

TD0035 - TS0036

**Anti-dumping / countervailing duties on certain pneumatic tyres used for buses or lorries
Originating in the People's Republic of China**

**SUBMISSION ON PRODUCT SCOPE, LEGITIMACY OF MEASURES AND TRANSITION REVIEWS,
INJURY AND THE ECONOMIC INTEREST TEST**

20 February 2024

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1. INTRODUCTION

1. The present submission is made in response to the comments from the China Rubber Industry Association (CRIA) dated 11 September 2023 and the Request dated 19 October 2023 made by Chongqing Hankook Tire Co., Ltd., Jiangsu Hankook Tire Co. Ltd., Hankook Tyre UK Ltd and Shanghai Hankook Tire Co., Ltd. (together, Hankook), to exclude so-called multi-life tyres from the product scope of the investigation.
2. As a preliminary point, this submission also addresses and rejects suggestions made by CRIA (also in its submission dated 11 September 2023) and the Chinese Ministry of Commerce (“MOFCOM”) (on 29 December 2023) that the present reviews relate to EU trade remedy measures and are in any way unlawful.

2. THE VALIDITY OF THE PRESENT TRANSITION REVIEWS

3. Pursuant to Regulation 97(1) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the “Dumping & Subsidisation Regulations”), the TRA must review every EU trade remedies measure in a determination notice.
4. The Secretary of State had the power to determine to transition an EU trade remedies measure at any time before replacement of EU trade duty (Regulation 96, Dumping and Subsidisation Regulations).
5. On 31 December 2020, the Secretary of State published:
 - Notice of determination 2020/22 to transition the anti-dumping duty on certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries and with a load index exceeding 121 originating in the People’s Republic of China imposed by European Commission Implementing Regulation (EU) 2018/1579 of 18 October 2018;¹ and
 - Notice of determination 2020/23 to transition the countervailing duty on certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries and with a load index exceeding 121 originating in the People’s Republic of China imposed by European Commission Implementing Regulation (EU) 2018/1690 of 9 November 2018.
6. The replacement of EU trade duty occurred at 11pm on 31 December 2020, when paragraph 1 of Schedule 7 to the Taxation (Cross-border Trade) Act 2018 came into force:

“Any direct EU legislation, so far as imposing or otherwise applying in relation to any EU customs duty, that forms part of the law of the United Kingdom as a result of section 3 of the European Union (Withdrawal) Act 2018 (incorporation of direct EU legislation) ceases to have effect.” (emphasis added)
7. Regulation 97(2) of the Dumping and Subsidisation Regulations provides that if the TRA conducts the transition review after replacement of EU trade duty, the review is of a UK trade remedies measure.

¹ As amended by Commission Implementing Regulation (EU) 2018/1690 of 9 November 2018.

8. The TRA issued the Notices of Initiation of the present reviews on 3 May 2023.
9. The UK has therefore applied, and the TRA is now reviewing, UK trade remedies measures.
10. In any event, and without prejudice to the foregoing, the EU measures were imposed on the basis of analysis which included the UK market and UK producers. The goods subject to review were imported into the European Union, including the UK, subject to the same customs duties throughout. Chinese exporters were dumping tyres and benefitting from unfair subsidies, wherever the tyres were eventually sold. UK producers also stood to suffer the same injury, given that they sold like goods in the UK in the relevant period.
11. The EU General Court's decision in *CRIA and CCCMC v European Commission* (T-30/19 and T-72/19) is entirely irrelevant for present purposes. As explained above, the relevant measures were transitioned into the UK on 31 December 2020 and were UK trade remedies thereafter. To the extent that the Chinese parties consider that there are substantive issues to be addressed regarding these UK measures, it is entitled to raise them in the context of these transition reviews. The Chinese parties could also have made an application for an interim review, but did not do so.
12. Finally, CRIA and MOFCOM assert that the UK transition reviews are unlawful under the WTO Anti-Dumping Agreement ("ADA") and Agreement on Subsidies and Countervailing Measures ("SCM"). This is denied. But in any event, this is entirely the wrong forum for these arguments. To the extent that there are questions about the UK's compliance with the ADA / SCM, this is an issue for the People's Republic of China to raise with the UK, in accordance with the binding dispute settlement procedures and before the Dispute Settlement Body of the WTO if necessary.
13. In the meantime, we respectfully conclude that the TRA should continue the transition reviews in accordance with domestic law.

3. PRODUCT SCOPE

14. The goods subject to review in the present cases are certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries, with a load index exceeding 121, imported into the UK under commodity codes 40 11 20 90 00 (new) and 40 12 12 00 10 (retreaded).
15. There are producers of like goods in the UK, among them: Bandvulc Tyres Ltd (a Continental AG UK subsidiary); Bulldog Remoulds Ltd / Bridgestone Europe NV/SA, (UK Branch); Michelin Tyre PLC; and, Vaculug Limited.
16. Retreaded tyres and new tyres are correctly considered as one product for the purposes of the present reviews.
17. The target market of the producers of both the goods subject to review and the like goods are the same: bus and lorry operators in the UK.
18. The target market bus and lorry operators make their decisions based, essentially, on some or all of the following factors: initial price, overall cost per mile, and additional considerations such as fuel efficiency, durability and sustainability. The weighting given to these factors will vary depending on customer type and how a vehicle is being used.

19. CRIA contests the product scope on the basis that "[n]ew and retreaded tyres have different essential physical, technical and chemical characteristics". Hankook allows itself to suggest that "[t]he UK tyre market is segmented in two main segments.... The first segment is called multi-life tyres. The second segment is called single-life tyres."

20. CRIA and Hankook's arguments are based on non-existent / artificial distinctions:

- firstly, because new, including multi-life, tyres and retreaded tyres share the same physical, chemical and technical characteristics and the same uses (3.1); and
- secondly, because the market is quite simply not divided into non-competing multi-life and single-life / retreadable tyres, nor in practical terms could it be - new multi-life tyres, retreaded tyres and single-life tyres compete across all customer types and market segments (3.2).

3.1 New (including multi-life) and retreaded tyres share the same basic physical, chemical and technical characteristics and the same basic uses²

21. Both new and retreaded tyres are made up of a casing and vulcanised rubber incorporating the tread layer and sidewall.

22. Tread patterns are also often replicated across new and retreaded ranges.

23. Although the chemical make-up of tyre rubber compounds can vary depending on usage and quality, it does not depend on whether the tyre is new or retreaded.

24. In addition, both new and retreaded tyres undergo rigorous checks before being released on the market.

25. To all intents and purposes, therefore, a retreaded tyre is made of the same materials as a new tyre, it looks the same and it is required to carry out the same functions.

26. Both new and retreaded tyres are used across all parts of the on-road truck and bus tyre markets, including local, regional, national and international freight carriage, and local to long-distance buses.

27. Across Europe and the UK, both retreaded and new truck tyres have to pass the same endurance test under UNECE regulations 109 and 54 respectively. A retreaded truck tyre performs as well as or better than many new truck tyres.

3.2 One single market in which all tyres compete

3.2.1 Competition within the UK tyre market

28. There is intensive and direct competition between all new and retreaded tyres.

² References in this section to "new" tyres include both multi-life and single-life tyres. There is no distinction to be made in this regard, as explained further below. References to "new" tyres are also made without prejudice to the fact that a retreaded tyre is, to all intents and purposes, "new" as well.

29. If competition is normal, truck and bus tyre buyers will make decisions essentially on the basis of their approach to cash flow.

- Company A may recognise the value of a contract involving tyre supply and management, factoring in maintenance, fuel, downtime and replacement tyre savings.
- Company B may prefer a higher upfront investment for a higher-quality, retreadable tyre, recognising the reduced cost per mile over the lifespan of the tyre (including retreading).
- Company C may prefer a lower upfront cost.

30. The key factor is cost. A premium, so-called multi-life tyre, is in competition with a retreadable tyre either on price directly or in terms of the cost per mile over the lifespan of the tyre as a whole.

31. All imported new tyres are therefore in direct competition with retreaded tyres.

3.2.2 Practical application of trade remedies measures

32. Hankook's Request to exclude multi-life tyres from the product scope of the present reviews is based on an artificial oversimplification of the distinction between multi-life and single-life tyres.

33. Multi- and single-life tyres are the same in terms of appearance and function. They differ in terms of initial performance and the potential for them to be retreaded, but these differences are not apparent at the point of import. It is only retreaders, at the end of the first life of the tyre, who are able to decide whether a tyre is in fact multi-life or not.

34. There are of course incentives for exporters to label their tyres as multi-life, when they may not be, in that retreadable tyres can command a higher price.

35. In addition, if multi-life tyres were excluded from the measures, exporters would be able simply to identify their tyres as multi-life, for the purposes of import only, and thereby avoid the additional duty imposed to prevent injury to domestic producers. The TRA would be creating an overwhelming circumvention risk.

36. It is thus impossible, in practical terms, to exclude multi-life tyres from the product scope.

4. THE UK INDUSTRY IS VULNERABLE TO UNFAIR TRADE PRACTICES

37. The imposition of measures on imports of Chinese tyres is crucial to the UK's retreaded industry which is vulnerable to unfair attacks from foreign exporters.

38. CRIA has referred to Bridgestone's press report announcing that it will expand its manufacturing process to include more 'hot' products,³ as an effort to boost the UK Manufacturing sector and adapt to demand from commercial customers. This report underlines that domestic producers are taking proactive measures to adapt to remain competitive against aggressively priced imported tyres.

³ Bridgestone Press Release, "Bridgestone's multi-million-pound investment makes retread range hot property" dated 25 May 2023, available here: <https://press.bridgestone-emea.com/en/bridgestones-multi-million-pound-investment-makes-retread-range-hot-property/>.

39. Nevertheless, Bridgestone confirmed in its anti-dumping and antisubsidy questionnaires that the industry is suffering in the face of imports of cheap tyres from China.⁴
40. Similarly, Michelin UK explained in its questionnaires that it has seen “*a big fall in the retread market*”.⁵
41. Despite presenting many environmental advantages,⁶ over the last decade, the market for retreaded truck and bus tyres has suffered a significant decline in the face of imports of new tyres from China. As noted by Vaculug “*in recent years the market share of retreaded tyres has declined from almost 50% to less than 35%*”.⁷
42. The anti-dumping and countervailing measures currently in place have improved the situation, but in spite of this, the sector remains vulnerable.
43. Trade statistics published by HMRC show that Chinese exports of bus and lorry tyres to the UK have more than halved since the imposition of the measures. In 2017, Chinese exporters exported 799,252 tyres to the UK.⁸ In 2018, this number reduced to 340,800.⁹
44. The following graph was populated with HMRC data on Chinese imports of new tyres subject to the present reviews:¹⁰

⁴ Bridgestone’s Anti-Dumping Questionnaire (Producer) Case TD0035: Certain pneumatic tyres used for buses or lorries (non-confidential), E(18); Bridgestone’s Subsidy Questionnaire (UK Producer) Case TS0036: Certain pneumatic tyres used for buses or lorries exported from People’s Republic of China, (non-confidential), E(18).

⁵ Michelin’s Anti-Dumping Questionnaire (Producer) Case TD0035: Certain pneumatic tyres used for buses or lorries (non-confidential), B2(5); Michelin’s Subsidy Questionnaire (UK Producer) Case TS0036: Certain pneumatic tyres used for buses or lorries exported from People’s Republic of China (non-confidential), B2(5).

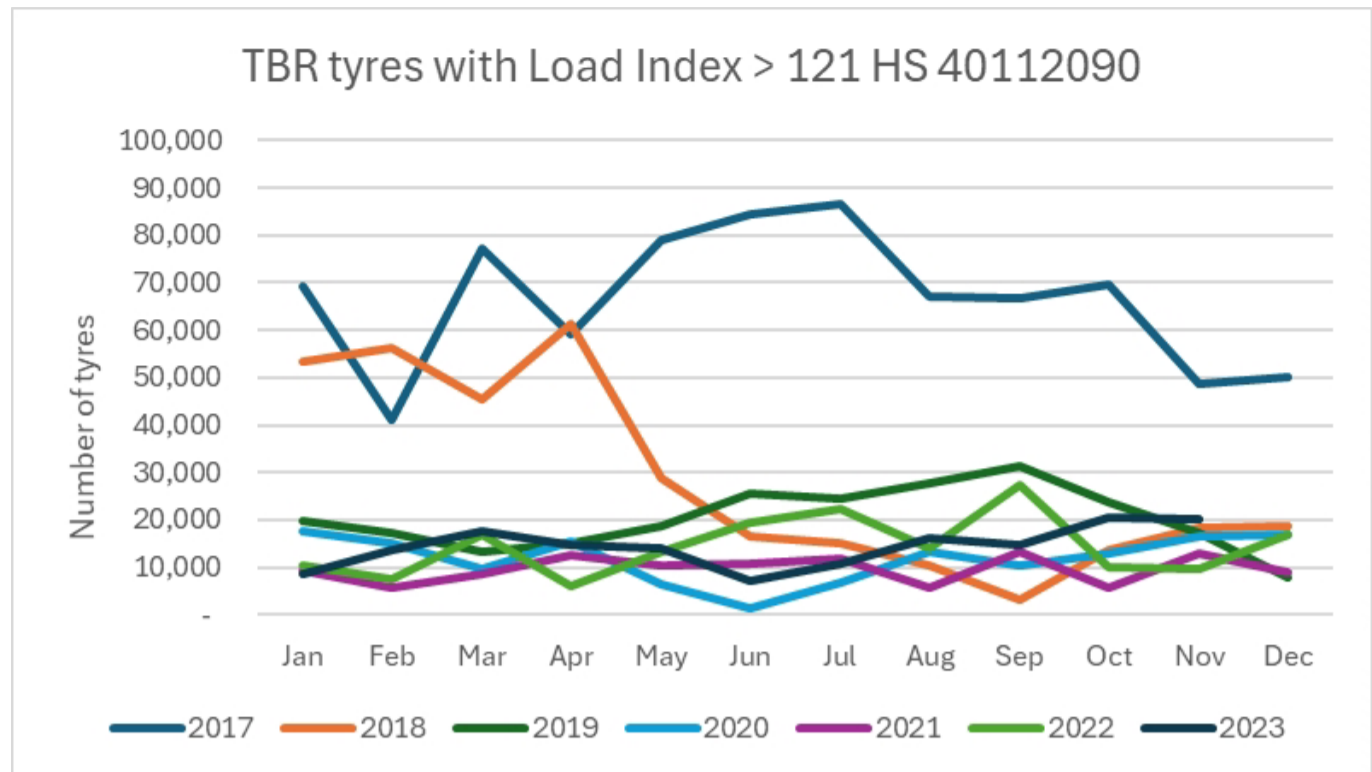
⁶ Letter from Vaculug Limited to Nigel Huddleston MP dated 30 March 2023: “[r]etreading is one of the few industries that’s genuinely sustainable. Through its commitment to providing exceptional resource efficiency, it significantly reduces the environmental impact of tyre usage and production. (...) This is based on the principle of circular economy, which benefits the environment by vastly reducing CO2 emissions (...)”.

⁷ Letter from Vaculug Limited to Nigel Huddleston MP dated 30 March 2023.

⁸ See Annex below, HMRC, UK trade statistics, OTS custom table, Monthly statistics on Chinese imports of Pneumatic tyres, new, of rubber, of a kind used for buses or lorries, with a load index of > 121 (40112090) from 2017 to 2023.

⁹ See Annex below, HMRC, UK trade statistics, OTS custom table, Monthly statistics on Chinese imports of Pneumatic tyres, new, of rubber, of a kind used for buses or lorries, with a load index of > 121 (40112090) from 2017 to 2023.

¹⁰ See Annex below, HMRC, UK trade statistics, OTS custom table, Monthly statistics on Chinese imports of Pneumatic tyres, new, of rubber, of a kind used for buses or lorries, with a load index of > 121 (40112090) from 2017 to 2023.



45. The European Commission opened its anti-dumping investigation in August 2017,¹¹ at the time of the initial decrease in imports. From February 2018,¹² the goods subject to review were subject to registration. There was an increase in imports in March / April 2018, before the provisional measures. The provisional measures were imposed in May 2018,¹³ and this is likely to be the predominant factor in the significant drop in imports around that time. Imports have then remained at a fairly consistent level for the duration of the measures. Were the measures to be lifted, it is anticipated that imports would return to 2017 levels.
46. Further, in 2022 the domestic truck and bus tyre market in China reportedly experienced severe shrinkage, largely due to a slowdown in housing and infrastructure projects. This, combined with over-supply, increases the pressure to grow exports. In addition, episodes of worker unrest have added pressure to grow the economy, even at the price of subsidising exports.
47. The guidelines published by the CRIA in the context of the 14th Five-Year Plan illustrate the Chinese Government's incentive to increase production.¹⁴ For lorry tyres specifically, the plan forecasts a production of 148 million units. With these quantities Chinese producers have little choice but to dedicate a significant share of their production for export markets. This is the case, notwithstanding the fact that the guidelines themselves state that the global tyre industry is in a saturated state.¹⁵

¹¹ Notice of initiation of an anti-dumping proceeding concerning imports of new and retreaded tyres for buses or lorries originating in the People's Republic of China, dated 11 August 2017. The Notice of initiation of an anti-subsidy proceeding concerning imports of new and retreaded tyres for buses or lorries originating in the People's Republic of China was published on 14 October 2017.

¹² Commission Implementing Regulation (EU) 2018/163 of 1 February 2018 making imports of new and retreaded tyres for buses or lorries originating in the People's Republic of China subject to registration.

¹³ Commission Regulation (EU) 2018/683 of 4 May 2018 imposing a provisional anti-dumping duty on imports of certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries, with a load index exceeding 121 originating in the People's Republic of China, and amending Implementing Regulation (EU) 2018/163.

¹⁴ Guidelines for the "14th Five-Year Plan" Development Plan of the Rubber Industry, Nov. 2020.

¹⁵ Guidelines for the "14th Five-Year Plan" Development Plan of the Rubber Industry, Nov. 2020.

48. This issue of overcapacity is not unique to the tyre industry in China. The interference of the Government of China in all sectors and the associated allocation of resources creates situations of overcapacity in many industries, including the steel industry.¹⁶
49. Given the vulnerability of the UK industry to unfair trade practices, it is essential to maintain measures to curb the threat posed by imported tyres from China.

5. ECONOMIC INTEREST TEST

5.1 Measures are in the economic interest of the UK

5.1.1 The retreaded tyre industry plays an important role in the UK's economy

50. A downturn in the UK treaded tyre industry would negatively impact the UK's economy.
51. The UK retreaded tyre industry makes a significant contribution to the UK economy through employment, investment and the circular economy.
52. Retreading is significantly more labour-intensive than manufacturing new truck tyres and as of March 2023, the industry supported 5,500 highly skilled workers.¹⁷
53. Unfair competition from abroad results in redundancies in the UK. When Michelin was forced to close its activities in Ballymena, Northern Ireland and Dundee, Scotland, there were more than 1600 redundancies.¹⁸ Closures have a big impact on regions with low employment rates such as Northern Ireland.
54. In its letter to Nigel Huddleston MP, Vaculug explains that should measures be lifted it would have no choice but to terminate the employment of nearly 200 people in its factory in Grantham, Lincolnshire.¹⁹
55. Similarly, Bridgestone explained in its anti-dumping and anti-subsidy questionnaires:²⁰

“If the existing anti-dumping measures no longer applied, in order to remain competitive we would need to review and almost certainly reduce overall employee numbers and levels of capital investment.”

¹⁶ Commission Implementing Regulation (EU) [2021/2239](#) of 15 December 2021 imposing a definitive anti-dumping duty on imports of certain utility scale steel wind towers originating in the People's Republic of China, rec. 71.

¹⁷ Letter from Vaculug Limited to Nigel Huddleston MP dated 30 March 2023.

¹⁸ Michelin's Anti-Dumping Questionnaire (Producer) Case TD0035 : Certain pneumatic tyres used for buses or lorries exported from People's Republic of China (Non-confidential), (non-confidential) G3(2); Michelin's Subsidy Questionnaire (Producer) Case TD0035 : Certain pneumatic tyres used for buses or lorries exported from People's Republic of China (non-confidential), G4(5).

¹⁹ Letter from Vaculug Limited to Nigel Huddleston MP dated 30 March 2023.

²⁰ Bridgestone's Subsidy Questionnaire (UK Producer) Case TS0036: Certain pneumatic tyres used for buses or lorries exported from People's Republic of China, E(2) (non-confidential); Bridgestone Anti-Dumping Questionnaire (Producer) Case TD0035: Certain pneumatic tyres used for buses or lorries exported from People's Republic of China, E(2) (non-confidential).

56. The industry does not only contribute to the economy through employment, it has also invested in training for workers which focuses on skills, flexibility, performance and capability (100,000 man-hours) and infrastructure (£30m in plant modernisation).²¹
57. The retreading industry presents also major environmental advantages and plays a significant role in promoting a circular economy.
58. As explained by Bridgestone:²²
- “Retread tyres use less than one-third the amount of raw materials used in new tires and enable the reuse of other tyre components, such as the casing. The retreading solution significantly contributes to the reduction of discarded tyres as well as the reduction of waste in communities.”*
59. According to Vaculug, with retreaded tyres *“85% of the returned tyre casing is reused, which saves 30 kg of rubber, up to 20 kg of steel and 60 kg of CO2.”*²³
60. In particular, the industry promotes the application of a 4-lives tyre policy that has multiple long-term economic and environmental benefits.
61. As explained by the BTMA a 4-lives tyre policy:²⁴
- “[A 4-lives tyre policy entails] an initial investment in a longer-lasting and higher-performing new tyre that can subsequently first be re-grooved (re-cutting the partly worn tread pattern on appropriately manufactured tyres) and then retreaded. Finally, the retreaded tyre can itself be regrooved. Depending on their condition, some tyres can then even be retreaded a second time.”*
62. According to the BTMA, the policy was adopted by most major commercial vehicle fleets for economic and environmental reasons:²⁵
- “A 4-lives tyre policy allows the use of higher-performing Tier 1 tyres at a cost per mile similar to that of using multiple lower-performing single-life tyres. In addition, compared to a single-life policy, a 4-lives tyre policy enables improved vehicle fuel efficiency, increased reliability and reduced environmental impact in use and at end-of-life. A 4-lives tyre policy offers a 3-fold improvement in resource efficiency compared to a tyre policy based on low-cost, single-life tyres. This is an important consideration since truck and bus tyres typically comprise 28% natural rubber which has been declared a Critical Raw Material by both the EU and the US, highlighting concerns regarding the future supply / demand balance of this vital raw material. A 4-lives tyre policy also maximises UK value-added through services (regrooving, and retreading), maximises supply resilience and minimises dependency on overseas recovery of end-of-life tyres (principally in India).”*

²¹ Letter from Vaculug Limited to Nigel Huddleston MP dated 30 March 2023.

²² Bridgestone’s press release, *“Bridgestone’s multi-million-pound investment makes retread range hot property”*, accessible at: [Bridgestone’s multi-million-pound investment makes retread range hot property \(bridgestone-emea.com\)](https://www.bridgestone-emea.com/press-releases/bridgestone-multi-million-pound-investment-makes-retread-range-hot-property)

²³ Letter from Vaculug Limited to Nigel Huddleston MP dated 30 March 2023.

²⁴ BTMA’s Transtion Review Anti-Dumping Questionnaire for Contributors (non-confidential), A2(1); BTMA’s Transtion Review Subsidy Questionnaire for Contributors (non-confidential), A2(1).

²⁵ BTMA’s Transtion Review Anti-Dumping Questionnaire for Contributors (Non-confidential).

63. A 4-lives tyre policy is not only in the interest of tyre retreaders but also tyre retailers. A 4-lives tyre policy maximises the provision of value-added activity, in particular regrooving (£40 - £50 per tyre) and tyre maintenance.
64. However, whilst the majority of large fleet operators recognize the benefit of a 4-lives tyre policy, almost half of the UK heavy vehicle fleet is made up of smaller operators often preoccupied with short-term considerations. It is here that the greatest risk of value destruction to the UK economy exists.
65. The increased use of imported tyres damages the demand for retreaded tyres, but it also reduces the supply of used tyre casings suitable for retreading. This affects SME retreaders in particular as they are more dependent on casings coming from small hauliers – precisely the operators who are more likely to switch to lower-cost tyres.
66. In its submission to the 2019 Department for Transport’s consultation on banning tyres aged 10 years and older, the British Tyre Manufacturers’ Association wrote:²⁶

“The loss of the use of retreaded truck and bus tyres in the UK would lead to an increase in the consumption of new truck and bus tyres in excess of 40%, costing vehicle operators an additional £102 million per year (on the basis of the central tyre price hypotheses used in the Impact assessment). Furthermore, it would spell the end of the UK retreading industry that supports 5,500 jobs [directly and indirectly] and contributes £230 million to the UK economy every year.”

67. For these reasons, the retreaded industry makes a significant contribution to the UK economy and fosters sustainability.

5.1.2 In the interest of UK consumers

68. Measures on imported new tyres are not only in the interest of the industry and the economy but also in the interest of its consumers.
69. The availability of retreaded tyres offers consumers the potential to adopt a policy more competitive than using low-cost new tyres, when other factors such as fuel efficiency, longevity and reliability are taken into account.
70. Cheaper tyres frequently do not represent a cost-saving opportunity for fleets of any size.
71. In addition, cheaper imported tyres undermine government policy regarding decarbonisation, supply resilience and resource efficiency, the environment and health, notably in terms of air quality.
72. In addition, increased emissions will be caused by the manufacture and end-of-life disposal of the increased quantity of tyres created by single-life products due to the loss of retreading.

²⁶ Department for Transport, “Government response to the consultation to ban tyres aged 10 years or older”, dated 14 July 2020.

5.2 Measures on new tyres would not limit the availability of used casing

73. Anti-dumping duties on new truck and bus tyres made in China will not limit the availability of used casings suitable for retreading. Suitability for retreading has to be incorporated in new tyre designs, and this is not the case with the majority of new truck and bus tyres imported from China.
74. Conversely, the likelihood of an even greater influx of new truck and bus tyres from China should measures be lifted **would** limit the availability of suitable casings because they would replace tyres that can be retreaded – at the same time as increasing the cost of those suitable casings.

ANNEX

Volume (per number of items) of Chinese imports into the UK of 40112090 Pneumatic tyres new, of rubber, of a kind used for buses or lorries, with a load index of > 121 (HMRC trade statistics)

Month	2017	2018	2019	2020	2021	2022	2023
January	69 338	53 231	19 720	17 624	9 356	10 229	8 705
February	40 910	56 325	17 371	14 963	5 840	7 629	13 529
March	77 180	45 391	13 130	9 827	8 439	16 838	17 739
April	59 280	61 439	15 133	15 448	12 501	5 962	14 576
May	78 893	28 836	18 712	6 490	10 394	13 273	13 878
June	84 419	16 525	25 515	1 422	10 611	19 388	7 032
July	86 750	15 003	24 483	6 740	11 707	22 151	10 824
August	67 172	10 488	27 658	13 297	5 545	14 068	16 086
September	66 875	3 057	31 406	10 467	13 101	27 390	14 595
October	69 733	13 705	23 754	13 043	5 611	9 910	20 393
November	48 683	18 176	17 419	16 563	12 997	9 666	20 174
December	50 019	18 624	7 988	17 013	8 998	16 938	16 843
Total	799 252	340 800	242 289	142 897	115 100	173 442	174 374

HMRC, UK trade statistics, OTS custom table, Monthly statistics on Chinese imports of Pneumatic tyres, new, of rubber, of a kind used for buses or lorries, with a load index of > 121 (40112090) from 2017 to 2023, available at: <https://www.uktradeinfo.com/trade-data/ots-custom-table/?id=4907eccd-9291-45d2-a9eb-0ffe1adca767>