



**Pre-Sampling Questionnaire (Importer)**  
**Transition review of anti-dumping measures**  
**Case TD0035: Certain pneumatic tyres used for**  
**buses or lorries imported from the People's**  
**Republic of China**

Period of Investigation:	1 January 2022 – 31 December 2022
Injury Period:	1 January 2019 – 31 December 2022
Deadline for response:	29 May 2023
Case Team Contact:	TD0035@traderemedies.gov.uk
Completed on behalf of:	HANKOOK TYRE UK Ltd.

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete.

- Confidential  
 Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **18 May 2023**.



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## The scope of this review

### Goods subject to review

This review covers certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries, with a load index exceeding 121, exported from the People's Republic of China (PRC).

These goods are currently classifiable within the following commodity codes:

- 4011 20 90 00;
- 4012 12 00 10.

These commodity codes are only given for information.

In this pre-sampling questionnaire, these goods will be referred to as the goods subject to review. Any reference to goods subject to review in this pre-sampling questionnaire refers to the goods description above, regardless of the commodity code under which they are imported.

### Like goods

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are like the goods subject to review. Any reference to 'like goods' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China which are like the goods subject to review in all respects, or with characteristics closely resembling them.

**Please follow the instructions for each question to provide the appropriate information regarding the goods subject to review or like goods.**

For more information about this case, you may refer to the Notice of Initiation published at: <http://www.trade-remedies.service.gov.uk/public/case/TD0035/>



## Instructions

### Who should complete this form

You should complete this form if you are a UK importer of the goods subject to review.

### Why you are being asked to complete this pre-sampling questionnaire

We are seeking your cooperation as a UK importer of the goods subject to review to inform our review of whether the current anti-dumping measure should be maintained, varied or discontinued. If you are not a UK importer of the goods subject to review, please complete either the relevant Pre-Sampling Questionnaire or the Other Interested Party and Contributor Registration Form if you have information which you wish to be considered during the investigation.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK importers complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

### Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **18 May 2023**. If you are *unable* to provide a completed submission by the given due date and you wish to request an extension, please contact James Reith at [James.Reith@traderemedies.gov.uk](mailto:James.Reith@traderemedies.gov.uk) and see the TRA's guidance on extension requests for further information.

### Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date.

Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.



Please see [the TRA's public guidance](#) for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems.

The non-confidential version of your submission will be placed on the public file, which is available on: <http://www.trade-remedies.service.gov.uk/public/case/TD0035/>



## Section A – Activities of your company and any associated parties

### A1 – Your company's activities

To determine your company's role for the purpose of this review, please select the activity/activities of your company below. For a definition of goods subject to review and like goods please refer to the section above on 'the scope of this review'.

- importer of the goods subject to review in the UK  
 other (please give details below)

If you have selected 'other', please describe the role of your company with regards to the goods subject to review or like goods:

Not applicable.

Please describe your interest in this review:

Hankook Tyre UK Ltd. (hereinafter, "HKTUK") is an importer of the goods subject to the present review and is part of a group of companies that wishes to cooperate in the present transition review with the TRA. This group consists of three companies, namely, Jiangsu Hankook Tire Co. Ltd ("JHKT"), HKTUK and Chongqing Hankook Tire Co Ltd ("CHKT") and is hereinafter referred to as the "**Hankook Group**".

During the period of investigation, HKTUK imported the goods subject to review to UK from associated exporter CHKT and JHKT. The decision to maintain, vary or revoke the anti-dumping measures significantly impacts HKTUK's business.



## A2 – Associated parties and operational links

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the goods subject to review or like goods during the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the goods subject to review or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1	Hankook Tire and Technology Co., Ltd	Seongnam-Si, Republic of Korea	[Confidential business information – nature of the activities of the associated party]	Parent company
Associated Party 2	Jiangsu Hankook Tire Co., Ltd.	Jiangsu, China	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 3	HANKOOK TYRE UK LTD.	Northamptonshire, UK	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 4	HANKOOK TIRE AMERICA CORP.	NEW JERSEY, USA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company



Associated Party 5	Hankook Tire Canada Corporation	ONTARIO, CANADA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 6	HANKOOK TIRE LATIN AMERICA	PANAMA CITY, PANAMA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 7	HANKOOK TIRE NETHERLAND S B.V.	HOOFDDORP, NETHERLAND S	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 8	HANKOOK REIFEN DEUTSCHLAND GMBH	NEU-ISENBURG, GERMANY	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 9	HANKOOK FRANCE SARL	VILLEURBANNE, FRANCE	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 10	HANKOOK TIRE ITALIA S.R.L.	MILAN, ITALY	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 11	HANKOOK ESPANA, S.A.	MADRID, SPAIN	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company



			<i>associated party</i>	
Associated Party 12	HANKOOK TIRE BUDAPEST TRADING KFT	BUDAPEST, HUNGARY	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 13	HANKOOK TIRE SWEDEN AB	STOCKHOLM, SWEDEN	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 14	Hankook Tire Austria GmbH	SCHWECHAT, AUSTRIA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 15	HANKOOK TYRE AUSTRALIA PTY, LTD.	NSW, AUSTRALIA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 16	Hankook Tire (Thailand) Co., Ltd.	DUBAI, U.A.E	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 17	HANKOOK TIRE MIDDLE EAST AND AFRICA	HO CHI MINH, VIETNAM	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company



Associated Party 18	HANKOOK TIRE VIETNAM CO., LTD.	SHANGHAI, CHINA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 19	SHANGHAI HANKOOK TIRE SALE CO LTD	KUALA LUMPUR, MALAYSIA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 20	PT. HANKOOKTIRE INDONESIA	MOSCOW, RUSSIAN FED.	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 21	HANKOOK TIRE MALAYSIA SDN. BHD.	KUALA LUMPUR, MALAYSIA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 22	Hankook Tire Rus LLC	MOSCOW, RUSSIAN FED.	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company
Associated Party 23	PT. Hankook Tire Sales Indonesia	KABUPATEN BEKASI, INDONESIA	[Confidential business information – nature of the activities of the associated party]	Controlled by the same parent company



## Section B – Details of companies you import from

Please provide the contact details for each individual company you import from. Please confirm in the final column if we are able to contact these companies.

Exporter/Supplier name	Address	Contact Details	Can we contact Y/N
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]

## Section C – Sales, imports and domestic purchases

### C1 – Total company revenue

Please provide your company's total revenue and the revenue of the goods subject to review:

	Value in GBP (£)
Total revenue of your company during the POI	[140,000,000 – 180,000,000]
Total revenue of your company for the goods subject to review during the POI	[25,000,000 – 30,000,000]



## C2 – Your imports of the goods subject to review

Please provide the total volume and value of the goods subject to review imported by your company from the People’s Republic of China during the POI:

	Volume (No of tyres)	Volume (Kg)	Value in GBP (£) <sup>1</sup>
The goods subject to review imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	[120,000-140,000]	[7,000,000-8,500,000]	[22,000,000-27,000,000]
The goods subject to review imported into the UK during the POI and <b>resold</b> in the UK	[90,000-110,000]	[5,500,000-6,500,000]	[16,000,000-19,000,000]
The goods subject to review imported into the UK during the POI and <b>consumed</b> by your own company	-	-	-
The goods subject to review imported into the UK during the POI and <b>exported</b>	-	-	-

[Confidential business information concerning certain transactions – the disclosure of that information would provide competitors with a competitive advantage and is not susceptible to a meaningful summary]

<sup>1</sup> The value in GBP reflects the purchase price.



Please provide the total volume and value of the like goods imported by your company from all other countries during the POI:

	Volume (No of tyres)	Volume (Kg)	Value in GBP (£) <sup>2</sup>
The like goods imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	[110,000-140,000]	[6,000,000-7,200,000]	[23,000,000-27,000,000]
The like goods imported into the UK during the POI and <b>resold</b> in the UK	[110,000-140,000]	[5,500,000-6,500,000]	[23,000,000-27,000,000]
The like goods imported into the UK during the POI and <b>consumed</b> by your own company	-	-	-
The like goods imported into the UK during the POI and <b>exported</b>	-	-	-

[Confidential business information concerning certain transactions – the disclosure of that information would provide competitors with a competitive advantage and is not susceptible to a meaningful summary]

### C3 – Like goods purchased from a UK producer

If you have also **purchased like goods** from a **UK producer** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.

<sup>2</sup> The value in GBP reflects the purchase price.



	Volume (No of tyres)	Volume (Kg)	Value in GBP (£)
Like goods purchased from UK producers during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	[4,500-5,500]	[340,000-400,000]	[725,000-850,000]
Like goods purchased from UK producers during the POI and <b>resold</b> in the UK market	[4,250-5,000]	[300,000-350,000]	[800,000-950,000]
Like goods purchased from UK producers during the POI and <b>consumed</b> by your own company	-	-	-
Like goods purchased from UK producers during the POI and <b>exported</b>	-	-	-

[Confidential business information concerning certain transactions – the disclosure of that information would provide competitors with a competitive advantage and is not susceptible to a meaningful summary]



## Section D – Additional information

### D1 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below.

Organisation name	Website
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]

### D2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the exporting country or territory, please provide details in the box below. This can include examples such as:

- Prices are artificially low
- There is significant barter trade (e.g. goods exchanged for other goods)
- Prices reflect non-commercial factors; or
- Anything else

HKTUK submits that neither tyres nor the main raw materials used in the manufacture of tyres (namely natural rubber, synthetic rubber and carbon black) are affected by a PMS in China. In particular, no significant distortions affecting these markets in China could be identified. In this regard, the following should be noted.

First, neither the price for tyres nor the price for natural rubber, synthetic rubber and carbon black is regulated or otherwise influenced by government intervention in China. Therefore, there is no indication whatsoever that the price for these materials in China is not the results of market forces.



Second, Hankook Group is in any case completely free from government intervention. In particular, the Chinese government has no influence whatsoever in the corporate management of Hankook Group. [CONFIDENTIAL – commercially sensitive information].

Third, there are no distortions affecting the cost of production of JHKT and CHKT. The price actually paid by JHKT and CHKT to buy natural rubber, synthetic rubber and carbon black is in line with international benchmarks. It follows that Hankook Group's cost of production is undistorted.

### D3 – Scope

Do you agree with the scope of the investigation as outlined on page 3?

Yes

No

If you have answered no to the above question, please can you explain why?



The product scope of this transition review is defined as “*certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries, with a load index exceeding 121*”. New tyres are classifiable under tariff code 4011 20 90 00, while retreaded tyres are classifiable under tariff code 4012 12 00 10.

The product scope, as determined by the TRA in the Notice of Initiation, is particularly broad and includes different categories of products which share some common features but which also differs significantly. These categories of products can be generally defined as follows:

- a) new multi-life (retreadable) tyres for buses and lorries (“**multi-life tyres**”). Multi-life tyres are high-quality new tyres which can be retreaded, i.e. refurbished through the replacement of the tread. Depending on their quality, multi-life tyres can be further distinguished in two sub-categories:
  - a. **Premium tyres.** Premium tyres ensure a high level of retreadability (at least two retreading when the tyre is subject to a normal use, which corresponds to an average life span of 660,000 km). Premium tyres generally bear the flagship brand of main manufacturers, which justifies higher prices for expected high performances as well strong marketing investments. Premium tyres are generally associated with a higher level of safety and are often accompanied with a good level of after-sale services. Original equipment for lorries or buses manufacturers are primarily premium tyres.
  - b. **Non-premium tyres.** Non-premium tyres are of lower quality compared to premium tyres but are generally retreadable at least once when subject to a normal use (which corresponds to an average life span of 440,000 km). Brand recognition remains important, but prices are lower compared to premium tyres (approximately between 65 % and 80 % of the price of premium tyres). Original equipment for trailers manufacturers can be non-premium tyres (in addition to premium tyres).
- b) new single-life (non-retreadable) tyres for buses and lorries (“**single-life tyres**”). Single-life tyres are new tyres but of lower quality compared to multi-life tyres, which makes them unsuitable for retreading. As a result, they have a shorter life span (the normal life span of a multi-life tyre before retreading is around 220,000 km but single-life tyres often have a life span of approximately 120,000 km due to their low quality) and are typically cheaper than multi-life tyres. Brand recognition is almost non-existent for single-life tyres and price (in general, less than 65 % of the price of premium tyres) is the determining factor in the customer's decision to purchase.



Bearing the above in mind, JHKT submits that the product scope of this transition review should be modified as to exclude multi-life tyres. The request is supported by two main justifications, namely (A) Multi-life tyres are not interchangeable with single-life and retreaded tyres, and (B) the exclusion of multi-life tyres from the scope of the transition review is in the economic interest of the UK.

**(A) Multi-life tyres are not interchangeable with single-life and retreaded tyres**

As discussed at length, *inter alia*, in the original investigation carried out by the European Commission (the “*original investigation*”), key differences exist between, on the one hand, new tyres (whether multi-life or single-life) and, on the other hand, retreaded tyres. These differences concern, in particular (but not limited to), the manufacturing process and the factors of production used in that process (including equipment and workforce). In fact, while the production process for new tires begins with rubber mixing and undergoes tire building and curing, for retreaded tires the production process amounts to the simple replacement of the tread on old casings. For this reason, the retreading is sometimes considered as a simple aftermarket service. In addition, there are differences in terms of use, distribution channels, customers between new and retreaded tyres. Based on these considerations, the investigating authorities in several jurisdictions across the world, such as the US, India, the EEC, and Egypt have consistently concluded that new and retreaded tyres constitute separate markets.

In the original investigation, however, the Commission followed a different – and, in a sense, unprecedented – approach and concluded, in essence, that new and retreaded tyres should be considered as a single product because a high level of interchangeability exists between, in particular, single-life tyres and retreaded tyres (both falling into “Tier 3”, according to the Commission’s analysis of the market, while premium tyres would be in “Tier 1” and non-premium tyres, in “Tier 2”). In particular, the Commission emphasized that “*users are aware that, performance-wise, retreaded and low-quality new tyres [i.e., single-life tyres] are not significantly distinguishable. That interchangeability in turn, establishes price as the determining factor in the customer’s decision to purchase a retreaded tyres or tier 3 new tyres [i.e., single-life tyres]*”. (See Reg. (EU) 2018/683, para. 141, confirmed by Reg. (EU) 2018/1579, paras. 138-144)

Based on the above, HKTUK respectfully submits that – if any interchangeability exists between the different categories of tyres – such interchangeability only exists between single-life tyres and retreaded tyres. By contrast, multi-life tyres are a clearly different product which, as such, should be treated separately. In fact, multi-life tyres have important characteristics that distinguish them from single-life and/or retreaded tyres. In particular:



- **Quality:** Multi-life tyres such as those manufactured by CHKT have a significantly longer life span than single-life and/or retreaded tyres due to their better quality. As the Commission acknowledged in the original investigation (See Reg. (EU) 2018/683, para. 55), multi-life tyres allow up to three retreadings for a normal use (amounting to 880,000 km), and thus offer significantly higher mileage than single-life and/or retreaded tyres. Additionally, the quality difference between multi-life tyres and, in particular, single-life tyres is significant and depends on technical characteristics including, in particular, the under-thread thickness (UTT). As regards retreaded tyres, it should be noted that - despite having the appearance of a new multi-life tyres - they bear the limitations caused by the ageing of the casing.
- **Warranty and after-sale services:** multi-life tyres are often accompanied by a casing warranty (for a certain number of years) and a good level of after-sale services. For instance, [CONFIDENTIAL – commercially sensitive information]. By contrast, single-life and retreaded tyres are generally not covered by casing warranty and are not accompanied by after-sale services of any type.
- **Use:** As acknowledged *inter alia* in the original investigation, while the great majority of single-life and/or retreaded tyres are used either on truck trailers and the drive axle of the truck, multi-life tyres are generally preferred on the steering axle. Due to safety concerns, as a general rule, the higher the importance of the tyre's position on the truck, the more likely is that high quality multi-life tyres will be used.
- **Channels of distribution:** multi-life tyres are mainly sold to trucks/trailers manufacturers. By contrast, single-life and retreaded tyres are mainly sold as replacement tyres to end-users, directly or through distributors. From the perspective of the OEMs, the cost of tyres represents a marginal part of the overall truck production cost. But tyres are a visible and performance-related element of the truck which may influence the purchasers' decision to buy and, later on, the purchasers' ex-post valuation of the vehicle. Therefore, lower quality tyres, whether single-life or retreaded, are normally not used as OE.
- **Consumer perception:** Brand recognition is very important for multi-life tyres, while it is virtually non-existent for single-life and retreaded tyres. Moreover, multi-life tyres (and the relevant brands) are generally associated with a higher level of quality and safety. In this regard, the Commission emphasized, e.g., that “*technical, quality and safety perception differences arise between two new tyres from different tiers*” (see Reg. (EU) 2018/683, para. 73, confirmed by Reg. (EU) 2018/1579, paras. 71). In general, retreadability is a key characteristic for marketing purposes insofar as it justified higher prices.



- **Price:** Multi-life tyres generally bear the flagship of an important brand. They also have a significantly longer life span compared to single-life and retreaded tyres, which justifies significantly higher prices in return for expected high performances as well particularly strong marketing investments. By contrast, the low price is in general the determining factor in the customer's decision to purchase single-life and/or retreaded tyres. According to the Commission, there are significant price variations between high quality (i.e., multi-life) and low quality (i.e., single life and/or retreaded) tyres and this distinction is fully integrated by manufacturers who model their products characteristics, performances and marketing strategies around the quality of tyres, as well as by consumers in their purchase decisions.

All the above elements should lead the TRA to conclude that multi-life tyres are significantly different from retreaded and single-life tyres.

#### **(B) The exclusion of retreadable tyres is in the economic interest of the UK**

In addition, HKTUK submits that the exclusion of retreadable tyres from the product scope is also in the economic interest of the UK.

In this regard, it should be noted that, based on HKTUK's best knowledge, there are **no imports of retreaded tyres from China into the UK**. This means that the goods under review are new tyres only (whether multi-life or single life). Moreover, in the UK, there are **no manufacturers of new tyres** (whether multi-life or single-life), but only manufacturers of retreaded tyres (i.e., retreaders). This means that the like goods (i.e., the tyres manufactured in the UK) are limited to retreaded tyres.

However, as explained above, retreaded tyres are interchangeable (and therefore, in competition) with single-life tyres only. Therefore, the only imported products that may cause or threaten to cause injury to the UK industry are single-life tyres, while **multi-life tyres cannot be the cause of any injury to the UK industry**.

Quite on the contrary, it should be recalled that the casings of multi-life tyres are the key input materials for UK retreaders. Without sufficient imports of multi-life tyres (and in the absence of UK production), UK retreaders would lack the key input material to carry out their business. Therefore, it is in the economic interest of the UK retreading industry (as well as to all their downstream customers) to have sufficient, stable and viable source of supply of multi-life tyres, exempted from AD/CVD measures.

It follows that the exclusion of retreadable tyres from the scope of this transition review would benefit the UK retreading industry.



**(C) Conclusion**

All the above points to the conclusion that multi-life tyres such as those produced and exported to the UK by JHKT and CHKT should be excluded from the product scope. This exclusion is in the economic interest of the UK industry, and it is in line with the TRA’s practice of comparing the like domestic product and the product under consideration on the basis of the criteria such as differences in the (i) physical characteristics, (ii) usage, (iii) sales channels and (iv) perception in the eyes of the consumers.

As a subordinate ground, should the TRA rejects HKTUK’s scope revision request, *quod non*, it is respectfully submitted that the measures should be revoked. In fact, while the goods imported from China are new tyres only, it should be recalled that there is no production of new tyres in the UK (whether multi-life or single-life). Thus, imports of new tyres from China cannot cause any injury to the UK industry.

HKTUK reserves the right to further supplement the above position in future submissions.

**D4 – Product Control Numbers**

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

We have created a draft PCN table and enclose this here for you now.

Category:	Section Width (in mm or inches)	Aspect Ratio (% of section width)	Construction	Rim / Wheel Diameter (inches)	Tyre Position	Winter Tyre	Tubeless or Tubetype Tyre
Expected input:	numerical measurement	numerical measurement	R - radial, B- Bias	numerical measurement	F - front, D - drive, T - trailer, Z - multi-position	Y - yes, N - no	TL - tubeless, TT - with tube

Please review the draft PCN structure for this review shown in the table above.



HKTUK respectfully submits that an additional digit should be added to the proposed PCN structure, as to reflect the so-called “undertread thickness” (“UTT”). The UTT measures, in essence, the distance from the bottom of the groove to the top of the outermost belt.

[CONFIDENTIAL – commercially sensitive information]

The UTT influences important characteristics of tyres including heat resistance, durability, regeneration, cut resistance, and chipping. For this reason, the UTT also depends on the intended use of each particular model of tyre.

For instance, Hankook Group applies the following UTT standards:

[CONFIDENTIAL – commercially sensitive information]



The UTT also reveals to which extent tyres can be regrooved and retreaded.

In particular, for the purpose of retreading, tyres that have passed initial inspection are buffed to remove the remaining tread and prepare the surface of the tyre to receive the new tread. During the buffing phase, the under-tread area is grounded. If the UTT is too thin, the under-tread area cannot be grinded as needed, which compromises the whole retreading process. Therefore, the thicker is the UTT, the higher is the retreadability, and vice-versa (the thinner is the UTT, the lower is the retreadability of the tyre).

In general, when the UTT is or more than 3 mm, the tyre is retreadable. Premium tyres typically have an UTT of at least 5 mm (or more). By contrast, cheap single-life tyres can have a UTT of just 2 mm. This thin layer of under tread is the result of efforts to reduce costs to sell at low prices.

In fact, the UTT affects the cost of manufacturing. Tyres with an UTT of 2 mm are from [CONFIDENTIAL – commercially sensitive information] to produce compared those having a UTT of more than 5 mm. This cost difference stems from the amount of natural and synthetic rubber consumed. Additional information about UTT measurement and its impact on manufacturing cost is provided in [Attachment 1](#) [CONFIDENTIAL – commercially sensitive information].

The introduction of an additional digit of the PCN reflecting the UTT is justified by the fact that none of the characteristics of the current PCN structure is capable of capturing the difference between multi-life tyres and single-life tyres. However, it is widely recognised that retreadability is one of the main characteristics, as well as one of the main marketing factors in the truck & bus tyre market and, therefore, heavily impacts price. While the average life span of tyres is about 220,000 km, the lifespan of premium tyres (which can normally be retreaded at least twice) amounts to around 660,000 km. By contrast, the life span of single-life tyres is only 120,000 km. In light of the above, HKTUK suggests that the following digit should be added to the PCN:

Category:	Under-tread thickness (retreadability)
Expected input:	Y - UTT > 3 mm N - UTT < 3 mm



### D5 – Economic Interest Test

It is a requirement of the review to conduct an Economic Interest Test (EIT). The aim of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods). Please confirm in the final column if we are able to contact these companies.

	Company name	Company location (city, country)	Company Contact Information (email/telephone)	Relationship	Can we contact Y/N
1	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
2	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
3	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
4	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
5	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
6	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]



7	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
8	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]

### D6 – Anything else

Please use the box below to provide information about anything else you consider relevant to this review.

HKTUK would like to provide the TRA with all the information necessary to recalculate the dumping amount and the injury margin for Hankook Group. Hankook Group would likely to express its strong interest in being sampled or otherwise individually examined in this transition review.

Now you have reached the end of this questionnaire please ensure that you have prepared a confidential and non-confidential version and indicated the status of each within the header. The non-confidential version should redact personal contact information, names, signatures, and exact sales quotes. Redacted figures should be replaced with a range where possible. Please return both versions to the TRA using the Trade Remedies Service ([trade-remedies.service.gov.uk](https://trade-remedies.service.gov.uk)).