire annex. We selected a sample of transactions for downward verification as a result of this analysis, to evaluate the accuracy and relevance of the data supplied by checking:   * Source documents provided by M-Sport Wheels Ltd to verify the import transactions, salary cost, carriage outwards, rent and business rates including copies of invoices, purchase orders and proof of delivery. * general ledger agreement of the selected transactions booked in the accounts. | |
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| How the information was checked | |
| **Upwards verification**  We performed upwards verification to confirm the completeness and relevance of the total import data set. We were unable to reconcile the reported total import cost data to M-Sport Wheels Ltd’s financial statements as M-Sport Wheels Ltd’s financial year runs from 1 September to 30 August, which differs to the TRA’s POI. We therefore relied on M-Sport Wheels Ltd’s trial balances and management accounts which were available providing a monthly breakdown.  During the verification visit we were unable to reconcile the submitted questionnaire annex data reported for imports to their accounting systems. M-Sport Wheels Ltd used the cost of sales data to build a new annex under the direction of the case team. However, credit notes relating to a previous supplier were not included in the revised questionnaire's annex data for import purchases and should have been included because they affected the total cost of sales (without them the total cost of sales did not reconcile). As a result, an adjustment was made to include the credit notes in the annex to reconcile to the trial balance. We are satisfied that the import data provided by M-Sport Wheels Ltd has been appropriately reconciled to their trial balances and can be considered as complete and relevant.  **Analytical and research procedures**  We analysed the questionnaire annex data that M-Sport Wheels Ltd provided for imports by considering the trends in volume, value, and average unit price to discover outliers in the data and investigate the reasons behind these outliers.  For the goods subject to review, we analysed M-Sport Wheels Ltd’s import volumes, import values, and average import prices per unit across the POI by using the questionnaire annex figures to plot graphs, as illustrated in Appendix 2 Figures 1, 2, and 3 (confidential). Appendix 2 contains tabular representations of changes from month to month, as shown in Tables 1, 2, and 3 (confidential). Our analysis was based on trendlines, which allowed us to evaluate overall trends for each quantity and identify any significant fluctuations by inspecting graphs and tables.  Once we had identified the trends we requested an explanation from M-Sport Wheels Ltd who stated that they usually receive a shipment of the goods under review each month, contributing to the volatility of import volumes and values. It also explained that there is a seasonality to the importation and selling of the goods under review.  **Downwards verification**  We performed downward verification to ensure the accuracy of the import purchase and cost data supplied in the questionnaire annex. This involved selecting a sample of import purchase and administration, selling and general (AS&G) costs to verify to the accounting system and agree source documentation provided during the onsite verification visit. Since all imported items were goods subject to review, no allocation of costs between PCNs was necessary, and this was reflected in the questionnaire's appendix. We selected the import data, salary, carriage outwards, rent, and business rates to be sample tested based on our risk assessment.  *Imports*  A sample of import transactions were agreed to the packing list, bill of lading, final invoice, payment made to supplier and general ledger. The transactions were also checked if they fell within the POI. We noted an exception where some of the transactions regarding a certain model of the goods under review were bought from another UK importer rather than being imported by M Sport Wheels Ltd. We filtered the annex data for goods of the brand in question and noted that the total amount was above our materiality threshold (which has been calculated on a risk-basis and constructed from revenue for the goods under review during the POI). However, some of the goods under review that were part of this brand were direct imports and were correctly included in the annex. We tested a sample of import transactions relating to this model and extrapolated the percentage of the sample that were not imports, across the whole value of the imports of the model in question. Based on this, we found this extrapolated value to sit below materiality. As a result of the extrapolated value falling below the materiality threshold, we were satisfied there was no need to investigate further. We are satisfied that the tests have been met, and the import costs have been reasonably reported. The import costs reported by M-Sport Wheels Ltd can be considered as reasonably accurate.  *Salaries*  We successfully tested the salary costs of one month by agreeing the salary cost disclosed in the management accounts to the payslips for all employees.  *Carriage Outwards*  We successfully tested a sample of carriage costs to the carrier invoice and payment made. Based on this, we have a reasonable level of assurance based on the testing undertaken on the carriage outwards costs reported by M-Sport Wheels Ltd.  *Rent*  We successfully tested rental costs to the trial balance and management accounts for completeness. The total rental costs were recalculated for the POI so that we were able to gain assurance over the total balance. There were no variances noted and we were able to obtain reasonable level of assurance over the rental costs reported by M-Sport Wheels Ltd.  *Business Rates*  We successfully tested business rates costs to the trial balance and management accounts for completeness. We recalculated the total business rates cost for the POI so that we were able to gain assurance over the total balance. We found no variances and were able to obtain reasonable level of assurance over the business rates cost reported by M-Sport Wheels Ltd. | |
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| Exceptions/Findings/Adjustments | |
| None | |
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|  | |
| Conclusions | |
| The information relating to imports and forward orders that we have been provided by the interested party is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as relevant, complete and accurate and can therefore be used by the TRA for the dumping likelihood assessment, the EIT assessment, and for any other purpose within this review. | |
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## C. Sales

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| What information was considered | |
| **Upwards verification**  M-Sport Wheels Ltd submitted their sales data for the goods subject to review in their questionnaire responses. Upwards verification is the process of verifying this information ‘upwards’ to M-Sport Wheels Ltd’s audited financial statements to test completeness and relevance. We compared the sales data in the questionnaire annex to M-Sport Wheels Ltd’s trial balance, management accounts, and unaudited financial accounts, to ensure the data we rely on is complete, specifically:   * total sales within the POI; * management accounts and trial balance covering 1 January 2020 to 31 December 2020 and 1 January to 30 June 2021 and the unaudited accounts for 2020. * transaction listing figures.   **Downwards verification**  M-Sport Wheels Ltd submitted their sales data for the goods subject to the review in their questionnaire responses. Downwards verification is the process of verifying this information by confirming whether it is consistent with M-Sport Wheels Ltd’s source documentation. The volume, value, and other fields of information within the sales data is traced downwards to validate the accuracy of the data submitted relating to the goods subject to review so that we are able to rely on the accuracy of the cost and purchase information submitted.  We identified trends and outliers during analytical review of the sales data volume, value, and unit price supplied in the questionnaire annex. We selected a sample of transactions for downward verification as a result of this analysis, to evaluate the accuracy and relevance of the data supplied by checking:   * Source documents provided by M-Sport Wheels Ltd to verify the sales transactions including copies of sales invoices, proof of delivery and payment received from the customer into the bank account; and * general ledger agreement of the selected transactions booked in the sales account.   **Price reductions**  M-Sport Wheels Ltd’s questionnaire annex was examined for any negative sales or missing costs. We identified any outliers during analytical review of the sales data and noted any discounts during downwards verification. We then discussed these findings with the director of M-Sport Wheels Ltd to obtain explanations for discounts or rebates during the POI. | |
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|  | |
| How the information was checked | |
| **Upwards verification**  We performed upwards verification to confirm the completeness and relevance of the total sales data set. We were unable to reconcile the reported total sales cost data to M-Sport Wheels Ltd’s financial statements as their financial year runs from 1 September to 30 August, which differs to the TRA’s POI period. We therefore relied on M-Sport Wheels Ltd’s trial balances and management accounts, which were available providing a monthly breakdown.  The sales data supplied in the questionnaire annex did not agree ‘upwards’ to the financial statements or management accounts. M-Sport Wheels Ltd provided us with the ‘global sales listing’ which is a report that shows the total global sales for each customer during the POI. This reconciled with the trial balances and agreed to the total revenue balance reported for the POI but did not agree to the detailed transactional listing in the questionnaire annex. This was because an incorrect currency conversion for direct shipments to certain customers was included in the questionnaire annex. These customers were UK based customers whose accounts were set up in US dollars, but their transactions should have been converted to GB pounds. Once the adjustment was made, the questionnaire annex reconciled ‘upwards’ to the trial balances, management accounts and unaudited accounts.  We are satisfied that the sales data provided by M-Sport Wheels Ltd has been appropriately reconciled to their trial balances and can be considered as complete and relevant.  **Analytical and research procedures**  For the goods subject to review, we analysed M-Sport Wheels Ltd’s sales value and volume by using the questionnaire annex data to plot graphs, as illustrated in Appendix 2 - Figure 4 and Figure 5 (confidential). Appendix 2 contains tabular representations of changes from month to month, as shown in Tables 4 and 5 (confidential). Our analysis was based on trendlines which allowed us to evaluate overall trends for each quantity and identify any significant fluctuations by inspecting graphs and tables.  Having identified the trends, we requested an explanation from M-Sport Wheels Ltd. In response, the company stated that the production being brought forward, production delays, and shipment delays can all contribute to volatility of sales. Additionally, M-Sport Wheels Ltd explained that the selling and importation of the goods subject to review differ seasonally.  **Downwards verification**  We first reviewed the detailed sales transactions to confirm that the associated party transactions identified in the company information and associations workbook had been correctly allocated. This was found to be the case.  We performed downward verification to ensure the accuracy, relevance and completeness of the sales data supplied in the questionnaire annex. This involved selecting a sample of sales transactions from the questionnaire annex data to verify to the accounting system and agree source documentation provided during the onsite verification visit. We agreed the sales transactions selected to the source documentation listed below:   * goods delivery note to the customer order, sales invoice, and the posting to the sales account in the general ledger; * amount per the sales invoice to the payment received from the customer; * description of the goods to the sample transaction; * verified whether an early payment discount or any other discount was given; * the sales price of the transaction to the pricing list; * checked if the transaction was a direct shipment; and * if the transaction falls within the POI.   We found that one of the sampled transactions had a discount applied that was not shown on the sales invoice. However, we found that this difference extrapolated for the complete questionnaire annex was below the materiality threshold, and so this was not investigated further. We are satisfied that the tests have been met, and the sales data has been reasonably reported. Based on this, we have a reasonable level of assurance on the sales data reported by M-Sport Wheels Ltd.  **Price reductions**  We held a discussion with M-Sport Wheels Ltd regarding price reductions and discounts as a discount was found during downwards verification. We found that prices are not set individually, but via a price list that is automatically calculated based on high level price list settings for each level of trade within a Microsoft Excel spreadsheet. However, we found that while pallet costs are usually included in carriage outwards within the management accounts, M-Sport Wheels Ltd may offer free pallet shipping to its UK customers in return for early payment. This arrangement was created to pass financing savings on to their customers. This pallet is not included within the questionnaire annex data and so does not affect the price of the goods subject to review. We found this information to be consistent with the information provided by the company in its questionnaire response.  For the transactions within the questionnaire annex that were without shipping costs, due to the instances where they did not charge for pallet shipping, the total value of shipping costs extrapolated for the missing shipping cost values was minimal and did not present a risk to the reliability of the data, this was not investigated further. We found this information to be consistent with the information provided by the company in its questionnaire response.  We found that M-Sport Wheels Ltd does not receive any rebates from its supplier. We found 15 negative sales within the questionnaire annex of the UK sales of the goods subject to review. These negative sales of total value, which are less than £1,000, are products returned by customers. Given the low number and value of these returns and considering that returns can occur where goods are being traded, we accepted this explanation and did not seek to evidence it. | |
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| Exceptions/Findings/Adjustments | |
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|  | |
| Conclusions | |
| The information relating to sales that we have been provided by the interested party is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as relevant, complete and accurate and can therefore be used by the TRA for the dumping likelihood assessment, the EIT assessment, and for any other purpose within this review. | |
| *Please indicate the confidentiality status of the information summarised above:* | |
| non-confidential | confidential |
| *If applicable, please specify what particular information you consider to be confidential, provide reasons as to why we should treat it as such, and create a non-confidential version of it (see also* [*public guidance*](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information)*):* | |
|  | |

## D. Economic Interest Test

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| --- | --- |
| What information was considered | |
| M-Sport Wheels Ltd completed Section E of their questionnaire regarding the Economic Interest Test (EIT). Their responses provided commentary on:   * Employment figures if the measures were to no longer apply; * Other countries that produce the goods subject to review; * Consumers of the goods subject to review; * Price, import volume, and export volume of the goods subject to review if the measures were to no longer apply; * Substitutability between forged wheels and cast wheels; * Future investment if the measures were to no longer apply; and * How continuing the measures could affect the UK market.   These claims were not substantiated by evidence and were therefore not verifiable. | |
| *Please indicate the confidentiality status of the information summarised above:* | |
| non-confidential | confidential |
| *If applicable, please specify what particular information you consider to be confidential, provide reasons as to why we should treat it as such, and create a non-confidential version of it (see also* [*public guidance*](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information)*):* | |
|  | |
| How the information was checked | |
| During verification we were able to confirm the location from which M-Sport Wheels Ltd operate, their staff numbers, the goods they import and sell, where the goods are imported from and who they sell the goods to.  M-Sport Wheels Ltd’s claim that there are no aluminium road wheel producers in the UK was verified as inaccurate as we were already engaged with a UK based aluminium road wheel producer.  M-Sports Wheels Ltd claims of the impact of the measures and consequences of removing the measure were not evidenced. We looked for independent sources to verify relevant data. For example, we reached out to the aluminium sector lead at BEIS who put us in touch with a specialist analyst, but this did not result in additional information specific to aluminium road wheels. No productive independent sources have been identified. | |
| *Please indicate the confidentiality status of the information summarised above:* | |
| non-confidential | confidential |
| *If applicable, please specify what particular information you consider to be confidential, provide reasons as to why we should treat it as such, and create a non-confidential version of it (see also* [*public guidance*](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information)*):* | |
|  | |
| Exceptions/Findings/Adjustments | |
| We do not accept that there is no UK producer of aluminium road wheels, as our investigation has uncovered that there is at least one. We believe that M-Sport Wheels Ltd’s claim of there not being any ARW producers in the UK is contrary to the definition of what would be considered UK production.  We were able to confirm all of M-Sports Wheels Ltd information relating to their business, however we were not able to corroborate any of their claims relating to the industry or the future of their company and the industry. | |
| *Please indicate the confidentiality status of the information summarised above:* | |
| non-confidential | Confidential |
| *If applicable, please specify what particular information you consider to be confidential, provide reasons as to why we should treat it as such, and create a non-confidential version of it (see also* [*public guidance*](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information)*):* | |
|  | |
| Conclusions | |
| We have limited assurance that the EIT information can be treated as relevant, complete, and accurate due to the lack of supporting evidence. We will consider the information relating to their company, but will disregard all other information relating to the market and future impacts of any measure or removal of measure. | |
| *Please indicate the confidentiality status of the information summarised above:* | |
| non-confidential | confidential |
| *If applicable, please specify what particular information you consider to be confidential, provide reasons as to why we should treat it as such, and create a non-confidential version of it (see also* [*public guidance*](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information)*):* | |
|  | |

# Conclusions

We have completed our verification of the data provided to us by M-Sport Wheels Ltd for use in our assessments. We were originally not able to verify the import purchase data supplied within the questionnaire annex to their accounting systems. However, M-Sport Wheels Ltd was able to provide us with a revised questionnaire annex under the direction of the case team, and so in conclusion we have a reasonable level of assurance the revised annex is relevant, complete and accurate.

M-Sport Wheels Ltd did not evidence claims made in the EIT section of their questionnaire response, relating to the industry and how any trade remedy measure would impact the industry and their business, and no independent secondary sources were found to verify those claims. We will therefore disregard these statements made by M-Sport Wheels Ltd relating to the economic interest of the measure.

We have obtained sufficient and appropriate evidence to conclude that all other information provided by M-Sport Wheels Ltd is verifiable. Therefore, we have a reasonable level of assurance that the data we will use in our decision making, is relevant, complete and accurate for the purpose of this investigation.