

Our Ref: HN/JN

27th February 2023

Lead Investigator Trade Remedies Authority
North Gate House,
21-23 Valpy Street,
Reading
RG1 1AF

Dear Sir,

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RE: TD0013 TRANSITION ANTI-DUMPING REVIEW ALUMINIUM ROAD WHEELS FROM PRC.

Back in August 2022, when we were first contacted by TRA, we understood the anti-dumping duty referred to just one piece aluminium road wheels, which was not our market so at that time any ADD being revoked would not directly have affected our business of multi piece aluminium road wheels, so therefore there was no likelihood of injury to our business.

However, recent update reports from TRA are now looking at one piece and multi piece ARW separately, and should the ADD be revoked on multi piece wheels this would definitely cause injury to the small number of multi piece ARW manufacturers that remain in the UK.

INJURY TO BUSINESS IN THE UK

We manufacture everything "in house", and only import base raw materials – Aluminium Sheet and Billet, as this is no longer produced in the UK. The bulk of raw material is sourced from EU Mills, with some coming from PRC.

All our CNC machining, powder coating and the intensive labour process of careful assembly and quality control is carried out by our skilled workforce. Our cast centre range is made by local UK foundries, and all our metal surface treatments are again carried out by local UK SME's, even our fixing bolts and nuts are made in the UK.

SME's are the backbone of British Industry and the throughput of these processes employs approximately 50 / 60 people to enable the production of our multi piece ARW. Add to this figure the employment numbers from the other multi-piece ARW manufacturers in the UK and this figure will be into the hundreds employed in this industry. Should the ADD be removed on multi-piece ARW all of these jobs would be in jeopardy.



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ECONOMIC INTEREST

The five remaining multi-piece ARW Companies, despite the negative impact from COVID, Brexit, raw material increases, wages rises, pensions and extortionate energy prices are currently holding their own. Retaining the ADD on multi-piece ARW from PRC would prevent injury occurring to these UK businesses.

As previously stated SME's are the backbone of UK industry representing in excess of 50 percent of the employment and turnover of the private sector. Although the multi-piece ARW companies are a small portion of these, they are significant nonetheless.

CARBON FOOTPRINT/ GREEN ISSUES / RECYCLING

Most countries are very aware about the current issues with global warming and trying to achieve a better carbon neutral footprint. One way we can all work towards this goal is by sourcing supplies within the UK. Maybe this is also something that should be considered and another reason to continue with the ADD on PRC for multi-piece ARW, especially as the UK Companies already within the UK can supply the demand.

Another area we are currently able to sustain, is the recycling of our aluminium swarf and turning. This is recycled in the UK and sold back to UK foundries in ingot form.

SUMMARY

The retention of the ADD on PRC imports of multi-piece ARW would serve to protect UK manufacturing, as well as maintain the high standards and safety of multi-piece wheels in the UK.

Yours sincerely,