Anti-Dumping Questionnaire (Importer)
Case AD0075:
Investigation into boom lifts originating in the People's Republic of China (PRC)

Period of Investigation (POI):	1 October 2024 – 30 September 2025
Injury period:	1 October 2021 – 30 September 2025
Deadline for response:	29 March 2026
Contact details:	AD0075@traderemedies.gov.uk
Completed on behalf of:	Dingli Machinery UK Limited

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

☐ Confidential
x Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **29 March 2026.**

Table of Contents

Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

This case is investigating the allegation that boom lifts (please refer to the "the scope of this investigation" for more information on the goods) from the PRC are being dumped (exported to the United Kingdom (UK) at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

Why should I take part?

We are seeking your cooperation as a UK importer of the goods concerned to identify whether an anti-dumping duty may be required to counteract the effect of dumping.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the instructions section below.

Please provide all the information requested by 29 March 2026. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our trade remedies guidance provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at AD0075@traderemedies.gov.uk

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and*

Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019 and under the *Taxation (Cross-border Trade) Act 2018.*

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our public file to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information.

You will be asked to attach supporting documents in appendices to supplement your responses: retain all these documents, your completed spreadsheet annexes, and any calculations you made when developing your responses for use during the verification of your response.

Further guidance and a glossary of terms can be found on the guidance tab of the annexes, along with examples of how to present data for confidential and non-confidential responses, formatting of figures, and overviews of what each section relates to.

Please also note the following points:

- Provide all formulas and calculations used within your questionnaire response. Space has been provided in the Guidance page of the annexes for you to do so.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices.

- Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- **Do not leave any questions blank**. If the question is not relevant to your organisation, please explain why. If the answer to a question is "zero", "no" or "none", please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

Please see our guidance on how to submit information for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.

- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

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 www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods concerned.

Please note, 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.

- If any of your subsidiaries or associated companies are also a UK importer of the goods concerned or the like goods, they should **also** complete an Importer questionnaire. Please make sure you provide your subsidiaries with access to it.
- If your subsidiaries or associated companies are not UK importers but are involved in the downstream sales of the goods concerned or the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex and any additional documents requested, you must upload confidential and non-confidential versions through our Trade Remedies Service. Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please provide all formulas and steps used in your calculations and other related material/documentation as part of your submission to support verification activities.

In some circumstances, verification may be conducted remotely.

We intend to conduct verification between the period 11th to 24th of June 2026. Please indicate any dates when you would be unable to host a verification visit.

Response: We suggest that TRA conduct the verification of Dingli UK at [Redacted – commercially sensitive information]. Dingli UK confirms its availability to host the on-site verification during the proposed period in June 2026. We remain flexible and look forward to coordinating the exact dates with the TRA.

Appendix reference: N/A

Once verification is complete, the TRA will prepare a report and share a draft with you. We will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this investigation

Goods concerned

This investigation covers **boom lifts** originating in the **PRC**, described as:

> *Boom lifts designed for the lifting of people, equipment and/or materials, with a maximum working height of 6 metres or more, and pre-assembled or ready-to-assemble sections thereof, excluding individual components when presented separately (but not excluding the sections (presented individually or together) listed below.) The Goods Concerned may contain additional features that provide for functions beyond the primary lifting function.*

The scope excludes scissor lifts, forklifts, vertical mast lifts (including where described as a 'boom' or otherwise), mobile self-propelled cranes and motor vehicles that incorporate a scissor arm assembly or boom assembly.

These boom lifts are currently classifiable within the following commodity code(s)

8427 1010 10	8427 9000 80	8428 9090 80	8431 3900 90
8427 1010 90	8428 1020 00	8431 2000 60	8427 2090 00
8427 2019 10	8428 1080 00	8431 3100 00	8427 1090 00
8427 2019 90	8428 9090 20	8431 3900 10	

These codes are only given for information.

In this questionnaire, these goods will be referred to as **'the goods concerned**'. Any reference to 'goods concerned' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This questionnaire asks for information about your company's sales and distribution of goods which are **like** the goods concerned. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than the PRC which are like the goods concerned in all respects, or with characteristics closely resembling them.

SECTION A:
Company structure and operations

In this section, we ask you about your company structure and operations, as we aim to understand how your company and any associated companies operate.

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Company information	
Legal name of company:	Dingli Machinery UK Limited
Legal structure (e.g., limited company, sole trader, partnership):	Private limited company
Year of establishment:	2018
Other operating names:	N/A
Company registration number:	11398451
Place of registration:	Nelson House, 2 Hamilton Terrace, Leamington Spa, Warwickshire, CV32 4LY, United Kingdom
Address of main site:	[Redacted – confidential information]
Postcode:	[Redacted – confidential information]
Contact details	
Name (point of contact):	[Redacted – personal information which identifies individuals]
Job title:	[Redacted – personal information which identifies individuals]
Business address:	[Redacted – personal information which identifies individuals]
Telephone No:	[Redacted – personal information which identifies individuals]
Email:	[Redacted – personal information which identifies individuals]
Website:	www.cndingli.com

A2 About your company

1. What is the role of your company in the UK market for the goods concerned and/or like goods? (e.g. buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end user, other).

Response: Dingli Machinery UK Limited (**"Dingli UK"**) is the importer and distributor of the goods concerned. Specifically, Dingli UK purchased the goods concerned from its parent company, Zhejiang Dingli Machinery Co., Ltd. (**"Zhejiang Dingli"**), and resold the goods concerned to customers within the UK and to the third countries.
Appendix reference: N/A

2. We need to check the legal establishment of your company. Supply the latest copies of the following documents:

   a) Articles of association (held by Companies House).
   b) Certificate of incorporation (issued by Companies House).
   c) Any relevant Business License(s) issued by the competent authority for your industry.

   Clearly specify what you are submitting and provide appendix references for your attachments in the box below.

Response: Please refer to **Appendix A2.2.1** for Articles of association, and **Appendix A2.2.2** for Certificate of Incorporation. **RESPONSE TO DEFICIENCY LETTER:** The non confidential version of Appendix A2.2 has now been split into two non-confidential versions of Appendices A2.2.1 and A2.2.2 as requested.
Appendix reference: **Appendix A2.2.1, A2.2.2**

3. Provide details of any changes in the legal form (for example, changing from a private company to a public company, from a limited company to a Limited Liability Partnership (LLP)) and/or structural changes (for example, mergers, acquisitions, change in ownership and/or sales) of your business over the past 5 years.

Response: Not applicable. Dingli UK neither made any changes in legal form nor underwent any structural changes over the past five years.
Appendix reference: N/A

Date	Legal form	Explanation of change
N/A	N/A	N/A

+Add additional rows as required.

4. List and explain all authorisations your company has been required to obtain to import, sell or distribute the goods concerned and the like goods. These may include licences, permits or permissions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

Response: Dingli UK is a private limited company that is only involved in trading, not production of any products. Dingli UK does not require any additional permit to sell the goods concerned and the like goods. Dingli UK is not subject to any direct or indirect quantitative restrictions, licensing constraints, or other similar governmental restrictions on these activities.

Appendix reference: N/A

5. State whether your company is a member of any representative organisations (e.g., trade bodies, associations, Chambers of Commerce) and provide their contact details.

Response: Dingli UK is not a member of any representative organisations.

Appendix reference: N/A

A3 Organisational structure

Answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) and legal persons (e.g. companies) are associated where they meet the definition of ‘related persons’ in Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

1. Is your company or parent company listed on the stock exchange?

If yes, provide the name of the stock exchange where it is listed, the stock code and date of listing.

Response: Dingli UK is not listed on the stock exchange. Dingli UK's parent company (i.e., Zhejiang Dingli) is listed on the Shanghai Stock Exchange (SSE) under stock code 603338. The date of Zhejiang Dingli's listing is 25 March 2015.
Appendix reference: N/A

2. Please complete the "**Associated companies"** tab in the **Annex** for your company's worldwide corporate structure and affiliations.

Response: Please refer to **Table A3.2** for the requested information.
Appendix reference: **Table A3.2**

3. Explain and/or demonstrate in a diagram the:
   a) Legal structure of your company;
   b) Internal hierarchical and organisational structure; and
   c) All sites/locations and departments which are involved in the production, sale, R&D, supply and distribution of the like goods or goods concerned.

Response: Please refer to **Appendix A3.3** for the requested information.
Appendix reference: **Appendix A3.3**

4. Explain, if there have been any changes to any of the above during the injury period (1 October 2021 to 30 September 2025).

Response: There have not been any changes to any of the above during the injury period (1 October 2021 to 30 September 2025).
Appendix reference: N/A

5. **If your company is part of a group** (e.g. parent company with subsidiaries, joint-ventures, common ownership), can you:

   a) Provide a diagram showing the complete ownership structure**. [Note: the diagram of corporate structure should be for the company's ultimate parent company].**
   b) List all related companies involved in the production or sale of the like goods and a description of the functions performed by each company within the organisation; and
   c) Specify which company within the group owns the production facility(ies)?

Response: Please refer to **Appendix A3.5.1** for a diagram showing the complete ownership structure. Please refer to **Appendix A3.5.2** for the requested information.

Appendix reference: **Appendix A3.5.1, A3.5.2**

A4 Board members and principal shareholders

1. Please complete the **"Owners and shareholders"** tab in the **Annex** for:

   1. All your company's shareholders that owned more than 5% of the company's shares during 1 October 2024 – 30 September 2025.

   2. A list of your current board of directors.

Response: Please refer to **Table A4.1** for the requested information.

Appendix reference: **Table A4.1**

2. Explain your procedure for appointing the members of the Board of Directors.

Response: Pursuant to Article [number] of Dingli UK's Articles of Association (see **Appendix A2.2.1**), members of the Board of Directors are appointed through [redacted – commercially sensitive information]. Since the establishment of Dingli UK in 2018, [name] has been the one and only director of Dingli UK.

Appendix reference: **Appendix A2.2.1**

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long term agreements (4-year period) or relationships with any company/companies located in the UK, the PRC or in third countries for the production (e.g. sub-contracting), supply and sale of the like goods, or other licensing, technical patent or compensatory agreements.

Response: Dingli UK did not have any long-term agreements during the POI. Therefore, this question is not applicable.

Company name and address	Nature of agreement	Company registration number and place of registration	Provide copy of contract and state appendix number
		Appendix reference: N/A	

+Add additional rows as required.

2. If your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, can you:
   - Provide copies of the contracts as evidence of these agreements; and
   - Explain how the prices of the internal sales have been determined.

Response: Zhejiang Dingli did not have any long-term agreements during the POI. Therefore, this question is not applicable.

Appendix reference: N/A

A6 Accounting practices

1. What accounting standards have been adopted by your company (e.g. IFRS)?

   Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, provide details.

Response: FRS102 under UK GAAP is have been adopted by Dingli UK. Dingli UK fully complies with FRS102 under UK GAAP, therefore Dingli UK's accounting practices do not differ in any way from FRS102 under UK GAAP.

Appendix reference: N/A

2. If any changes have occurred with respect to your accounting practices and/or policies during 1 October 2021 – 30 September 2025, please explain the changes. The explanation should include dates and the reasons for those

changes along with the financial impact of those changes on the goods concerned.

Response: No, Dingli UK's accounting practices and/or policies did not undergo any changes during 1 October 2021 – 30 September 2025.

Appendix reference: N/A

3. State your financial accounting period (e.g. 1 January to 31 December).

Response: Dingli UK's financial accounting period is from 1 January to 31 December.

Appendix reference: N/A

4. Has your accounting period changed during 1 October 2021 – 30 September 2025? If yes, describe these changes.

Response: No, Dingli UK's accounting period has not changed during 1 October 2021 to 30 September.

Appendix reference: N/A

5. For your company and any associated parties involved in the production, importing, exporting, marketing or sales of the goods concerned, attach copies of your financial statements and audit reports covering 1 October 2021 – 30 September 2025.

   If your financial statements are unaudited, explain why this is the case.

Response:
During the POI, the related companies listed in **Appendix A3.5.2** were involved in the production or sale of the goods concerned. Specifically,

- Zhejiang Dingli Machinery Co., Ltd
  Please refer to **Appendix A6.5.1** for the requested financial statements and audit reports.

- Zhejiang Green Power Machinery Co., Ltd.
  Please refer to **Appendix A6.5.2** for the requested financial statements and audit reports.

- Dingli Machinery UK Limited

Please refer to **Appendix A6.5.3** for the requested financial statements and audit reports.

- California Manufacturing and Engineering Co., INC ("CMEC")
  Please refer to **Appendix A6.5.4** for the requested financial statements and audit reports. Please note that the consolidated financial statements covers both CMEC and MEC Aerial Platform Sales Corp.

- MEC Aerial Platform Sales Corp
  Please refer to **Appendix A6.5.5** for the requested financial statements and audit reports. Please note that the consolidated financial statements covers both CMEC and MEC Aerial Platform Sales Corp.

- Dingli AWP Europe Trading Limited B.V.
  This company was established on January 27, 2022. Therefore, the financial statements for 2021 are not applicable. Please refer to **Appendix A6.5.6** for the requested financial statements.

- Dingli AWP Oceania Trading Pty Ltd
  This company was established on February 22, 2022. Therefore, the financial statements for 2021 are not applicable. Please refer to **Appendix A6.5.7** for the following documents:
  - Audit report covering the period from February 22, 2022 to June 30, 2023. Note that from June 30, 2023 onward, the company has request exemption from further audits. Therefore, there is no audit report after that date.
  - Financial statements covering the period from July 2023 to September 2025.

- Dingli Middle East Trading (FZE)
  This company was established in 2022. Therefore, the financial statements for 2021 are not applicable. Please refer to **Appendix A6.5.8** for the audit report for 2022 through 2024 and financial statements covering the period of January through September of 2025.

- Dingli of Brazil Importation and Trading of Machinery Ltd.
  This company was established in 2022 and had no actual operation in 2022. Therefore, the financial statements for 2021 and 2022 are not applicable. Please refer to **Appendix A6.5.9** for the requested financial statements.

- Dingli AWP (Singapore) Trading PTE. LTD.

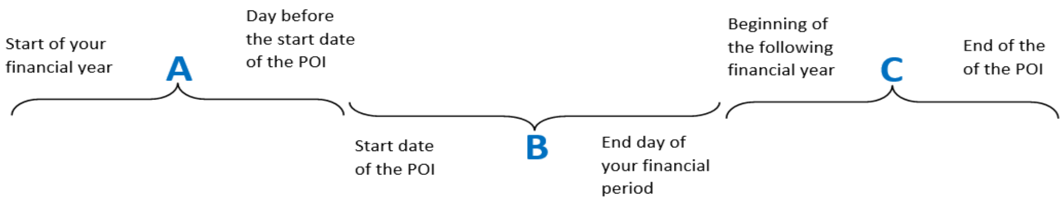
This company was established in 2024. Therefore, the financial statements for 2021 through 2023 are not applicable. Please refer to **Appendix A6.5.10** for the audit report for 2024 and financial statements covering the period of January through September of 2025. • Tripod Machinery Middle East Trading Co. Ltd This company was established in 2024 and had no actual operation in 2024. Therefore, the financial statements for 2021 through 2024 are not applicable. Please refer to **Appendix A6.5.11** for the trial balance covering the period of January through September of 2025. • Shanghai Dingce Financial Leasing Co., Ltd. The requested financial statements for Shanghai Dingce Financial Leasing Co., Ltd. was provided at **Appendix A6.5.12**.

Appendix reference: **Appendix A6.5**

6. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the 1 October 2024 – 30 September 2025. If your financial year is fully aligned with the POI, this is all that is required.

   Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:

   A. The trial balance which starts from the beginning of your financial year and ends on 30 September 2024;
   B. The trial balance which starts from 1 October 2024 to the end of your financial year; and
   C. The trial balance which starts from the beginning of your following financial year and ends on 30 September 2025.



Response: Please refer to **Appendix A6.6** for the requested information.

Appendix reference: **Appendix A6.6**

7. For your company and any associated parties involved in the production, importing, exporting, marketing or sales of the goods concerned: provide workings (explaining sources) used to produce the annex information for the goods concerned and like goods for the POI. This information helps us reconcile your data.

Response: Please refer to **Appendix A6.7** for an extract from Zhejiang Dingli's consolidated audited report for year 2024, which lists the related companies of Zhejiang Dingli. Records of these companies indicate that Zhejiang Dingli, Green Power and Dingli UK are the only three associated companies in China and UK that were involved in the production and sales of the goods concerned.
Appendix reference: **Appendix A6.7**

8. **If your company is part of a group of companies,** please attach a copy of the consolidated accounts of the group for the most recently completed financial year.

Response: Dingli UK is a wholly-owned subsidiary of Zhejiang Dingli. Please refer to **Appendix A6.5** for the consolidated financial statements of Zhejiang Dingli for the most recent completed financial year (i.e., year 2024).
Appendix reference: **Appendix A6.5**

SECTION B:
Your goods

We ask you about your products in order to classify your company role correctly and understand if you are an importer of the like goods for the UK market and to gain a better understanding of how the goods you import.

B1. 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.

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above.

When providing PCNs, please refer to Table 0 and then the relevant table for either assembled machines or the type of subassembly being represented. For example:

- For an assembled boom lift, please use the categories in Table 0 and Table 1.
- For a turret subassembly, please use the categories in Table 0 and Table 3.

This is the Product Control Number (PCN) structure:

Table 0		
Description	**Answer**	**Value**
Assembled Machine or Subassembly?	Assembled Boom Lifts	1
	Chassis Subassemblies	2
	Turntable/Turret Subassemblies	3
	Boom Subassemblies	4
	Basket/Cage Subassemblies	5

Table 1: Assembled Boom Lifts		
Description	**Answer**	**Value**
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Tracks or Wheels	Tracked	1
	Wheeled	0
Maximum Working Height (m)	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m≤33m	28
	>33m≤38m	33
	>38m≤43m	38
	>43m	43
Power Type	Combustion	CO
	Electric – Lithium Batteries	EL
	Electric – Other Batteries*	EO
	Hybrid – Lithium Batteries	HL
	Hybrid – Other Batteries*	HO
Boom Type	Vertical Mast with Jib	V
	Telescopic	T
	Articulated	A
Cage Width^	<1.5m	11
	>1.5m≤1.9m	15
	>1.9m≤2.3m	19
	>2.3m	23

*Other Batteries includes but is not limited to: Lead-acid, AGM, Gel batteries etc.
^Cage width refers to the longest horizontal measurement of the cage assembly when the cage is parallel to the ground.

Table 2: Chassis Subassemblies		
Description	**Answer**	**Value**
Vehicle Type	Trailer Mounted	M
	Self Drive	D
	Self Propelled	P
Tracks or Wheels	Tracked	1
	Wheeled	0
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m≤33m	28
	>33m≤38m	33
	>38m≤43m	38
	>43m	43
Power Type	Combustion	CO
	Electric – Lithium Batteries	EL
	Electric – Other Batteries*	EO
	Hybrid – Lithium Batteries	HL
	Hybrid – Other Batteries*	HO
	Not applicable**	NA

*Other Batteries includes but is not limited to: Lead-acid, AGM, Gel batteries etc.
** Use this option for where there are no specific power components in this subassembly

Table 3: Turntable/Turret Subassemblies		
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m≤33m	28
	>33m≤38m	33
	>38m≤43m	38
	>43m	43
Power Type	Combustion	CO
	Electric – Lithium Batteries	EL
	Electric – Other Batteries*	EO
	Hybrid – Lithium Batteries	HL
	Hybrid – Other Batteries*	HO
	Not applicable**	NA

*Other Batteries includes but is not limited to: Lead-acid, AGM, Gel batteries etc.
** Use this option for where there are no specific power components in this subassembly

Table 4: Boom Subassemblies		
Description	**Answer**	**Value**
Boom Type	Vertical Mast with Jib	V
	Telescopic	T
	Articulated	A
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m≤33m	28
	>33m≤38m	33
	>38m≤43m	38
	>43m	43

Table 5: Basket/Cage Subassemblies		
Description	**Answer**	**Value**
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Cage Width^	<1.5m	11
	>1.5m≤1.9m	15
	>1.9m≤2.3m	19
	>2.3m	23

^Cage width refers to the longest horizontal measurement of the cage assembly when the cage is parallel to the ground.

Example PCN for an electric Lithium battery powered, articulated self-drive wheeled boom lift with a 14m maximum working height and a cage width of 2m: **1D013ELA19**

Example PCN for a chassis section for a combustion powered, self-propelled wheeled boom lift with a 19m maximum working height: **2P018CO**

1. Comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we are interested in your opinions on:

    - the categorisation of product features;
    - the list of products included in the "other" category and whether this prevents a fair comparison between PCNs; and
    - whether you are aware of, any specialised products that fall within the definition of the "goods concerned" or "like goods" which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the "goods concerned.
    - Is there any overlap in our PCN structure where products could be more than one PCN, if yes, can you suggest an alternative?

Response: In Dingli UK's response to the Registration Form, we proposed to subdivide the machines with the maximum working height exceeding 28 meters in the PCN structure. Our proposal has been accepted and incorporated into the current PCN structure. At the current stage, Dingli UK does not have any further comments on the PCN structure.

Appendix reference: N/A

2. Give details of any factors including manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned and the like goods.

Response: Dingli UK is a trading company. Therefore, this question is not appliable.

Appendix reference: N/A

3. If you further process the goods concerned or like goods for onward sale, please list your produced goods below. Indicate the relevance of the incorporated goods concerned and/or like goods in relation to the finished product.

Response: Not applicable, Dingli UK did not further process the goods concerned or like goods for onward sale.

Appendix reference: N/A

B2. Understanding your goods

1. Please complete the **"Your company's goods"** tab in the **Annex.**

   This tab collects information on:
   ▪ PCN and your internal coding system
   ▪ Physical (including technical) and commercial characteristics of your goods
   ▪ Product similarities - how are the goods concerned you export different from those produced in the UK

Response: Please refer to **Table B2.1** for the requested information.

Appendix reference: **Table B2.1**

2. For the goods concerned, describe your company's Internal coding system and how your own internal codes correspond to the PCN structure we have provided.

   Supply any evidence you have that is relevant.

Response: Please refer to **Appendix B2.2** for the requested information. Specifically, the worksheet titled "List" sets out the PCN, material code, and model number of the goods concerned. The coding rules for the material code and model number, together with the meaning of the relevant characters, are explained in the worksheets titled "Material Code" and "Model No." in this appendix, respectively.

Appendix reference: **Appendix B2.2**

3. If your company does not use the same product codes across imports, sales and invoicing, please explain how they differ.

Response: Dingli UK uses the same internal codes across imports, sales and invoicing. Therefore, this question is not applicable.

Appendix reference: N/A

4. Please list all main categories of products produced and/or traded by your company and indicate
   . which category covers the goods concerned
   . which incorporate the goods concerned or like goods

Response: Dingli UK is a trading company, therefore it did not produce anything. During the POI, Dingli UK sold the following categories of products:
- Scissor lifts
- Boom lifts (goods concerned)

- Vertical mast lifts with jibs (goods concerned)
- Other vertical mast lifts
- Stock pickers
- Spare parts.

Appendix reference: N/A

5. If there are differences in characteristics between your range of goods concerned (goods sold in the UK) and your like goods sold in your domestic market which cause differences in price, explain those differences and the effect they have on price.

   Supply any relevant evidence (e.g. sales brochures, input costs, or other promotional material).

Response: All the goods concerned sold by Dingli UK during the POI were supplied and produced by Zhejiang Dingli. Zhejiang Dingli has a wide range of products and the product mix for goods concerned and like goods might be different. However, as the PCN and the company's own material code categorized its products into groups for purpose of fair comparison, as long as the goods are under the same material code, there are no fundamental differences in characteristics between goods concerned (in-scope goods sold by Zhejiang Dingli to the UK) and like goods (in-scope goods sold by Zhejiang Dingli in the domestic market).

Appendix reference: N/A

6. Can you list all the main categories of products produced and/or traded by your company indicating which category covers the goods concerned or like goods.

Response: Dingli UK is a trading company, therefore it did not produce anything. During the POI, Dingli UK sold the following categories of products:

- Scissor lifts
- Boom lifts (goods concerned)
- Vertical mast lifts with jibs (goods concerned)
- Other vertical mast lifts
- Stock pickers
- Spare parts.

Appendix reference: N/A

7. This question concerns **ONLY the goods concerned and/or like goods if they are incorporated** (i.e. used as an input) by yourself or another company to manufacture another product.

Can you:

- Classify your incorporated goods into the categories of products produced and/or traded by your company
- Briefly describe the final goods which incorporate the goods concerned and/or like goods.
- Explain how relevant boom lifts are to the manufacture of the finished product.
- What is the value added of the incorporated good?
- Indicate the relevance of the incorporated goods concerned and/or like goods in relation to the finished product.

Response: Neither does Dingli UK nor another company incorporates the goods concerned and/or like goods to manufacture another product. Therefore, this question is not applicable.	
	Appendix reference:

B3. Suppliers of the imported goods

1. Please complete the "**Suppliers of goods concerned"** tab in the **Annex**.

   This tab asks you to provide contact details for each company that supplies you with the goods concerned. For each supplier that is not a manufacturer of the goods concerned, you will be asked to provide details of the manufacturer, if known.

Response: Please refer to **Table B3.1** for the requested information.	
	Appendix reference: **Table B3.1**

SECTION C:
Imports and forward orders

C1 Imports

1. Please complete the "**Imports**" tab in the **Annex** for the injury period for the goods concerned and like goods, broken down by country of origin. Provide the information on a Cost, Insurance, and Freight (CIF) basis if possible.

Response: Please refer to **Table C1.1** for the requested information. **RESPONSE TO DEFICIENCY LETTER:** The non-confidential version of Table C1.1 has now been revised as per instructions, by using the total purchase value figures of the first year of the injury period to also index the purchase volumes and price figures across the injury period.
Appendix reference: **Table C1.1**

2. If your imports in **"Imports"** tab in the **Annex** have not been made on a CIF basis, please explain the basis on which they have been reported.

Response: [Redacted – commercially sensitive information]. All imports were made on a [Redacted – commercially sensitive information] basis.
Appendix reference: N/A

C2 Details of import transactions

1. Please complete the "**Import transaction"** tab in the **Annex**. In this tab, you are asked to provide transaction level details of imports of the goods concerned from the PRC during the POI.

Response: Please refer to **Table C2.1 Import Transactions** for the requested information.
Appendix reference: **Table C2.1**

2. Provide invoices and any supporting documents for two of the transactions you provided in the "**Import transactions**" tab. Give details below of any supporting documents provided.

Response: In **Appendix C2.2.1** and **Appendix C2.2.2**, we have provided the relevant documents for the two import transactions with the largest values. The submitted documents for these two import transactions include: 1. sales contract between Zhejiang Dingli and Dingli UK, 2. commercial invoice, 3. packing list, 4. bill of lading, 5. bank payment slip, and 6. invoice for import expenses covering the import port handling fee and freight from the import port to the UK warehouse.

	Appendix reference: **Appendix C2.2.1** and **Appendix C2.2.2**

3. Referring to the costs you provided in the Import transactions tab in the Annex, for the goods concerned, please:
   - State which costs were incurred by your company between the UK border and arrival of the goods at your warehouse
   - Classify the costs incurred as duties, import costs or post-import costs.
   - Explain whether these costs are incurred as a percentage of the purchase price, or as a fixed amount per unit of the goods concerned.

Response: During the POI, all purchases made by Dingli UK were based on the [Redacted – commercially sensitive information] term. Under the [Redacted – commercially sensitive information] sales term, the supplier (i.e. Zhejiang Dingli) [redacted – expenses paid under the applicable sales terms], while Dingli UK was responsible for [redacted – expenses paid under the applicable sales terms]. The following three types of costs borne by Dingli UK are reported in **Table C2.1 Import Transactions**. [Redacted – list of expenses incurred and detailed explanation as to how these have been reported in the tables].

	Appendix reference: **Table C2.1**, **Appendix C2.2.1** and **Appendix C2.2.2**

C3 Forward orders

This question ONLY applies if you have Forward sales contracts.

1. Please complete the "**Forward orders**" tab in the **Annex**.
   - Attach copies of forward contracts/ongoing supply agreements for the goods concerned up to one year after the end of the POI (30/09/2026).

- Explain whether forward contracts are a standard way of doing business in your industry? If there have been any changes in the volume and value of forward contracts over time, explain the reason(s) why this is the case.

Response: Dingli UK did not have forward sales contracts during the POI. Therefore, this question is not applicable to Dingli UK.
Appendix reference: N/A

SECTION D:
Cost, sales and selling expenses

D1 Cost reconciliation

1. Please complete the "**Costs reconciliation"** tab in the **Annex**.

Response: Please refer to **Table D1.1** for the requested information.
Appendix reference: **Table D1.1**

D2 Administrative, Selling and General expenses (AS&G)

1. Please complete the "**AS&G"** tab in the **Annex**.

   The tab collects data on selling, general and administration expenses (AS&G) costs for the goods concerned sold in the UK

   Note: You should include all selling, general and administration expenses related to the sale of the goods, including finance expenses.

Response: Please refer to **Table D2.1** for the requested information. The AS&G costs were reported as follows. In Table A "AS&G costs for all goods and all PCNs", the "All goods" line was completed based on [redacted – commercially sensitive information]. The "All PCNs" line in Table A was then allocated on the basis of [redacted – commercially sensitive information]. Each line in Table B was further allocated from the figures in "All PCNs" line of Table A using the same [redacted – commercially sensitive information] method based on [redacted – commercially sensitive information]. Note that [expenses] had already been reported in the sales database (Table D6.1 Sales Transactions), which were also booked as [redacted – commercially sensitive information]. To avoid double counting, [redacted – explanation as to how the expenses have been reported in the tables].
Appendix reference: **Table D2.1**

D3 Sales of the goods concerned

1. Please complete the "**Sales"** tab in the **Annex**.

This tab asks you to provide annual sales data on the value and quantity of goods sold in the UK or re-exported during the injury period for the:

- Goods concerned imported from the PRC; and

- Like goods from all other countries imported into the UK by your company. If known and applicable, can you provide each source country of the like goods.

Response: Please refer to **Table D3.1** for the requested information. **RESPONSE TO DEFICIENCY LETTER:** The non confidential version of Table D3.1 has now been revised so that the base year for the indexation is the first year of the injury period instead of the POI.
Appendix reference: **Table D3.1**

D4 Sales reconciliation

1. Please complete the "**Sales reconciliation"** tab in the **Annex**.

Response: Please refer to **Table D4.1** for the requested information.
Appendix reference: **Table D4.1**

D5 Sales of goods incorporating the goods concerned and/or like goods

This question should **ONLY** be completed if you import the goods concerned and/or like goods for the purpose of incorporating (or inputting) into the manufacture of another finished good.

Response: This question is not applicable to Dingli UK since Dingli UK did not import the goods concerned and/or like goods for the purpose of incorporating (or inputting) into the manufacture of another finished good.

1. Please complete the "**Sales incorporating goods"** tab in the **Annex**.

   This tab requests information on the value and volume of goods produced by your company sold in the UK or exported incorporating the goods concerned or like goods, where the:

   - Good concerned are sourced from the exporting country and /or

- Like goods are sourced from all other countries (3rd countries).

Indicate the importance of the incorporated goods concerned and/or like goods in relation to the finished product.

D6 Sales transactions

1. Please complete the "**Sales transactions"** tab in the **Annex.**

   Provide the requested information for the goods concerned you sold on the UK market during the POI.

> **NOTE:** If you incorporated the goods concerned (i.e. used as input) to manufacture another good (finished good), complete this tab using ONLY the transaction data for the finished good

Response: Please refer to **Table D6.1** for the requested information.

Below please find a detailed explanation for each of the expenses reported in **Table D6.1**:

[Redacted – list of expenses incurred and detailed explanation as to how these have been reported in the tables].

Appendix reference: **Table D6.1**

2. Please provide invoices and any supporting documents for two of the transactions stated within the "Sales transactions" tab in the Annex. Use the box below to give an overview of any supporting documents provided.

Response: Please refer to **Appendix D6.2** for sales documents of two sales made by Dingli UK within **Table D6.1** to two of its unaffiliated customers. These two sales corresponds to [redacted – commercially sensitive information] (Column D) in **Table D6.1**. The sales documents of each sale contain the following documents:

- Sales contract
- Commercial invoice
- Delivery Note

Appendix reference: **Appendix D6.2**

SECTION E:
Injury

The purpose of this section is to collect further information as to the injury alleged by the UK industry. Note that the information submitted at this point can only be taken into account if supported by **factual evidence**.

1. Do you think the UK producers of the like goods (UK industry) are suffering or have suffered injury caused by the dumped goods concerned imported to the UK?

Response: We do not consider that the UK industry is suffering, or has suffered, injury caused by Dingli UK's exports of the goods concerned to the UK.

First, the causation analysis should distinguish carefully between the product segments actually sold by Dingli UK and those predominantly sold by the Applicant. As already explained in Dingli UK's Registration Form, the goods sold by Dingli UK within the UK include boom lifts with working height above 28 metres, whereas the Applicant's publicly available materials show a product offering centred on compact, low-weight boom lifts, with its identified self-propelled range topping out at 28 metres. Publicly available UK hire-market materials also show active demand and availability for much higher-reach machines, including Dingli machines around 44 metres and other brands' machines above that level, especially for outdoor industrial, infrastructure and renewable-energy applications. This indicates that a material part of Dingli UK's UK sales serves a distinct segment and is not directly substitutable in practice with the Applicant's core compact-range offering.

Second, should the TRA establish that the UK industry suffered any injury, Dingli UK respectfully submits that such injury (if any) must have been caused by other known factors. For example, public data shows that construction conditions in the UK were weak or uneven during and around the relevant period: ONS reported falls in construction output in the three months to October 2025 and again in November 2025, while IPAF reported that the UK MEWP rental fleet contracted by 2% as rental companies adopted a more cautious purchasing approach amid market saturation and uncertainty in construction. In parallel, financing conditions remained restrictive for a substantial part of the injury period, with Bank Rate at 5.0% in August 2024, 4.75% in November 2024 and 4.5% in February 2025. These factors are capable of materially affecting capital-equipment purchases, fleet renewal cycles, utilisation, margins and rental-company investment decisions independently of the imports under investigation.

Third, developments in technology and changes in the pattern of demand should also be taken into account. The Applicant itself publicly presents its offering as compact and low-weight, and it has recently advertised new hydrogen-electric and electric models and international product launches. That suggests an industry undergoing product and technology transition, not simply price competition on a like-for-like basis

across a homogeneous market. In this connection, it is noted that TRA's own guidance states that the non-attribution analysis must consider whether factors such as technology and export performance may explain any deterioration of the injury indicators. Public information indicates that the Applicant, Niftylift, specializes in compact, low-weight boom lifts and does not appear to offer self-propelled boom lifts with a maximum lifting capacity exceeding 28m, whereas Dingli UK sold many of these machines during the POI. Those machines serve different applications and are not fully substitutable in practice. Accordingly, the UK industry could not have suffered injury on account of Chinese imports of boom lifts with a working capacity exceeding 28m.

Appendix reference: N/A

2. Aside from the imports of the goods concerned from the country under investigation, please provide details of any other reasons that could have resulted in the alleged injury suffered by the UK industry, for example: contraction in demand or changes in the pattern of consumption of the like goods in the UK or developments in technology.

Response: Aside from the imports of goods concerned from China, other plausible causes include: (i) weaker or uneven UK construction demand; (ii) cautious fleet-investment behavior by rental companies; (iii) higher financing costs during much of the injury period;; and (iv) changes in customer preferences toward electric/hybrid machines, telematics and other technological features. The GDP monthly estimate of UK for December 2025 published by Office for National Statistics indicated that construction output fell by 2.1% in the three months to November 2025 (see Page 2 of **Appendix E2.1**). Moreover, IPAF reported that the UK Mobile Elevating Working Platforms ("**MEWP**") fleet contracted by 2% (see Page 3 of **Appendix E2.2**). These facts indicate broader market conditions capable of affecting the industry independently of Dingli UK's imports.

Appendix reference: **Appendix E2.1**, **Appendix E2.2**

3. Do you have any information on the PRC (for individual companies and/or the industry) about the:
   - production volumes
   - capacity
   - utilisation of capacity among the PRC producers and exporters of the goods concerned during the POI.

   If yes, provide estimates and substantiate with evidence where possible.

Response: As an importer located in the UK, Dingli UK is not in a position to provide verified PRC industry-wide estimates for production volumes, capacity or capacity

utilisation during the POI. Dingli UK does not have a reliable basis to quantify those figures for the industry as a whole. Please refer to Zhejiang Dingli's anti-dumping questionnaire response for its company-specific data.

Appendix reference: N/A

4. Do you know how capacity and capacity utilisation among exporters of the goods concerned have changed during the injury period or might change in the next 5 years? Provide evidence if available.

Response: Dingli UK does not have verified market-wide data showing how PRC capacity or capacity utilisation changed during the injury period or how they may change over the next five years. Please refer to Zhejiang Dingli's anti-dumping questionnaire response for its company-specific data. Based on the information available to Dingli UK, there is no basis to conclude that there is an imminent surge in production capacity for the goods concerned in the PRC. Any changes in such capacity (if any) would likely reflect global demand conditions and product-mix decisions across different categories of MEWPs and related equipment.

Appendix reference: N/A

5. Do you have any information on the stock volumes of the like goods in the overseas exporters' domestic market?

   Provide estimates and substantiate with evidence where possible.

Response: Except for company-specific data concerning Zhejiang Dingli, Dingli UK does not have verified information on stock volumes of like goods in the overseas exporters' domestic market and therefore cannot provide a reliable estimate. Please refer to Zhejiang Dingli's anti-dumping questionnaire response for its company-specific data.

Appendix reference: N/A

6. Are there any other goods that can be produced using the same manufacturing equipment/processes, that are not the like goods/goods concerned?

   How feasible would it be to shift production to the like goods/goods concerned?

Response: To the best knowledge of Dingli UK, some fabrication, welding, machining, painting and final-assembly equipment used for boom lifts can also be used for other MEWPa. However, switching production is neither simple nor economical. Product-specific engineering, tooling, testing, supplier qualification and certification requirements mean that short-term conversion is limited, even if medium-term adjustment is feasible. Accordingly, common equipment may exist, but this does

not mean that producers can instantly and easily shift output into the goods concerned.

Appendix reference: N/A

7. In respect of UK consumer preference, are there any differences between:
   – Like goods produced by the UK industry (and sold in the UK)
   – Goods concerned you import from the PRC
   – Like goods imported from third countries (like goods)

   What impact do these differences have?

Response: Key factors include: working height; outreach; machine size and weight; rough-terrain capability; power type; availability; after-sales support; and total cost of ownership. In Dingli UK's experience, some customers prefer compact and lighter machines for constrained urban or mid-rise work, whereas others require higher-reach or hybrid machines for infrastructure, industrial or energy-related applications. The practical impact is that competition is only partially direct, because not all models meet the same end-use requirements.

Appendix reference: N/A

8. In respect of quality, specifications/standards, price, and anything else you consider relevant, are there any differences between the:
   - goods produced by the UK industry (and sold in the UK)
   - goods concerned you import from the PRC
   - like goods imported from third countries (like goods)

   Justify your claims with evidence where possible.

Response: Broadly speaking, all major producers in the market appear to meet the relevant safety and technical standards, so the main differences are usually commercial and technical. Therefore, the main differences are product range, working height, outreach, articulated versus telescopic design, hybrid/electric availability, machine dimensions and weight, lead time and brand familiarity. These differences affect substitutability and mean that comparisons should be made by segment rather than in the abstract.

One of the major differences is that the UK producers do not produce boom lifts with working height exceeding 28 meters, whilst Chinese producers offer a variety of boom lifts with working height exceeding 28 meters.

Appendix reference: N/A

9. Do you have any information on the trends and projections of demand for the relevant goods:
   a) in the UK

b) in the overseas exporters market

Response: In the UK, near-term demand appears mixed rather than uniformly strong. Public data show softer construction output and more cautious rental-fleet investment, but medium-term demand should continue to be supported by infrastructure, utilities, facilities maintenance and renewable-energy projects. Demand growth, where it occurs, is likely to be stronger in segments requiring greater working height, rough-terrain capability and low-emission power options. As regards the overseas exporters' domestic market, Dingli UK is not in a position to provide verified market-wide projections and does not consider it appropriate to speculate without reliable evidence.

Appendix reference: N/A

10. The applicant has alleged a "threat of material injury" in its application. Do you think the UK industry is currently under the threat of injury caused by the dumped imports of the goods concerned? If yes, can you please give your comments as to why?

Response: Dingli UK does not consider that the UK industry is currently under a threat of material injury caused by the imports of the allegedly dumped imports from China. A finding of threat of material injury should be based on clearly foreseeable and imminent developments supported by facts. Dingli UK does not anticipate any imminent surge of imports from China. Moreover, and in any event, there is limited substitutability and interchangeability between UK-produced boom lifts and boom lifts imported from China since the UK industry does not produce boom lifts with a working capacity exceeding 28m. The market is mature and competitive, and current demand conditions do not support a speculative assumption that the allegedly dumped imports from China will sharply increase in the near term.

Appendix reference: N/A

11. Are you planning to increase imports of the goods concerned? Please provide us with your import projections up to 3 years after the end of the period of investigation. Please provide any contracts/order confirmation covering that period.

Response: No, Dingli UK is not planning any sharp or abnormal increase in imports of the goods concerned. On the basis of current commercial expectations, imports are expected to remain broadly stable. At present, Dingli UK does not anticipate any expansion of import volumes from China into the UK market.

Appendix reference: N/A

12. If you are planning to increase/decrease import volumes, explain why.

Response: Not applicable, as Dingli UK does not plan to increase its import volumes. That said, if anti-dumping measures are imposed, Dingli UK fears that its import volumes will decrease, as some purchases may be delayed or reduced due to the resulting increased cost of the machines.

Appendix reference: N/A

SECTION F: Understanding the UK market and potential impacts of a measure

This section collects information to understand the competitive landscape and how the market works for boom lifts. It is also used to feed into the Economic Interest Test which assesses the economic impact of a measure compared to what would happen if a measure is not applied.

F1 Understanding the UK Market

. Describe the end-use(s) of boom lifts. If there are multiple uses, list them, and estimate what proportion of sales goes toward each use type.

Response: Boom lifts are used wherever safe and efficient working at height is required. The main end-uses include: construction and façade installation/maintenance; general building and facilities maintenance; industrial maintenance; warehousing/logistics and fit-out work; infrastructure and utilities; and energy/renewables work, especially where higher reach is needed. Dingli UK does not have verified market-wide percentages for each end-use, but in its experience construction/building maintenance and rental-fleet general purpose applications represent the largest share, with industrial/infrastructure/energy-related uses forming an important additional segment.

Appendix reference: N/A

2. Give details of any goods which could be substituted for boom lifts?

Response: Potential substitutes may include scissor lifts, spider lifts, truck-mounted platforms, mast lifts, scaffolding and, in some cases, telehandlers or cranes for material-handling tasks. However, these machines are not really interchangeable or substitutable with boom lifts. The appropriate equipment depends on the required working height, outreach, terrain, mobility and whether personnel need up-and-over access. Accordingly, substitution is often limited and project-specific rather than general.

Appendix reference: N/A

3. Give details of any goods which are complementary to boom lifts?

Response: Complementary goods and services include batteries and chargers, GPS devices, spare parts, replacement tyres, harnesses and other safety accessories, maintenance and repair services, operator training (including IPAF training), transport/logistics services and equipment financing. In practice, sales of boom lifts are often linked to broader after-sales and support services rather than the machine alone.

Appendix reference: N/A

4. Based on your knowledge, approximately:

▪ How many UK based companies produce boom lifts,

▪ How many foreign companies sell boom lifts in the UK? and are these producers typically large, small, or a mix of both?

Response: Based on publicly available information, Niftylift, the Applicant, appears to be the main UK-based producer in the core self-propelled boom-lift segment. The UK market is served by numerous foreign suppliers, consisting mainly of medium-to-large international manufacturers, together with UK importers, distributors and rental companies.

Appendix reference: N/A

5. From what you know, approximately what quantity of boom lifts by units is sold in the UK each year?

Response: Dingli UK does not have market-wide data for annual UK sales of boom lifts by unit.

Appendix reference: N/A

6. How similar are boom lifts produced by different producers? Explain any significant differences (e.g. branding, packaging, quality, or other features).

Response: Boom lifts produced by different manufacturers are similar in that they perform the same core function of providing safe working-at-height access. However, there can be significant differences in brand, working height, outreach, articulated versus telescopic configuration, machine weight and dimensions, hybrid/electric/diesel powertrain, rough-terrain capability, telematics, safety features, operator familiarity, service network and resale profile. Packaging is not usually a relevant or differentiating factor in this market. In practice, these technical and commercial differences can be important and may determine whether products are genuinely interchangeable for a given job.

Appendix reference: N/A

7. How easy is it for businesses to start production of boom lifts?

Are there any barriers to starting production? (e.g. sunk costs - investment already incurred that can't be recovered, technology, regulatory barriers, limitations in achieving a certain level of production to make it feasible to start, high cost and long duration of investment before starting production, skills shortages, etc.).

Response: It is not easy to start production of boom lifts. Entry requires substantial upfront investment in plant, welding and machining capability, paint and assembly facilities, engineering and product-development capability, testing and certification, supply-chain development, dealer/service support and working capital. There are also safety, regulatory and reputational barriers, because customers expect proven performance, parts availability and after-sales support. Economies of scale and experience are therefore important barriers to entry.

Appendix reference: N/A

8. How easy is it for businesses to stop production of boom lifts? Are there any barriers to stopping production? e.g. labour related costs, regulatory exit requirements, sunk costs, long-term contracts with buyers or suppliers and any penalty termination costs, government interventions (e.g. subsidies), bankruptcy regimes, prohibitive start costs if production must be run continuously?

Response: It is also not especially easy to stop production. Producers typically have sunk investment in plant and tooling, employment-related obligations, supplier commitments, dealer/service networks, spare-parts responsibilities and inventory. That said, production can normally be reduced or rebalanced over time by adjusting product mix and output rates.

Appendix reference: N/A

9. If the price of all of boom lifts in the UK were to increase, would consumers significantly reduce their demand? and why?

Response: If boom-lift prices in the UK were to increase across the board, demand would probably not collapse in the short term because many working-at-height tasks still need to be performed safely and lawfully. However, customers would be likely to respond in various ways: purchases may be deferred, replacement cycles extended, rental periods shortened, used equipment retained for longer, or alternative access solutions considered where feasible. Demand is therefore likely to be relatively inelastic in the short term, but more responsive over time.

Appendix reference: N/A

10. Do consumers buy boom lifts from the cheapest producer, or are there other factors that influence their decision such as quality and service?

Response: No. In Dingli UK's experience, customers do not simply buy from the cheapest producer. Price matters, but so do working height, outreach, power type, machine size and weight, delivery lead time, local service support, spare-parts availability, reliability, financing, operator familiarity and expected resale value. For many rental and end-user customers, availability and after-sales support are especially important because downtime is costly.
Appendix reference: N/A

11. Explain how easy is it for producers to increase or decrease production in response to changing market conditions such as increased demand?

Response: Producers can normally increase or decrease production over time, but not instantly. In the short term, production is constrained by component availability, engineering and testing requirements, labour, lead times and factory scheduling. In the medium term, producers may be able to add shifts, rebalance output across product categories, or expand capacity if demand is sustained. For boom lifts, especially higher-reach products, response times are not immediate because of the complexity of the equipment and the support infrastructure required.
Appendix reference: N/A

12. In the past few years, describe any major changes in demand or preferences for boom lifts and their causes? For example:

- Price of goods,
- price of substitutes and complementary goods,
- consumer income,
- consumer preferences and tastes,
- demographic changes,
- technological developments,
- taxes and subsidies.

Response: Over the past few years, Dingli UK observed some changes in this regard. Customers have shown increased interest in electric and hybrid machines, GPS devices and other features that improve fleet management and total cost of ownership. At the same time, higher financing costs and more cautious rental-fleet investment have moderated demand growth in some periods. Public infrastructure and energy-transition projects continue to support demand in certain higher-reach and rough-terrain segments, while ordinary construction demand has been more mixed.
Appendix reference: N/A

13. Do you foresee any major changes in demand or preferences for boom lifts in the next five years?

Response: Over the next five years, Dingli UK expects continued demand for electric/hybrid machines, telematics-enabled equipment, and products suited to infrastructure, utilities and energy-transition work. Demand is likely to remain cyclical and sensitive to general construction conditions, but the medium-term direction should remain broadly stable to moderately positive. Dingli UK also expects product differentiation by reach, powertrain and application to remain commercially important, rather than the market becoming more homogeneous.

Appendix reference: N/A

14. What are the major distribution and marketing channels within the UK market for boom lifts?

Response: The main distribution channels in the UK are: (i) direct sales by manufacturers or importers to rental companies and end users; (ii) sales through distributors or dealers; and (iii) marketing through industry contacts, tenders, direct commercial outreach, digital channels and trade events.

Appendix reference: N/A

15. Who (type of business/consumer) buys boom lifts within the UK market, and for what purpose?

Response: The main buyers are rental companies, construction contractors, facilities-management providers, industrial operators, utilities and infrastructure contractors, and energy/renewables businesses. They purchase boom lifts to obtain safe temporary access for installation, maintenance, inspection, repair and related work at height. The precise machine required depends on the job site, required reach and outreach, terrain, emissions requirements and space constraints.

Appendix reference: N/A

16. Do boom lifts from the PRC compete directly with UK produced or other imported like goods? Are there any factors, other than cheapest price, which affect consumer purchasing options?

    Can you explain?

Response: Boom lifts from the PRC compete directly with UK-produced and other imported goods in some segments, especially where specifications overlap. However, competition is not fully direct across the whole market because boom lifts are differentiated by working height, outreach, powertrain, dimensions, weight and application. As a result, a UK-produced compact machine may compete closely with some imports, while higher-reach hybrid or rough-terrain machines may compete more with other imported products than with the UK producer. Besides price, customers consider specification, availability, service, reliability and total cost of ownership.

Appendix reference: N/A

17. Are there any government regulations or tax incentives which significantly affect the production or sales of boom lifts? If yes, give details.

Response: Yes. Production and sales are affected by general safety and equipment rules applicable to work at height and lifting equipment, including the HSE framework around MEWPs and LOLER/PUWER-type obligations, as well as product-safety, noise and emissions requirements. Dingli UK is not aware of any UK tax incentive specific to boom lifts as such. However, broader government policies supporting infrastructure, grid expansion and clean-energy development can indirectly support end-market demand for boom lifts used in those sectors.

Appendix reference: N/A

18. Describe any developments in technology affecting the characteristics, demand or the production process of boom lifts.

Response: Recent technological developments include wider adoption of electric, hybrid and lithium-based power systems, more telematics and remote diagnostics, improved safety and anti-entrapment features, lighter and more efficient structural design, and continued development of higher-reach models. These developments affect both demand and production. Customers increasingly value lower-emission machines and fleet-management functionality, while producers must invest in engineering, control systems, batteries and software integration.

Appendix reference: N/A

19. Describe any other factors which influence the market for boom lifts which you have not already mentioned (e.g. seasonality).

Response: Other important market factors include rental penetration, availability of used equipment, delivery lead times, financing conditions, parts and service coverage, and the timing of large projects. There may be some seasonality in construction and outdoor work, but Dingli UK does not consider seasonality to be the primary driver of this market. In Dingli UK's view, financing conditions and project timing are usually more important than seasonal effects.
Appendix reference: N/A

F2 Background

Please complete "**UK domestic companies**" tab in the **Annex.**

Response: Please refer to **Table F2** for the requested information.
Appendix reference: **Table F2**

F3 Your company

1. Please complete the **"Employment by location"** tab in the **Annex**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.

Response: Please refer to **Table F3.1** for the requested information. [Redacted –detailed explanation as to how the employment data has been reported in the table].
Appendix reference: **Table F3.1**

2. Explain how your total employees involved in the UK manufacture of like goods are split across different sites/locations.

Response: Not applicable. Dingli UK is a trading company. Therefore, there is no employee involved in the UK manufacture of like goods.
Appendix reference: N/A

3. How would these employment figures be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

Response: The impact of any anti-dumping measure on Dingli UK's business operations would depend on the level of the duties. A high dumping margin rate may result in reduced import and sales volumes, which would in turn severely impact Dingli's economic situation and the welfare of its employees. Should high dumping duties be imposed on Zhejiang Dingli's imports, Dingli UK may have to let its employees go by making them redundant.

Appendix reference: N/A

4. How significant are the imports of Boom lifts relative to your company's overall volume of imports?

Response: During the POI, Dingli UK imported [number] units of the goods concerned (including boom lifts and vertical mast lifts with jibs) from the PRC, with an import value of GBP [amount]. The imports of goods concerned account for roughly [percentage]% of the total imports of Dingli UK by value.

Appendix reference: N/A

F4 Potential impacts of a measure

. How would you expect an increase in the prices of the imported boom lifts to affect:

(1) Domestic prices of boom lifts
(2) UK production of boom lifts
(3) Total Imports of boom lifts the PRC and other third countries to the UK
(4) Total exports of boom lifts from the UK

Response: If the price of imported boom lifts were to increase: (1) domestic prices of boom lifts would likely increase as well, resulting in higher costs for all UK downstream industries; (2) UK production might benefit in overlapping segments; however, total UK demand cannot be met by the UK industry alone, also because the UK industry offers a limited product range and is not present in higher-reach segments; (3) imports from the PRC would likely decrease, while some demand might shift to other third-country suppliers where comparable products are available; and (4) UK exports are unlikely to be negatively affected. In this connection, Dingli UK notes that the Applicant claims that it "*has been forced to increase export sales*" due to the allegedly dumped imports from China. However, this allegation is not credible because, while the Applicant's UK sales slightly decreased over the injury period (by 7%), its export sales increased by a sharp 26%. Overall, during the injury period, the

Applicant increased its total production volumes by 16%. Had the Applicant had to increase its export production volumes out of necessity, its total production and sales volumes would have (at best) remained stable. However, this was not the case. The Applicant thus appears to be trying to conceal that it is a highly export-oriented producer, even though its export production accounted for ~[61-85]% of its total production during the injury period. This casts doubts as to the Applicant's allegations. Dingli UK also notes that, during the POI selected by the Applicant, when the imports from China allegedly increased, the Applicant's domestic production and sales volumes also increased, while its exports decreased. This (i) supports the view that the UK industry is not suffering from any injury on accounts of Chinese imports (because the alleged increase in import from China coincides with an increase in the Applicant's UK production and sales); and (ii) indicates that there is no correlation between the allegedly dumped imports and the Applicant's export performance (because increased Chinese imports *into the UK* cannot possibly explain a decrease in Applicant's *export* production volumes).

Appendix reference: N/A

2. How would your company be affected if an anti-dumping measure was imposed, including impacts:

   (a) by site (this is only relevant if your company operates across more than one site);
   (b) on domestic sales of boom lifts;
   (c) on your plans for investment/expansion.

Response: An anti-dumping measure would affect Dingli UK negatively. The impact would be felt on domestic sales, warehousing, service and administration activities, rather than in UK manufacturing. Domestic sales of the imported boom lifts would likely decline due to the increased landed costs and resulting higher prices, and customer demand would become more price-sensitive. Dingli UK would also be more cautious about inventory, recruitment and further investment or expansion in the UK if commercial conditions became materially less competitive.

Appendix reference: N/A

3. Would there be any indirect effects (e.g. price increases, consumers switching to substitute products, input costs, reduced innovation) on your industry and/or business if trade remedies are imposed on the goods concerned? Comment on the effect if no measure is imposed.

Response: Yes. Indirect effects could include higher prices for rental companies and end users, delayed fleet replacement, longer retention of older equipment, reduced model choice, a shift toward partial substitutes where technically feasible, and weaker pressure on suppliers to innovate or improve service. If no measure is imposed, the market would remain more competitive and customers would continue to benefit from broader choice and stronger price discipline.

Appendix reference: N/A

4. Do you know of any related industries that would be affected if an anti-dumping measure was imposed?

   Please consider in particular:

   - Upstream industries – those who produce inputs (such as raw materials) needed for the production of boom lifts;

Response: The most directly affected upstream industries in the UK would likely be service providers linked to the UK supply and support chain, rather than raw-material manufacturers. Should measure result in increased UK production of boom lifts, there could be some marginal positive effect for UK suppliers of components, servicing, logistics and related support. However, Dingli UK does not expect a dramatic upstream effect unless the UK industry decides to invests significantly in production capacity and UK production volumes substantially increase.

Appendix reference: N/A

   - Downstream industries – those who purchase boom lifts;

Response: Downstream industries are likely to be affected more. Rental companies, construction contractors, facilities-management businesses, industrial-maintenance users, utilities and renewable-energy/infrastructure operators could all face higher acquisition or rental costs and reduced model choice if measures are imposed. In sectors where working height, rough-terrain capability or low-emission operation are important, reduced availability of certain imported models could also affect project efficiency and timing.

Appendix reference: N/A

   - Industries for complimentary goods – those which would typically be bought alongside of boom lifts (such as ink being bought with printers); and

Response: Industries supplying complementary goods and services could also be affected. If import volumes fall, demand may also soften for telematics/GPS suppliers, spare-parts distributors, maintenance and inspection providers, training providers, transport/logistics services and equipment-finance providers associated with the imported boom-lift fleet. The scale of the effect would depend on how far UK customers shift to other brands rather than simply reducing purchases.
Appendix reference: N/A

- Industries for substitute goods – those which might be bought instead of boom lifts (such as margarine instead of butter).

Response: Some substitute industries could potentially benefit if measures are imposed, to the extent that customers switch to other access solutions where technically feasible. These may include suppliers or renters of scissor lifts, spider lifts, truck-mounted access platforms and, in some cases, scaffolding or other temporary-access solutions. However, because substitution is often limited by the job requirements, any such benefit would likely be limited.
Appendix reference: N/A

5. To what extent would you expect any changes in prices of boom lifts to be passed onto final consumers?

Response: Dingli UK would expect a substantial part of any increase in boom-lift prices to be passed on to final customers over time, although not necessarily on a one-for-one or immediate basis. The extent of pass-through would depend on the duty level, the product segment, customer contracts and the competitive response of other suppliers. In a competitive market, part of the cost may initially be absorbed within the supply chain, but a material share would ultimately be reflected in customer prices.
Appendix reference: N/A

6. How would the number or range of suppliers in the boom lifts market be affected if an anti-dumping measure was imposed? Please provide an explanation.

Response: An anti-dumping measure would likely reduce the effective number or range of suppliers available to UK customers, particularly if some PRC suppliers become materially less competitive or curtail their UK activity. Even if some demand may shift to third countries, the overall supplier base would likely become narrower in practical terms, especially for certain higher-reach, hybrid or niche models.
Appendix reference: N/A

7. How would suppliers' ability to differentiate their products by price, quality, service or innovation in the boom lifts market be affected if an anti-dumping measure was imposed? Please provide an explanation.

Response: A measure would likely reduce competitive pressure on suppliers to differentiate by price, service, delivery terms and innovation. Differentiation by engineering design and brand would still exist, but customers might face fewer viable alternatives in some segments. In practice, a narrower competitive set can reduce the commercial incentive to improve price, service and product development.

Appendix reference: N/A

8. How would the cost of switching between suppliers in the boom lifts market be affected if an anti-dumping measure was imposed? Please provide an explanation.

Response: The cost of switching between suppliers would likely increase. With fewer competitively available options, customers may need to accept models with different specifications, retrain operators and technicians, adjust spare-parts holdings, or work with a different service network. Switching costs are particularly relevant for rental fleets and repeat end users that value commonality and uptime.

Appendix reference: N/A

9. How would suppliers' ability to set their prices be affected if an anti-dumping measure was imposed? Please provide an explanation.

Response: Remaining suppliers' ability to set prices would likely increase if an anti-dumping measure significantly reduced import competition. That does not mean prices would become unconstrained, because third-country supply and customer resistance would still matter. However, the general direction would be toward greater pricing discretion than in a market with broader import competition.

Appendix reference: N/A

10. How would the choices of boom lifts available to consumers be affected if an anti-dumping measure was imposed? Please provide an explanation.

Response: The choices of boom lifts available to UK consumers would likely become more limited if measures were imposed. This may be most visible in specific product niches, hybrid or otherwise differentiated models. Even where alternative suppliers remain active, customers may face fewer combinations of reach, powertrain, weight and price point than they do today.

Appendix reference: N/A

11. How would the ability of downstream businesses or consumers to make informed decisions be affected if an anti-dumping measure was imposed? Please provide an explanation.

Response: The ability of downstream businesses or consumers to make informed decisions would likely be somewhat reduced if the market became less competitive and fewer offers were available for comparison. Customers benefit from comparing multiple suppliers on price, specification, service and technology. A narrower supplier base may reduce transparency in practical commercial decision-making, even if technical information remains available.

Appendix reference: N/A

12. Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

Response: In Dingli UK's view, segment-specific substitutability is especially important in this case.

Appendix reference: N/A

F5 Impacts on groups with protected characteristics

As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

1. Please provide any relevant information about whether the imposition of an anti-dumping measure might disproportionately affect any of these groups or any other particular group.

Response: Dingli UK is not aware of any specific reason why an anti-dumping measure would disproportionately affect persons with protected characteristics as such.

Appendix reference: N/A

SECTION G: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	Yes
Section B – Your goods	Yes
Section C – Imports and forward orders	Yes
Section D – Cost, sales and selling expenses	Yes
Section E – Injury	Yes
Section F – Understanding the UK market and potential impacts of a measure	Yes

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	**Document title**
Appendix A2.2	Legal Establishment of Dingli UK
Appendix A3.3	Internal Organization Structure
Appendix A3.5	Ownership Structure and Related Companies
Appendix A6.5	Financial Statements
Appendix A6.6	Trial Balance of Dingli UK
Appendix A6.7	Workings
Appendix B2.2	Internal Coding System
Appendix C2.2.1	Purchase Doc for Invoice [Redacted – commercially sensitive information]
Appendix C2.2.2	Purchase Doc for Invoice [Redacted – commercially sensitive information]
Appendix D1.1	Source Document for Cost Reconciliation (Dingli UK)
Appendix D6.2	UK Sales Docs
Appendix E2.1	GDP Monthly Estimate
Appendix E2.2	2025 Rental Market Report by IPAF

+Add additional rows as required