



10 April 2012

Ms Joanne Reid
Director, International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
Canberra ACT 2600

Dear Ms Reid,

ALUMINIUM ROAD WHEELS FROM CHINA

We submit the following comments in response to Arrowcrest's submission of 26 March 2012 concerning Customs' visit report re Mullins Wheels.

1. HSV

While Customs will examine the period 2006 to 2011 in its injury assessment, it is only injury experienced during the investigation period (IP) which can be attributed to dumped/subsidised exports from China.

Arrowcrest's loss of 50% of its volume to HSV occurred after the IP.

2. Suzuki Australia

Customs' visit report re Arrowcrest ("the visit report") states that –

(a) following the GFC (2008) Arrowcrest lost the majority of Suzuki's business to YHI Australia; and

(b) Arrowcrest's 2009 quote for Suzuki's new Swift wheel was unsuccessful.

It is reasonable to assume that most, if not all, of Arrowcrest's sales to Suzuki were lost before the IP.

3. General Motors Holden

Arrowcrest's supply to GM Holden ceased well before the IP – para 11.1.5 of the visit report refers.

That Arrowcrest was not successful in its tender for the Holden Cruze wheels does not represent injury experienced during the IP.

Furthermore, in its submissions (2) to this investigation and in its comments to Customs during the visit report re GM Holden, Holden makes it clear that its choice of ARW suppliers depends on a number of factors other than price, eg reliability of

quality and quantity of supply. It cannot be assumed that Arrowcrest lost the Cruze tender because of dumping and/or subsidisation from China.

4. AM sector

Mullins reiterates the irrelevance of Arrowcrest's claim of rapid growth in imports from China since 2003 and its loss of sales since 2003.

It is of important note that neither Performance nor Dragway supported Arrowcrest's application for imposition of dumping duty – Arrowcrest is the sole applicant. There has been a submission from Dragway supporting Arrowcrest's position but nothing from Performance.

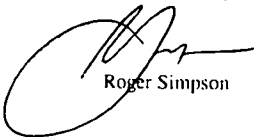
5. Causation

Arrowcrest's claims concerning Mullins' update of its wheel styles is incorrect. Mullins provided Customs with the history of its wheel styles at Customs' verification visit.

Arrowcrest's statement that Mullins' wheel styles are sold by its Chinese manufacturers to markets other than Australia is false.

Mullins reiterates its previous submission that Arrowcrest has inflicted injury upon itself by reducing sales and marketing activities to a very low level. This reduction in sales and marketing services, together with its rejection of major customers Bob Jane and Beaurepaires, is a key factor in Arrowcrest's loss of sales volumes and market share.

Yours sincerely,



Roger Simpson