

**Request for information on scope relating to
TRANSITION REVIEW No.TD0013**

**Anti-dumping duties on certain aluminium road wheels originating in the People's Republic
of China**

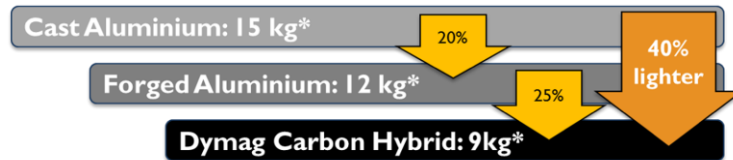
1. To what extent do cast wheels directly compete with forged wheels and to what extent would an OEM view forged and cast wheels as interchangeable when making purchasing decisions? For example, would an OEM purchaser directly compare forged wheels and cast wheels to meet a purchasing/supply requirement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

Dymag response:

OEM and aftermarket customers choose cast, forged or increasingly carbon composite wheels based on cost vs. function and aesthetics.

OEMs: For lower value cars, cast is preferred on most vehicles where the volume production is high – 1k – 100k+ vehicles per year (4,000+ wheel per year). This is due to low cost and flexible design options.

However more niche or limited edition vehicles will often have a forged wheel as standard or as an option to the cast wheel fitted as standard. This is because the wheels have a different “machined” look and are approximately 20%+ lighter than a cast equivalent. However they are significantly more expensive. Carbon wheels are lighter again, and significantly more expensive than either cast or forged wheels.



*Example: Jaguar F-Type
Front Wheel.*

Carbon wheels would typically be 25% lighter than forged aluminium and 40%+ lighter than cast.

The trend is towards larger and heavier vehicles, especially Battery Electric Vehicles (BEVs). This increases the focus on lightweight wheels (and tyres). As high speed rotating parts, the benefits of lighter wheels are greatly magnified compared to other static components, due to the impact on handling, cornering, acceleration and braking (source <https://www.researchdive.com/> link to <https://bit.ly/3tS18em>). Consequently they consume less energy than heavier wheels and can improve BEV range and/or reduce CO2 by up to 5% (source: Carbon Revolution of Australia. <https://newsexplorer.net/carbon-fiber-ev-wheels-will-be-lighter-quieter-and-more-efficient-s1035639.html>).

The drive towards Net Zero by OZEV means the UK government should be encouraging the adoption of lighter wheels. It is therefore of benefit for the UK to make lighter wheels relatively more affordable and keeping pressure on both cast and forged wheels would assist the adoption of lighter UK produced carbon wheels.

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Dymag is the UK's only commercial producer of auto carbon wheels, and top 3 globally, competing mainly with imported wheels from Australia by Carbon Revolution and Mubea/CarboTech of Germany/Austria. Chinese and South East Asian manufacturers are now trying to sell low cost carbon alternatives of questionable quality and safety. **Note: wheels are safety critical components.**

The differential cost between cast and forged is significant, and it is significant again to carbon. We need to see the dumping of low cost environmentally damaging cast wheels restricted, followed by forged wheels.

We would also want the UK Government to tighten up on the import of carbon wheels from China and South East Asia as they are being or will be dumped into the UK market in due course.

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

If the UK wants to drive to Net Zero, then it would help to as a minimum keep pressure on cast wheels, and potentially on forged wheels to help even lighter carbon wheels become more viable and increase adoption.

However carbon hybrid wheels use forged centres so we would strongly recommend that sub-components of carbon hybrid wheels attract zero import tariffs.

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

The aftermarket in the UK has been decimated by the import of lower cost cast wheels undermining the market for forged wheels.

If we are to develop the environmental and performance benefits of light weight wheels, then cast wheels should be subject to tariffs and possibly forged wheels.

Yours faithfully



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