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185

ARROWCREST GROUP

Public File Version

21 February 2012

Ms. Joanne Reid
Director, Operations 2
International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
CANBERRA ACT 2601

Dear Joanne,

Reference : Arrowcrest response to Versus submission.

I refer to the submission on behalf of Versus dated 21 December 2011.

Background

It is Arrowcrest's understanding that Mullins Wheels initially resisted the prospect of closing its Australian manufacturing operations but, faced with the same injury indicators experienced by the remaining three Australian manufacturers at Performance Wheels, Dragway and Arrowcrest, and as a result of dumped and subsidized ARWs from China, Mullins elected to close its local production and switch instead to importing CSA branded wheels from at least one unrelated Chinese manufacturer.

It is Arrowcrest's experience that, prior to the onset of dumped and subsidized ARW exports from China, Mullins had competed fairly with ARW imports from other countries including Indonesia, Malaysia, Philippines and Taiwan, for example.

Arrowcrest rejects the assertion that Mullins chose to close its Australian manufacturing operations on the basis that it might access better manufacturing technology and efficiency by purchasing someone else's ARWs. Aside from employing a skilled local workforce, Arrowcrest understands that in the early 2000's, Mullins had upgraded at no small cost its melt shop, diecasting and wet-coat paintline facilities at its Salisbury, South Australia factory.

Arrowcrest therefore contends that Mullins would require significant financial offset to enable it to shoulder the extra-ordinary costs associated with its ultimate decision to close down its Australian production operations in favour of importing ARWs from China from 2007 onwards.

Page 1 of 9

General Notes on the Application

Normal Value Calculation

In Part B of its application Arrowcrest has provided constructed costs to make ARWs in China working backwards from finished ARW weights to calculate aluminium consumed, paint and packaging, labour content and variable and fixed overhead cost per ARW. Output rates, labour content and depreciation are based on the low pressure diecasting (LPDC) method.

Dumping margins are derived from a comparison of those constructed costs with independently researched normal values in China. The dumping margins referenced by Arrowcrest are the averages for ARWs from a number of exporters.

Gravity (GDC) diecasting relies on molten aluminium filling a die under the force of gravity. Conversely, in the LPDC method molten aluminium is pumped into the die under pressure (typically around 1 bar). A brief comparison of the two methods follows:¹

"Gravity casting is a method of manufacturing a cast wheel of a specific metal alloy, typically aluminum, although Magnesium is also used, which involves supplying molten metal to a mould cavity via a feeder through a running system where the molten metal entry point is located above the top of the mould cavity. In this manufacturing process all the metal entering the mould is subject to turbulence. This turbulence can cause severe defects such as oxide inclusions and entrapped gas porosity and in some cases mould erosion and hotspots.

Low-pressure casting in the other hand takes care of the disadvantages of Gravity casting by filling the mould through an in-gate just below the top of the mould cavity from a source under the mould through a method which allows complete filling of the mould. The force of gravity acts against the upward flow of the metal and eliminates the possible turbulence caused by the falling liquid metal. The molten metal is stored in a pressured container and by increasing the pressure metal is then forced into the mould.

Low Pressure Casting Compared to Gravity Casting

In low-pressure casting the method in which the metal is forced into the mould is the main difference/advantage over gravity casting and is absolutely controlled. As explained above it results in a low turbulence or turbulence-free mould filling with little to no corrosion.

The molten metal in the furnace is in a closed container under protected atmosphere. Because of this the metal absorbs less hydrogen and any other impurities as well as the oxide formation being greatly reduced. As opposed to gravity casting, the metal surface is not interrupted constantly since it is been forced from under the metal surface. What you get is a very clean quality metal.

¹ <http://www.e90post.com/forums/showthread.php?t=295274>

Basically low-pressure casting uses positive pressure to move molten metal into the mold quickly thus resulting in a finished product with an Aluminum that is denser than Gravity cast. The cost involving the production of low-pressure cast are higher than gravity

As per Tlrack.com:

GRAVITY CASTING
Gravity casting is the most basic process of pouring molten aluminum into a mold utilizing the earth's gravity to fill the mold. Gravity casting offers a very reasonable production cost and is a good method for casting designs that are more visually oriented or when reducing weight is not a primary concern. Since the process relies on gravity to fill the mold, the aluminum is not as densely packed in the mold as some other casting processes. Often gravity cast wheels will have a higher weight (emphasis added) to achieve the required strength.

LOW PRESSURE CASTING
Low pressure casting uses positive pressure to move the molten aluminum into the mold quicker and achieve a finished product that has improved mechanical properties (more dense) over a gravity cast wheel. Low-pressure casting has a slightly higher production cost over gravity casting. Low pressure is the most common process approved for aluminum wheels sold to the O.E.M. market. Low-pressure cast wheels offer a good value for the aftermarket as well. Some companies offer wheels that are produced under a higher pressure in special casting equipment to create a wheel that is lighter and stronger than a wheel produced in low pressure. Once again in the quest for lighter weight, there is a higher cost associated with the process.

In a Wheel Quality perspective
The advantages of low pressure die casting process are several :
- higher yield achievable
- reduction of machining costs
- excellent control of process parameters
- good metallurgical quality
- leads to an optimal use of the aluminum
- excellent mechanical and technological properties of the castings.

Disadvantages of gravity die-casting:
- High porosity rate
- High absorption of impurities
- Less dense material which results in a heavier wheel to be able to achieve the required load rating
- Very high process variations which leads to more defective units

Gravity casting does get the job done but with a higher rate of defective units as opposed to a stronger and lighter wheel made by low-pressure casting."

Arrowcrest agrees that capital and tooling costs to establish a GDC operation can be lower than capital and tooling costs to establish an LPDC operation of similar capacity. Arrowcrest notes however that a GDC operation still requires furnace facilities, heat treatment plant, numerically controlled lathes, cleaning and metal pre-treatment facilities and paint line of the same kind required to produce LPDC ARWs.

The GDC "savings" referred to in PWC's submission are in truth confined to the cost of diecasting machines and casting dies only, and these "savings" do not translate into savings in the capital cost of plant for preceding and subsequent operations necessary to produce ARWs.

Regardless of which casting method is employed, in reality the diecasting machine and casting die capital cost content per ARW is negligible when compared to the aluminium, energy, paint, packaging and sundry consumables cost content per ARW. There are no advantages in material or energy content when using GDC as opposed to LPDC.

As noted, GDC does not produce lighter ARWs than LPDC and it is typical that a GDC ARW will be heavier than an LPDC ARW for the same end-use application.

In Arrowcrest's experience (having operated GDC for around 31 years until 2011), the method of pouring a casting using GDC is up to 450% less efficient than using LPDC, before adding the cost of higher rejects arising from the GDC method.

The die-fill riser and rim feed riser for GDC is significantly heavier than the sprue removed from LPDC castings, i.e. 3.5kg to 4kg as compared to 0.161kg. In GDC this could account for around 60% of the metal poured remaining in the finished ARW and 40% being removed as riser and swarf. It is Arrowcrest's experience in GDC that the riser can be remelted and repoured (after appropriate fluxing to clean the recovered metal of oxides and impurities), but this does not make the aluminium in the finished ARW any cheaper. The melt losses and cleaning costs associated with re-melting heavy risers adds cost to the metal used to produce the finished product.

Conversely, if the majority of AM ARWs in China are produced using the GDC method and this method was cheaper than LPDC, then the dumping margins calculated by Arrowcrest (using independently researched normal values in China), would in fact be higher than presented in Arrowcrest's application.

The Goods Under Consideration

Arrowcrest closed its Philippine ARW manufacturing operation in 2008. Remaining stock in Australia produced in its Philippine's plant is marked "Made in Phil".

Since the closure of its Philippine ARW manufacturing operation, where only some of its ARWs were produced, Arrowcrest produces all of its ARWs at its Woodville North facility and does not import any of its ARWs. Arrowcrest's 2010-11 catalogues are up to date.

Whilst Arrowcrest does not manufacture ARWs solely for caravans and trailers, it does supply its ARWS to the Australian caravan and trailer industry, albeit at substantially reduced volumes due to imports of ARWS from China at dumped and subsidized prices.

The processes and technologies required to produce ARWs for caravans and trailers are the same as those required to produce ARWs for passenger and 4wd motor vehicles, albeit that vehicle manufacturers might have varying standards and specifications for the ARWs fitted to their vehicles.

As noted, Arrowcrest does supply its ARWs to the caravan and trailer industry in Australia and does supply ARWs to the standards and specifications required for this industry.²

Arrowcrest's wet spray clearcoat finish surpasses its automotive customers' specifications for exposure to alkalinity, salt, humidity, gasoline, adhesion and chipping. Arrowcrest's ARWs are fitted to a wide range of vehicles that tow caravans and trailers and certainly Arrowcrest's automotive customers, for example, do not experience in-field claims relating to extended or frequent exposure to water.

Arrowcrest has also manufactured and supplied ARWs fitted with steel inserts, including for caravan and 4wd applications. It is Arrowcrest's experience that a steel insert is typically used in wheels produced using the GDC method, but not in wheels using the LPDC method. As noted, the GDC method typically results in a "spongier", less dense material in the finished ARW. Arrowcrest has the facility to fit metal inserts if and when required.

Arrowcrest tests its ARWs to numerous industry standards, including the Australian standard AS1638. Arrowcrest also tests to SAE, JIS and ISO standards.

Arrowcrest produces ARWs to specific (and varying) wheel offsets, widths and bolt patterns (PCD) including for caravan and trailer fitment. Whilst there are no industry or ISO standards for these dimensions for caravans or trailers, it is increasingly common that buyers of caravans and trailers look for interchangeability of ARWs between the towing and towed vehicles. For this reason, Arrowcrest's 4wd ARWs are fitted to some manufacturers' off-road camper/caravan trailers. Caravan and trailer manufacturers in Australia have, since at least the early 1970s, also used Arrowcrest's and others' 4wd steel wheels for the same reason.

Material Injury.

Global Financial Crisis.

Arrowcrest's sales volumes in FY09 were 33% lower than the sales volumes it achieved in FY08.

² See attachments for examples.

In FY09, Arrowcrest's share of the available market decreased by 12.5%, whilst imports from China increased their share of the available market that year by 37.5%.

Imports from China increased in terms of both volume and market share during the global financial crisis whilst volumes and market share for all other countries and the Australian industry fell.

Automotive Competitiveness and Investment Scheme.

ACIS was replaced by the Automotive Transformation Scheme (ATS). Arrowcrest's injury factors are not distorted by any eligibility under either scheme.

Tariff reductions.

Tariff reductions and FTAs do not account for the wholesale swing away from ARWs manufactured in Singapore, Thailand and the United States to imports from China. Please refer to Arrowcrest's application Part A, pages 38 to 42.

Likewise the onset of rapid growth in imports from China (ABS data suggests by 738% over the past eight years) pre-dates the strengthening of the Australian dollar.

Arrowcrest rejects the reference to "inefficient Australian manufacturers".

Other.

Arrowcrest is not aware of the September 2010 IBIS report referred to by PWC, and Arrowcrest was not consulted in its preparation. In the 2008-09 period for example, Arrowcrest did not produce gearboxes, steering and suspension parts, motor accessories or clutches.

Internal Factors.

Failure to adapt to design trends.

It is not uncommon for those engaged in the manufacture and/or distribution of ARWs to be quick to compare other market participants for a perceived lack of developments in design, fashion and technology. It is also not uncommon for some participants to introduce accoutrements, such as clip-on plastic wheel attachments in an attempt to establish a point of difference but these are attachments not prevalent in the Australian market. Arrowcrest can certainly produce its ARWs to include plastic attachments if required.

It is Arrowcrest's experience that the majority of end-use consumers do not routinely scrutinize the field for the latest design, fashion or so-called technology in isolation from appealing styling. As noted, Versus does not update its "highly popular models" but does instead test the market with updates of its product offering on a quarterly basis. Arrowcrest contends that the manufacturer of ARWs for Versus sells those ARWs in markets outside Australia, also at dumped and subsidized prices, which affords the manufacturer a large base from which to quickly recover its tooling investments.

Arrowcrest routinely updates its styling with the introduction of new finishes and styles, albeit that its ability to invest in new dies for new styles and sizes has been severely hampered as a result of volumes and market share lost to ARWs imported from China at dumped and subsidized prices.

Arrowcrest rejects the notion that it would inflict injury upon itself.

As a result of Arrowcrest's experience with copies of its ARWs produced and imported from China, (with very little real opportunity to redress damages arising), Arrowcrest has not registered any of its new designs since around 2007.

Arrowcrest does attend and promote at numerous market events and in various venues, including sponsorship and promotion at V8 Supercars, the AFL, Wheels magazine, Street Machine magazine, Unique Cars and other media outlets. Arrowcrest has however stopped attending niche market events such as Auto Salon, because it cannot compete on price with imported ARWs from China in the "Hot 4" and similar youth-oriented sector where price is a significant determining factor in the purchasing decision.

Arrowcrest notes that it uses diamond tip cutting tools for all of its "machined-face" and "machined-lip" finishes. Arrowcrest employs Japanese and Italian CNC machining equipment together with readily available diamond tooling in its Australian operations and has done so for at least the past twenty years. Performance Wheels and Dragway (and previously Mullins Wheels), also access and employ this technology in Australia.

Arrowcrest can adopt PVD, Vacuum Chrome or Sputtering technology but demand for this type of finish in Australia is low.

Arrowcrest first used clearcoat colouring in its "ZS-SP" range of wheels in the mid 1990's, prior to the incorporation of Versus as a wheel distributor in Australia. Arrowcrest was first in the Australian market with this technology which is not new and, currently, not in mainstream demand.

Arrowcrest has investigated stainless steel lip technology but again the demand for this accoutrement is low and there are problems associated with cleaning and maintaining clip-on stainless steel rings on ARWs.

Plastic wheel attachments and machined accent rings are not mainstream accoutrements in the ARW market in Australia despite being available for the past four or five years.

Arrowcrest produces staggered ARWs for HSV and for the aftermarket. Arrowcrest's 2010-2011 catalogue references a wide range of applications covering all popular small, mid and large passenger vehicles and 4wd's, necessitating a variety of four-stud, five-stud and six-stud fitments.

Arrowcrest produces 20" ARWs and can produce 22" ARWs. The latter size is not widely used in the Australian market but as this size is common in the U.S. market it is quite straightforward for importers of ARWs from China to include 22" ARWs in their product line-up. There is a degree of "one man upmanship" in the marketing of ARWs in the Australian aftermarket but size is not necessarily a guarantee of sales performance.

Failed Philippines venture and over-reliance on outdated steel technology.

Customs has verified that Arrowcrest's injury factors do not include losses arising from the closure of its Philippine operations. The closure was brought about by the fact that Arrowcrest's Philippines operation could not compete against Chinese ARWs in the American market, despite having similar costs of capital, energy and labour.

Arrowcrest repatriated its ARW dies from the Philippines and commenced Australian production of those ARWs providing continuity of supply and sales.

The Philippines facility was acquired to service the American market and was run by local management domiciled in the Philippines and in America. Arrowcrest's local Australian business continued on-foot unimpeded by the lack of success experienced in the American market.

At the time when major caravan manufacturers trended away from steel wheels to ARWs, commencing in earnest in 2006/07, Arrowcrest quoted to supply Tyres 4U, for example, with ARWs for this industry. However Arrowcrest could not compete with the prices for ARWS from China and was unsuccessful in winning business at Jayco Caravans, for example.

It is the Australian industry's experience that the unfair price advantage is so attractive that a majority of caravan and trailer manufacturers who previously purchased the Australian industry's wheels, in particular Arrowcrest's and Performance's wheels (steel and ARW), now directly import their wheel requirements from China.

Over-reliance on the OEM segment to support revenue growth.

As noted in its application, neither Arrowcrest nor the other members of the Australian industry set about to lose OEM or aftermarket business in Australia.

It is true however that as a result of its losses to imports of ARWs from China at dumped and subsidized prices that Arrowcrest is very reliant on its long term relationship with Toyota.

Arrowcrest notes that in 2006 when Holden released the VE model Commodore, Holden did not fit 20" ARWs direct from the factory. Arrowcrest did however supply staggered 20" ARWs to Holden's performance offshoot, Holden Special Vehicles.

Arrowcrest introduced its first aftermarket 20" ARW for fitment to Holden's Commodore model (and other makes including Ford), in 2007.

Failure to take advantage of growing distribution channels within the AM segment.

Arrowcrest has resisted selling direct to the public in a bid to support its traditional aftermarket customer base which comprises retail tyre outlets.

Arrowcrest has however sold wheels to the public on a small scale when private consumers have approached Arrowcrest for a direct sale.

Since the mid-1970's Arrowcrest has dealt directly with distributors and retailers for all of its wheel products, including ARWs, and does pay rebates at a corporate head office level. However, as noted in its application, Arrowcrest struggles to afford the level of rebates currently paid by importers of ARWs from China at dumped and subsidized prices.

Arrowcrest operates decentralized warehouses and sales outlets in Perth, Brisbane, Sydney and Melbourne, as well as from its head office in Adelaide.

The trend to distribute ARWs by working directly with distributors and retailers commenced with the inception of the AM ARW industry in Australia in the early 1970's and since that time Arrowcrest has not subordinated its selling functions.

Arrowcrest however had no choice but to reduce its sales force from around 2008 in response to continuously declining sales and profitability in its aftermarket ARW business and notes that it is not alone in recording on-going losses and impairment as a direct result of ARWs imported from China at dumped and subsidized prices.

Yours sincerely,



Bill Davidson
General Manager

ROH "IMPACT" ARW

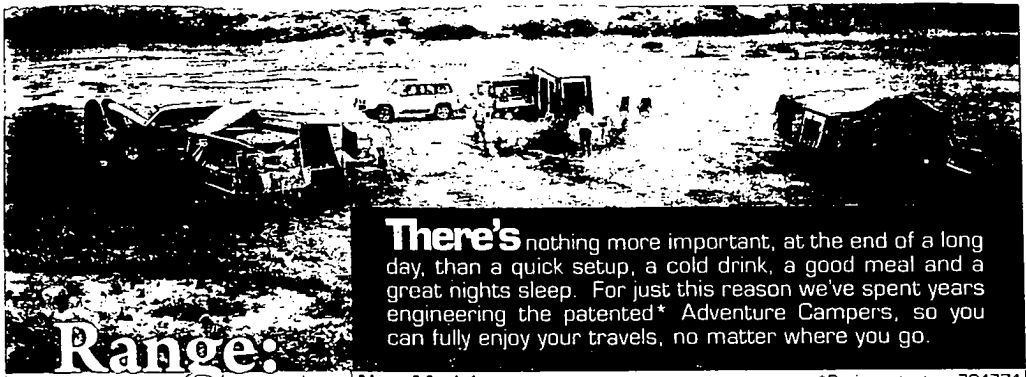
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New Models

*Design patent no. 704771

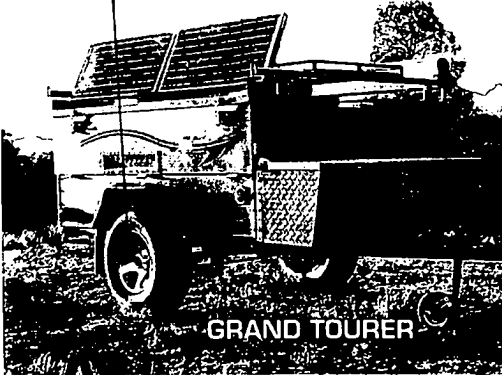
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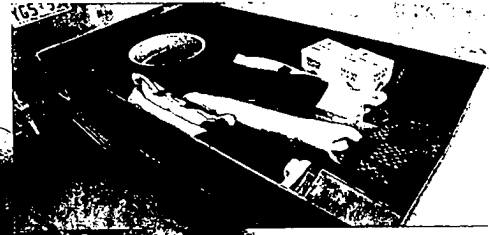
Adventure Stockman

For those not needing a tent we've produced the Stockman Camper Trailer. Most of the fantastic features of the Cape York without the tent. This provides an additional massive roll out storage drawer. Of course the tent can be added at a later stage if required.

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GRAND TOURER



Trailer Floorplan

		2150	1600	
Main Storage	Kitchen	King Size Bed	2050	
Shade Sail	Annexe	Sewn In Floor	Extra Room (Optional)	2300

All Adventure Campers, including the TrayTop, feature the patented bedding system and tough offroad construction.

With 6 models and a host of options there is:

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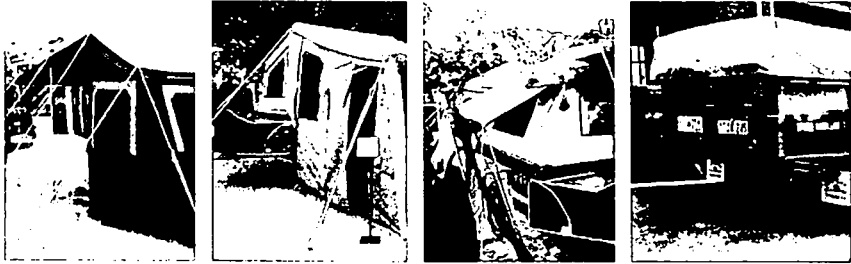
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174

RDA "RTX" ARW



Off Road Soft Floor Camper Trailer



Click on images to enlarge

Camper comes complete with:

7 x 4 Trailer Very Solid Heavy Duty Off Road Trailer

520mm Deep Trailer

Heavy Duty Trailer, 3mm Zincaneal steel main chassis

Tailgate Steel Swing Out Kitchen with 2 Burner Gas Cooker

Deep Cycle Battery & Charger 12V Anderson Plug

Battery Box with Battery/4X 12Volt Sockets

Ladder for Queen Size Bed

Extended Heavy Duty 3mm x 150mm x 50mm Drawbar

Spare Wheel

Special Heavy Duty 60mm, Double Wrap Leaf Springs

Water Tank with Pumps

Hyland Tow-Hitch

16" Tyres & Rims (3 x ROH to match most Vehicles)

Solid Pivoting Jockey Wheel

LED Taillights

Superior Stone Guard

Big Front Mounted Toolbox

2 x 4.5 Kg Gas Bottle Holders & Bottles

3 x 20ltr Jerry Can Holders

Deluxe Heavy Duty Canvas

Queen Size Bed and Extra Pockets to bed Area

High Density Foam Mattress

Gas Struts Under Bed to Trailer

	Basic	Deluxe
Queen Size Mattress with Protector	✓	✓
Double bunks with weight up to 80kg or Self Inflated Mattress	✓	✓
Ladder for Queen Bed	✓	✓
Fire Extinguisher & Blanket	✓	✓
4X12 Volt Sockets	✓	✓
Rope & Pegs for Tent	✓	✓
2X12 Volt LED Ultra Bright Lights	✓	✓
Enviro Mat for Annex	✓	✓
3X Jerry Cans	✓	✓
Walls/Doors with Awning		✓
Table & 4 Chairs		✓
1 Utility Table		✓
80L Waeco Fridge/Freezer		✓
BBQ		✓
Kitchen Ware - includes 4X melamine plates, side plates, cereal bowls, mugs, 1X melamine salad spinner, cutlery, egg rings, can opener, veggie peeler, 4X melamine tumblers, 4		✓

Single Door Entry with Large End Wall Awning Cover
 Dual Lower Vents
 Extra Window Ventilation (A Cool Camper !)
 One Piece Heavy Duty Ripstop PVC Flooring
 Stainless Steel D Rings. Triple Sown to Floor
 Camper Annex 2.2m wide and walls optional
 Draft Skirt over Tailgate
 Bed end Awning (Jackson Awning)
 Water Tank, 60 ltr under Floor with Lockable Filler
 The Simplest Camper to Erect
 Dust sealed Camper. Dust sealed Trailer
 Push bike carrier (optional)
 Boat Racks (optional)
 Generator (optional)

All images are courtesy of Outback Campers

wine glasses, BBQ/kitchen set, grater, bottle opener/cork screw, cutting board, plastic jug with lid, colander, tongs, frypan. 2X plastic storage containers with lids and serving tray		
Double Cast Iron Jaffle		✓
Stainless Steel Teapot/Billy		✓
1X Broom and Dustpan & Brush		✓
Kitchen Pack - includes tea towel, matches, wash cloth, scourer, garbage bags and dish wash detergent		✓
Rope & Pegs for Clothes		✓


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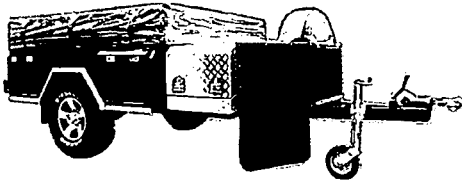
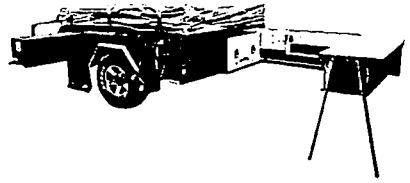
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- ENCLOSED COMPARTMENTER SIDED TRAILER
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- 100W FOLDING SOLAR PANEL
- CONTINUOUS FLOW GAS HOT WATER WITH SHOWER
- CSA 4X4 MAG WHEELS (2) & MAXIS BIG HORN TYRES (2)
- SPARE WHEEL & COVER
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- SECOND ANNEX (SAFARI 12)
- REAR ROOM (FAST FOLD 9)
- LOCKABLE ALUMINUM GULL WINGED FRONT STORAGE
- 10 INCH SOLID HEAVY DUTY JOCKEY WHEEL
- WATER TANK WITH ALUMINUM BASH PLATE
- FULL DRIFTA RETURN SLIDE OUT KITCHEN
- DRIFTA SLIDE OUT STORAGE SYSTEM
- INSIDE SLIDE OUT STORAGE SYSTEM
- BIKE RACK MOUNTING PROVISION / RECOVERY POINT
- DROP & LOCK REAR STABILIZERS
- LED TRAILER LIGHTS

MULLINS

WITH FAST FOLD 9 OR SAFARI 12 TENT



TOURER ON ROAD

- 7' x 4' Trailer
- Full tub construction / Tubbed zinc anneal body
- Checker plate guards & pans
- Zinc anneal front & rear panels
- 100x50x3mm 1.9m draw bar - Semi off road
- 75x50x3mm 1.9m draw bar - On road
- Full length centre draw bar
- 50x50x3mm Cold rolled boxed frame chassis - Semi off road
- Disc override brakes - Semi off road
- 45mm Solid Axle Heavy duty bearings- Semi off road
- 40mm solid axle - On road
- Ford 5 stud pattern

\$5399

FAST FOLD 9 TENT

\$5599

SAFARI 12 TENT

TOURER SEMI OFF ROAD

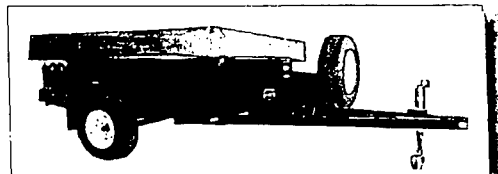
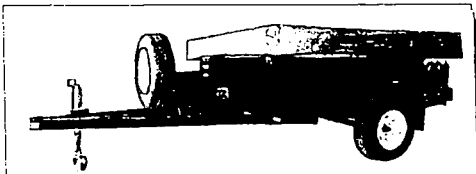
- Swing up 6 inch Ark heavy duty jockey wheel
- 14 x 6 Sunrasia rims - NEW / 14 inch 185 L/T tyres
- NEW Spare wheel
- 2 Rear wind down heavy duty stabilizer legs
- R H Rear swing tail gate
- Rubber automotive seals fitted
- Recovery - bike rack mount
- 2 Jerry can holders
- 1 Gas bottle holder
- Front upright spare wheel mount
- Black agriculture grade enamel paint
- Lockable aluminium front storage box

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FAST FOLD 9 TENT

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SAFARI 12 TENT



All our trailers are fully ADR compliant

Specifications are subject to change without prior notification

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