



Trade Remedies  
Authority

**Recommendation to the Secretary of State**

**Case TD0013**

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

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## SECTION A: Introduction

1. This section (A) summarises the legal framework for this recommendation and the Trade Remedies Authority (TRA)'s findings. The background to the review and further detail on all aspects are set out in the body of the report.
2. This document sets out our recommendation and the essential facts on which we have based our recommendation. It should be read in conjunction with other public documents available for this case on the [public file](#). Its purpose is to set out our recommendation to the Secretary of State for Business and Trade (the Secretary of State).
3. For further guidance and information regarding transition reviews, please see our [public guidance](#).

### A1 Legal framework

4. This recommendation is made pursuant to regulations 100(1), 100(2)(a)(i), 100(2)(a)(ii), 100A and 100B of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019<sup>1</sup> (the Regulations). In accordance with regulation 100(2)(b) of the Regulations, this recommendation includes:
  - a description of the goods to which the recommendation relates;
  - the names of overseas exporters or, where impracticable, the exporting countries or territories;
  - a summary of the review; and
  - the reasons for the recommendation.
5. In accordance with regulation 100A(2) of the Regulations, when making a recommendation to vary the measure, we must:
  - show that we are satisfied that the economic interest test (EIT) is met;
  - have had regard to the current and prospective impact of the anti-dumping amount; and
  - include the following information:
    - the anti-dumping amount;
    - the goods to which the anti-dumping amount applies; and
    - the period for which the anti-dumping amount is to apply.

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<sup>1</sup> Statutory Instrument 2019/450, as amended.

## A2 About this review

6. This is a transition review under regulation 97(2)(b) of the Regulations of the UK trade remedies measure set out in [Taxation Notice 2020/11](#). This UK measure gives effect to the European Union (EU) [Commission Implementing Regulation \(EU\) 2017/109 of 23 January 2017](#).
7. This review concerns the anti-dumping measure applying to certain aluminium road wheels (ARW) originating in the People's Republic of China (PRC). The [Notice of Initiation \(NOI\)](#) was published on 7 October 2021.
8. In this transition review, the goods subject to review are defined as:

*aluminium road wheels of motor vehicles per commodity code headings 87 01 to 87 05, whether or not with accessories and whether or not fitted with tyres. **Commodity codes:** 8708 70 10 15, 8708 70 10 50, 8708 70 50 15 and 8708 70 50 50. **Exporting countries:** The People's Republic of China.*
9. The Period of Investigation (POI) for this review was 1 July 2020 to 30 June 2021. To assess injury, we examined the period 1 July 2017 to 30 June 2021 as the injury period (IP).
10. On 14 February 2023, we published our [Statement of Essential Facts \(SEF\)](#), pursuant to regulation 62 of the Regulations. We received submissions in response to the SEF, and we considered all of the points made in these submissions.
11. On 3 July 2023, we published a [notice of change to intended final recommendation](#). We did not receive any submissions in response to this notice.

## **SECTION B: Summary and Findings**

### **B1 Interested parties and contributors**

12. The following interested parties provided a response to the questionnaires issued by the TRA to gather detailed information on which to base our assessments:
  - Rimstock Limited (Rimstock), a domestic producer of like goods; and
  - M-Sport Wheels Limited (M-Sport Wheels), an importer of goods subject to review.
13. The following interested parties provided a response to the SEF published by the TRA on 14 February 2023:
  - 360 Wheels Limited (360 Wheels), a domestic producer of like goods; and
  - Image Wheels International Limited (Image Wheels), a domestic producer of like goods.
14. Further relevant submissions were made by other interested parties and contributors.

### **B2 Scope**

15. Regulation 99A(2)(a)(ii) of the Regulations provides the TRA with the discretion to consider, within the conduct of a transition review, whether the goods or the description of the goods to which an anti-dumping amount applies should be varied.
16. ARW can be produced by a casting or by a forging. We determined that owing to the technical, aesthetic and price differences between them, ARW produced by a casting and ARW produced by a forging can be considered as separate subtypes of the goods subject to review. During our review, we also identified an additional sub-categorisation of ARW, as both forged and cast ARW can be produced as one whole and complete aluminium road wheel (a one-piece wheel) or made from an assembly of multiple pieces that could be a mixture of forged and cast aluminium parts, or even a hybrid between carbon fibre and aluminium parts (a multi-piece wheel). We therefore also considered these subtypes in our review.
17. In the recommended measure, we use the term “machined” to differentiate finished and unfinished ARW from unmachined raw blanks. Finished or unfinished ARW are to be included within the scope of the measure in our Final Recommendation to the Secretary of State, whereas unmachined raw

blanks are not to be included within the scope of the measure in our Final Recommendation.

18. Where we refer to ARW and parts of ARW that are either finished or unfinished, we refer to all ARW and parts of ARW that may or may not be finished but have been subject to machining procedures (such as turning, milling and drilling) and therefore would not fall within the categorisation of unmachined raw blanks.
19. During the course of the investigation, we received a request from an interested party (M-Sport Wheels) that ARW manufactured using the cast production method (as opposed to the forge production method) should be excluded from the scope of the review, as they were substantially different to ARW manufactured using the alternative forging production method.
20. Having considered this request, we determined that cast ARW should remain within the scope of this review as there is evidence of a UK cast ARW manufacturing industry, but our recommendation below is that this industry would not be injured if the measure were revoked on cast wheels.

### **B3 Recalculation and assessment of dumping and injury**

21. We did not have access to sufficient data to recalculate dumping and injury margins, and we therefore considered that it was not appropriate to recalculate the anti-dumping amount (under regulation 99A(2)(a)(i) of the Regulations). We are therefore basing our recommendation for this transition review on likelihood of dumping and injury assessments, in accordance with regulation 99A(1) of the Regulations.

### **B4 Likelihood of dumping assessment**

22. In accordance with regulation 99A(1)(a) of the Regulations, we assessed whether dumping of the goods subject to review would be likely to continue or recur, if an anti-dumping amount were no longer applied to those goods (the likelihood of dumping assessment).
23. We determined that, on the balance of probabilities, it is likely that dumping of the goods subject to review would recur if the measure were no longer applied.

### **B5 Likelihood of injury assessment**

24. In accordance with regulation 99A(1)(b) of the Regulations, we considered whether injury to the UK industry producing the domestic like goods would be likely to continue or recur, if the anti-dumping amount were no longer applied to the goods subject to review (the likelihood of injury assessment).

25. We determined that, on the balance of probabilities, it is likely that injury:
- would recur if the anti-dumping amount were no longer applied on one-piece forged, assembled multi-piece and parts of ARW originating in the PRC; and
  - would not recur if the anti-dumping amount were no longer applied on all other goods subject to review.

## **B6 Economic Interest Test**

26. Having considered all the evidence and information obtained from secondary sources, including that presented by interested parties and contributors, and all the factors listed in paragraph 25(4) of Schedule 4 to the Taxation Cross-Border Trade Act 2018 (the Act), we have concluded that the Economic Interest Test (EIT) is met for the recommended measure.

## **B7 Recommendation to the Secretary of State**

27. In accordance with regulation 100(1) of the Regulations, following a transition review, the TRA must make a recommendation to the Secretary of State to vary or revoke the application of the anti-dumping amount to the goods subject to review.
28. Our recommendation is to:
- maintain the anti-dumping amount in relation to ARW machined from a forged blank or assembled from multiple pieces, or machined parts of aluminium road wheels;
  - vary the application of the anti-dumping amount on these types of ARW so that it applies until 25 January 2027; and
  - revoke the application of the anti-dumping amount in relation to all other ARW, starting from 26 January 2022.
29. Pursuant to regulation 100A(4)(b) of the Regulations, we recommend maintaining the anti-dumping amount on one-piece forged and multi-piece ARW because it was not possible to recalculate that amount.
30. The application of the measure will be varied under regulation 100A of the Regulations in relation to the relevant goods subject to review which fall under the following UK commodity codes:
- a. 8708 70 10 15
  - b. 8708 70 10 50

c. 8708 70 50 15

d. 8708 70 50 50

31. The description of goods falling under the above commodity codes to which the measure will be extended, is:

*aluminium road wheels machined from a forged blank, assembled from multiple pieces, and machined parts of aluminium road wheels, of aluminium; whether finished or unfinished, whether or not with their accessories and whether or not fitted with tyres.*

32. The description of relevant goods subject to review falling under the above commodity codes in relation to which the measure will be revoked, is:

*all other goods*

33. We make this recommendation on the grounds that:

- It is likely, on the balance of probabilities, that dumping of goods subject to review would recur if the anti-dumping amount were no longer applied to those goods;
- It is likely, on the balance of probabilities, that injury to the UK industry would recur from the dumping of one-piece forged and assembled multi-piece ARW, and parts of ARW, originating in the PRC, if the anti-dumping amount were no longer applied to these goods.
- It is likely, on the balance of probabilities, that injury to the UK industry would not recur from dumping of all other goods subject to review, if the anti-dumping amount were no longer applied.
- We are satisfied that the application of the anti-dumping amount on the specified subset of the goods subject to review meets the EIT.

## SECTION C: Background

### C1 Initiation of the transition review

34. The UK chose to maintain some trade remedy measures once it was outside the EU's common external tariff. The Department for International Trade (DIT) identified which EU measures were of interest to the UK following a call for evidence.
35. For each of these EU measures, the Secretary of State for International Trade (Secretary of State) published a Notice of Determination, under regulation 96(1) of the Regulations, setting out the decision to transition the corresponding EU trade remedies measure, and a Taxation Notice, on replacement of the EU trade duty. The TRA conducts transition reviews to determine if these measures should be varied or revoked in the UK.
36. On 31 December 2020, the Secretary of State published [Notice of Determination 2020/11](#) regarding the anti-dumping duty on certain ARW originating in the PRC. [Taxation Notice 2020/11](#) gave effect to the transition of the EU anti-dumping duty on ARW originating in the PRC to become an additional amount of UK import duty. In accordance with regulation 97(2)(b) of the Regulations, the TRA is required to conduct a transition review of the UK trade remedies measure specified in a determination notice.
37. On 7 October 2021, the TRA published a [Notice of Initiation](#) to initiate a transition review into certain ARW originating in the PRC.
38. Please note that, since February 2023, DIT has become the Department for Business and Trade (DBT), and references to the Secretary of State are to the Secretary of State for Business and Trade.

### C2 EU measure

39. On 10 May 2010, the European Commission (the Commission) imposed definitive anti-dumping duties of 22.3% on imports of certain ARW originating in the PRC in [Commission Implementing Regulation \(EU\) No. 964/2010](#).

#### C2.1 EU reviews conducted since the original investigation

40. Since the original investigation, the Commission initiated two expiry reviews – [R628](#) and [R759](#) – of the anti-dumping measure applicable to imports of certain ARW originating in the PRC, to consider whether to maintain the [EU measure](#). The recommendations of both the R628 and the R759 reviews were to maintain the existing measure.

## **C3 Our transition review process**

### **C3.1 The transitioned measure**

41. The EU measure transitioned into UK law (and as set out in [Taxation Notice 2020/11](#)) took effect as a UK measure on replacement of EU trade duties. The UK measure was due to expire on 25 January 2022 but, given this review was ongoing at the time, under regulation 97C of the Regulations, this measure will continue to apply until the Secretary of State publishes a notice accepting or rejecting the TRA's recommendation, following the transition review process, to vary or revoke the application of the anti-dumping amount to the goods subject to review.

### **C3.2 Information from participants in the review**

42. We received submissions from four UK producers:
- [Rimstock](#);
  - [Dymag Group Limited \(Dymag\)](#);
  - [360 Wheels](#); and
  - [Image Wheels](#).
43. We received submissions from one UK importer: [M-Sport Wheels](#).
44. We received a registration submission from the [Ministry of Commerce of the PRC](#) (MOFCOM) together with further comments regarding a [particular market situation \(PMS\)](#).
45. We received submissions from the following contributors and further interested parties:
- [China Chamber of Commerce for Import and Export of Machinery and Electronic Products \(CCCME\)](#); and
  - [Zhejiang Autom Aluminum Wheel Co., Ltd. \(Zhejiang Autom\)](#).
46. The information submitted by all interested parties and contributors is listed in [Annex 4](#).

### **C3.3 Verification of data**

47. We checked Rimstock's and M-Sport Wheels' submissions for consistency and completeness. During these checks, we identified deficiencies in responses to the TRA requests for information and compliance with confidentiality

requirements. These deficiencies were adequately addressed prior to undertaking the verification work.

48. We conducted an on-site verification visit to Rimstock's manufacturing facility in West Bromwich in April 2022. Further verification activity took place via email and video conferencing. Details of the verification work completed can be found in our [verification report](#) of Rimstock's data. Based on the work undertaken, we have a reasonable level of assurance regarding the relevance, completeness, and accuracy of the information used in this review.
49. We conducted a verification visit to M-Sport Wheels' facility in Tilbury in March 2022. Further verification activity took place around this visit via email and video conferencing. Details of the verification work completed can be found in our [verification report](#) of M-Sport Wheels' data. Based on the work undertaken we have a reasonable level of assurance regarding the relevance, completeness, and accuracy of the information used in this review.
50. In addition to evidence provided by these parties, we used [HMRC overseas trade data](#) pertaining to relevant markets as information obtained from secondary sources, in accordance with regulation 47(5) of the Regulations. We treated this secondary information with special circumspection, and where practicable, we verified it using independent sources. Where we did not verify data, we were able to highlight those areas, and we drew conclusions where appropriate.

### **C3.4 How we have used submitted information**

51. Throughout this transition review, we used the data submitted by interested parties and contributors within the evidence base we assessed to form our conclusions. We compared submitted information against information submitted by other interested parties, information obtained from secondary sources, including TRA data subscriptions, and/or publicly available data from government, industry and other sources.

### **C3.5 Statement of Essential Facts (SEF)**

52. The TRA published a SEF on 14 February 2023, pursuant to regulation 62 of the Regulations. This included:
  - Our intended recommendation;
  - A summary of the facts considered during the transition review that formed the basis of our intended recommendation; and
  - Details of the analysis forming the basis of our intended recommendation.

53. Interested parties were invited to make submissions within 14 days of the publication. 360 Wheels submitted a [response](#) within the deadline and also additional [response](#) on 6 March 2023. The TRA decide to accept the additional submission as doing so would not significantly impede the progress of the review. .
54. Image Wheels waived its anonymity and submitted a [response](#) on 1 March 2023, after the deadline of 28 February 2023. The TRA decided to accept the submission as doing so would not significantly impede the progress of this transition review.

### C3.5.1 Forged blanks

55. The TRA received enquiries from UK industry about the definition of the term “unfinished” in the description of the goods subject to review that we were intending to recommend should continue to be subject to the measure. Specifically, whether this description included forged blanks.
56. We define forged blanks as any raw forging for the manufacture of ARW, that may or may not resemble an ARW or part of an ARW, that has not yet been subject to any machining process, such as turning, milling and drilling. We recognise that as part of the manufacturing process, a hole may be punched / stamped through the centre of a blank, and some parts are sawn or cut from raw aluminium. We do not consider these ‘machining’ operations. Figures 1 and 2 below show the difference between a raw forged blank and a machined, unfinished ARW.



Figure 1: Forged ARW blank



Figure 2: Machined, unfinished ARW

57. Considering the relatively high proportion of ARW production costs involved in the machining process that takes place after the raw forged blank is produced, for the purposes of this transition review, we have determined that unmachined

raw forged blanks are not included within the term “unfinished” and are not recommended to be subject to the measure.

58. For the avoidance of doubt, where we refer to ARW that are either finished or unfinished, we refer to all ARW that meet the description of one-piece forged or multi-piece ARW, and parts of ARW, that have been subject to machining procedures including milling, turning and drilling. Machining procedures exclude sawing/cutting and stamping/punching. Therefore, unmachined raw forged blanks do not fall within the definition of unfinished ARW.

### **C3.5.2 Multi-piece ARW**

59. The submissions and supporting evidence we received in response to the published SEF were primarily concerned with the TRA’s intention to exclude assembled multi-piece ARW originating in the PRC from the recommended measure.
60. Our finding on likelihood of dumping applies to all ARW and therefore also applies to assembled multi-piece ARW.
61. In our previous likelihood of injury assessment, we had considered the UK industry, not as a whole, but broken into ‘participating’ parties and ‘non-participating’ parties. Following the receipt of submissions in response to the SEF, we were able to assess the UK industry in more detail. We discuss the UK industry in more detail in SECTION E: The current UK industry and market.
62. We assessed 360 Wheels’ and Image Wheels’ submissions and supporting information, in addition to our original findings, and conclude that it is likely that the UK industry producing the like goods would be injured by dumped imports of one-piece forged ARW, multi-piece ARW and parts of ARW, whether finished or unfinished, originating in the PRC, if the measure were revoked.
63. 360 Wheels also stated that the UK industry would not likely be injured by dumped imports of parts of ARW. The TRA has considered this statement and does not agree. As shown in SECTION F: Likelihood of Dumping Assessment, the TRA considers it likely that dumping would recur if the measure were revoked for all types of ARW originating in the PRC, including parts of ARW (i.e., all of the goods subject to review). Parts of ARW are manufactured in the UK and then assembled into multi-piece wheels. Multi-piece ARW can also be assembled from imported parts or a mix of both. We have received information from UK producers that selling assembled multi-piece wheels from imported parts is a commercially viable proposition. These assembled multi-piece wheels from imported parts would directly compete with entirely UK-manufactured multi-piece wheels. Revoking the duty currently applied on parts of multi-piece ARW originating in the PRC while maintaining the measure on assembled multi-piece ARW originating in the PRC increases the price differential between assembled multi-piece wheels from imported and UK-manufactured parts. We consider it likely that assembled multi-piece wheels from dumped imported

parts would cause injury to the UK injury because these types of multi-piece wheels could be sold at lower prices, which may lead to price suppression or undercutting.

64. We consider that parts of ARW that have been subject to any machining, such as turning and milling, are “finished or unfinished parts” and therefore will be subject to the measure. Parts of ARW that have not been machined – including sawn bar, cut plate or flow-formed part – would all be considered unmachined raw blanks that will not be subject to the measure.
65. The conclusion that the measure is in the economic interest of the UK is unchanged by the measure being maintained on multi-piece ARW and parts of ARW originating in the PRC, as well as one-piece forged ARW originating in the PRC.
66. For this reason, we are recommending that the measure be extended at the same level of anti-dumping import duty on assembled multi-piece ARW and parts of ARW, as well as one-piece forged ARW originating in the PRC.

## SECTION D: The Goods

### D1 Introduction

67. The goods subject to review in this transition review are defined in the NOI as:

*aluminium road wheels of motor vehicles per commodity code headings 87 01 to 87 05, whether or not with accessories and whether or not fitted with tyres.*

**Commodity codes:** 8708 70 10 15, 8708 70 10 50, 8708 70 50 15 and 8708 70 50 50. **Exporting countries:** The People's Republic of China.

### D2 Assessment of the goods

68. The scope of this transition review, as set out in the NOI and detailed above, consists of ARW imported from the PRC and therefore includes all ARW and any subcategories of goods imported from the PRC.
69. We identified various subcategories of ARW. We established that there are two production methods for ARW – casting and forging, and we identified that ARW can be produced using these production methods as either a single-piece complete ARW, or from two to three parts of an ARW (multi-piece) that are assembled to create the finished complete ARW.
70. In its original review ([Council Implementing Regulation \(EU\) No 964/2010](#)), the Commission did not distinguish between subcategories of ARW. The Commission's provisional determination stated that there are both cast and forged ARW produced in the PRC. It found that one-piece cast ARW made up the majority of the total imports from the PRC. It considered the EU ARW industry as a whole and recommended a measure be imposed on all ARW imported from the PRC.
71. We received a submission from an interested party, M-Sport Wheels, claiming that ARW produced by casting are different products and have different characteristics and prices compared to ARW produced by forging, and that they should therefore be treated separately – and that ARW produced by casting should be excluded from the scope of this review and of the measure.
72. We received evidence that the UK domestic industry produces ARW by forging. We found information from secondary sources that indicated the presence of cast ARW manufacture in the UK, and so we did not accept that cast ARW should be excluded from the scope of the review. In response to the submission, we did consider whether the goods to which the anti-dumping amount applies should be varied under regulation 99A(2)(a)(ii) of the Regulations. We assessed a number of factors to establish the similarities (or likeness) of forged ARW and cast ARW, including a subcategory of cast ARW that is cast flow formed ARW, and we made several observations.

73. Both production methods of casting and forging can be applied to all ARW. We established that multi-piece ARW make up a very small proportion of ARW in the market. We therefore compared both production methods based on one-piece ARW and made a separate analysis of how multi-piece ARW compare.

## **D2.1 Production processes**

74. Cast ARW are produced by inserting liquid aluminium alloy into a mould, where it cools and solidifies, to produce the ARW. Cast ARW may be further processed by “flow forming” to marginally reduce the weight of the ARW.
75. Forged ARW are manufactured from a solid cylindrical block of aluminium alloy that is pressed into a barrel shape and then machined into the final design.
76. Both cast and forged ARW are finished using similar processes such as coating, deburring and painting.
77. We found that while cast ARW and forged ARW share some production process elements, the processes are generally different and producing ARW by forging is more expensive than by casting.

## **D2.2 Physical, technical, and chemical characteristics**

78. Both cast and forged ARW are produced from the same or similar grades of aluminium alloy and are therefore chemically identical.
79. The different manufacturing processes result in the finished products having different properties. Forging results in a more aligned metal grain structure which improves the strength of the finished product. Casting results in a less aligned and more porous grain structure, which is inherently weaker and therefore requires more material to achieve a given strength.
80. Consequently, forged ARW have a better strength-to-weight ratio and can be lighter and less bulky to achieve a given performance. Forged ARW can also be machined more precisely, meaning that some designs of ARW are only achievable through forging.
81. We considered cast flow formed ARW and whether these could compete with forged ARW on technical characteristics. We identified that cast flow-formed ARW are a version of cast ARW, where the barrel area of an ARW is cast to be shorter and thicker than the final required dimensions and is then rolled (flow-formed) to form the final shape. We concluded that while cast flow formed ARW do provide some weight saving compared to standard cast ARW, they are essentially still cast ARW and do not achieve the same level of strength, durability, weight saving, and machinability as forged ARW. We verified information from M-Sport Wheels that flow formed ARW are more expensive to produce than standard cast ARW but have been sold by them at

the same price, as they have not been able to command a premium in the market. M-Sport Wheels have subsequently stopped its flow-formed ARW product lines.

82. From the visual inspections we conducted on samples of ARW, we concluded it was possible to physically distinguish between cast and forged ARW.

### **D2.3 Interchangeability and typical end use**

83. Both cast and forged ARW share the typical end use as an ARW for motor vehicles.
84. Although forged ARW are not limited to specialist uses, there are some uses for which only forged ARW would be suitable.
85. Interested parties have consistently differentiated between cast and forged ARW, describing forged ARW as premium products with technical and aesthetic differences, used on high-value and high-performance vehicles that are manufactured in lower volumes. They described cast ARW being the preferred choice for high volume production of lower value vehicles. There is some evidence of interchangeability where vehicle producers offer forged ARW as an option to upgrade vehicles normally fitted with cast ARW.
86. We found that all ARW are to a certain extent technically interchangeable as they are both ARW that can be manufactured to share geometrical (fitment) characteristics such as diameter, offset, number and pitch circle diameter of bolt holes, and centre bore.
87. We do not have information regarding the general distribution and use of forged ARW in the market, i.e., whether or not their typical end-use is in circumstances where a cast wheel could not perform the same role and therefore differ to the typical end-use of a cast ARW.

### **D2.4 The relationship between types of ARW in the domestic ARW market**

88. The market is split into three segments:
  - a. original equipment manufacturers (OEM), which use ARW for the cars they manufacture;
  - b. the after-market (AM), which sells ARW directly to the public; and
  - c. motorsport, which uses ARW for motorsport cars.
89. As discussed further in Section [E2 Market size and structure](#), we were unable to determine the exact size of the UK's ARW market. For similar reasons, we were unable to determine the relative sizes of these three segments. However,

we examined the information provided by interested parties to find an indication of how these segments are served. During the POI, the largest UK producer's sales of one-piece forged ARW were distributed as: 96% to OEM, less than 1% to AM and 4% to motorsport. During the POI, all of the verifiable import sales from the participating UK importer (M-Sports) were one-piece cast ARW, and were distributed as: 6% to OEM, 91% to the AM and 3% to motorsport.

90. On 18 March 2022, we [published](#) a request for more detailed information relating to cast and forged ARW in the domestic market. In response to this request, we received formal submissions from two ARW producers and one importer. These submissions are available on the [public file](#).
91. In its [questionnaire response](#), Rimstock stated that cast ARW imported at dumped prices from the PRC would compete with its forged products. We note that Rimstock import cast ARW from countries other than the PRC.
92. In contrast, 360 Wheels stated that its domestically produced forged ARW do not compete with imported cast ARW. We note that 360 Wheels does import cast ARW from the PRC.
93. Based on the data from interested parties that we found to be verifiable, the price of forged ARW is on average five times the price of cast ARW. Comparing the cheapest forged ARW to the most expensive cast ARW and the cheapest cast ARW to the most expensive forged ARW, the price of forged ARW is a minimum three times and maximum nine times the price of cast ARW.
94. This price difference is principally a consequence of the different production processes involved.
95. This price difference suggests that, in making purchasing decisions to buy forged ARW rather than cast ARW, factors other than price outweigh this price difference in the mind of the customer.

## **D2.5 Distribution channels and customers**

96. From the sales data we found to be verifiable we found that cast and forged ARW are sold through the same distribution channels and, to some degree, to the same customers.

## **D2.6 Multi-piece ARW**

97. To fully understand the ARW goods and industry, we considered how multi-piece ARW compare to one-piece ARW.

98. As multi-piece ARW are produced by either casting, forging, or a combination of the two where some parts are cast and others are forged, multi-piece ARW are chemically the same as one-piece ARW. The technical characteristics are different in that the overall weight is increased with the addition of material required to assemble the multiple pieces.
99. The production method varies as the parts of the ARW are produced individually, albeit through the same casting and/or forging process. Multi-piece ARW have an additional step of assembly using fixings such as bolts.
100. Multi-piece ARW are interchangeable with, and share the typical end use as, one-piece ARW.
101. Compared to one-piece ARW, multi-piece ARW are not generally available in the OEM market. Multi-piece ARW appear in low volumes in the AM and motorsport market, and at an increased cost compared to an equivalent one-piece ARW. We assess that multi-piece ARW are offered as a customisable option for car enthusiasts and for bespoke vehicles.
102. Parts of multi-piece ARW are imported and used for the production of assembled multi-piece ARW, and carbon-fibre and aluminium hybrid road wheels, which operate in a niche sector of the market and in small quantities.
103. Based on information obtained from secondary sources, our assessment of the ARW market is that multi-piece ARW are sold at a notably higher price point than one-piece ARW.

## **D2.7 Conclusion on assessment of the goods**

104. Forged and cast ARW are produced differently, using the same or similar grades of aluminium alloy to produce physically and technically different products.
105. Using verifiable data from interested parties, we established that UK-produced forged ARW cost on average five times more than an imported cast ARW.
106. This difference suggests that price is not the only determining factor in making purchasing decisions to buy forged ARW rather than cast ARW.
107. We established that cast and forged ARW are interchangeable where a matching ARW is available. An example of a typical end-use for both types of ARW would be on a consumer vehicle though we did not establish whether the typical specific end-use of forged ARW within that application as a road wheel is different to that of a cast ARW, given the technical and price differences.
108. Both forged and cast ARW are sold into the OEM, AM and motorsport markets, through the same distribution channels and, to some degree, to the same customers.

109. We did not accept that cast ARW, as a sub-type of goods subject to review, should be removed from scope of the investigation as we have found information obtained from secondary sources suggesting cast ARW production in the UK within the POI.
110. Based on technical and price differences, and their different treatment in the market, we consider that cast and forged ARW are different sub-types of ARW for the purposes of this trade remedies measure.

## SECTION E: The current UK industry and market

### E1 Overview

111. Where we refer to the UK industry, we are referring to a group of producers whose collective output of the like goods constitutes a major proportion of the total production of those goods in the UK. Like goods are goods which are like the goods subject to review in all respects or, if not alike in all respects, have characteristics closely resembling those of the goods subject to review.
112. In the SEF, we considered the UK industry and market under separate groups of participating and non-participating parties. We did this to highlight that we had identified different sectors within the ARW market but had only received full participation from a producer in one of those sectors. After receiving new information in response to the SEF, we were able to consider the UK industry and market in more detail.

#### E1.1 The domestic industry

113. At the time of writing the SEF, we had identified five UK producers of like goods: Rimstock, 360 Wheels, Image Wheels<sup>2</sup>, Dymag and Tech-Del Limited (Tech-Del).
114. Having considered the responses to the SEF, we determined the UK industry to be made up of seven known producers:
- **Rimstock**, a producer of one-piece forged ARW (which previously also produced one-piece cast ARW, before closing their casting facility before to the start of the POI);
  - **360 Wheels**, a producer of one-piece forged and multi-piece ARW, operating in the OEM and AM markets;
  - **Image Wheels**, a producer of bespoke multi-piece ARW from parts that are either forged or cast, operating in the AM;
  - **Dymag**, a producer of a variety of wheels, some of which are ARW;
  - **Tech-Del**, a producer of bespoke one-piece cast ARW, sold under the brand name “Minilite”;
  - **M. B. Racing Limited** (MB Racing Wheels), a producer of bespoke multi-piece ARW, now owned by G-Cat Engineering Ltd; and
  - **Force Racing Wheels Ltd** (Force Racing), a producer of bespoke multi-piece ARW.

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<sup>2</sup> At the time of writing the SEF, Image Wheels wished to remain anonymous; but after SEF publication, Image Wheels submitted a response to the SEF and decided to waive their anonymity.

115. Having considered the sizes and products of these producers, we assessed that the UK industry consists of one high-volume producer (producing one-piece forged ARW) and six lower-volume producers (producing a variety of one-piece, multi-piece, forged and cast ARW).
116. Rimstock is the largest producer of ARW in the UK. Our estimate is that it accounted for a majority of the UK's one-piece forged ARW production during the POI<sup>3</sup>. Rimstock was the only party to submit a full response to the UK producer questionnaire.
117. We note that Rimstock went into administration in July 2023. This was after the publication of our SEF and after the close of the window for SEF responses. The available evidence on this matter did not change our assessment of the UK industry.
118. The other six UK producers are smaller, and by our estimates, represent a minority of the UK industry, even when combined. We note that 360 Wheels "estimate the combined turnover [of the UK producers of multi-piece ARW] to be similar to that of Rimstock"<sup>4</sup>; however, we did not receive or find sufficient evidence to confirm this.
119. We checked that these six companies were UK producers of ARW. To do this, we engaged in correspondence with the companies and examined submissions to this review. We considered the consistency of the information provided to us and also compared that information with information obtained from secondary, publicly available sources.
120. We gained sufficient assurance that 360 Wheels is a UK producer for the purposes of this investigation. 360 Wheels produces one-piece forged and multi-piece ARW in the UK. Where it produces multi-piece wheels from cast parts, the parts are manufactured, machined and assembled into wheels in the UK, and where it produces multi-piece wheels from forged parts, the forged raw blank part is imported, but then machined and assembled into wheels in the UK. As discussed in C3.5.2 Multi-piece ARW, the raw forged blanks of parts will not fall within the scope of the measure, but parts that are machined will continue to do. Therefore, 360 Wheels is a producer of these subtypes of the like goods. We note 360 Wheels also imports one-piece cast ARW from various countries, including the PRC; but having considered the relationship between the different types of ARW (as discussed in Section D2.4: The relationship between types of ARW in the domestic ARW market), we did not determine 360 Wheels would behave differently to the other producers of the like goods. We therefore included 360 Wheels within our definition of the UK industry.
121. We gained sufficient assurance that Image Wheels is a UK producer of multi-piece ARW, and that it manufactures ARW from machining through to

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<sup>3</sup> To make this estimate, we used the data in Rimstock's confidential questionnaire submission, confidential information submitted by Image Wheels ([summarised on the public file](#)), and information obtained from secondary sources about the UK market for the like goods.

<sup>4</sup> See [360 Wheels' submission in response to the SEF](#).

assembly, all in the UK (as mentioned on its company website and in its [SEF response](#)). We also gained sufficient assurance that Dymag produces ARW in the UK.

122. Through our own research into secondary sources, we identified that Tech-Del are a low-volume producer of a bespoke, one-piece cast ARW<sup>5</sup>. However, we did not receive any engagement from Tech-Del.
123. MB Racing Wheels and Force Racing were identified to us in [360 Wheels' SEF response](#). 360 Wheels identified them as producers of multi-piece ARW operating during the POI. We did not receive any direct communications from MB Racing Wheels or Force Racing, and we did not request their participation because doing so would have impacted the progress of the review. However, using information obtained from secondary sources, we gained sufficient assurance that they are UK producers of ARW<sup>6</sup>.
124. We did not identify any other domestic producers of ARW. However, we acknowledge that there may be some small ARW producers of which we are not aware.

## **E2 Market size and structure**

125. We were unable to establish the total size of the UK market in units (number of ARW). Although Rimstock supplied production data for completed units of ARW, we could not use this to determine the size of the UK market in units, because we did not receive production data from any other producers, and because HMRC import data is only available in kilograms (kg).
126. We did not attempt to convert the import data into units using an average weight for ARW, owing to size variations in units of ARW, weight differences between cast and forged ARW, and the inclusion of other items (such as parts and accessories of ARW) within the same commodity codes as finished ARW.
127. However, using UK vehicle production figures from the Society of Motor Manufacturers and Traders (SMMT), we estimated the OEM consumption to be approximately 4.2 million individual ARW for the POI.
128. Due to the fragmented and disparate nature of the AM and motorsport sectors, and lack of participation in this transition review from these sectors, we were

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<sup>5</sup> The website for Minilite products [states that](#) "Minilite wheels are 'Low-Pressure' die cast, in high grade aluminium alloy". This is corroborated by other sources. For example, the automotive retailer "Hamilton Classic" [states that](#) Minilite wheels are available in "low-pressure die-cast aluminum alloy", and the automotive retailer "TyreSave" [states that](#) "Minilite wheels are made from LM9 alloy" (an aluminium alloy).

<sup>6</sup> For example, Force Racing's company website [states](#) that their "wheel centres are CNC machined in house from 6082T6 billet aluminium" and some of their products are explicitly [described](#) as having "rims in polished aluminium"; and MB Racing Wheels' page on "racecarsdirect.com" [states](#) that they "manufacture [...] 3 Piece modular wheels for modern and historic racing cars with a range of magnesium and aluminium centres" using their "own spun aluminium rims".

unable to identify a reliable source of data to accurately quantify the overall volume or value of these two market segments individually.

129. We did not receive any requests to treat the three market segments separately. However, we did seek to establish whether there was a material difference between the OEM, AM and motorsport market segments that should be reflected in our review.
130. We established that across all market segments, ARW are made to fit and perform to the same standard, and that domestic producers supply all markets.
131. Based on the information available, we found no grounds to consider the OEM, AM and motorsport markets as separate markets in undertaking this review.
132. From our verification work on Rimstock's production data and our analysis of HMRC trade data, we estimated the value of the UK ARW market (combining UK-manufactured ARW and UK imports of ARW) to be in excess of £300 million during the POI.
133. From our analysis of import data and the production data available to us, we estimate that one-piece cast ARW make up over 95% of the total UK ARW market. We estimate that multi-piece ARW make up less than 1% of the UK market in the like goods and the difference of approximately 4% is made up of one-piece forged ARW.
134. Since we could not determine the exact size of the UK market, we were also unable to firmly establish the percentage of the market supplied by domestic producers. However, as set out in Section [G2.4 Market share](#), we estimated that Rimstock accounts for less than 5% of the UK market. This indicated the majority of UK demand is met by imports.

## **E2.1 Competition in the market**

135. Having found that the majority of the like goods produced in the UK are manufactured by Rimstock, we assessed that most of the like goods produced in the UK are one-piece forged ARW. The majority of these one-piece forged ARW are sold to OEMs, and they are in direct competition with imports of one-piece forged ARW – a subtype of the goods subject to review.
136. Both domestic producers of forged ARW – Rimstock and 360 Wheels – also import cast ARW, as well as parts and accessories for ARW from the PRC and other export markets. Rimstock stated that one-piece cast ARW could compete with the one-piece forged ARW it produces; whilst 360 Wheels stated on the [public file](#) that the only imports that compete with its one-piece forged and multi-piece ARW are imports of the same, and therefore revocation of the measure on cast ARW, as a subtype of the goods subject to review, could benefit its business.

137. In response to the SEF, both 360 Wheels and Image Wheels submitted that their multi-piece ARW would be in competition with imports of multi-piece ARW originating in the PRC if the measure were no longer applied. (We discuss the likely consequence of this in Section [G4 Undercutting of the UK industry](#).)
138. From the information supplied to us and our own research, we did not find any evidence of direct competition between imports of cast ARW as a subtype of the goods subject to review and domestically produced one-piece forged ARW and multi-piece ARW, as subtypes of the like goods. Refer to SECTION D: The Goods for more details.

## **E2.2 Conclusion on market size and structure**

139. The available evidence suggested that domestic production of the like goods supplies less than 5% of the domestic market, with the remainder being met by imports.
140. Domestically produced like goods compete directly with imports of forged and multi-piece ARW as subtypes of the goods subject to review. We did not receive any conclusive evidence to establish competition between the like goods produced in the UK and imports of one-piece cast ARW as another subtype of the goods subject to review.

## SECTION F: Likelihood of Dumping Assessment

### F1 Introduction

141. We assessed whether the dumping of the goods subject to review would be likely to continue or recur if the anti-dumping amount were no longer applied to those goods, pursuant to regulation 99A(1)(a) of the Regulations. In undertaking this assessment, we have considered the current and prospective impact of the anti-dumping amount, as required under regulation 100A(2)(b) of the Regulations.
142. To conduct the likelihood of dumping assessment, we considered:
- the price comparison between the PRC-produced goods subject to review and UK-produced like goods (F2);
  - whether dumped imports to the UK have continued whilst the measure has been in place (F3);
  - whether exporters from the PRC have significant levels of production capacity (current or potential), which would give them the ability to dump if the measure were revoked (F4);
  - whether exporters from the PRC have significant inventories, which give them the ability to dump if the measure were revoked (F5);
  - whether exporters from the PRC have significant levels of production which would give them the ability to dump if the measure were revoked (F6);
  - whether exporters from the PRC are dumping in third countries (F7);
  - whether exporters from the PRC are subject to anti-dumping measures elsewhere (F8);
  - whether the conditions in the PRC domestic market are favourable for like goods (F9);
  - whether exporters from the PRC would be likely to choose to export to the UK over other markets based on the attractiveness of the UK market (F10); and
  - whether exporters from the PRC have previously or habitually circumvented the effects of trade remedy measures (F11).

#### F1.1 Data limitations

143. We have considered the likelihood of dumping on a PRC countrywide basis, rather than an exporter-by-exporter basis. This is due to the non-cooperation of PRC exporters, which resulted in no evidence being available to the TRA on any individual exporters.

144. Information obtained from secondary sources including, but not limited to, HMRC and UN Comtrade, was used in accordance with the Regulations where primary data was not available.
145. HMRC uses commodity codes to separate different products. The commodity codes relating specifically to ARW and related goods are not sufficiently granular to segregate into categories of cast and forged ARW, one-piece and multi-piece ARW, or their parts. Our determinations on a likelihood of dumping are therefore applicable to all goods subject to review.
146. The Commission investigation into ARW completed in 2009 stated that “high-end technology types of wheels”, which are ARW other than one-piece cast ARW, “constituted only a very small fraction of total exports from the PRC”. Due to the capital-intensive nature of the ARW industry, and the prevalence of one-piece cast ARW in market, we do not expect that ARW production capacity in the PRC, or the distribution of various product categories within that data, have changed significantly enough to materially affect our assessment of HMRC’s overseas trade data.
147. We cannot establish the precise mix of goods subject to review imported within the commodity codes, due to the lack of granularity in the overseas trade statistics that do not identify the types and subtypes of goods imported to the UK. We also note that the average price of imports from different countries ranged from less than £1/kg to over £3,000/kg. We therefore concluded that ARW prices between exporting countries cannot be reliably compared.
148. We did not receive any submissions regarding domestic prices in the PRC for the like goods from any PRC exporters of ARW or the Government of the PRC. We were also unable to identify reliable publicly available records (i.e., information from secondary sources) of domestic prices of the like goods sold in the domestic market of the PRC during the POI that we could access. Therefore, we have no data on the domestic prices of the like goods sold domestically in the PRC.
149. Consequently, we were unable to calculate the countrywide average domestic price of the like goods sold in the PRC – known as the “normal value”. Establishing the difference between the normal value and the export price (i.e., the price of the goods subject to review exported to the UK) would be required to calculate whether the goods subject to review were being imported at dumped prices.
150. Instead, we compared the price trend of imports of ARW from the PRC from before the Commission’s measure (implemented in 2010) came into place up to the end of the POI – noting that in its original investigation, the Commission found that dumping occurred during the period 1 July 2008 to 30 June 2009. If the import price of ARW from the PRC had stayed the same or reduced relative to the average import price from the rest of the world (RoW) over that same period, this would indicate that dumping had continued. If the price had increased relative to the average import price from the RoW, and by more than the dumping margin, this would indicate dumping had not continued. In both of these cases, any indication would not be conclusive in itself.

## F2 Volume and price comparison between the PRC- and UK-produced goods

151. The relevant HMRC data is measured in kg and domestic production in the UK is measured in units. We did not attempt to establish an average weight of an ARW to make a comparison as we did not find this would be reliable enough, given the types of like goods being produced in the UK. We therefore cannot make any direct comparisons between import data and domestic production.
152. As we concluded that import prices between countries are not directly comparable, we did not conduct a price comparison analysis.

## F3 Continued dumping

153. As discussed in Section [F1.1 Data limitations](#), we were not able to calculate the normal value of the like goods sold in the domestic market of the PRC due to the lack of data available, so we were not able to calculate whether any changes to the normal value had occurred which would have helped us conclude whether the goods subject to review were being imported at dumped prices.
154. We instead used HMRC data detailing the price of UK imports of the goods subject to review, to assess the likelihood of dumping continuing or recurring if the measure was removed.
155. ARW imports from the PRC into the UK were subject to anti-dumping measures from 25 October 2010 until the end of the POI. To understand the market trend prior to introduction of the measure, we have analysed import data from 2008 to 2021.

Table 1: UK imports of ARW from the PRC relative to total UK imports of ARW from the RoW

		08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21
UK imports from the PRC	Volume in metric tonnes (mT)	5,952	6,248	2,555	1,674	1,150	2,167	3,979	3,411	4,183	4,006	3,961	4,006	6,589
	£ per mT	2,843	2,930	2,628	2,577	2,349	2,524	2,843	2,873	3,053	2,980	3,148	3,173	3,108
	Adjusted £ per mT	—*	—*	3,215	3,152	2,873	3,087	3,477	3,513	3,734	3,645	3,849	3,881	3,801
Total UK imports from RoW	Volume in mT	30,078	38,586	42,759	58,769	61,232	56,419	59,636	67,385	68,339	61,341	58,563	48,052	53,833
	£ per mT	4,051	3,808	4,258	4,365	4,433	4,597	4,145	4,196	4,828	5,570	5,934	5,940	5,375

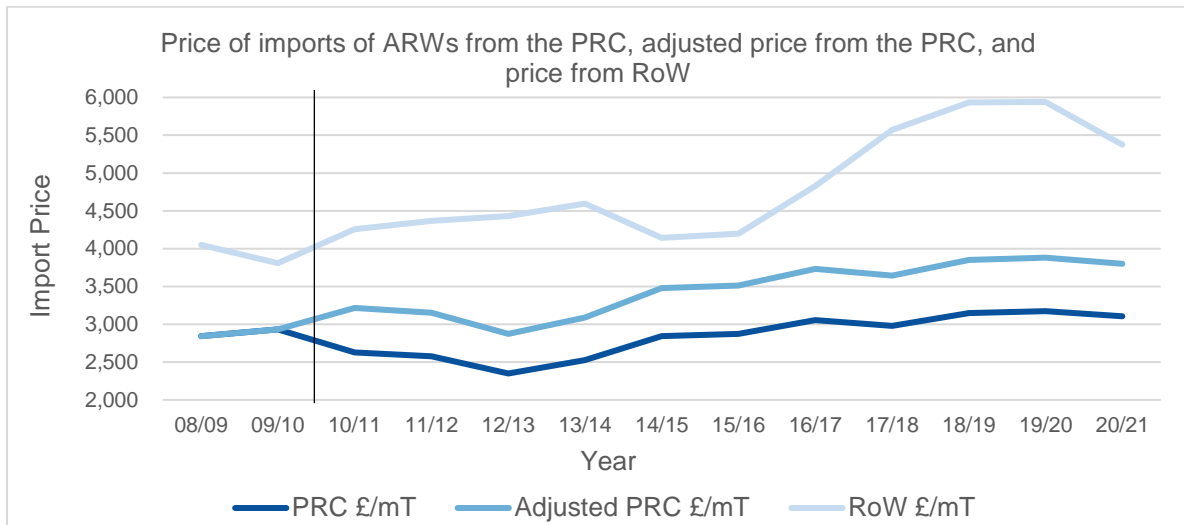
Source: [HMRC overseas trade data](#), 2022.

Note: Adjusted values on PRC import prices based on the inclusion of the 22.3% anti-dumping duty applied that is not included in HMRC price figures.

Note: This (and all subsequent) analysis of [HMRC overseas trade data](#) follows the date range for the POI. For example, 08/09 includes imports from 1 July 2008 to 30 June 2009.

\* The anti-dumping duty was not applied until October 2010

Graph 1: Price of imports of ARW from the PRC, adjusted price from the PRC, and price from RoW



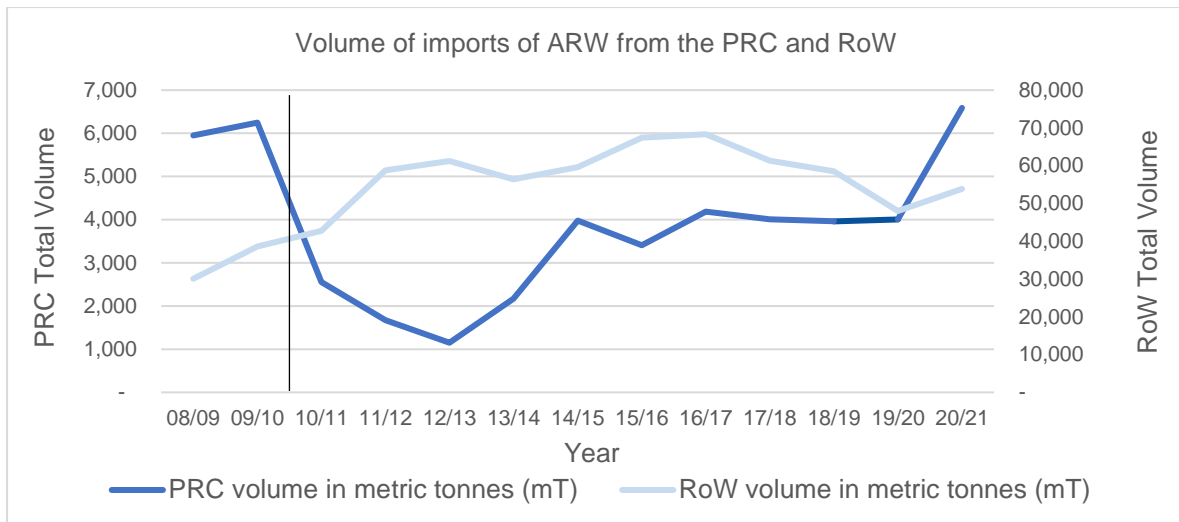
Source: [HMRC overseas trade data](#), 2022.

Note: Adjusted values on PRC import prices based on the inclusion of the 22.3% anti-dumping duty applied that is not included in HMRC price figures.

156. Table 1 shows PRC import prices of ARW adjusted to include the anti-dumping duty of 22.3% between 2010 and 2021.
157. Graph 1 shows an increase in disparity between the PRC and average RoW UK import price from the level at which the Commission concluded dumping was occurring. This indicates that it is possible the goods subject to review continued to be dumped into the UK during the POI. However, as this is not the only reason that PRC prices may have dropped – the PRC exporters’ costs may have gone down over this period relative to RoW costs, leading to a lower export price – it is not conclusive in itself that dumping has continued during the POI.

### F3.1 Continued dumping – value and volume of imports

Graph 2: Volume of imports of ARW from the PRC and RoW

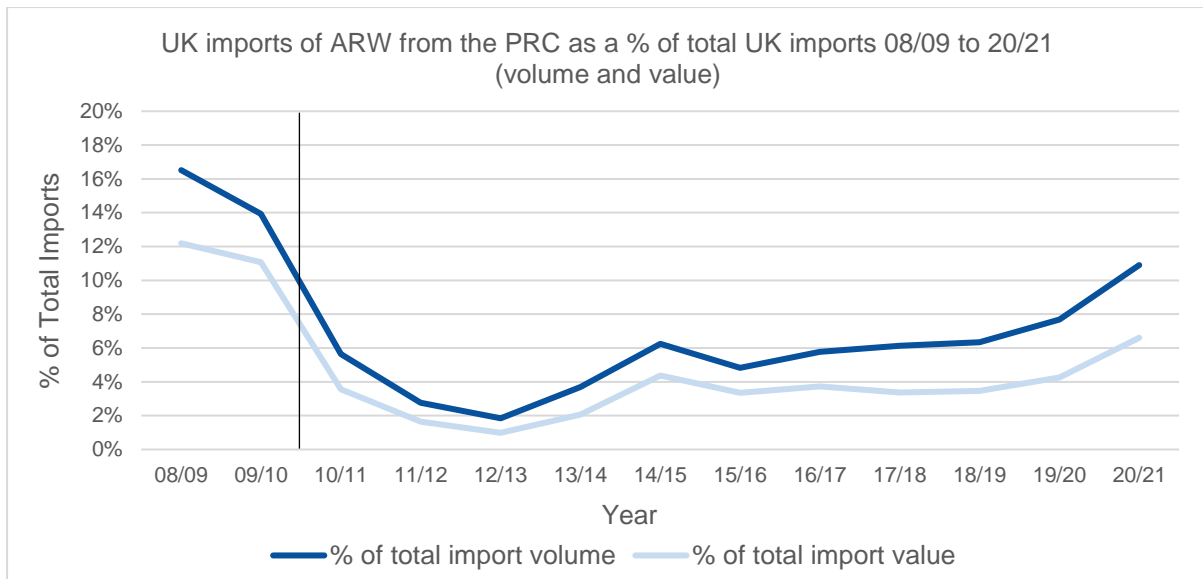


Source: [HMRC overseas trade data](#), 2022.

158. Table 1 and Graph 2 show that the volume of UK imports of ARW from the PRC increased by 64% in the POI (1 July 2020 – 30 June 2021) compared to the previous year (1 July 2019 – 30 June 2020) and the volume of UK imports of ARW from the RoW only increased by 16% in the POI compared to the previous year.
159. These years overlapped with the Covid-19 global pandemic, and so import volumes may have been affected by production, shipping, or other economic or logistical challenges created by the pandemic, especially during the 12 months of 1 July 2019 – 30 June 2020. Indeed, the RoW data shows a drop in import volume during this time, with an increase in imports between 1 July 2020 – 30 June 2021. However, there was a slight rise in import volume from the PRC during the 1 July 2019 – 30 June 2020 period, followed by an even greater rise in imports during the POI. Therefore, the supply chain disruption that may have impacted the imports from the RoW during the 1 July 2019 – 30 June 2020 period did not appear to impact imports from China, indicating another factor may be responsible for the increase in PRC imports.
160. Given that the volume of UK imports of goods subject to review have risen over the POI, it is possible this would continue to an even higher volume if the measure were revoked.

### F3.2 Continued dumping – market share

Graph 3: UK imports of ARW from the PRC as a % of total UK imports 08/09 to 20/21 (volume and value)



Source: [HMRC overseas trade data](#), 2022.

161. Graph 3 shows that the market share of total UK import volume of ARW originating from the PRC had been falling since the initial Commission anti-dumping measure was implemented, from 13.9% between 1 July 2009 to 30 June 2010 to 1.8% between 1 July 2012 to 30 June 2013.
162. This reduction in market share and total import volume from the period 1 July 2009 – 30 June 2010 to 1 July 2012 – 30 June 2013 suggests that the measure had affected the trade flow of ARW from the PRC.
163. The PRC market share by volume then increased to 6.3% between 1 July 2014 to 30 June 2015 and has steadily increased from the period 1 July 2015 – 30 June 2016 to 1 July 2020 – 30 June 2021, where the market share was 10.9%.
164. This increase in market share is notable and indicates the PRC exporters have the capacity to increase their market share, particularly if the measure was revoked.

Table 2: Major countries of origin of UK imports of ARW as a percentage of total UK imports by volume during the injury period and the POI

Country	2017-2018	2018-2019	2019-2020	POI
Türkiye	14.3%	18.8%	20.3%	22.7%
Germany	13.7%	14.5%	15.2%	16.7%
The PRC	6.1%	6.3%	7.7%	10.9%
South Korea	22.9%	19.5%	16.1%	10.1%
Italy	4.4%	5.9%	6.2%	8.6%
Poland	4.3%	5.9%	7.0%	6.9%
Taiwan	4.4%	4.1%	4.8%	4.6%
Thailand	5.7%	4.6%	4.1%	4.1%
Czechia	2.9%	2.8%	2.7%	2.3%

Hungary	1.6%	1.8%	1.6%	2.1%
RoW	19.5%	15.8%	14.4%	11.0%

Source: [HMRC overseas trade data](#), 2022.

165. Table 2 shows the country of origin of UK imports of ARW during the injury period by country. The PRC is one of the larger sources of ARW during the POI and was consistently one of the top four importers during the IP.
166. Imports from the PRC have maintained a significant market share from 2017-2021 and have been continuously low in price during this period. The PRC market share by value from 2017-2021 is lower than by volume – which can be accounted for noting that ARW from the PRC are cheaper than ARW from countries with similar volumes.

### F3.3 Conclusion on continued dumping

167. HMRC data indicates that the disparity between the lower price of the goods subject to review imported into the UK and the higher average price of non-PRC (like goods) imports has increased since the Commission found that dumping was occurring and the initial EU measure came into force. The volume of imports of the goods subject to review into the UK has significantly increased in the POI when compared to the preceding year (1 July 2019 – 30 June 2020).
168. These trends indicate that there have been continued imports of the goods subject to review into the UK since the implementation of the first EU measure in 2010 and it is possible that these imports have been at dumped prices, though this is not conclusive based on the import volume and value analysis alone.

### F4 Production capacity

169. Paragraph (69) of [Commission Implementing Regulation \(EU\) 2017/109](#) states that the production capacity of ARW producers in the PRC was approximately 190,000,000 units at the lowest estimate. This is approximately 45x total UK consumption.
170. We considered the Commission’s findings and the sources it used, including an excerpt from the [Global and China Automotive Wheel Industry Report 2012/2013](#) that confirmed excess capacity in the ARW market in the PRC.
171. While these sources are dated outside of our IP, due to the capital-intensive nature of the ARW industry, we find it plausible that ARW production capacity in the PRC has not changed to the extent to which PRC exporters could not increase exports to the UK in high proportions relative to UK consumption. Nor have we identified any evidence or information that indicates that production capacities have changed.

### F5 Inventories

172. We did not receive any submissions regarding total inventories of ARW exporters from the PRC within the POI. Therefore, we have no primary data on ARW inventories in the PRC.

## **F6 Production levels**

173. Rimstock stated that it was aware of ongoing investment by three ARW producers in the PRC but did not provide evidence to support its claims. No other interested party submissions comment on countrywide changes in production levels in the PRC during the POI or injury period. We were unable to find any secondary data sources of ARW production levels in the PRC during the POI or injury period.

## **F7 Exports to third markets**

174. We did not receive any submissions regarding export sales of the like goods from the PRC from any PRC exporters of ARW or the Government of the PRC. Therefore, we have no primary data on ARW export sales from the PRC.
175. We reviewed export data from UN Comtrade to analyse exports the like goods from the PRC to third countries during the POI. However, UN Comtrade data also does not segregate between the different types and sub-types of goods included within the relevant commodity codes. As we do not know how the mix of products being exported from the PRC under these commodity codes varies from country to country, we cannot draw any conclusions.

## **F8 Anti-dumping measures in other countries**

176. The TRA has found current measures against exports of ARW from the PRC in Argentina ([case number 1/2018](#)) with the product scope consisting of the commodity code 870870. The Comisión Nacional de Comercio Exterior (National Foreign Trade Commission) in Argentina found in its 2018 investigation that the exporters from the PRC had been dumping ARW into Argentina with a dumping margin of 36.9%.
177. The TRA has identified current measures against exports of ARW from the PRC imposed by India ([case number 16/2018](#)) with the product scope consisting of the commodity code 870870. The Directorate General of Trade Remedies in India (DGTR) found in its 2014 investigation that exporters from the PRC had dumped ARW into India with dumping margins ranging between 45%-70%. In its 2019 expiry review, the DGTR concluded that exporters from the PRC had continued to dump ARW into India with dumping margins of between 10%-45%.
178. The TRA has also found historic measures against exports of ARW from the PRC imposed by Australia ([case number 464](#)) with the product scope consisting of the commodity codes 870870 and 871690. The Anti-Dumping Commission in Australia (ADC) found in its 2018 revocation review that if the measure was revoked it “would lead, or be likely to lead to, a continuation of,

or a recurrence of, the dumping and subsidisation that the anti-dumping measures are intended to prevent”. The measure was revoked because “the majority of the Australian industry (namely Starcorp as the largest producer) does not believe that it would suffer material injury if the measures were revoked and is supportive of the measures being revoked”.

179. The fact that other authorities either have anti-dumping measures in place, or had measures in the past, indicates a pattern of dumping by ARW exporters from the PRC.

## **F9 Conditions in exporters’ home market**

180. We did not receive any submissions regarding the domestic market for the like goods in the PRC from any exporters of ARW from the PRC or the Government of the PRC.
181. The [Global and China Automotive Wheel Industry Report 2020-2025](#) states that the PRC’s demand for ARW has declined 6.99% year-on-year. The TRA could not verify this statement from other independent sources.
182. We have received an allegation from Rimstock, of a Particular Market Situation (PMS) in the PRC’s ARW industry, particularly in respect of export taxes on the raw material of aluminium and in respect of energy prices.
183. The information provided to us indicated a potential for a PMS, in the form of VAT rebates and export taxes artificially lowering the price of primary aluminium (a key input in the T6082 aluminium alloy, which is in turn a key input of ARW), and that Government control of the price of electricity (which is a major cost component in the production of ARW) artificially lower the price of ARW production in the PRC.
184. We do not have sufficient evidence to reach a determination on the implications of a PMS existing for ARW in the PRC.

## **F10 The attractiveness of the UK market**

185. The attractiveness of the UK market to ARW exporters from the PRC is a major factor in determining the likelihood that exporters from the PRC will dump ARW into the UK. If the UK market is particularly attractive to exporters from the PRC, it is likely that dumping would recur if the anti-dumping measure were revoked.
186. Using import and verified domestic production data, we have been able to establish that domestically produced like goods supply a very small percentage of overall UK consumption. There is therefore high demand for imported ARW, making the UK an attractive market for overseas exporters of the same.

### **F10.1 Market size and growth**

Table 3: Total size and growth of the UK ARW market based upon UK industry sales, and UK import and export trade flows over the last three years.

		2018/19	2019/20	2020/21 (POI)
Total domestic producer sales (Rimstock) [Questionnaire annex]	Indexed Volume (Units)	100	52	18
	Indexed Value (£000s)	100	60	46
Total UK imports [HMRC]	Indexed Volume (mT)	100	83	96
	Indexed Value (£000s)	100	83	86
Total UK exports [HMRC]	Indexed Volume (mT)	100	63	79
	Indexed Value (£000s)	100	74	92
Total UK market consumption	Indexed Volume (mT)	N/A	N/A	N/A
	Indexed Value (£000s)	100	85	81

Source: Questionnaire responses and [HMRC overseas trade data](#), 2022.

Note: Total UK market consumption by metric ton cannot be shown as the TRA do not have data for domestic producer sales of like goods by weight.

187. Table 3 shows UK consumption of ARW declined between 2018 and 2021, which may reduce the attractiveness of the market.
188. If the trend of declining consumption of ARW in the UK were to continue, there is lower likelihood that ARW from the PRC would be dumped into the UK if the measure was revoked as the UK market would be less attractive.
189. M-Sport Wheels stated that if the measure no longer applied, total imports of the goods subject to review into the UK would initially and temporarily increase while it increased its UK stock holding.
190. The TRA does not find these factors conclusive regarding likelihood of dumping of ARW from the PRC recurring if the measure were revoked.

### **F10.2 Intensity and nature of UK competition**

191. Export volumes of the goods subject to review consist of 1.4% of total export volume. Non-price factors, such as geographic proximity, market size and growth for ARW, strategic objectives, and regulatory issues may be disincentivising PRC exporters from focusing on exporting more to the UK rather than other third countries. Without co-operation from exporters from the PRC, we are unable to determine whether such other factors are affecting exports to the UK.

### **F10.3 Specific business environment and industry trends**

192. We have not received any submissions from automotive industry manufacturing trade bodies, or indications from domestic producers or

importers of ARW, that downstream industry trends have changed in a way that would affect the likelihood of dumping.

193. In the absence of additional data, we have not identified any evidence or information that the likelihood of dumping has been affected by changes in downstream industries.

#### **F10.4 Substitutability of domestically produced and imported products**

194. Rimstock stated in its questionnaire response that domestically produced like goods and imported ARW products are substitutable.
195. Our assessment of the goods and information from the Commission's original provisional determination is that UK-produced like goods are directly substitutable by imports of a matching subtype of goods subject to review.

#### **F10.5 Conclusion on the attractiveness of the UK market**

196. In summary, the UK market shrank over the POI, although imports of goods subject to review increased during that same period.
197. However, the UK market is heavily reliant on imports to satisfy domestic consumption as it cannot be met by domestic production of like goods. UK-produced ARW account for less than 5% of the market, and so imports are vital to meet UK demand.
198. M-Sport Wheels has stated that importers would increase their stock holdings if the measure was revoked.
199. The increase in PRC imports, reliance on imports for the UK market and the possibility of increased stock holdings by importers indicates an attractive UK market for imported ARW and therefore it is possible that dumping of the goods subject to review would recur if the measure no longer applied.

#### **F11 Precedent of habitual circumvention or absorption of measures**

200. Domestic producers Rimstock, 360 Wheels and Image Wheels, stated that the current measure mitigates the impact of dumping of imports of the goods subject to review.
201. The EC, the DGTR in India, the Comisión Nacional de Comercio Exterior (National Foreign Trade Commission) in Argentina, and the Australian Anti-Dumping Commission have not initiated any circumvention investigations into ARW from the PRC.
202. We found no evidence that exporters from the PRC have circumvented the UK measure on the goods subject to review.

203. Graph 1 (Price of imports of ARW from the PRC, adjusted price from the PRC, and price from RoW) indicates the existing measure being absorbed by exporters from the PRC. Import prices diverge from 1 July 2009 – 30 June 2010 to 1 July 2012 – 30 June 2013, with import prices from the RoW increasing and the PRC-equivalent prices decreasing.
204. The price of the goods subject to review decreased so that between 1 July 2012 and 30 June 2013 the price with the anti-dumping amount of 22.3% applied (£2,873 per mT) was lower than the price between 1 July 2009 and 30 June 2010 without the anti-dumping measure (£2,930 per mT).

## **F12 Conclusion on likelihood of dumping assessment**

205. We determined that:
- a. HMRC data does not distinguish between the different subtypes of ARW or related products.
  - b. PRC exporters have sold only a small proportion of their total exports of ARW to the UK during the POI.
  - c. Based on HMRC data for the period of 2008 to 2021, imports of the goods subject to review have continued and have risen through the injury period and POI. PRC exporters have exported ARW to the UK during the POI at a lower price on average than the average global import price for ARW from the RoW.
  - d. The UK's market for ARW has shrunk. Nevertheless, the UK's reliance on imported ARW for domestic consumption makes the UK an attractive market for dumped ARW imports from the PRC.
  - e. It is likely that the PRC ARW industry has capacity to substantially increase ARW exports to the UK.
  - f. Trade remedy measures, investigations, and reviews in third countries, namely the EU, Argentina, Australia, and India, indicate that exporters from the PRC continue to dump ARW into third country markets.
  - g. No evidence has been found that ARW exporters from the PRC have engaged in circumvention.
206. Although the goods subject to review increased their UK market share throughout the injury period and POI, along with an increase in price disparity between PRC imports and RoW imports, without being able to calculate a normal value, it is difficult to conclude that dumping has continued from the initial implementation of the measures as there are other potential explanations for this data.
207. However, because of the pattern of low priced PRC imports that have gained market share in a declining but still attractive UK market, and the observed pattern of dumping elsewhere in the world, these factors do indicate that, on a

balance of probabilities, dumping of ARW from the PRC would be likely to recur if the anti-dumping measure were no longer applied.

208. Our conclusion on the likelihood of dumping recurring applies to all ARW products.

## SECTION G: Likelihood of Injury Assessment

### G1 Introduction

209. Under regulation 99A(1)(b) of the Regulations, the TRA is required to consider whether injury to the UK industry in the like goods would be likely to continue or recur if the anti-dumping amount were no longer applied (the likelihood of injury assessment).
210. To conduct the likelihood of injury assessment, we considered:
- the current state of the UK industry ([G2](#));
  - other causes of vulnerability ([G3](#));
  - undercutting of the UK industry ([G4](#)); and
  - domestic and international market conditions ([G5](#)).

### G2 The current state of the UK industry

211. Most of the verifiable data we used when assessing the current state of the UK industry was submitted by Rimstock. Rimstock was the only UK producer to provide a full questionnaire response.
212. We noted that the trends in Rimstock's economic performance over the POI were impacted by the closure of its cast ARW foundry in early 2020. Therefore, its economic performance may have worsened – at least in part – as a result of the shift in production in addition to other factors such as dumped imports. We assessed this as part of the non-attribution analysis in Section [G4.2.2 The closure of Rimstock's casting facilities](#).
213. Additionally, Rimstock was unable to provide data for the first year in the IP (2017/18) due to its acquisition by Safanad in that year. This meant that, for some factors, we could only analyse three out of the four years in the IP. Nevertheless, we determined we had adequate data to identify trends and make conclusions about each factor in relation to injury.
214. As previously noted, Rimstock went into administration in July 2023. This was after the publication of our SEF and after the close of the window for SEF responses. The available evidence on this matter did not materially change our assessment of the current state of the UK industry.
215. We also noted that Rimstock sell imported cast ARW from India and Italy, but this does not represent a large proportion of its total sales, and we determined it does not affect their behaviour as a UK producer of the like goods (forged ARW).
216. For the other UK producers, we relied on the financial statements available on Companies House. Each of these companies publish micro company accounts or total exemption full accounts, which are not set out in a common format.

217. Despite the lack of information from questionnaire responses, we were able to complete an assessment of the whole UK industry. To do this, we considered all the available information holistically, assessing the relevance and reliability of that information, and comparing information between sources.
218. Where possible, we took into account distinctions between forged, cast, one-piece and multi-piece ARW when assessing the current state of the UK industry.

## G2.1 Sales

Table 4: Rimstock's domestic sales of ARW over the last three years of the IP – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
Domestic sales by volume (pieces)	100	58	16
Domestic sales by value (£)	100	60	37
Domestic sales as % of total sales by value	74%	74%	59%

Source: Questionnaire responses submitted by interested parties to the TRA.

219. As shown in Table 4, domestic sales accounted for 59% of Rimstock's total ARW sales (by value) in the POI.
220. Over the last three years of the IP, both the volume and value of sales decreased. Table 4 shows that the volume decreased to a greater extent than the value, 84% compared to 63% respectively. This is consistent with Rimstock turning from high-volume and low-value cast ARW to lower-volume but higher-value forged ARW. This was also reflected in the average price of units sold and in the increase in profits discussed in the next Section ([G2.2 Profits](#)).

Table 5: Rimstock's average price of ARW over the last three years (per piece) – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
UK sales price for Rimstock	100	103	234

Source: Questionnaire responses submitted by interested parties to the TRA.

Table 6: Rimstock's sales forecasts (2021 to 2025) – indexed to 2021.

	2021	2022	2023	2024	2025
Sales forecast volume (pieces)	100	107	176	274	333
Sales forecast value (£)	100	99	173	298	348

Source: Questionnaire responses submitted by interested parties to the TRA.

Note: Rimstock did not provide a breakdown of sales forecasts between domestic and export sales. We have adjusted the figures by 59% as per Table 4, although this did not change the indices.

221. Rimstock's sales forecasts predicted an increase in sales. However, these forecasts were based on the current circumstances within the industry, and if

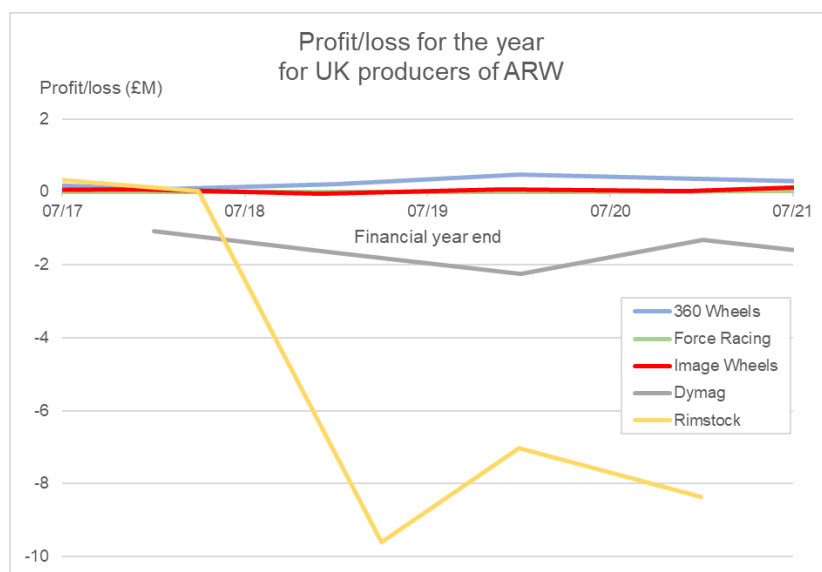
the measure were to be varied or no longer applied, the accuracy of the forecasts may be impacted.

222. We did not receive or find detailed data for the sales of like goods by the other UK producers, and so we could not analyse trends in their sales. However, 360 Wheels submitted that it has a turnover of approximately £2,000,000<sup>7</sup>; and in [response to the SEF](#), it estimated that turnover for the UK multi-piece wheel manufacturing industry would be “in excess of £3,000,000”. As discussed in the next Section ([G2.2 Profits](#)), 360 Wheels, Image Wheels and Force Racing reported regular profits over the IP, suggesting their ARW sales were stable.
223. We concluded that, overall, the UK industry’s sales of like goods decreased during the IP, but that the multi-piece producers’ sales are more stable. If the measure were no longer applied, current sales forecasts may be negatively affected.

## G2.2 Profits

224. To analyse profits, we considered information from the UK producers’ financial reports on Companies House. We did not find reliable evidence on profits for Tech-Del and MB Racing Wheels.
225. We noted that these figures did not necessarily relate to the like goods alone. (In particular, Dymag specialise in non-ARW products, so its overall profitability is not a strong indicator of its ARW performance.) Furthermore, the available evidence did not distinguish between products destined for the domestic market and those destined for export markets. Since we were unable to account for these limitations, we considered the evidence holistically and treated it with special circumspection where appropriate.

Graph 4: Estimated profits and losses for UK producers of ARW.



Source: financial statements on Companies House.

<sup>7</sup> 360 Wheels submitted a confidential breakdown of their profit and loss account to support this.

Note: We estimated the profits of Image Wheels, Force Racing, and 360 Wheels by calculating the change in their profit and loss accounts from year to year; and during 2019, Rimstock changed its accounting period from 31/03 to 31/12, so their financial statements are not directly comparable year to year. However, these metrics still help us to consider the underlying trends.

- 226. Regardless of distinctions between market and product type, we observed that Rimstock was in a loss-making position for the majority of the IP, indicating vulnerability. Our analysis of Rimstock’s verifiable confidential information confirmed it was currently in a loss-making position.
- 227. However, Rimstock’s forecasts did suggest its profitability might move in an upward trend toward breakeven. An analysis of Rimstock’s forecasted EBITDA between 2021 and 2025 suggests a return to profit in 2024.
- 228. By analysing their financial statements, we observed that 360 Wheels, Image Wheels and Force Racing were profitable for the majority of the IP.
- 229. Overall, the data available on profits suggests the UK industry in the like goods is in a vulnerable position. The producers of multi-piece ARW are in a less vulnerable position than Rimstock, but this does not mean they would be unaffected if the measure were no longer applied.

### G2.3 Output

Table 7: UK production over the last three years of the IP (pieces) – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
Total UK production volume (pieces)	100	48	11
Total UK production value (£)	100	60	37

Source: Questionnaire responses submitted by interested parties to the TRA.

Note: We were not provided a breakdown of output between domestic and export sales. We have chosen to adjust figures for each year using “domestic sales as % of total sales by value” as per Table 4.

- 230. As Table 7 demonstrates, we were unable to differentiate Rimstock’s output between cast and forged ARW, except for during the POI (as Rimstock had closed its casting foundry in early 2020). Nor could we identify how much of Rimstock’s output was destined for domestic sales and how much was destined for export sales.
- 231. Output decreased over the three-year period, with Rimstock closing its cast ARW production facility. Based on the information provided to us, we were unable to determine whether the output had decreased only because of this shift in production or if output of the like goods had also reduced as a result of reduced sales.
- 232. We did not receive or find any information with which to analyse output trends for the other UK producers.

## G2.4 Market share

Table 8: UK ARW consumption over the last three years of the IP (£) – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
UK market	100	82	84

Source: Questionnaire responses submitted by interested parties to the TRA; [HMRC overseas trade data](#), 2022.

Table 9: Market share over the last three years of the IP (% of UK market (£)) – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021 (POI)
Rimstock's UK sales of ARW	100	73	39
Imports from EU countries	100	103	109
Imports from non-EU countries (excluding PRC)	100	97	87
Imports from the PRC	100	124	195
Total imports	100	101	102

Source: Questionnaire responses submitted by interested parties to the TRA; [HMRC overseas trade data](#), 2022.

233. The nature of the UK market is that a small proportion of the market is supplied by the UK industry, whilst most of the market is supplied by imports.
234. Using vehicle production data from the SMMT, HMRC data on imports of ARW and verifiable sales data, we estimated the UK industry's market share to be less than 5% of the market during the POI.
235. Over the IP, Rimstock's market share decreased by 61%. This coincided with an increase of 95% in the market share of imports of the goods subject to review.
236. We were unable to differentiate consumption between the various subcategories of ARW, and so we were unable to establish the distribution of market share over the IP. However, in response to the SEF, 360 Wheels [submitted](#) that the "manufacturers of multi-piece wheels represent in excess of 90% of the domestic consumption". This suggests that the UK market for multi-piece ARW is served more by domestic production compared to one-piece ARW.
237. We did not receive or find sufficient information to analyse trends in the market share of the UK's multi-piece producers. However, Image Wheels [submitted](#) that revoking the measure on multi-piece ARW "would definitely cause injury to the small number of multi-piece ARW manufactures that remain in the UK".
238. Overall, the UK industry's market share decreased over the IP, at a time when imports of the goods subject to review increased.

## G2.5 Productivity

Table 10: Rimstock’s productivity over the last three years of the IP – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
Average output in volume per FTE employee (pieces)	100	52	36
Average output in value per FTE employee (£)	100	65	115

Source: Questionnaire responses submitted by interested parties to the TRA.

Note: The average output per employee is calculated by dividing the total output (by volume and value) by the number of employees.

239. The trends observed in Rimstock’s productivity were consistent with its shift from cast ARW to forged ARW as shown in Table 10. The decrease in productivity by volume is likely to be linked to the longer production time involved in forging compared to casting, whilst the increased in productivity by value is likely to be linked to the fact that forged ARW are higher-value products.
240. We did not receive or find any reliable information on the productivity of the other UK producers.

## G2.6 Return on investments

Table 11: Rimstock’s investments over the last three years of the IP – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
Total investments – whole company (£)	100	169	154
Total investments - in relation to like goods (£)	100	169	154

Source: Questionnaire responses submitted by interested parties to the TRA.

241. Rimstock stated that “poor financial performance as a result of investing and development of the forging process lowered ROI and took the business into a loss-making position”; if the measure were no longer applied, it “would scale back investment by 80%”, which would “reduce the business longevity and reduce labour growth plans”. Rimstock did not provide evidence to support these statements.
242. Rimstock’s initial capital-investment strategy is focused on increasing productivity and its ability to take on high-value contracts. Rimstock has therefore shown an increase in investments (Table 11) with improving (but still negative) return on investments. We were unable to confirm if these investments were only intended to focus on growth in the domestic market rather than its export market.
243. If the measure were no longer applied, Rimstock stated it would scale back investments and look to start operating in mainland Europe. However, it currently has no base there from which to operate and it did not provide any supporting evidence that it would take this action.

244. We did not receive or find any information regarding the return on investments for the other UK producers. However, we have considered their ability to raise capital or investments in [Section G2.15](#) (below).

### **G2.7 Utilisation of capacity**

245. We did not have verifiable data for capacity or utilisation over the whole IP, so we could not determine whether this had improved or worsened during this time.
246. We did not receive or find any verifiable information on capacity or utilisation for the six smaller producers.
247. For Rimstock, the total output by volume during the POI gave a capacity utilisation of approximately 50%.
248. Rimstock stated that it plans to increase its one-piece forged ARW production capacity significantly in the coming years.

### **G2.8 Factors affecting domestic prices of the like goods**

249. Prices of ARW can vary significantly due to being produced to different contract specifications. This accounts for the spike in Rimstock's forged ARW prices in December 2020, as confirmed during our verification visit.
250. In response to the SEF, 360 Wheels [submitted](#) that "there is direct competition between imported multi-piece wheels and domestically produced multi-piece wheels". They stated that energy and raw-material price inflation had increased costs in the UK, but not so in the PRC; if the measure were no longer applied, the UK industry would have to reduce its prices in order to compete with imports from the PRC. We did not receive any supporting evidence for these statements.

### **G2.9 The magnitude of the margin of dumping**

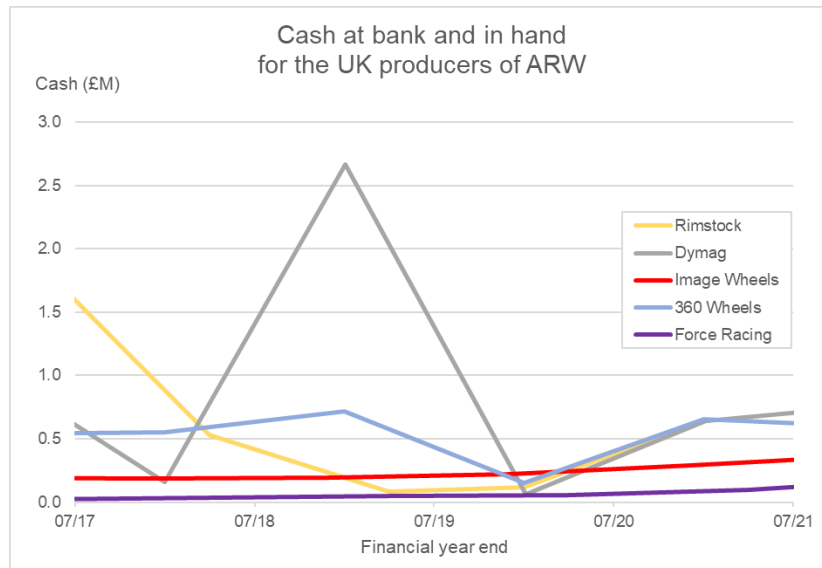
251. We did not receive a questionnaire response from any exporters from the PRC and therefore we cannot calculate a normal value or, subsequently, calculate dumping margins in the UK.
252. As discussed in [Section F7 Exports to third markets](#), anti-dumping measures are in place from other investigating authorities. India found a dumping margin from PRC exporters of between 10%-45%, and Argentina found a dumping margin from PRC exporters of 36.9%.

### **G2.10 Cash flow**

253. We were not provided with cash flow evidence by any UK producers. Instead, we examined the cash balances in their financial statements on Companies

House. We did not find information on the cash flows of Tech-Del or MB Racing Wheels.

Graph 5: Cash balances of the UK industry over the IP.



Source: financial statements on Companies House.

- 254. Rimstock’s cash at bank and in hand decreased by 67% from March 2017 to December 2020. During the POI, it received three cash injections from its immediate parent company (Rimstock Holdings Limited), and it subsequently went through a major refinancing programme. This indicated that cash flow has been an issue for Rimstock.
- 255. Over the IP, Image Wheels and Force Racing had consistently positive cash flows that gradually increased their cash balances. Dymag and 360 Wheels had fluctuating cash flows, ending the IP with similar cash balances to the start of the IP. In particular, Dymag had a spike in their cash balance in 2019, which we considered was likely to be connected with an [investment from Puma Private Equity](#).
- 256. Since these producers’ financial years were not aligned with each other, it was not possible to analyse their combined cash flow with precision. However, we estimated the combined cash flow using the cash balances closest to the start of the IP and the end of the IP. This suggested a reduction in cash of approximately 14%, amounting to approximately £400,000.

## G2.11 Inventories

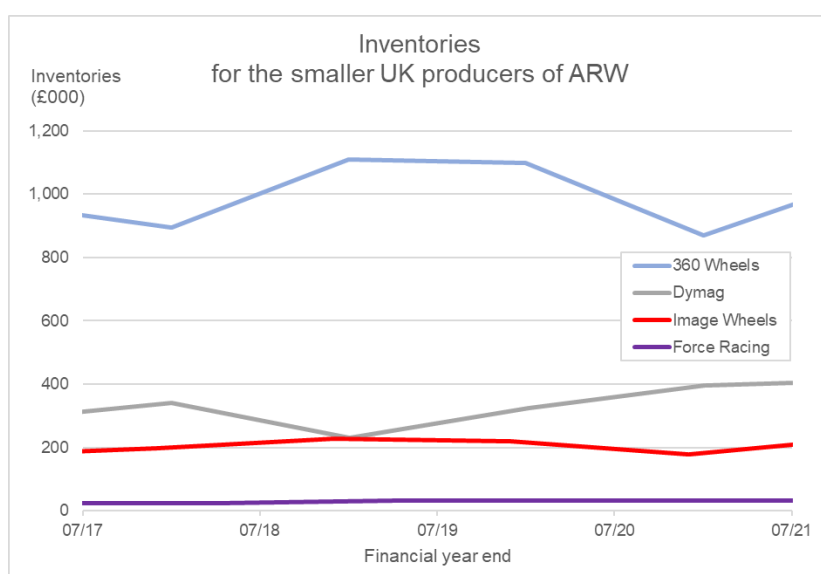
Table 12: Rimstock’s inventory over the last three years of the IP – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
Stocks at year end, total volume (pieces)	100	54	8
Stocks at year end, total value (£)	100	59	14

Source: Questionnaire responses submitted by interested parties to the TRA.

257. Large movements of stock came from the sale of Rimstock’s built-up inventories of cast ARW following the closure of its casting facility in early 2020.
258. We did not receive or find information on inventories for Tech-Del or MB Racing Wheels. However, we used publicly available financial statements to examine the trends in inventories for the other four UK producers. We could not establish how much of this inventory was related to the like goods, or measure the inventory in units, so we treated the information with special circumspection.

Graph 6: Inventories of the smaller UK producers.



Source: financial statements on Companies House.

259. For 360 Wheels, Dymag, Image Wheels and Force Racing, the level of inventory at the end of the IP was similar to at the start of the IP. We did not observe any clear trends.

## G2.12 Employment

260. The evidence available for the IP indicated that a majority of the employees in the UK’s ARW industry worked at Rimstock.

Table 13: Rimstock’s employment over the last three years of the IP – indexed to 2018/2019.

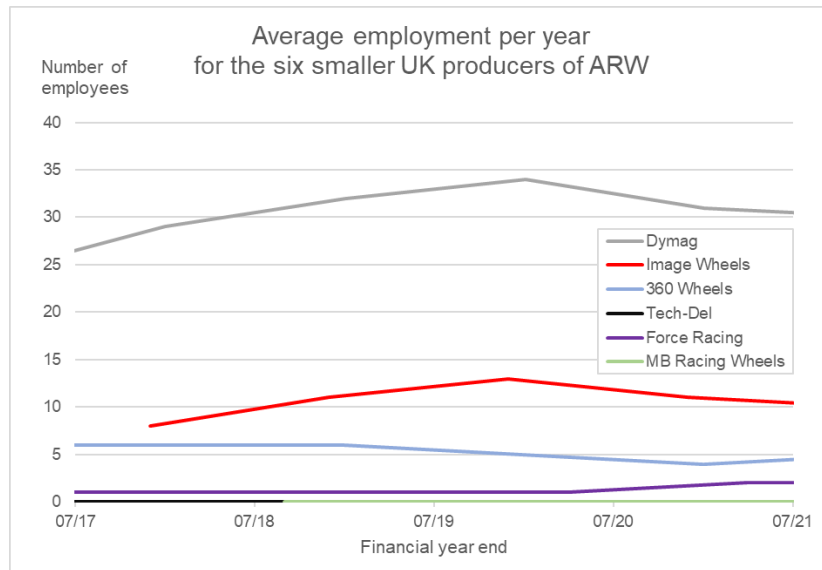
	2018/2019	2019/2020	2020/2021(POI)
Total number of employees (FTE) based on verifiable data from questionnaire responses	100	92	40

261. Rimstock’s decrease in employment in the POI resulted primarily from the closure of its cast ARW foundry in early 2020. However, Rimstock also referred

to the unsustainability of a loss-making company, and indeed, now that the company has gone into administration, the jobs of its employees are endangered.

262. For the other six UK producers, employment fluctuated slightly over the IP. According to the figures in their financial statements, their combined employment was between 44 and 53 employees over the IP, peaking in 2019. (We note that these figures may not correspond to ARW-related employment.)

Graph 7: Employment over the IP for the six smaller UK producers.



Source: financial statements on Companies House.

263. In response to the SEF, 360 Wheels [submitted](#) that “conservative estimates of employment in the UK multi-piece wheel manufacturing industry would be in excess of 25 people”. In Image Wheels’ [SEF response](#), Image Wheels estimated that the number employed in manufacturing multi-piece ARW in the UK is “into the hundreds”, and that “all of these jobs would be in jeopardy” if the measure were revoked on multi-piece ARW.

264. Although these estimates did not exactly correspond with the figures we obtained from Companies House, we concluded that multi-piece ARW are likely to represent a minority of the employment in the UK industry in the like goods. Overall, employment in the UK’s ARW industry fell over the POI.

### G2.13 Wages

Table 14: Wages at Rimstock over the last three years of the IP – indexed to 2018/2019.

	2018/2019	2019/2020	2020/2021(POI)
Median wage for FTE (£)	100	64	127

Source: Questionnaire responses submitted by interested parties to the TRA.

Table 15: UK inflation measured by the Bank of England over the last five years

	2017	2018	2019	2020	2021
What would £100 in 2017 cost in other years?	£100.00	£102.48	£104.31	£105.20	£107.92

Source: Bank of England Inflation calculator

Note: The calculator uses Consumer Price Index (CPI) inflation data from the Office for National Statistics from 1988 onward.

265. We expected an upward trend in average wages over the IP as Rimstock removed staff involved in the casting process, while adding higher-paid staff to manage the Computer Numerical Control (CNC) machines used for machining forged ARW.
266. The year 2019/20 showed a distinct deviation from trend due to the Covid-19 pandemic, during which a number of staff were put on furlough. The median wage increased for the staff retained following the foundry closure and brought back to work after furlough.
267. We did not receive or find any reliable information on wages for the other UK producers.

## G2.14 Growth

268. The other injury factors considered in this assessment demonstrate a decline in Rimstock's performance over the IP.
269. Rimstock's turnover decreased during the IP. However, the contracts secured may suggest significant future growth, if we use the forecasts provided to us to understand the future direction of the industry. This aligns with its plans to increase its production capacity (as mentioned in [Section G2.7](#)).
270. Although it did not provide any supporting evidence, Rimstock stated that if the measure no longer applied:
- *it “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”;*
  - *it “would scale back investment by 80%, this would reduce the business longevity and reduce labour growth plans”;* and
  - *“[the] whole supply chain and its employees would be negatively impacted as manufacturing would reduce in the UK. Business viability would be questionable which puts at risk between 90-100 roles in the current time period, Rimstock volume is scheduled to grow by over 500% 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”.*

271. For the multi-piece ARW industry, the financial statements of the different UK producers revealed no clear trends in the rate of growth over the IP. However, the financial statements suggested growth was lower in 2019 and 2020.
272. In response to the SEF, 360 Wheels [submitted](#) that one-piece forged and multi-part ARW were “an ongoing area of growth” for its business, and that the other UK producers of multi-part ARW were experiencing year-on-year growth.

### **G2.15 The ability to raise capital or investments**

273. Rimstock reported difficulty raising capital, and though they secured funding after the IP, this continued to be an issue.
274. In response to the SEF, 360 Wheels [submitted](#) that ARW was an area of its business that it had “continually re-invested” in. It had planned further investment “with more machinery being added and additional employment opportunities for the local workforce”. Regarding the wider industry, 360 Wheels commented that “the UK manufacturers of multi-piece wheels continue to invest, grow and post profits” despite the challenges to the UK industry. (See [Section G3](#), below, for our assessment of these challenges.)
275. Through our own research, we identified that Dymag received an [investment from Puma Private Equity](#) in 2019. However, it was unclear to what extent this affected its ARW business.
276. We were unable to conclude on whether revocation of the measure would undermine the industry’s ability to acquire funding in the future, beyond the impact it may have on business performance, which is covered elsewhere in this assessment.

### **G2.16 Conclusion on the current state of the UK industry**

277. Even with the protection provided by the current measure in place, most of the factors we considered (above) worsened or remained the same over the IP for the UK’s largest producer of like goods.
278. The available evidence suggested a more positive performance for the six smaller producers, which mainly produce multi-piece ARW – a subtype of the like goods. However, while these producers currently have a positive performance while the measure is in place, we consider it likely that the industry would be injured if the measure were to be revoked.
279. Overall, we determined that the UK industry is in a vulnerable position.

### **G3 Other causes of vulnerability**

280. We considered factors other than ongoing imports of the goods subject to review that may be responsible for vulnerability of the UK industry, because if other factors can be seen to have a major impact, it is less likely that dumped

imports of ARW from the PRC would cause injury to the UK industry if the measure were no longer applied. We conducted this part of the analysis to ensure that any injury is not wrongly attributed to imports of ARW from the PRC.

- 281. We identified the following additional factors that may be responsible for vulnerability of the whole UK industry: EU Exit, Covid-19, the current state of the UK economy, and a general drop in the production of vehicles.
- 282. We identified the change in management and closure of its casting facilities as additional factors that may be responsible for injury to Rimstock.
- 283. This Section (G3), and determinations based on it, consider distinctions between cast and forged ARW where possible.

**G3.1 Factors related to the UK industry**

**G3.1.1 EU Exit**

- 284. The UK left the EU on 31 January 2020 but remained part of the EU Customs Union and the EU Single Market until 31 December 2020 (during the POI). The TRA published the Notice of Initiation on 07 October 2021.
- 285. Given the proximity of the initiation of this review and EU Exit, it is unlikely that any effects of the UK’s withdrawal from the EU manifested within the IP.

Table 16: The % of total sales per geographic market as stated in financial statements (2017-2020)

	31/03/17	31/03/18	31/03/19	31/12/19	31/12/20
UK	72.9%	73.2%	75.0%	66.8%	80.7%
Rest of Europe	23.7%	19.6%	20.4%	30.4%	14.8%
Rest of World (RoW)	3.5%	7.2%	4.7%	2.8%	4.5%

Source: Rimstock’s financial statements: 2017-2020.

Note 1: Rimstock changed its accounting period from 31/03 to 31/12 during 2019 so the previous financial statements are not directly comparable but help us to understand underlying trends.

Note 2: In its financial statements, Rimstock have not specified whether “Europe” accounts for either Europe as a continent or the EU Customs Union. We expect a close correlation, whichever definition was intended.

- 286. The UK industry has not made any statements referring to EU Exit. As seen in Table 16, between the financial years ending in 2019 and 2020, the industry increased its proportion of sales to the domestic market and reduced its proportion of sales to the rest of Europe.

**G3.1.2 Covid-19**

- 287. The Covid-19 pandemic disrupted global supply chains, in particular during 2020. As a result, the price of shipping containers rose considerably, impacting

import costs. At the same time, the domestic price of aluminium rose, impacting production costs.

288. Rimstock stated that Covid-19 worsened its financial performance. Rimstock had a significantly reduced turnover in April 2020 compared to the monthly average for 2020. Rimstock stated that “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”.
289. As stated in Section [G2.13 Wages](#), staff were placed on furlough in 2019/20 due to Covid-19 as a result of government restrictions.
290. As most economies have opened back up since the pandemic first arrived, we do not expect Covid-19 to be an ongoing cause of injury to the UK ARW industry.

### G3.1.3 The current state of the UK economy

Table 17: UK Nominal GDP from 2017 to 2021 – indexed to 2017.

	2017	2018	2019	2020	2021
UK GDP	100	102	103	94	101

Source: [ONS \(Gross Domestic Product\)](#).

291. The UK economy grew from 2017 to 2019. There was a decrease of 6% of nominal GDP in 2020 compared to 2017 with a slight recovery in 2021.
292. Interested parties did not make any specific statements about the UK economy. However, they did mention Covid-19 (as above), which is in part related to the UK’s macroeconomic state.

### G3.1.4 A general drop in the production of vehicles

Table 18: Number of cars produced in UK annually from 2017 to 2021 – indexed to 2017.

	2017	2018	2019	2020	2021
Yearly number of cars produced in UK	1,671,166	1,519,440	1,303,135	920,928	859,575
Index (2017 = 100)	100	91	78	55	51

Source: [Statista](#).

293. Table 18 shows that the production of cars in the UK decreased by 49% in 2021 compared to 2017, which is greater than the decrease in UK consumption of ARW (15% from 2018/2019 to 2020/2021).

294. In section B2, question 2, of Rimstock’s questionnaire response, Rimstock stated that “the market is driven by style as opposed to seasonality and the market size generally controlled by the OEM vehicle production volumes.”
295. Overall, the reduction in the production of vehicles is likely to have influenced market consumption and therefore sales.

### **G3.1.5 RoW ARW imports to the UK**

296. We were unable to determine whether low-priced imports from sources other than the PRC had any negative impact on the situation of the UK industry.

### **G3.2 Factors related to Rimstock – The closure of Rimstock’s casting facilities**

297. In early 2020, Rimstock closed its cast ARW foundries and began to import one-piece cast ARW from countries other than the PRC, focusing its UK production on forged ARW. It stated that this was because “the price point for cast ARW within Europe had dropped to a level that was unsustainable unless utilising excess capacity over and above the breakeven point. Whilst difficult to prove that this was wholly due to the importation of Chinese ARW it no doubt contributed to the situation”.

### **G3.3 Conclusion on other causes of vulnerability**

298. We concluded it was likely that these factors (notably Covid-19 and a general drop in the production of vehicles) may have contributed to an extent to the vulnerable state of the whole UK industry.
299. We note that the profitability of the other ARW producers in the UK did not drop over the IP, even through the Covid-19 period. Therefore, although these other factors may have contributed to the vulnerable state of the UK industry, they are insufficient to have a major impact on the likelihood that injury would recur if the measures were revoked.

### **G4 Undercutting of the UK industry**

300. Price undercutting is where dumped goods are consistently priced lower than those of the like goods in the UK. In the event of undercutting, the UK industry may be forced to reduce its prices to compete against the lower priced dumped goods or risk losing market share (price depression). This may also prevent prices of like goods in the UK from rising to a level that the UK industry would otherwise achieve (price suppression).
301. In response to the SEF, 360 Wheels [provided](#) a sample of prices for multi-piece ARW. We examined the supporting evidence and although we were unable to assess the completeness of that pricing information, we determined

360 Wheels’ non-confidential summaries of the confidential evidence were reasonable.

302. 360 Wheels [stated](#) that, if the measure were revoked on multi-piece ARW, it would be “forced to reduce [its] prices in order to compete with the Chinese factories”, despite its “cost base increasing significantly due to energy, raw material and wage inflation”. The wider UK industry would likely “suffer downward pressure due to imports from China”. Although 360 Wheels provided some examples of price quotes from PRC multi-piece exporters, we were unable to assure ourselves of this data and thus it will be excluded. . However, publicly available pricing information on multi-piece wheels from the PRC suggest prices below those offered by 360 Wheels.
303. Overall, we did not find clear evidence of undercutting of the whole UK industry. However, there are suggestions that the UK’s multi-piece industry could be undercut by multi-piece imports from the PRC.

## G5 Domestic and international market conditions

### G5.1 PRC to UK export capacity and market attractiveness

Table 19: The PRC’s increasing percentage of UK import volume shares.

	2017/2018	2018/2019	2019/2020	2020/2021(POI)
The PRC	6.1%	6.3%	7.7%	10.9%
Top five countries (excluding the PRC)	63.1%	64.5%	64.8%	65.0%
All others	30.8%	29.1%	27.6%	24.1%

Source: [HMRC overseas trade data](#), 2022.

Table 20: The PRC’s increasing percentage of UK import value shares.

	2017/2018	2018/2019	2019/2020	2020/2021(POI)
The PRC	3.4%	3.5%	4.3%	6.6%
Top five countries (excluding the PRC)	64.4%	67.9%	67.7%	64.1%
All others	32.2%	28.6%	28.0%	29.3%

Source: [HMRC overseas trade data](#), 2022.

304. Tables 19 and 20 show that the share of imports of the goods subject to review over the IP increased by both value and volume compared with all other imports.
305. In the 2022/C 29/07 [expiry review](#) conducted by the Commission “the applicant has provided sufficient evidence that imports of the product under review from the country concerned to the Union have remained significant in absolute terms and in terms of market shares”.

306. As discussed in Sections [F7 Exports to third markets](#) and [G2.9 The magnitude of the margin of dumping](#), India found that PRC exporters continued to dump ARW into India at a dumping margin between 10%-45% depending on the exporter. Argentina found that PRC exporters continued to dump ARW into Argentina at a dumping margin of 36.9%.
307. Owing to the lack of granularity in the HMRC data, we were unable to directly compare PRC imports with RoW imports, because we could not determine whether the composition of exported goods within a given commodity code was consistent.
308. However, we were able to conclude that, even with the existing anti-dumping measure in place, imports of the goods subject to review gained market share in the UK from both RoW competitors and domestic UK producers. Revocation of the measure would further strengthen the competitive position of PRC exporters, who could therefore be expected to increase the rate at which they are gaining share in a declining UK market.

## **G5.2 Interchangeability/competition between goods**

309. In our [assessment of likelihood](#) of dumping, we concluded that dumping of ARW originating in the PRC would be likely to recur if the measure were no longer applied. In this situation, it is likely that imports of the goods subject to review from the country concerned would secure market share from UK producers, and this would apply to all types of ARW. However, the likelihood of injury as a result of this may vary depending on the type of ARW (whether forged or cast, one-piece or multi-piece).
310. Rimstock claimed possible injury caused by competition from cheap imported one-piece cast ARW originating in the PRC. It no longer produces one-piece cast ARW, instead importing them from countries other than the PRC (Italy and India). It did not evidence any intention of reinstating or investing in production of one-piece cast ARW. Rimstock only manufactures one-piece forged ARW, and stated on the [public file](#) that the measure had successfully addressed the injury caused by dumped imports of the goods subject to review .
311. As discussed in Section [D2.4 The relationship between types of ARW in the domestic ARW market](#), purchasing decisions to buy forged rather than cast ARW are likely to be made considering factors other than price, such as the additional durability, machinability, strength and reduced weight of forged relative to cast ARW.
312. We determined it was unlikely that buyers of forged ARW would change to cast ARW following a reduction in the price of cast ARW caused by the revocation of the measure. So, we do not expect that an increase in volumes of one-piece cast ARW, as a subtype of the goods subject to review,(and sold at low prices) would cause injury to UK producers of forged ARW.

313. As outlined in Section [E1.1 The domestic industry](#), we identified six UK producers of like goods in addition to Rimstock. They each produce different variations of the like goods in low volumes, but overall, their main production is multi-piece ARW using both forged and cast parts produced in the UK.
314. As stated in Section [E2.1 Competition in the market](#), we accepted there is direct competition between imported forged and multi-piece ARW (as subtypes of the goods subject to review) and domestically-produced forged and multi-piece ARW (as subtypes of the like goods).
315. As stated in Section [C3.5.2 Multi-piece ARW](#), we assessed the information in the submissions relating to the SEF and the supporting evidence. We concluded that the UK industry was likely to suffer injury from dumped imports of multi-piece ARW originating in the PRC if the measure were no longer applied. We also consider it more likely than not that the UK industry would be injured by imports of parts of ARW from the PRC if the measure were no longer applied to those goods.
316. We concluded that dumped imports of forged, multi-piece and parts of ARW originating in the PRC would be likely to take market share from UK producers and put downward pressure on their prices, giving rise to material injury. In contrast, we did not find any likelihood of injury to the UK industry from the dumping of one-piece cast ARW and other products comprised within the goods subject to review.

## **G6 Change to the MFN duty rate on ARW**

317. On 19 May 2020, the UK Government announced the UK's new Most Favoured Nation (MFN) tariff regime, the UK Global Tariff (UKGT). The UKGT came into force on 1 January 2021 and replaced the EU Common External Tariff (CET) with some exceptions.
318. Changes to MFN duty rates relating to certain products subject to anti-dumping measures which the UK is transitioning will be deferred until after the TRA has completed a transition review of those measures.
319. The UKGT rate applicable from 1 January 2021 to commodity codes 8708 70 10 15 and 8708 70 10 50 is 3%. (This may change to 2% once the ARW anti-dumping transition review has been completed.)
320. The UKGT rate applicable from 1 January 2021 to commodity codes 870 70 50 15 and 8708 70 50 50 is 4.5%. (This may change to 4% once the ARW anti-dumping transition review has been completed.)

## **G7 Conclusions and findings – likelihood of injury assessment**

321. As stated in Section [F12 Conclusion on likelihood of dumping assessment](#), we consider that, on the balance of probabilities, dumping of the goods subject to review would recur if the anti-dumping measure were no longer applied.
322. We determined that the UK industry as a whole is in a vulnerable position.
323. We determine it is likely that the UK industry would be injured by dumped imports of the following subtypes of goods subject to review: one-piece forged ARW, multi-piece ARW, and parts of ARW, originating in the PRC, if the measure were revoked.
324. However, we do not consider it likely that the UK industry would be injured by imports of one-piece cast ARW or any other products comprised within the goods subject to review.

## SECTION H: Economic Interest Test

### H1 Introduction

325. Taking into account the determinations set out in [Section G: Likelihood of Injury Assessment](#), the following EIT considers a measure varied to apply to one-piece forged ARW, multi-piece ARW, and parts of ARW, as subtypes of goods subject to review. This is consistent with the conclusions reached on the subtypes of domestically produced like goods likely to be adversely affected by a likely recurrence of dumping, and on the UK industry (producing those like goods) likely to suffer material injury, if the measure were no longer applied.
326. Under Regulation 100A(2)(a) of the Regulations, where the TRA makes a recommendation to vary the application of an anti-dumping amount at the conclusion of a transition review, the TRA must be satisfied that the application of an anti-dumping amount meets the EIT.
327. The aim of the EIT is to determine whether the application of an anti-dumping measure on the goods subject to review is in the economic interest of the UK. This test is presumed to be met unless we are satisfied that the application of the measure is not in the economic interest of the UK, pursuant to paragraph 25(3) of Schedule 4 to the Taxation (Cross-Border Trade) Act 2018 (the Act).
328. In accordance with paragraph 25(2) of Schedule 4 to the Act, the EIT is met in relation to the application of an anti-dumping remedy if the application of the remedy is in the economic interest of the UK.
329. In line with paragraph 25(4) of Schedule 4 to the Act, we have taken account of the following factors in conducting the EIT:
- a. the injury caused by the dumping of goods to the UK industry in the goods and the benefits to that UK industry in removing that injury;
  - b. the economic significance of affected industries and consumers in the UK;
  - c. the likely impact on affected industries and consumers in the UK;
  - d. the likely impact on particular geographic areas, or particular groups, in the UK;
  - e. the likely consequences for the competitive environment, and for the structure of markets for goods, in the UK; and
  - f. such other matters as the TRA considers relevant.

### H2 Evidence base

330. As stated in [C3.2 Information from participants in the review](#), we originally received questionnaires responses from:

- a. One domestic producer of the like goods: Rimstock; and
  - b. One importer of the goods subject to review: M-Sport Wheels.
331. We then identified other affected businesses from [HMRC trader search](#) and the questionnaire responses from Rimstock and M-Sport Wheels, and contacted 28 other companies for their input. We received no further responses from this engagement.
332. [Section G: Likelihood of Injury Assessment](#) found that there is not a likelihood of injury recurring from dumped imports of cast ARW from the PRC (a subtype of goods subject to review). Therefore, as M-Sport Wheels is an importer of only cast ARW, its questionnaire response is not used within the EIT.
333. In response to the SEF, we received submissions from two companies that identified themselves as UK producers of assembled multi-piece ARW: 360 Wheels (who also produces forged one-piece ARW) and Image Wheels. There is limited information available on this segment.
334. We supplemented evidence by conducting research using publicly available sources such as Companies House and ONS Labour Market Statistics.
335. Due to the size of the producers in the multi-piece ARW market and no questionnaire responses, there is limited financial information available for this segment.

### **H3 Injury**

336. [Section G: Likelihood of Injury Assessment](#) sets out the injury likelihood assessment which concluded that injury to the UK one-piece forged and multi-piece ARW industry would be likely to recur; however, there is no indication that injury would be likely to recur to other UK ARW producers. The EIT will therefore focus on one-piece forged and assembled multi-piece ARW, and parts of ARW.
337. Our review of the industries' accounts indicate that the verified UK producer Rimstock has experienced worsened turnover and profitability trends over the IP, suggesting that it may be vulnerable to increased competition from lower-priced imports. The varied measure is likely to prevent recurrence of injury to this UK producer.

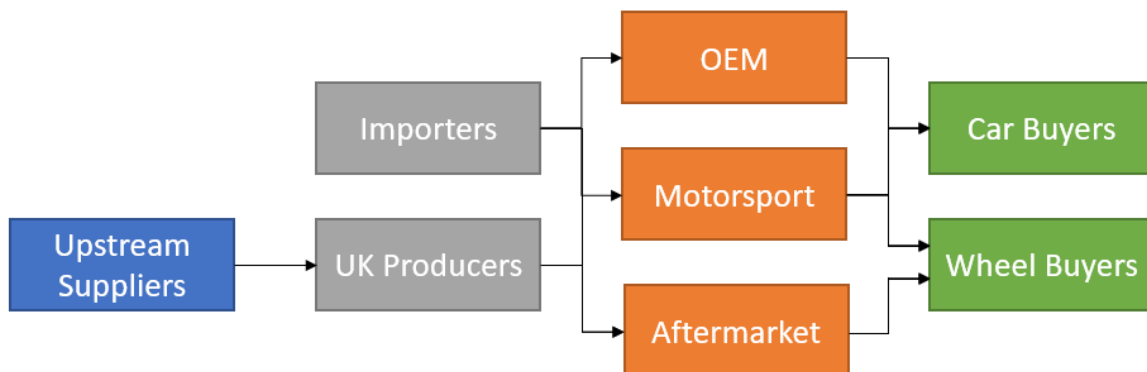
For the remainder of the EIT, one-piece forged ARW, multi-piece ARW and parts of ARW will be referred to as the UK ARW market, where appropriate.

### **H4 Economic significance of affected industries and consumers**

338. We identified the following groups as potentially being affected by the proposed measure (Figure 1):

- **Upstream businesses:** These include suppliers of aluminium, energy and metal treatment that are inputs into the production of ARW.
- **UK producers** of ARW.
- **Importers** of ARW.
- **Downstream businesses:**
  - **OEMs:** These are car manufacturers that purchase ARW for use on the cars they produce and sell.
  - **AM companies:** These purchase ARW to sell to the public.
  - **Motorsport companies:** These produce or supply parts and cars for use in motorsport applications, where ARW are a component.
- **Consumers:** These use ARW on their cars.

Figure 1: Supply chain for ARW



339. We note that there is overlap between these groups. For example, we are aware of downstream users of ARW who directly import, and UK producers of ARW do generally also import ARW. We attributed all known businesses to one of these groups based on their predominant activity, to avoid double counting.
340. We identified known businesses in each of these groups and, where it was not possible to fully investigate all known businesses in the timeframe of the review, we considered a selection of them.

341. We collected accounts data for the injury period from Companies House for the selected businesses. Where possible, we calculated average annual employment, Gross Value Added (GVA), and Earnings before Interest, Taxes, Depreciation and Amortisation (EBITDA) from available accounts between 2017 and 2021.
342. We analysed each of the affected groups cited in turn.

#### **H4.1 Upstream Businesses**

343. The aluminium used in the domestically produced like goods is predominantly sourced from Germany, so we did not analyse the significance of aluminium production. We therefore sampled 10 of the UK businesses remaining suppliers of other inputs. This was based on the businesses' most significant purchases.
344. Using Rimstock's questionnaire response and accounts published on Companies House, we calculated that the industry's input costs are on average less than 1% of the sampled upstream companies' turnover. Therefore, we conclude that ARW production is not significant for the selected upstream businesses.

#### **H4.2 UK Producers of ARW**

345. One UK producer of ARW, Rimstock, submitted a questionnaire response. We analysed the data from this response and financial accounts to assess the economic significance of ARW to the whole UK industry.
346. We calculated that Rimstock's average GVA was £3.8m per annum and it employed an average of 202 people over the IP. We also estimated that Rimstock's UK market share for all ARW was less than 5% in the POI, based on net value. Produced ARW accounted for 86% of Rimstock's domestic revenue during the POI. Evidence suggests that this selected ARW market is smaller than the cast ARW market, as in this market, ARW is commonly used in higher end cars, whereas cast ARW is used in most other cars. Therefore, Rimstock's market share for this ARW market is likely to be higher than for the overall market and by their own account less than 10% of the forged ARW market.
347. There are negative economic and business trends present in the POI, such as a reduction in employment and a significant reduction in GVA. Rimstock stated that this is due to a new investment and production strategy, featuring investment into forged ARW production capacity and the closure of cast ARW production. Additionally, and as previously noted, Rimstock went into administration in July 2023

348. 360 Wheels is another producer in the UK ARW market. Based on the conversations we had with the stakeholder and information publicly available, 360 Wheels does not produce any other goods other than the like goods, in any notable quantity or value. We were not able to verify this. In response to the SEF, 360 Wheels submitted unverified profit and loss accounts for 2020 and 2021. For these years, we calculated that 360 Wheels' average GVA was £0.4m per annum.
349. Image Wheels also submitted a response to the SEF. Based on stakeholder engagement and publicly available information, it is our understanding that the main activity of the business is the manufacturing of multi-piece ARWs. However, we were not able to verify this.
350. Both Image Wheels and 360 Wheels claimed that the UK multi-piece ARW sector is profitable and with positive year-on-year growth. While we do not hold any evidence that could confirm this claim, publicly available information would indicate that they are profitable and growing.
351. 360 Wheels provided the names of two other UK producers of ARW. These are small and medium sized businesses for which full financial accounts were not available on Companies House, and from whom we did not receive any evidence. Therefore, we could not make a definitive conclusion on the significance of ARW to the remaining producers.
352. We conclude that ARW are likely to be significant to Rimstock, 360 Wheels, and Image Wheels. However, due to limited availability of verifiable data, we have only selected Rimstock when estimating the economic significance metrics in Table 21.

#### **H4.3 Importers of ARW**

353. One importer registered its interest in the case: M-Sport Wheels. However, since it solely imports cast ARW, it is not relevant for the EIT. We used the UK Trade Info UK database to identify further companies which imported goods from outside the EU. From this, we identified 199 businesses that imported goods defined under the relevant commodity codes for ARW in the POI.
354. We selected the five importers with the highest number of annual transactions during the POI. We estimated that ARW imports account for at most 50% of their turnover on average; this is likely an overestimate as many importers sell products that cannot be separated from ARW in the available data. Furthermore, we are unable to determine if the importers focus on cast or one-piece forged ARW, as the commodity codes are the same. Financial data indicates strong performance with an average GVA of £26.9m, and employment of 454 people for all selected importers with available financial accounts across the IP. This may not be representative as financial accounts data was not available for some selected importers.

355. Nevertheless, we have no evidence to suggest that the significance of one-piece forged and multi-piece ARW is different to cast ARW for importers, so we conclude that ARW are likely to be significant to them.

#### **H4.4 Downstream Businesses**

356. From Rimstock's questionnaire response, we are aware of 76 businesses that have purchased ARW from it. These businesses are split into three segments: (a) OEM, which uses ARW on cars that are manufactured in the UK; (b) after-market (AM), which sells ARW directly to the public; and (c) motorsport, which produces motorsport cars or parts. For the motorsport and aftermarket segments in this section, we have not been able to estimate the split between cast and one-piece forged ARW within Rimstock's sales based on the information provided to us.

357. 360 Wheels claimed that most of its clients are SMEs and submitted a selection of purchase orders from clients. However, these do not include enough information to conclude whether ARW are likely to be significant to these downstream businesses.

##### **H4.4.1 OEM Companies**

358. The OEM segment in the UK is substantial, with 921,000 units produced in 2020 albeit a 29.3% decline compared to the previous year. It accounted for the majority of Rimstock's production domestic sales, at 96% of domestic revenue.

359. We analysed the top five business from the OEM segment based on the highest gross invoice value of produced ARW from Rimstock during the POI.

360. The selected OEM businesses employed 40,362 people on average per annum across the IP and had a total average GVA of £3.39bn.

361. Purchases of one-piece forged ARW from Rimstock averaged 0.02% of the sampled OEM's turnover, with the most significant purchases from Rimstock for an individual OEM being an estimated 2.46% of its turnover.

362. Though ARW are in general necessary for the completion of a whole vehicle, we conclude that produced/forged ARW from Rimstock form a small part of OEM expenditure and that Rimstock are not an important supplier to them.

#### **H4.4.2 After-market (AM)**

363. The AM segment only accounts for under 2% of Rimstock's sales.
364. We analysed the top three businesses from the AM segment with the highest gross invoice value of ARW from Rimstock during the POI. It is worth noting that two of these businesses are small and medium enterprises (SMEs), for which full accounts are not published. This was an issue regardless of sample size. Furthermore, for this segment, it is unclear which type of ARW was purchased.
365. The sampled businesses employed 178 staff on average per year and had a total average GVA of £7.6m across the IP.
366. Their purchases of ARW accounted for 0.03% of the sampled businesses' turnover during the IP. This is likely to be a significant underestimate due to the large number of SMEs within this segment which do not publish full accounts.
367. Nevertheless, there is no evidence to suggest that ARW are significant to this segment of downstream businesses.

#### **H4.4.3 Motorsport**

368. Rimstock also sells ARW to the motorsport segment, with this accounting for under 5% of Rimstock's sales. Furthermore, for this segment, it is unclear which type of ARW was purchased.
369. We selected the three businesses from the motorsport segment with the highest gross invoice value of ARW from Rimstock during the POI.
370. The sampled businesses employed a total of 242 staff and had a total average GVA of £10m on average over the IP.
371. Their purchases of ARW from Rimstock accounted for 0.4% of the selected businesses' turnover during the IP. This may be an underestimate of the significance of ARW, as they likely purchase ARW from multiple sources, as OEM businesses do. Their total purchases of ARW as a percentage of turnover is therefore likely to be higher.
372. Nevertheless, there is no evidence to suggest that ARW are significant to motorsport businesses.

## H4.8 Consumers

373. We received little evidence concerning the final consumers of ARW. The largest purchaser is OEM businesses, which sell them as part of a completed car. In this segment, using Rimstock's 2021 average UK sale price and the 2021 average UK car price, one-piece forged ARW are estimated to account for 3.5% of a car's price. However, Rimstock focuses on high-end ARW which are commonly used in higher end cars. Therefore the 3.5% figure is likely to be an overestimate for the cars that Rimstock's ARW are used on. This suggests it is unlikely that changes to one-piece forged ARW prices would be passed on to consumers.
374. In the AM segment, ARW are sold directly to consumers. In this case, we do not have evidence on the extent to which price changes would be passed on to consumers. However, we determined that the burden is more likely to be passed on to consumers in the AM segment than in the OEM segment. This is because consumers would purchase ARW solely and not as a part of a car.
375. In the motorsport segment, ARW are sold to motorsport businesses and directly to consumers. As with the AM, we do not have evidence on the extent to which price changes would be passed on to consumers. We draw a similar conclusion to the AM, where prices are more likely to be passed on to the consumer than in the OEM segment, however we do not know the extent to which this could occur.
376. Finally, based on our understanding from our internal research and a note from 360 Wheels, multi-piece ARWs would feature in the high-end ARW market, thus similar cost pass-through as one-piece forged ARW could be expected.

## H4.9 Summary table

377. Table 21 presents evidence on the economic significance of industries we identified in the supply chain for ARW. Where possible, we have focused on the selected ARW market alone, though this has not always been feasible owing to data limitations. The comparative metrics for the UK producers only consider Rimstock.
378. From the available evidence, importers and all downstream segments appear to employ significantly more people and have higher GVAs than the UK industry over the IP. However, the estimates are not directly comparable as many of the downstream businesses and importers' activities are broader than those directly linked to the ARW supply chain.
379. Furthermore, these segments have a significant portion of small businesses that do not publish full accounts, making financial comparisons difficult.

Table 21: Significance metrics for affected industries

	<b>Upstream businesses</b>	<b>UK producer</b>	<b>Importers</b>	<b>OEM</b>	<b>AM</b>	<b>Motorsport</b>
Total known businesses	394	6	199	More than 16	36	25
Total selected	10	1	5	5	3	3
Number of Questionnaire Responses	0	1	1	0	0	0
Estimated significance of forged ARW to this group	<b>Not significant</b> (UK producer costs vs upstream business turnover)	<b>Highly significant</b> (Only sells ARW)	<b>Significant</b> (Many importers appear to focus on ARW)	<b>Not Significant</b> (Small component of costs)	<b>Unlikely to be significant</b>	<b>Unlikely to be Significant</b>
Total employment of selected businesses	N/A	202	454	N/A	N/A	N/A
Total GVA of selected businesses	N/A	£3.8m	£26.9m	N/A	N/A	N/A
Total turnover of selected businesses	N/A	£12.4m	£153.7m	N/A	N/A	N/A
Average EBITDA margin for selected businesses	N/A	-31%	7%	N/A	N/A	N/A
Vulnerability to negative economic impacts	<b>Low</b> – strong profitability trends and low ARW reliance	<b>High</b> – poor profitability trends for one-piece forged ARW	<b>Low</b> – strong profitability trends	<b>High</b> – due to factors such as Covid-19, not ARW supply/price	<b>Low</b> – strong Profitability Trends	<b>High</b> – poor profitability trends, particularly in Covid-19

Sources: Questionnaire response and Companies House

Note: The significance of ARW to each of the groups was estimated using the available financial metrics. The significance metrics were derived by taking annual unweighted average of the annual financial data available for the selected businesses from 2017-2021. We estimated GVA by adding employment costs, depreciation, and amortisation to operating profits. We estimated EBITDA by dividing the sum of operating profit, depreciation and amortisation by turnover. The assessment of vulnerability to negative economic impacts was made by analysing published accounts from 2017-2021.

## **H5 Likely impact on affected UK industries and on consumers**

### **H5.1 Likely impact on affected industries and consumers**

380. In this section, we assess the overall impact that the proposed measure might have on the affected groups identified. We do this by assessing how prices and quantities of goods in the supply chain might change if (i) the measure was varied as proposed, or (ii) it was revoked. The likely impact of the measure is the difference between these two states. In the previous section, we concluded that ARW are not significant to upstream or downstream businesses, thus, these groups are not assessed here.
381. We have not been able to quantify these impacts because of the limited amount of data and quantifiable evidence available, but we have assessed the possible impacts as comprehensively as possible based on the evidence available to us.

### **H5.2 Impact on prices and quantities if the measure was varied as proposed**

382. If the measure was varied for five years as proposed, imports of ARW from the PRC would continue to face an ad-valorem duty of 22.3%.
383. According to SMMT, car production fell by 29.3% in 2020, and in 2021 was still 25% below 2019 levels, linked to the Covid-19 pandemic, and global shifts in supply chains relevant to the automotive industry. This has reduced the demand for ARW from OEM businesses, which is the largest market for ARW, according to Rimstock.
384. There was no evidence to suggest that there could be issues with the supply of ARW if the measure is varied as proposed.

### **H5.3 Impact on prices and quantities if the measure was revoked**

385. If the existing measure was revoked, imports of the selected ARW market from the PRC would likely become cheaper by up to 18.2%, which would be the price impact resulting from removal of the current ad-valorem duty of 22.3%.
386. Rimstock stated that if the measure was revoked, it would need to focus on export sales. Rimstock highlighted that currently ARW exports are worth 41% of its revenue (of which 87% is one-piece forged ARW) and we believe that it could not make up for the loss of domestic sales through exports. However, since its exports are sizeable, this could cushion some negative impacts to its domestic sales.
387. Furthermore, Rimstock has an estimated UK market share of less than 5% by value of ARW, this indicates that Rimstock is unlikely to be a significant supplier of ARW to the UK market, meaning there is no evidence to suggest

that a revocation of the measure would affect the price and quantities of ARW in the UK. We do not have sufficient evidence to assess Rimstock's market share of the selected UK ARW market.

388. According to the submissions in response to the SEF, if the measure was revoked, UK producers of multi-piece ARW would be forced to reduce prices to compete with imports from the PRC or risk losing market share.

#### **H5.4 Likely impact on affected industries and consumers**

##### **H5.4.1 UK Producers of ARW**

389. Varying the measure as proposed is likely to aid UK producers' ability to compete with potentially cheaper ARW imports from the PRC.
390. Rimstock stated that the measure plays an important role in helping them achieve returns on its investment into ARW production.
391. If the measure was revoked and imports from the PRC increased, there could be a negative impact for Rimstock due to potentially reduced ability to compete in the tender process used by OEM businesses. This factor is dependent on whether price is the most important factor, with evidence provided by Rimstock highlighting that price is likely to be the most important factor.
392. Overall, we conclude through the evidence submitted, that varying the measure on the selected ARW has expected positive impacts for the industry.

##### **H5.4.2 UK Importers of ARW**

393. If the measure was varied as proposed, importers are unlikely to be impacted as we do not expect any change in current import trends.
394. We expect imports of the selected ARW from the PRC to increase if the measure were revoked. This could have a positive impact on importers that currently import from the PRC, or who are able to start importing from the PRC and increase their sales by selling more competitively priced ARW.
395. Furthermore, due to the existing importers' market share of ARW, we expect that there would be no supply concerns for the downstream segments if the UK industry reduced production.

### **H5.4.3 UK Consumers**

396. As already highlighted, ARW are insignificant to downstream businesses. There is no evidence to suggest that there will be any impacts on consumers in these segments.
397. If the measure was revoked, potentially lower prices in the AM segment could be passed on to consumers.
398. Finally, the producer stated that there are no differences in the technical nature or application between ARW produced in the UK and the PRC; therefore, we do not expect a drop in quality for ARW consumers if PRC's market share increased.

## **H6 Likely impact on particular geographic areas or groups within the UK**

399. This section explores how impacts of the proposed measure are likely to be geographically distributed and whether any particular groups might be disproportionately impacted.

### **H6.1 Likely impact on particular areas**

400. Our geographical analysis considers the selected parties: Rimstock and the five importers. We assessed geographical significance in terms of employment at the level of Local Authority Districts (LADs).
401. We used three sources of evidence to analyse employment:
  - a. Questionnaire responses: these included data on total employment and employment attributable to one-piece forged ARW production;
  - b. Companies House: this provides data on total business employment;
  - c. ONS estimates of working age population by LAD.
402. Questionnaire responses were our preferred source because we verified the figures from them. For businesses that did not submit questionnaire responses, we information published by Companies House to determine employment. We have greater confidence in employment by site for Rimstock than for downstream businesses because they are primarily taken from its questionnaire responses.

### **H6.1.1 UK Producer of ARW**

403. Rimstock is situated in the West Midlands. We calculated the estimated employment by LAD as a percentage of the working age population in the district. We found that employment from Rimstock was an insignificant proportion of total LAD employment: the producer employs less than 0.1% of the total LAD working population.

### **H6.1.2 UK Importers of ARW**

404. We found that the employment attributable to UK importers was an insignificant proportion of total working population in their corresponding LADs. The largest proportion was in Shropshire, at 0.2% of the total LAD working population and related to the selected importer that employs the highest number of people (434).

405. Overall, we conclude that neither revoking nor varying the measure is likely to have a significant impact on any particular geographic area.

### **H6.2 Likely impact on particular groups**

406. We considered the likely impact on particular groups including those with protected characteristics as defined by the Equality Act 2010.

407. No party provided any evidence of potential impacts on particular groups, across workers or consumers. We do not consider that varying the measure, as proposed, would lead to impacts on particular groups.

### **H7 Likely consequences for the competitive environment and the structure of UK markets for these goods**

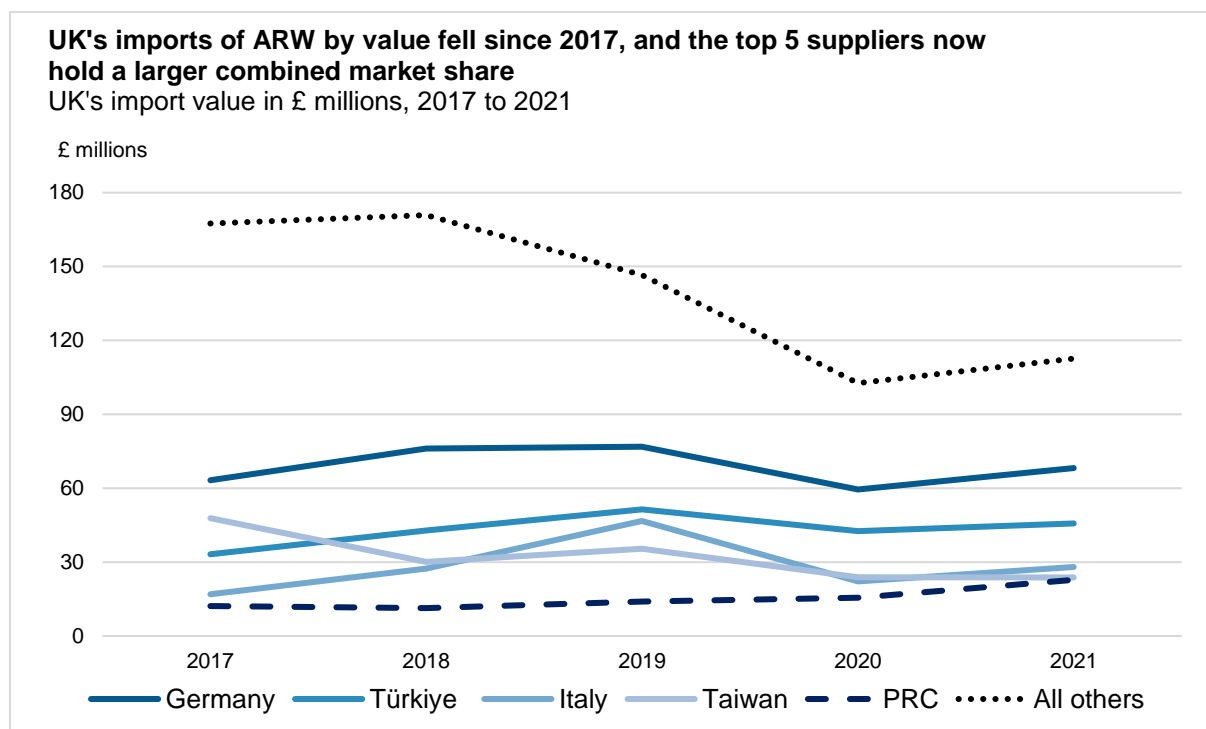
408. The assessment of likely consequences for the competitive environment and structure of the UK market considers four areas:

- the impact on the number or range of suppliers;
- the impact on the ability of suppliers to compete;
- the impact on the incentives to compete vigorously; and
- the impact on the choices and information available to consumers.

## H7.1 The impact on the number and range of suppliers

409. As noted above, Rimstock has a total ARW UK market share of less than 5%.
410. If the measure was varied, Rimstock's market share will largely remain unaffected because the UK market is mostly made up of imports from Germany, Republic of Türkiye, Italy and Taiwan (Figure 4a below). Over the course of the IP, the PRC's share of UK imports increased from 4% in 2017 to 8% in 2021, but even at 8%, it remains far below Germany's 23% and Türkiye's 15%.
411. A revocation of the measure could make it easier for PRC exporters to sell to the UK. The number and range of PRC suppliers may potentially increase but could be offset by a loss of other suppliers, with the net impact unclear.

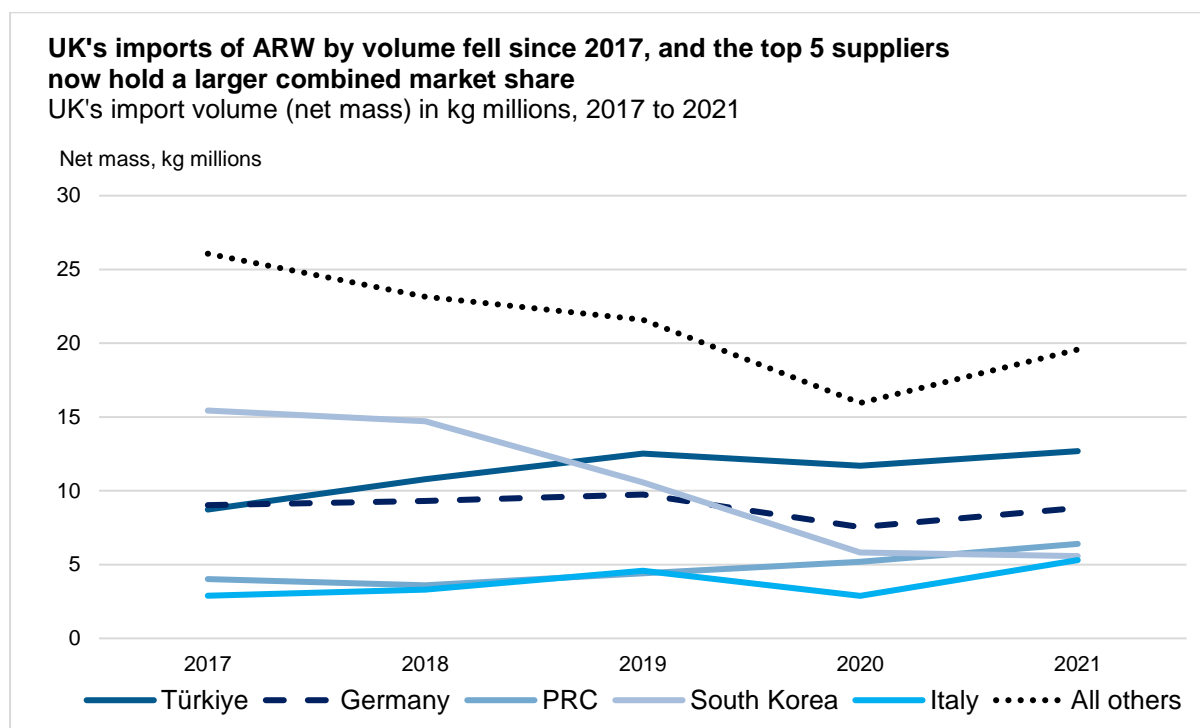
Figure 4a: The UK's top five suppliers of ARW by import value, 2017 to 2021



Note: In 2017, the top 5 countries accounted for 51% of all UK imports by value, and this increased to 63% in 2021.

Source: [UK Trade Info](#), accessed on 26 July 2022.

Figure 4b: The UK's top five suppliers of ARW by import volume, 2017 to 2021



Note: In 2017, the top 5 countries accounted for 57% of all UK imports by volume, and this increased to 62% in 2021.

Source: [UK Trade Info](https://www.uktradeinfo.com/), accessed on 26 July 2022.

412. Figures 4a and 4b highlight ARW import trends from 2017. Since 2019, five countries accounted for over 60% of the UK's ARW imports, and 10 countries accounted for over 85% of total imports of ARW in the UK. Whilst there was a degree of volatility in the composition of the top five and individual country market shares, none of these countries accounted for less than 3% of ARW imports. This indicates that there are alternative suppliers to the market from several countries.

## H7.2 The impact on the ability of suppliers to compete

413. If the measure was revoked, suppliers from the PRC would be better able to compete in the UK market. Considering the relative price of the goods subject to review (Table 1), this could drive out some current suppliers (domestic and foreign) due to price competition.

414. There is no evidence to suggest that varying the measure as proposed would impact the ability of suppliers to compete.

## H7.3 The impact on the incentives to compete vigorously

415. There is no evidence to suggest that varying the measure as proposed would directly impact incentives to compete vigorously.

## **H7.4 The impact on the choices and information available to consumers**

416. As noted above, ARW are generally supplied to motor vehicle manufactures to be incorporated within vehicle purchases. Some ARW are sold direct to consumers looking for AM or motorsport parts.
417. We found no evidence to indicate that varying or revoking the measure would affect the choices and information available to consumers.

## **H8 Such other matters as the TRA considers relevant**

418. As part of the EIT, we consider any other factors additional to those set out in the legislation which have implications in concluding whether the proposed trade remedy measure is in the economic interest of the UK.
419. We received no further evidence from interested parties.

### **H8.1 Forms of Measure**

420. The current measure is an ad valorem tariff of 22.3% covering all products imported under the commodity codes set out in [Section D: The Goods](#) originating in the PRC. The injury likelihood assessment concluded it is likely that UK producers would be injured by the dumping of one-piece forged ARW, assembled multi-piece ARW, and of parts of ARW.
421. In the EIT we consider whether any changes to the length, coverage or amount of duty of the measure, would minimise the negative impacts of the measure on some parties while retaining the overall benefits.
422. We have found no evidence suggesting that a form of measure, other than the variation we intend to propose, would be more appropriate.

## **H9 Conclusion on Economic Interest Test**

423. In accordance with paragraph 25 of Schedule 4 to the Act, we considered whether the application of a remedy would be in the economic interest of the UK. Pursuant to paragraph 25(3) of Schedule 4 to the Act, the EIT is presumed to be met unless we are satisfied that the application of the remedy is not in the economic interest of the UK.
424. Following the likelihood assessments, in Sections [F](#) and [G](#), we have considered whether varying the existing measure would be in the economic interest of the UK.
425. The section discussing the likelihood of injury from dumped imports of the goods subject to review (Section [G](#)) concluded that injury was likely to recur from dumped imports of one-piece forged ARW, multi-piece ARW and parts of

ARW originating in the PRC, as subtypes of the goods subject to review, but it was unlikely to recur from dumped one-piece cast ARW imports from the PRC. Therefore, the EIT focuses on the combined market of multi-piece ARW, parts of ARW and one-piece forged ARW.

426. Economic significance of affected industries and consumers: we found that there are two groups which are significantly linked to ARW, UK producers and importers of ARW. The importer segment appears to be the most economically significant. Rimstock, the main UK producer, appears to be the most vulnerable to negative economic impacts. The two other UK producers that engaged in the investigation claim positive profits and year-on-year growth for the multi-piece ARW market. ARW are not a significant product in terms of value for the downstream segments.
427. Likely impact on affected industries and consumers: we found that the impacts of varying the measure are minimal and expect the continuation of the current trends. The removal of the measure would likely benefit importers; however, we expect a larger negative impact for the UK producers.
428. Likely impact on particular geographic areas, or particular groups in the UK: we found no evidence of significant impacts.
429. Assessment of the likely consequences for the competitive environment: we found there are numerous suppliers from multiple countries, with indications that the revocation of the measure would increase the ability of PRC exporters to participate in the UK market.
430. We have identified the following key positive impacts of varying the measure:
  - The UK industry has the potential to be more competitive in the future and start to see benefits, as it experiences returns on its investments into ARW production.
431. The contrasting key negative impacts are:
  - Importers and consumers may not be able to benefit from cheaper ARW from the PRC.
432. We do not have evidence to suggest that the potential negative impacts outweigh the potential positive impacts. Therefore, having considered the evidence provided, we conclude that varying the measure by extending its application on one-piece forged ARW, multi-piece ARW, and parts of ARW, is in the economic interest of the UK.

## **SECTION I: Findings and Final Recommendation**

### **I1 Findings**

433. We make a recommendation on the grounds that:

- One-piece ARW produced by casting, one-piece ARW produced by forging, and multipiece ARW (whether cast or forged), should be considered as distinct sub-types of ARW;
- It is likely that dumping of the goods subject to review originating in the PRC would recur if the anti-dumping duty were no longer applied;
- It is likely that material injury to the UK industry would recur from dumped imports of one-piece forged and multi-piece ARW, and parts of ARW, as subtypes of the goods subject to review originating from the PRC, if the anti-dumping duty were no longer applied;
- It is likely that injury to the UK industry would not recur from importation of other ARW from the PRC, if the anti-dumping duty were no longer applied.
- The application of the varied anti-dumping duty to one-piece forged and multi-piece ARW, including parts of ARW, originating in the PRC, meets the EIT.

434. We therefore recommend that the anti-dumping measure continue to be applied for one-piece forged and multi-piece ARW, including parts of ARW, and to no longer be applied for all other ARW and goods imported under commodity codes.

### **I2 Final Recommendation**

435. In accordance with regulation 100(1) of the Regulations, the TRA must make a recommendation following a transition review to vary or revoke the application of the anti-dumping amount to the goods subject to review.

436. Our recommendation is to vary the application of the anti-dumping amount under regulation 100A of the Regulations in relation to aluminium road wheels machined from a forged blank or assembled from multiple pieces, or machined parts of aluminium road wheels, and revoke the application of the anti-dumping amount in relation to all other wheels of aluminium, under regulation 100B of the Regulations.

437. The anti-dumping amount in relation to all other wheels of aluminium will be revoked from 26 January 2022 in accordance with regulations 100B(2), 94(1)(b)(ii) and 97C(1)(a) and (2) of the Regulations.

438. As it has not been possible to recalculate the anti-dumping amount, we recommend maintaining the anti-dumping amount in relation to aluminium road

wheels machined from a forged blank or assembled from multiple pieces, or machined parts of aluminium road wheels, for a period of five years and ending on 25 January 2027, pursuant to regulation 100A(3)(d) and (4)(b) of the Regulations.

439. The application of the measure will be varied under regulation 100A of the Regulations in relation to ARW and parts and accessories thereof, which fall under the following UK commodity codes:

a. 8708 70 10 15

b. 8708 70 10 50

c. 8708 70 50 15

d. 8708 70 50 50

440. The description of goods falling under the above commodity codes to which the measure will be varied, is:

*aluminium road wheels machined from a forged blank or assembled from multiple pieces, or machined parts of aluminium road wheels, of aluminium; whether finished or unfinished, whether or not with their accessories and whether or not fitted with tyres.*

441. The description of goods falling under the above commodity codes to which the measure will be revoked, is:

*all other goods imported under the commodity codes.*

### Annex 1: Anti-dumping duties on goods subject to review

Country	Company	Anti-dumping duty rate (%)
The People's Republic of China	All other companies	22.3

### Annex 2: EU anti-dumping duties imposed by [Commission Implementing Regulation \(EU\) No 964/2010](#)

Company	Anti-dumping duty rate (%)
All other companies	22.3

### Annex 3: EU anti-dumping duties imposed by [Commission Implementing Regulation \(EU\) 2017/109](#)

Company	Anti-dumping duty rate (%)
All other companies	22.3

### Annex 4: Interested parties and contributors

Party type	Name (abbreviation)	Submission(s)
UK Producer	Rimstock Limited (Rimstock)	<a href="#">Pre-sampling questionnaire Questionnaire</a>
UK Producer	Dymag Group Limited (Dymag)	<a href="#">Pre-sampling questionnaire</a>
UK Producer	360 Wheels Limited (360 Wheels)	<a href="#">Submission SEF response 1</a> <a href="#">SEF response 2</a>
UK producer	Image Wheels International Limited (Image Wheels)	<a href="#">Submission SEF response</a>
UK Importer	M-Sport Wheels Limited (M-Sport Wheels)	<a href="#">Pre-sampling questionnaire Questionnaire</a>
PRC Exporter	Zhejiang Autom Aluminum Wheel Co., Ltd. (Zhejiang Autom)	<a href="#">Pre-sampling questionnaire</a>
Foreign Government	The Government of the People's Republic of China (the Government of the PRC)	<a href="#">Pre-sampling questionnaire</a>
Trade Body	China Chamber of Commerce for Import and Export of Machinery and Electronic Products (CCCME)	<a href="#">Pre-sampling questionnaire</a>