Trade Remedies Authority

Anti-dumping and Subsidy Investigations:

Application form

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

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

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version.** Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

Contents

Instructions 3

A. About the Goods 6

B. About the Application 17

C. About other interested parties 19

D. Representativeness 29

E. About the allegedly dumped imports you want us to investigate 30

F. Subsidised imports 46

G. Injury 51

H. Causal link between the imported goods and injury to your industry 71

Request for registration 74

Declaration 75

Checklist 76

Instructions

About us

The Trade Remedies Authority (TRA) is an arm's length body of the UK's Department for Business and Trade. It carries out trade remedies investigations to find out if a new trade measure may be needed to counter dumped or subsidised imports or a sudden surge in imports.

The legislative framework that the TRA operates under is found in the Taxation (Cross-border Trade) Act 2018 ('the Act') and the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 ('the Regulations').

About you

You can apply to us to open an investigation if you are a UK producer of goods or a representative of a UK producer and you have evidence of unfair trade practices relating to the dumping or subsidy of goods imported into the UK.

You must provide sufficient evidence of dumped or subsidised goods being imported into the UK and that the dumped or subsidised imports have caused or are causing injury to the UK industry (in compliance with the Act).

You can find out more about our remit and how we work by reading our guidance on trade remedies investigations.

About this form

Complete this form and the relevant annexes if you want to apply for a new anti-dumping or subsidy investigation. This form will give us the information we need to decide whether to initiate an investigation into your concerns. You can find more information on how we assess applications in our guidance.

You must submit your application online through the Trade Remedies Service (https://www.trade-remedies.service.gov.uk). When you submit your application, you must also submit a non-confidential version (including the annexes) which doesn't contain any data you think is sensitive (for instance, commercial data about your company), as we are required to publish a copy of the application form. You can find out more about what can be considered confidential and how to prepare a non-confidential version of your documents in our guidance.

If you are considering submitting an application and would like to discuss it with someone first, please email contact@traderemedies.gov.uk. You can find more on completing this application in our Pre-Application Office and application assessment guidance.

If you have any issues or queries about using the Trade Remedies Service, please email help@traderemedies.gov.uk.

What happens next

Once you have completed this application form you can share a confidential version with the Pre-Application Office to get feedback before you formally submit your application. When you formally submit your application, you will need to submit a confidential and a non-confidential version of this form. Please upload these through our Trade Remedies Service at www.trade-remedies.service.gov.uk.

Once you have done this:

- you will receive an email confirming the documents have been uploaded successfully;
- the assessor(s) of your application will contact you if further information is required; and
- the assessor(s) of your application may contact you to arrange a visit to verify the information contained in your responses.

How to complete this application form

Please read and follow all the instructions carefully. You will need to provide evidence to support your concerns. You may need to attach supporting documents in appendices to supplement the answers you give.

Please also note the following points:

- Try to avoid leaving any questions blank. If the question isn't relevant to you, please try to explain why.
- If the answer to a question is "zero", "no", "none" or "not applicable", please write this rather than leaving the answer blank.
- If you feel you can't present the information as requested, please contact the Pre-Application Office by emailing contact@traderemedies.gov.uk.
- If there is not enough space in any part of the application form to provide a full answer, please attach 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.
- If you include any documents not in English, please provide an English translation.
- Provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).

- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
- All figures should be reported net of tax unless otherwise stated.
- For definitions of the incoterms used throughout this document, please visit the International Chamber of Commerce.

A. About the Goods

This section of the application form is about the imported goods you want us to investigate. These imported goods will be referred simply to as 'the goods'.

You can only ask us to investigate imported goods if you (or the industry you represent) produce 'like goods'. Like goods are defined as goods which are similar to the goods under investigation in all respects or have characteristics which closely resemble them. When we decide what are like goods, we will consider the following non-exhaustive list of criteria:

- physical likeness, such as physical characteristics
- commercial likeness, including competition and distribution channels
- functional likeness, such as end-use or if the goods can be substituted for each other
- similarities in production, such as method and inputs
- other relevant characteristics

A.1. The Imported Goods

1. Describe the imported goods you are concerned about (if possible, please attach digital versions of images, brochures, catalogues, etc which show the goods in question).

*The imported goods are electric robot mowers, capable[1] of cutting grass (for example, in lawns, parks and sports grounds), without direct human control, whether or not including the secondary equipment necessary to their functioning (a charging station and, in most cases, ancillary materials or equipment necessary for the proper navigation of the robot lawn mower, e.g., a boundary wire or a wireless alternative thereto) ("**Robot Mowers**").*

The defining feature of a Robot Mower is not its size, power output, or intended area capacity, but its ability to cut grass autonomously within a defined area, without an operator continuously steering the machine using a steering wheel, handlebar, remote control, or equivalent direct control mechanism.

In essence, a Robot Mower consists of:

- *The lawn mower itself, as illustrated in **Figure 1**.*

[1] *Including products that may also have other capabilities.*

- *A charging station that the mower automatically approaches after a mowing cycle to charge the battery.*
- *In most cases, a backend system for digital services, such as an application to control the mower.*

Figure 1 – Robot Mowers[2]



The essential characteristics of all Robot Mowers are, for practical purposes, identical. Robot Mowers contain a blade to cut grass, a battery or other electric accumulator that allows the Robot Mower to operate without being connected to a power supply, and a technology that ensures that the Robot Mower mows the lawn efficiently and completely through systematic or random movement patterns.

Appendices A.1.1-2 contain sample brochures of imported Robot Mowers.[3]

Appendix reference: A.1.1-2 – Brochures

2. Explain where the imported goods you are concerned about are being exported from.

*The imported goods are being exported from the People's Republic of China ("**PRC**").*

Appendix reference:

3. Provide the tariff classification(s) for the imported goods.

Robot Mowers are typically imported into the UK under 8-digit customs code 8433 11 10 (mowers for lawns, parks or sports grounds; powered, with the cutting device

2 *Source: https://www.zdnet.com/home-and-office/yard-outdoors/how-to-choose-robot-mower-for-yard-expert-advice.*

3 *Positec catalogue, **Appendix A.1.1**; Yardforce catalogue, **Appendix A.1.2**.*

rotating in a horizontal plane; electric). This customs code includes lawnmowers other than Robot Mowers, such as traditional walk-behind lawnmowers powered by batteries. There currently are no 10-digit customs codes that further split out customs code 8433 11 10 into Robot Mowers.

Since the initiation of the EU anti-dumping investigation on 19 November 2025, the UK has put in place tariff code 8433 11 10 10 for in-scope Robot Mowers.

Appendix reference: N/A

4. Give details regarding whether the imported goods are currently subject to any anti-dumping/countervailing/safeguard measures or ongoing investigations in other countries.

*Yes, Robot Mowers originating from the PRC ("**Chinese Robot Mowers**") are currently subject to an ongoing anti-dumping investigation in the European Union ("**EU**") (case AD745). The EU is the largest Robot Mower market in the world.*

*The EU anti-dumping investigation was initiated on 19 November 2025.[4] The European Commission ("**Commission**") is expected to impose definitive anti-dumping duties by 16 January 2027.*

Appendix reference: N/A

A.2. The Like Goods

1. Describe the like goods produced by the UK industry (if possible, attach digital versions of images, brochures, catalogues, etc).

*The Robot Mowers produced by the UK industry ("**UK Robot Mowers**") are as described in **Section A.1.1**.*

Appendix A.2.1 contains a brochure of UK Robot Mowers.

Appendix reference: A.2.1 – Brochure Husqvarna

A.3. Comparability between the Goods

1. Explain how the like goods produced by the UK industry are like the imported goods. Please cover the following aspects of the goods.

   The physical, technical, chemical and any other characteristics that describe the goods – explain any differences:

[4] *See Notice of initiation of an anti-dumping proceeding concerning imports of robot lawn mowers originating in the People's Republic of China, OJ C, 19.11.2025.*

UK and Chinese Robot Mowers are like. UK and Chinese Robot Mowers follow the same general production process. They share the same essential physical and technical characteristics, use the same components, and are intended for the same end use. UK and Chinese Robot Mower brands also typically work under the same robotic standard. As such, UK and Chinese Robot Mowers are interchangeable.

Appendix reference: N/A

2. If the goods can be subdivided into separate models – provide details about each of the models, such as their product literature and technical documentation:

*The maximum area capacity ("**MAC**") is the primary differentiator between Robot Mowers and determines the key models in the market.*

In short, Robot Mowers are designed to mow lawns of different sizes, and customers typically select a model based on the maximum size of the lawn it can mow. Robot Mowers with lower MACs are typically simpler and cheaper products, whereas higher-MAC products are more advanced, command higher prices, and are usually for professional purposes.

*This is because, generally speaking, models with higher MACs require larger batteries, more electronics (such as sensors for safety reasons) and more robust mechanics (such as cutting systems), and are therefore typically more expensive than models with lower MACs. The market distinguishes between the main MAC segments reflected in the PCNs in **Section A.3.6**.*

The secondary differentiator is the technology used to define the mowing area. Specifically, all Robot Mowers require a method by which the Robot Mower stays within a defined area, such as the garden it is mowing. Overall performance of the Robot Mower is not affected by the technology used. Currently, there are two main technologies:

- *Using a physical boundary wire ("**BW**"), which is a 'guide' wire made from copper that delineates the area that the Robot Mower mows within. BW technology was launched by the Applicant in 1995. Many BW Robot Mowers are sold with an installation kit (including, for instance, guidewires) included in the package.*
- *Without physical boundary wire (i.e., boundary-wire free) ("**BWF**"), which is a technology launched by the Applicant in 2019. While BWF models are typically more expensive to produce due to higher technology costs, they are generally easier to install and maintain as they do not require physical wire installation.*

  BWF Robot Mowers typically use global navigation satellite system positioning and/or technologies using vision or technologies similar to vision (such as Lidar). Different technologies might be preferable for different locations. For instance, global navigation satellite system positioning might not work well in non-open areas where access to the open sky is limited, and vision-based technologies might not work well at night. Competition does not primarily take

place between specific BWF technologies, as users are generally technology-agnostic.

Other features, such as cellular connectivity, object detection capabilities, or drive configuration, may vary between models but are of secondary importance compared to MAC, and, to a lesser extent, the technology used.

Appendix reference: N/A

3. Give the tariff classification of the goods (customs commodity code) – if there are multiple models, provide the customs commodity code for each model:

*See **Section A.1.3**.*

Appendix reference: N/A

4. Summarise the production process of the goods in the UK and in the exporting country/countries. Make sure you explain if there are different production processes within the UK and/or the exporting country/countries concerned:

The production process of all Robot Mowers is largely identical in the UK and in the PRC. The key components of a Robot Mower, which are assembled onto the body of the Robot Mower, are:

- *The printed circuit board assembly, which includes the printed circuit board or boards, and all electrical components soldered onto the board*
- *The batteries*
- *The sensors*
- *The wheel motor assembly*
- *The cutting motor assembly*
- *The chassis*
- *The cover assembly with the charging module*

The UK industry manufactures some key components in-house, while some other components are sub-assemblies that are produced specifically for the UK industry by contract manufacturers. Chinese Robot Mower producers may or may not manufacture key components in-house.

Appendix reference: N/A

5. Provide a general description of the UK market for the goods including the nature and conditions of competition within the overall market. In your answer please refer to:

- general users/consumers/customers;
- market segmentation;
- government regulation or tax;

- distribution and marketing (for example, how is the product sold and is quality or price the deciding factor);
- the nature of competition within the overall market;
- the degree of price sensitivity;
- the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
- developments in technology affecting the characteristics, demand or the production process of the goods;
- other commercially significant goods which could be substituted for your goods and the goods being imported into the UK; and
- any other factors that influence the market.

After making some general comments (Section A), the Applicant addresses the elements of the UK Robot Mower market set out in the question (Sections B-K).

A. General comments on the UK Robot Mower market

The UK Robot Mower market is an emerging market compared to more mature European markets such as Germany, France, and the Nordic countries. While the EU is the largest global market for Robot Mowers, penetration in the UK remains more limited.

This reflects, among other things, the still relatively modest degree of consumer adoption, and the fact that Robot Mowers remain a discretionary, higher-value consumer product. At the same time, this means that the market potential on the UK market is large, as consumers gradually swap traditional lawn mowers for Robot Mowers. As one Chinese Robot Mower producer put it:

> *"With post-Brexit labour shortages pushing up gardening costs, and a growing desire for that perfectly manicured, striped British lawn, the appeal of a high-precision, fully autonomous mowing system has never been stronger."*[5]

*As explained in **Section G.1**, this means the UK market for Robot Mowers is growing.*

More generally, the global Robot Mower market is concentrated almost entirely in the UK, Europe, and the United States, as these are high-income markets where homeowners tend to have lawns with a sufficient sized lawn to warrant using a Robot Mower and have a desire for automated lawn maintenance. In contrast, there is no material Chinese domestic market for Robot Mowers.

[5] *Mammotion, RTK Robot Lawn Mower UK, **Appendix A.3.1**.*

B. General users/consumers/customers

In general, most UK users of or customers for Robot Mowers are:

- *Private homeowners, including owners of larger residential properties*
- *Professional users that cut grass around, e.g., offices, sporting grounds, or golf courses*

C. Market segmentation

*The UK Robot Mower market is segmented in the first place into a lower-end retail channel, and a higher-end dealer/specialist channel. See **Sub-section E** for more detail.*

*Within each channel, the market is segmented according to MAC and technology type (BW or BWF). See **Section A.3.2** above.*

D. Government regulation or tax

Government regulation or tax do not play a particular role in the UK Robot Mower market, as UK manufacturers, dealers, and end consumers of Robot Mowers do not need any hard-to-obtain authorization, other than conforming to strict safety standards under rules such as the Electrical Equipment (Safety) Regulations 2016.

UK imports of Robot Mowers generally benefit from a 0% import duty.[6] This is also the case for imports from the PRC.

E. Distribution and marketing

Robot Mowers are sold via two main distribution channels.

The first distribution channel is sales via retailers. Retailers are typically large DIY superstores or online retailers. They usually focus on lower-end Robot Mowers where price competition is particularly fierce. Retailers provide no technical assistance or after-sales support to consumers, and only provide traditional warranty and return support (if any) as for other general products.

The second distribution channel is sales via servicing dealers. Dealers are typically independent, specialized companies that sell garden and related equipment. They generally focus on higher-end, more complex Robot Mowers for, on average, higher MACs.[7] Dealers provide technical assistance, product installation and after-sales support to customers.

There is some overlap between the channels, and the importance of the retail channel is increasing.

F. Competition within the overall market

*As noted in **Sub-section A**, the UK Robot Mower market remains a relatively young market with relatively low penetration rates. Compared with the mature EU market, the UK market is still lagging. As explained further in **Section G**, in the EU, several domestic Robot Mower producers have already exited the market, while others have*

been forced to adapt by relocating production to the PRC. This demonstrates how quickly dumped and subsidized Robot Mower imports are reshaping markets.

Until the dumped Chinese Robot Mowers started grabbing market share, the UK Robot Mower market consisted of the Applicant, the sole UK Robot Mower producer, and imports from a range of producers in the EU. The rise in dumped imported goods from the PRC upsets the UK market, as Chinese Robot Mower manufacturers are aggressively grabbing market share through quickly decreasing prices.

G. Price sensitivity

Price sensitivity is (very) high, and the Robot Mower market is fully transparent.

Factors such as product type/specification, account classification, additional discounts, and time period may affect pricing.

H. Trends and drivers of demand

The UK Robot Mower market is growing and will normally continue to grow. Growth is driven by gradual consumer awareness, broader product availability, technological development, and increasing interest in convenience and automation in home and garden care. In professional applications, the automation of lawnmowing is a growing trend that helps increase customer satisfaction (e.g., on a golf course), permitting scarce human resources to focus on more value-creating activities.

Demand is influenced by a number of factors, including:

- *The number of households with suitable gardens and other public and private green spaces*
- *Disposable income*
- *The mowing season*
- *Retail and dealer promotion of the product category*
- *Technological innovation, (e.g., BWF Robot Mowers)*

I. Developments in technology affecting the characteristics, demand or the production process

Technological developments in the Robot Mower market have primarily focused on navigation and boundary systems, in particular the transition from BW to BWF.

While, in the POI, BW Robot Mowers still accounted for a significant number of sales, the market share of BW Robot Mowers is decreasing rapidly.

This development is driven by the advent of BWF Robot Mowers as well as the maturing of a range of navigation technologies on which BWF Robot Mowers rely for performance and reliability. These include RTK satellite positioning, vision-based

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6 *With the exception of imports from Belarus and Russia. See UK Integrated Online Tariff, Commodity code 8433 11 10 10,* ***Appendix A.3.2****.*

7 *BW Robot Mowers sold via dealers typically do not include installation kits, as dealers tend to install these Robot Mowers using different tools that allow for more time-efficient installations.*

systems, LiDAR, and hybrid or sensor-fusion solutions combining multiple technologies (e.g. RTK combined with vision or onboard sensors). While these technologies affect installation, usability, and convenience, they do not fundamentally alter the characteristics or production process of Robot Mowers. Further, in many cases, there is no clear or systematic cost distinction between different BWF navigation technologies, as systems based on different approaches (e.g., RTK versus vision) involve trade-offs in component costs (such as processing power, sensors, and connectivity).

J. Other commercially significant goods which could be substituted for the Applicant's goods and the imported goods

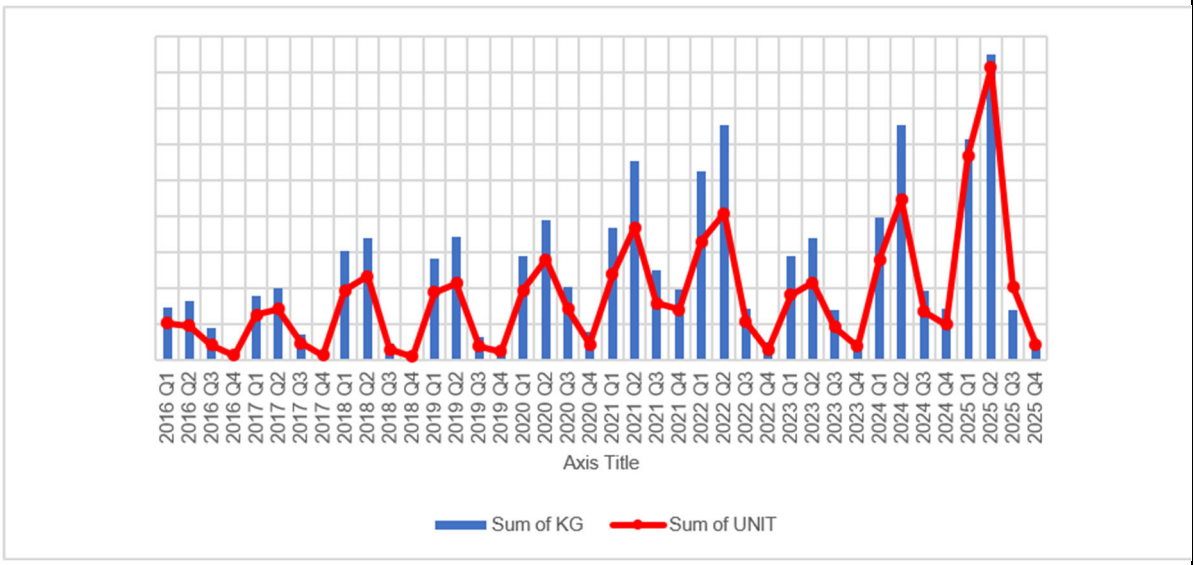
There is no substitute for Robot Mowers.

K. Any other factors that influence the market

The Robot Mower market is highly seasonal. Robot Mower producers sell most volumes to dealers and retailers in Q3 and Q4, as those dealers and retailers stock up for end consumer purchases in Q1 and Q2. Imports are often focused in Q1 and Q2, although in the Robot Mower industry, buyers are buying earlier.

Import statistics for the commodity code covering Robot Mowers – 8433 11 10 – demonstrate the seasonality, even if the bulk of imports under this code by number of units is of electric motor mowers for lawns, parks or sports grounds, with the cutting device rotating in a horizontal plane other than Robot Mowers. As Figure 2 demonstrates, imports are concentrated in Q1 and Q2 of each year.

Figure 2 - UK import statistics under 8433 11 10[8]



[8] *HMRC import statistics by origin, [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights] ,* ***Appendix A.3.3****.*

Trade Remedies Authority

Appendix reference: A.3.1 – UK market growth; A.3.2 – UK import duties; A.3.3 – UK import statistics

6. We give goods in our investigations Product Control Numbers (PCNs) which are identifiers unique to our work and are created on the basis of the main characteristics differentiating the goods from other goods. We use PCNs to allow comparison between products made by domestic and foreign producers. The accuracy of the TRA's PCN structure is directly proportionate to information supplied by the applicant. If the goods concerned covers a range of goods with different characteristics that would affect comparability:

- Please describe the key physical characteristics that have a consequential and material effect on prices, with the list of characteristics going from most to least consequential
- Please provide evidence to substantiate that these physical characteristics have a consequential and material effect on prices. This evidence could be in reference to specific unit costs, if those costs effect price comparability
- Use this information to delineate between models of not only the goods produced by the UK industry, but by the exporting producers, giving the information requested in the subsequent sections in reference to each model rather than the goods category as a whole. The annex will indicate where information is being asked for on an individual model basis.
- If you already have a view on a PCN structure, please propose that here.

*The Applicant proposes the product control numbers ("**PCNs**") set out in **Table 1**. These PCNs mirror the PCNs used by the Commission in the EU anti-dumping investigation on Chinese Robot Mowers,[9] adjusted for the fact that:*

- *There was a shift from BW to BWF Robot Mowers, with BWF Robot Mowers having a higher MAC. Also, the Applicant no longer produces any Robot Mower below 500 m^2. The Applicant has therefore removed the first category "Area capacity ≤ 500 m^2" for the first PCN field.*
- *In the EU case, there was limited use in distinguishing between Robot Mowers with MACs with 1,500 up to 3,000 m^2 and Robot Mowers with MACs with 3,000 up to 5,000 m^2. The Applicant has therefore merged these two categories.*

[9] *The PCN structure used by the Commission is set out in Table B to the exporting producer questionnaires, which are available at: https://tron.trade.ec.europa.eu/investigations/case-history?caseId=2830.*

Table 1 – Proposed product control numbers		
Field description	**Product properties**	**PCN value**
What is the MAC of the Robot Mower according to technical specifications?	Area capacity ≤ 1,000 m^2	1
	1,000 m^2 < area capacity ≤ 1,500 m^2	2
	1,500 m^2 < area capacity ≤ 5,000 m^2	3
	Area capacity > 5,000 m^2	4
Does the Robot Mower require a boundary wire to operate or is it boundary-wire free?	Boundary wire	W
	Boundary-wire free	F
Does the Robot Mower have cellular connectivity hardware permanently built into the mower, i.e. connectivity via mobile network, that is included in the Robot Mower from factory (i.e., not sold separately as an optional accessory)?	No cellular connectivity	N
	Cellular connectivity	C
Does the Robot Mower have object detection and avoidance feature/hardware that is integrated in the robot mower from factory (i.e., not sold separately as an optional accessory)?	No object detection functionality	0
	Basic functionality (collision avoidance)	1
	Advanced functionality (perception)[10]	2
Does the Robot Mower have two- or all-wheel drive?	Two-wheel drive	2
	All-wheel drive	4

Appendix reference: N/A

[10] Defined as the Robot Mower's ability to respond based on a semantic understanding of its environment, including object recognition and classification and/or behaviour adjustments derived from visual or sensor-based perception.

B. About the Application

Individuals or groupings of companies, individuals and trade bodies can all be applicants. Generally, an industry that is concerned about a set of imported goods should make only one application to us for an investigation. When we assess your application, we will consider information about all the companies which make up the group that is applying. When you are answering questions about the goods you produce, please include information about the goods produced by all the companies and individuals who are submitting this application.

B.1. Applicant Information

Name of Applicant

*Husqvarna UK Limited ("**Applicant**").*

Address

Preston Road, Aycliffe Industrial Park, Newton Aycliffe, County Durham, DL5 6UP, United Kingdom.

Email

[Sensitive information removed – Personal data]

Telephone

[Sensitive information removed – Personal data]

Contact Name

[Sensitive information removed – Personal data]

Company Ownership (provide broad details of shareholding)

The Applicant is a wholly owned subsidiary of the Husqvarna Group. The Husqvarna Group is publicly listed on Nasdaq Stockholm (ticker HUSQ A and HUSQ B).

Name of Lawyer/Representative

[Sensitive information removed – Personal data]

B.2. Period of Investigation

For the subsequent sections, please use the same 12-month period for every question and indicate below which 12-month period you are using. This period should not end more than six months before the date this application is submitted. This period will be referred to as 'the period of investigation (POI)' for the rest of the application. The 36-month period preceding the POI, will be referred to as the injury period. Please indicate the 12-month POI in the box below.

*The period of investigation ("**POI**") for this application is 1 January-31 December 2025. The period from 1 January 2022 to the end of the POI is the injury period ("**Injury Period**").*

The Robot Mower industry is highly cyclical: both production and the large majority of sales take place in a limited number of months. In addition, [Sensitive information removed – Applicant's business operations]. For that reason, the Applicant requests the TRA to use full calendar years also for the investigation.

At the very least, the Applicant requests the TRA to use full calendar years for the periods preceding the POI. Providing data for periods other than full calendar years would be [Sensitive information removed – Applicant's business operations].

Please give the volume and value of like goods you produced in the UK for the POI.

In the POI, the Applicant produced [100,000-400,000] Robot Mowers in the UK.

Using the average price per unit of all the Applicant's sales to unrelated parties, the value of this production exceeds GBP [150-700] million.

C. About other interested parties

C.1. UK producers

Your application must be supported by other UK producers who represent at least 25% of total UK production. This is based on production physically located in the UK. The level of support for the application must be greater than the level of opposition among UK producers.

If there are other UK producers, you will need to contact them and ask them whether they support or oppose this application. Please attach their written responses to your application OR their details should be provided below. Use a separate table for each producer.

We understand that other producers may be concerned about providing confidential information for this form. If necessary, you can ask an independent third party to confidentially combine information from the individual companies. Alternatively, the other producers can send the information separately to the TRA for us to combine.

UK producer	
Legal name of company:	*N/A. The Applicant is the sole UK producer of Robot Mowers.*
Name (point of contact):	
Role:	
Address:	
Telephone No:	
Email:	
Company website:	
Goods produced Please list all the UK-made goods this producer makes which are sold on the UK market and are like the imports this application is about	
Position regarding application (delete as applicable)	Support/oppose/undeclared

C.2. Other parties

1. Provide details of all known producers/exporters in the exporting country or producer/exporter associations in the exporting country, including:

Name:	*Airseekers Robotics*
Address:	*Room 4106, Building 1, Changfu Jinmao Building, South Side of Shihua Road, Fubao Community · Fubao Street, Futian District*
Email:	*info@airseekers.ai*
Telephone Number:	*N/A*

Name:	*Altverse*
Address:	*Longhorn High-Tech Park, Dalang, Longhua*
Email:	*info@altversebot.com*
Telephone Number:	*+86 0755 2814 0239*

Name:	*Anthbot*
Address:	*N/A*
Email:	*support@anthbot.com*
Telephone Number:	*+86 17322446748*

Name:	*Aquark Technology Limited*
Address:	*Keyuan Two Road, Ronggui, Shunde*
Email:	*sales@aquark.com*
Telephone Number:	*+86 20 3781 4693*

Name:	*Chervon Holdings (EGO)*
Address:	*No. 99 West Tianyuan Road Jiangning Economic and Technological Development Zone*
Email:	*chervon-ir@cn.chervongroup.com*
Telephone Number:	*N/A*

Name:	*Coors Robotics (Ecovacs)*
Address:	*No. 18 Youxiang Road*
Email:	*ir@ecovacs.com*
Telephone Number:	*0512-65875866*

Name:	*Daye (Einhell, Grouw, Grizzly, Mowox)*
Address:	*No.58 Jinfeng Road*
Email:	*zjb01@dayepower.com*
Telephone Number:	*0574-62569800*

Name:	*Dreame (Dreame)*
Address:	*17th Floor, Leighton Centre, 77 Leighton Road, Causeway Bay*
Email:	*support.us@dreame.tech*
Telephone Number:	*+1 (866) 977-5177*

Name:	*Ecoflow (Ecoflow)*
Address:	*Unit B, Building 7, Guojichuangxingusanqi, Dashi No,1 Road, Nanshan District*
Email:	*support@ecoflow.com*
Telephone Number:	*+1 (800)-368-8604*

Name:	*Globe Technologies Asia (Cramer, Greenworks, Powerworks)*
Address:	*No. 65-1, Xinggang Road, Zhonglou Economic Development Zone*
Email:	*customerservice@globetech.com*
Telephone Number:	*0519-89805880*

Name:	*Heisenberg Robotics*
Address:	*Room 802, Lvjing Meijing Plaza, No. 4088, Qiaoxiang Road, Gaofa Community, Shahe Street, Nanshan District*
Email:	*support@heisenberg-robotics.com*
Telephone Number:	*N/A*

Name:	*Joybee*
Address:	*N/A*
Email:	*hello@joybeerobot.com*
Telephone Number:	*N/A*

Name:	*Kowoll Garden (Kowoll)*
Address:	*N/A*
Email:	*sales@kowoll-garden.com*
Telephone Number:	*+852 9494 4416*

Name:	*Mammotion (Mammotion)*
Address:	*9th Floor, Building A3, Nanshan Zhiyuan, No. 1001 Xueyuan Avenue, Nanshan District*
Email:	*support@mammotion.com*
Telephone Number:	*+86 0755-86165015*

Name:	*Ninebot (Segway)*
Address:	*Building A4, Zhongguancun Dongsheng Science Park, No.66 Xixiaokou Road, Haidian District*
Email:	*ir@ninebot.com*
Telephone Number:	*010-84828002-841*

Name:	*Positec (Kress, LandXcape, Worx)*
Address:	*No. 18, Dongwang Road, Suzhou Industrial Park*
Email:	*contact@positecgroup.com*
Telephone Number:	*0512-65152888*

Name:	*RoboUP*
Address:	*Room 603, Building 6, Area 48, Science and Technology Park, No.8 Kewei Road, Nanshan District*
Email:	*hello@iroboup.com*
Telephone Number:	*N/A*

Name:	*Ryobi (Ryobi)*
Address:	*No.10 Wanda Road, Dalian Economic & Technological Development Zone, Liaoning Province*
Email:	*N/A*
Telephone Number:	*86-411-8733-3111*

Name:	*Shanghai Xiaojia Data Technology Co., LTD (iSward)*
Address:	*Luoshan Road, Pudong New District*
Email:	*info@isward-tech.com*
Telephone Number:	*+1 833 955 4001*

Name:	*Shenzhen Aiper Intelligent Co. Ltd*
Address:	*Room 501, Building 1, Shenzhen Software Park, No. 2, Gaoxin Middle 2nd Road, Maling Community, Yuehai Street, Nanshan District*
Email:	*support@lfibot.com*
Telephone Number:	*N/A*

Name:	*Shenzhen LYF Intelligence Co., Ltd (Novabot)*
Address:	*Room 501, Building 1, Shenzhen Software Park, No. 2, Gaoxin Middle 2nd Road, Maling Community, Yuehai Street, Nanshan District*
Email:	*support@lfibot.com*
Telephone Number:	*N/A*

Name:	*Spacewalker Technology (MOVA)*
Address:	*Shangjiwan Headquarter, Building E3 Economic Garden, 2288 Wuzhong Blvd, Suzhou, Jiangsu 215000*
Email:	*aftersales@mova-tech.com*
Telephone Number:	*N/A*

Name:	*Sumec (Yard Force)*
Address:	*198 Changjiang Road*
Email:	*tzz@sumec.com.cn*
Telephone Number:	*025-8453-1968*

Name:	*Sunseeker (Orbex, Scheppach, Texas)*
Address:	*Room 301, No. 226, Gaoji Road, Sijing Town, Songjiang District*
Email:	*ryan@sunseekerpower.cn*
Telephone Number:	*N/A*

Name:	*Suzhou Cleva Electric Appliance Co. Ltd. (Lawnmaster)*
Address:	*No.8 Ting Rong Street Suzhou Industrial Park*
Email:	*sales@cleva.com.cn*
Telephone Number:	*86 512 82275889*

Name:	*Suzhou Lymow Technology Co., Ltd. (Lymow)*
Address:	*Suzhou, Jiangsu, China (specific street address N/A)*
Email:	*info@lymow.com*
Telephone Number:	*N/A*

Name:	*Yarbo*
Address:	*1609-1610, Block C, Building 9, Baoneng Science and Technology Park Longhua District*
Email:	*support@yarbo.com*

Telephone Number:	*+1 (631) 818-1850*

Name:	*Zhejiang Safun Industrial Co., Ltd. (Sanfun)*
Address:	*No. 551 Jiuzhou West Road, Hardware Science & Technology Industrial Zone, Yongkang, Zhejiang*
Email:	*sales@safuntool.com*
Telephone Number:	*+86-579-87228379*

Name:	*Zhejiang YAT (Hooki, Powerplus, Senix)*
Address:	*No. 150, Wenlong Road, Yuxin Town, Nanhu District*
Email:	*yat.zq@yat.com*
Telephone Number:	*0573-83606088*

2. Provide the details of all known importers of the goods in the UK or any associations of importers in the UK, including:

Name:	*Amazon UK*
Address:	*1 Principal Place, Worship Street, London, EC2A 2FA, United Kingdom*
Email:	*amazon-uk-limitedlegal@amazon.com*
Telephone Number:	*02070847911*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*B&Q Limited*
Address:	*B&Q House, Chestnut Avenue, Chandler's Ford, Eastleigh SO53 3LE*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact person (if available)	*[Sensitive information removed – Personal data]*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Sims Garden Machinery*
Address:	*20/21 The Waterways, Stratford-Upon-Avon, CV37 0AW*
Email:	*info@simsgardenmachinery.co.uk*

Telephone Number:	*01789 205671*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Mower Magic Limited (Luba Robot)*
Address:	*Magic House, North Hykeham, Lincolnshire, England, LN6 9AL. United Kingdom*
Email:	*sales@lubarobot.co.uk*
Telephone Number:	*01522 283007*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Agent*

Name:	*Cleva UK*
Address:	*Q4 Quorum Business Park, Newcastle upon Tyne NE12 8EZ*
Email:	*N/A*
Telephone Number:	*N/A*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Agent*

Name:	*The Mower Shop Limited*
Address:	*Northampton Road, West Haddon, Northampton, Northamptonshire, NN6 7AS.*
Email:	*N/A*
Telephone Number:	*01788 510 453*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*World of Mowers*
Address:	*Criftin Enterprise Centre, Unit 8, Oxton Road, Epperstone, Nottingham, NG14 6AT*
Email:	*info@worldofmowers.co.uk*
Telephone Number:	*0115 920 0099*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*The Mower Shack*
Address:	*Eastland House, 50 Forge Lane, Halesowen, West Midlands, B62 8EB*
Email:	*info@themowershack.co.uk*
Telephone Number:	*07367 717178*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Dean Mowers Ltd*
Address:	*Central Garage, High Street, Blakeney, Glos, GL15 4EB*
Email:	*admin@deanmowers.co.uk*
Telephone Number:	*01594 516613*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Currys Group Limited (formerly DSG Retail Limited / Dixons Stores Group Limited)*
Address:	*1 Portal Way, London, W3 6RS*
Email:	*business@currys.co.uk*
Telephone Number:	*0344 561 1234*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Tesco Stores Limited*
Address:	*Tesco House, Shire Park, Kestrel Way, Welwyn Garden City, AL7 1GA*
Email:	*Customer contact via online form / WhatsApp*
Telephone Number:	*0800 323 4040 (customer service)*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*CDS (Superstores International) Limited (trading as "The Range")*

Address:	*Elsie Margaret House, 15 William Prance Road, Plymouth, PL6 5ZD*
Email:	*Contact via online form at help.therange.co.uk*
Telephone Number:	*0345 026 7598*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Argos Limited*
Address:	*33 Charterhouse Street, London, EC1M 6HA*
Email:	*N/A (customer contact via online chat / phone)*
Telephone Number:	*0345 640 2020*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Wickes Building Supplies Limited*
Address:	*Vision House, 19 Colonial Way, Watford, WD24 4JL*
Email:	*customercare@wickes.co.uk*
Telephone Number:	
Contact person (if available)	*0330 123 4123*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Lidl Great Britain Limited*
Address:	*Lidl House, 14 Kingston Road, Surbiton, England, KT5 9NU*
Email:	*Customer contact via online portal*
Telephone Number:	*0800 977 7766*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Aldi Stores Limited*
Address:	*Holly Lane, Atherstone, Warwickshire, CV9 2SQ*
Email:	*customer.service@aldi.co.uk*
Telephone Number:	*0800 042 0800*

Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

Name:	*Dobbies Garden Centres Limited*
Address:	*Melville Nurseries, Lasswade, Midlothian, Scotland, EH18 1AZ*
Email:	*N/A*
Telephone Number:	*N/A*
Contact person (if available)	*N/A*
Nature of their business (retailer/agent etc)	*Retailer*

3. Provide the details of all known suppliers, users and consumers of the goods in the UK, or associations of suppliers, users or consumers including:

Users/consumers are private individuals.

Name:	*European Garden Machinery industry Federation*
Address:	*Av. des Arts 56, 1000 Bruxelles, Belgium*
Email:	*secretariat@egmf.org*
Telephone Number:	*+32 2 206 68 66*
Contact Person (if available)	*N/A*

D. Representativeness

D.1. Summary of UK Producer support or opposition for this application

We need to know about the total volume of UK production for UK markets by the producers who support your application. **Please complete Annex 1**, which will guide you through the calculation of whether representativeness requirement is met in terms of volume and value. If any figures are estimates, please explain how you worked out this information.

*See **Annex 1**. The Applicant is the sole UK producer of Robot Mowers. It follows that the entire UK Robot Mower industry supports this application.*

D.2. Market Share

1. The applicant UK industry/industries should have at least a 1% share of the UK market for the goods, irrespective of where the goods were produced. Please demonstrate this by **completing Annex 2**. If you have other specific market share information, please also provide that.

*See **Annex 2**. The Applicant has at least a 1% share of the UK Robot Mower market.*

2. Please note that the requirement can be waived in certain circumstances, for example if your application is about imports preventing a UK industry from being established for a 1% market share. If you think the requirement should be waived, explain why.

N/A.

D.3. Related Persons

If you know that the Applicant or any other known UK producer of the goods is related (as defined under Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018 (a)) to an exporter or an importer of the goods, describe the company and the relationship.

The Applicant is part of the Husqvarna Group, which produces Robot Mowers in the European Union. Husqvarna Group entities supply Robot Mowers to the Applicant for sale on the UK market.

E. About the allegedly dumped imports you want us to investigate

Complete this section if you are making an application for a dumping investigation.

Please give us all the information you can about the imported goods you believe are being dumped and the injury being caused to UK industry.

E.1. Sufficiency Test

Please note that we may reject your application if there is not sufficient evidence of dumping or injury. Evidence of dumping is insufficient if the margin of dumping is less than 2% of the export price (minimal).

1. List all countries (or territories) where the imported goods are produced (country of origin) and the countries (or territories) from which they are exported to the UK, if this is different.

Robot Mowers are produced in the UK, the EU, the PRC, and – although volumes are insignificant – Israel.

*The by far largest EU producer of Robot Mowers is Husqvarna Manufacturing CZ s.r.o. ("**HMCZ**"), which has a production facility in the Czech Republic. HMCZ is part of the Husqvarna Group and thus related to the Applicant.*

2. **Complete Annex 2**, giving the volume and value of the imported goods for the POI, to demonstrate percentage of total imports.

*See **Annex 2**.*

3. Provide details and evidence of how the volume and value of dumped imports have been calculated.

As the customs code under which Robot Mowers are imported contains other products, it is not possible to use import statistics to establish the volume and value of dumped imports.

I. Volume of dumped imports

The Applicant thus first calculated the estimated UK consumption of Robot Mowers. The Applicant started from data reported by [Sensitive information removed – Name of a market intelligence provider. Disclosure of this name would violate third party copyrights]. [Sensitive information removed – A market intelligence provider] reports total sales volumes on the UK market based on [Sensitive information removed –

Data provided by a market intelligence provider. Disclosure would violate third party copyrights].

[Sensitive information removed – Data provided from a market intelligence provider. Disclosure would violate third party copyrights].

It appears [Sensitive information removed – Names of Chinese Robot Mower exporters] are among the top three of Chinese Robot Mower exporters [Sensitive information removed – Chinese producers' exports]. [Sensitive information removed – A market intelligence provider] data thus does not include the ever-bigger volumes sold by [Sensitive information removed – Data provided by a market intelligence provider. Disclosure would violate third party copyrights].

To account for the sales volumes of [Sensitive information removed – Data provided by a market intelligence provider], the Applicant used data from market intelligence provider [Sensitive information removed – A market intelligence provider] for [Sensitive – Large EU markets]. [Sensitive – Large EU markets] together account for ~50% of the EU market and are thus representative markets to use as a proxy for the UK market, for which the Applicant does not have comparable [Sensitive information removed – A market intelligence provider] data. The Applicant used the split between [Sensitive information removed – Data provided by a market intelligence provider] sales volumes and [Sensitive information removed – Data provided by a market intelligence provider] sales volumes in [Sensitive – Large EU markets] to estimate the sales volumes of [Sensitive information removed – Data provided by a market intelligence provider] sales volumes in the UK.

By summing up sales volumes of [Sensitive information removed – Data provided by a market intelligence provider. Disclosure would violate third party copyrights] and estimated sales volumes [Sensitive information removed – Information on Applicant's methodology to estimate some sales volumes], the Applicant calculated estimated UK consumption of Robot Mowers.

Next, to estimate sales volumes of EU Robot Mower exporters on the UK market, the Applicant started from actual export volumes of Robot Mowers made in the EU and sold on the UK market by the Husqvarna Group, which is by far the largest producer of Robot Mowers in the EU. As a best estimate, the Applicant extrapolated that volume to cover all EU producers based on the Applicant's share in all EU Robot Mower exports, as established in the EU anti-dumping case.

Finally, as there is no material production of Robot Mowers outside the UK, the EU, and the PRC, the Applicant assumed that Chinese Robot Mower exporters account for all sales on the UK market that are not made by the UK industry or exported from the EU.

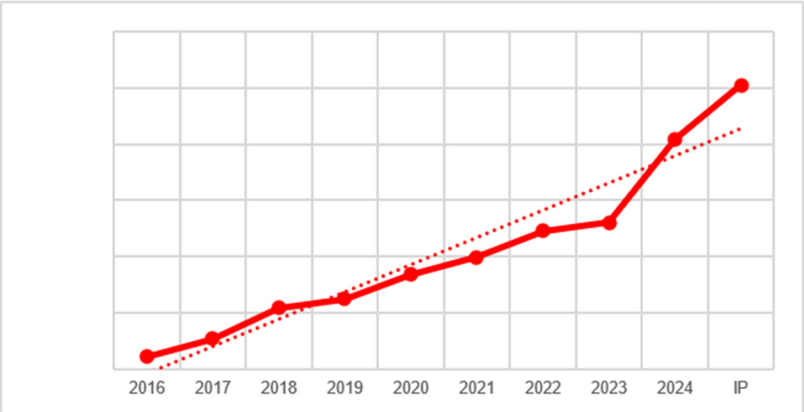
The Applicant notes that its consumption analysis is conservative and almost certainly underestimates both UK consumption and the volume of Chinese Robot Mower exports. [Sensitive information removed – Chinese Robot Mower producers' export strategy] very large quantities of Robot Mowers that are not captured by

[Sensitive information removed – Market intelligence providers] data (e.g., Robot Mowers sold via certain e-commerce platforms).

*As **Annex 2** demonstrates, even based on conservative estimates, Chinese Robot Mower sales on the UK market increased sharply over the Injury Period.*

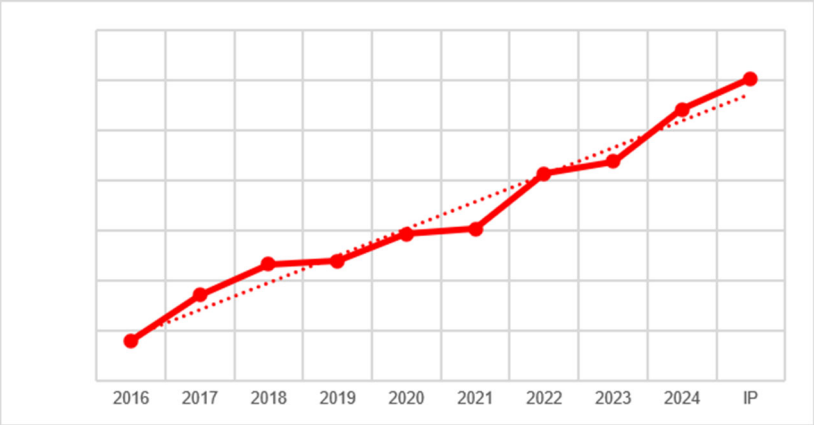
*This reflects the same trend as that on the EU market. For context, Figure 3 and Figure 4 report – again based on conservative estimates – the evolution of Chinese Robot Mower sales and the resultant market share for Chinese Robot Mowers on [Sensitive – Large EU markets] since 2016. As these figures demonstrate, both in absolute and relative terms, Chinese Robot Mower exporters are taking over markets at breakneck speed. Since 2021, in particular, the market share for Chinese Robot Mowers on the [Sensitive – Large EU markets] doubled from [Sensitive information removed – Calculation based on data from market intelligence provider]. As explained in **Section G**, the flood of Chinese Robot Mowers at injuriously low prices has resulted in the Applicant exiting several market segments already and threatens the survival of the Applicant's remaining UK business.*

Figure 3 - Chinese Robot Mower sales in [Sensitive – Large EU markets][11]



[11] *Source: [Sensitive information removed – A market intelligence provider].*

Figure 4 - Market share of Chinese Robot Mowers in [Sensitive – Large EU markets][12]



II. Value of dumped imports

As import statistics do not permit isolating the value of imports of Robot Mowers, the Applicant estimated the value of Chinese Robot Mower sales on the UK market based on the estimated sales volumes established above and an estimated average price per unit.

*As no UK market data on the prices of Chinese Robot Mowers is available to the Applicant for the Injury Period, the Applicant started from the Applicant's own average sales price per unit on the UK market in each year of the Injury Period. The Applicant then adjusted this price downward by the weighted average undercutting margin established in **Annex 9** and **Section G.1.6**, i.e., the margin by which the seven representative Chinese Robot Mower models undercut the directly competing Applicant models. The estimated value of Chinese Robot Mower sales is the product of the estimated sales volume and the resulting estimated average price per unit.*

E.2. Normal value

Normal value refers to the domestic price that the imported goods are normally sold for on the domestic market in their country of export. This value should then be adjusted for costs arising after the ex-works (EXW) level (and any other factors that need to be considered) to make a fair comparison with the export price.

If your complaint concerns more than one exporting country, calculate the normal value for each country

There are several different methods for calculating normal value, with the appropriate method being determined by the circumstances of trade between the exporting country and the UK, and the nature of exporting country's economy.

[12] *Source: [Sensitive information removed – A market intelligence provider].*

Therefore, when you tell us the normal value of the goods, you will also need to explain which method you are using to calculate it and why.

The methods are:

- 'Comparable Price', this is the price of the goods in the ordinary course of trade in the home market of the exporting country;
- Constructed Normal Values in the country of export based on the cost of production, plus reasonable amounts that would have been incurred on a domestic sale in the country of export for administrative, selling and general expenses and for profit;
- 'Sales made to a third country by the exporter', provided this amount is representative of the domestic selling price in sales in the country of export (provide evidence to support this); or
- If none of the above is possible, establish the normal domestic value from the best information available to you and provide this information to us, along with an explanation of the approach you have adopted. Alternatively, if prices in the exporter's domestic market are unavailable and it is not possible to construct a normal value, please contact the TRA to discuss further options.

Where possible, you should calculate normal value using the 'Comparable Price' Method. However, there are situations where this would be inappropriate, and so one of the alternative methods should be used. This includes situations where:

- the goods are not sold in the ordinary course of trade in the domestic market of the exporting country;
- these sales on the domestic market of the exporting country sales don't allow a proper comparison with their sales on foreign markets because of:
    - a particular market situation;
    - low volume of sales in the domestic market of the exporting country;
- the overseas exporter does not sell these goods in their domestic market;
- the imports are from a particular foreign country – this is a specific term defined under Regulation 14 of the Dumping & Subsidy Regulations which means that it's difficult to use prices of goods in that country as a fair comparison.

More information on each of these conditions and when they apply can be found in our guidance on dumping investigations.

E.2.1. Method

Please indicate below the method you have used for calculating normal value of the imported goods. If you have used an alternative basis to comparable price (e.g. constructed normal value), please explain why you believe it isn't appropriate to use comparable price and provide your evidence to support this.

*In view of the length of the Applicant's response to this Section, the response is enclosed in **Annex E.2.1**.*

Please give the normal value calculations using the appropriate section below, making sure to use the section relevant to the method you have described in this section. Delete tables for any methodologies you are not using.

The evidence you provide of normal value should, as far as possible:

be representative of different product types or models within the goods you are applying to us to investigate, if there are substantial differences in the normal value between these product types and models; and relate to normal value spread over the POI

E.2.2. Comparable Price

Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level. If using this method, **please complete Annex 3**.

*N/A. The Applicant constructs normal value because of the particular market situation ("**PMS**") in the PRC.*

E.2.3. Constructed Normal Value

Please complete Annex 4, explaining how each cost was calculated including:

- materials;
- direct labour;
- overheads;
- administration, sales and general expenses (ASG), excluding transport costs; and
- the reasonable profit margin in the country of origin.

Where there is a particular market situation, make adjustments to elements of cost or

profit that are not substantially determined by market forces. For further information, see our guidance on adjusting costs when constructing normal value or contact our Pre-Application Office (contact@traderemedies.gov.uk).

For any of the above methodologies, attach supporting documentation for the prices, costs and any adjustments (see below) you have made. This can include:

- price lists;
- price quotations;
- sales invoices for domestic sales;
- sales correspondence;
- publicly available material containing information on domestic selling prices; and
- market surveys.

*See **Annex 4**.*

*As concerns raw material costs, electronics are crucial components in Robot Mowers. Many electronic components used in Robot Mowers are not off-the-shelf commodity products, but complex printed circuit boards ("**PCBs**") that contain key components for the functioning of the Robot Mower – e.g., PCBs that drive the cutting pattern or that operationalize the BWF technology.*

The customs classification of PCBs and other electronics components groups together a range of products with varying prices. There is also no publicly available information on the costs of electronic components. Orders are typically placed with suppliers following extensive technical discussions about the precise requirements of specific components. In the case of the Applicant, [Sensitive information removed – Applicant's business operations].

Therefore, to ensure a proper benchmark for the costs of electronic components that are distorted in the PRC by the PMS, in the context of the present application and for the ensuing investigation, it is most appropriate to use data from a representative country producer of Robot Mowers.

*The Applicant thus used the actual costs from HMCZ's Czech Robot Mower production facility to construct the normal value. The Applicant explains why the Czech Republic is an appropriate third country in **Section E.2.5**.*

*In **Annex 4**, the Applicant used actual costs for four representative models (two BWF and two BW) produced in HMCZ's Czech Robot Mower production facility. The data was sourced from HMCZ's EU complaint and its verified questionnaire response in the EU anti-dumping investigation. The four models are the most direct competing*

*models with the representative models selected for the export price calculation, as detailed in **Section E.3**. They are:*

- *[Sensitive information removed – Applicant's model], a BWF model*
- *[Sensitive information removed – Applicant's model], a BWF model*
- *[Sensitive information removed – Applicant's model], a BW model*
- *[Sensitive information removed – Applicant's model], a BW model*

To ensure comparability with the models selected for the export price calculation, the Applicant made adjustments for the differences in PCNs based on its costs for adding certain capabilities (e.g., the cost of adding perception to a model).

*For selling, general, and administrative expenses ("**SG&A**"), the Applicant used HMCZ's tactual SG&A costs. The Applicant corroborated this with the SG&A margin for two of the largest Chinese exporters, i.e., Ecovacs and Segway.[13] The Applicant calculated the SG&A markup from these exporters' 2024 financial statements, which are the most recently available statements.*

For profit, the Applicant calculated profit from the 2024 financial statements of Ecovacs and Segway. Both companies had quasi-identical profit margins, and the Applicant used their average.

E.2.4. Selling Price from Exporter to a Third Country

If this is the preferred method, **please use Annex 3**, indicating here which country you are using, and amending the listed adjustments to better reflect the adjustments made. Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level

N/A. The Applicant has constructed the normal value.

E.2.5. Appropriate third country

This method is only available for particular foreign countries as defined under Regulation 14 of the D&S Regulations.

1. Nominate an appropriate third country so you can establish normal values based on their selling prices.

[13] *The two other – likely – largest Chinese exporters, Positec and Mammotion, do not publish financial statements.*

Regulation 14(1)(b) of the D&S Regulations applies to the PRC. Thus, the TRA should calculate the normal value of Chinese Robot Mowers based on the costs of production of like goods plus a reasonable amount for SG&A and for profits in an appropriate third country. As explained below, the Applicant considers that Czech Republic is an appropriate third country in the sense of Regulation 14(4) of the D&S Regulations.

Should the TRA consider that Regulation 14(1)(b) does not apply to the PRC, Czech Republic also meets the requirements for an appropriate representative country based on which adjustments can be made under Regulation 13(4)(a) of the D&S Regulations.

2. Explain your basis for selecting this third country.

*As explained in **Section E.2.3**, the cost of electronics is crucial to determining the normal value, and the electronic components used in Robot Mowers are not routinely used in other products.*

*Therefore, in the context of the present application and for the ensuing investigation, it is crucial to use data from a representative country producer of Robot Mowers. As explained in **Section E.1**, Robot Mowers are produced only in the UK, the EU (in Czech Republic and Italy), the PRC, and, in limited quantities, Israel.*

The Applicant considers that the Czech Republic meets the requirements for the selection of the appropriate representative third country under Regulations 14(4) and 13(5) of the D&S Regulations.

A. The Czech Republic has a similar level of economic development to the PRC

*As **Table 2** demonstrates, Czech Republic has a similar level of economic development to the PRC, based on GDP per capita, World Bank classification, life expectancy, literacy rate, and employment in the industry as a percentage of total employment.*

In any event, Czech Republic is much more similar in terms of economic development to the PRC than Israel or Italy are.

The Applicant notes that the World Bank classifies a country as 'high income' as of a GDP per capita in 2024 of USD 13,845. While the PRC was, based on its 2024 GDP per capita, thus still an upper middle-income country, its GDP per capita of USD 13,303 is very close to the cutoff for high income countries. The GDP per capita of the Czech Republic and that of the PRC are closest, as Italy and Israel's GDP per capita is significantly higher than that of the Czech Republic.

In terms of life expectancy and employment in industry as a percentage of total employment, Czech Republic is very close to the PRC – significantly closer than Israel or Italy. The literacy rate in all four countries is very similar.

Table 2 – Level of economic development				
Development indicator	***PRC***	***Czech Republic***	***Israel***	***Italy***
GDP per capita (2024)[14]	*USD 13,303*	*USD 31,823*	*USD 54,177*	*USD 40,385*
World Bank classification (2025)[15]	*Upper middle income*	*High income*	*High income*	*High income*
Life expectancy (2023)[16]	*78 years*	*80 years*	*83 years*	*84 years*
Literacy rate[17]	*97% (2020)*	*99% (2011)*	*98% (2011)*	*99% (2019)*
Employment industry as % of total employment (2023)[18]	*32%*	*35%*	*15%*	*26%*

B. Evidence of a Czech Robot Mower industry

The Czech Republic has the largest non-Chinese Robot Mower industry. HMCZ has a production capacity of [600,000-800,000] units, which is [the large majority] of total EU Robot Mower production capacity.

The Robot Mowers manufactured at HMCZ are identical to Chinese Robot Mowers in terms of applications physical, and technical characteristics.

The EU market for Robot Mowers is the largest in the world. Aside from dumped imports of Chinese Robot Mowers, it is a competitive and mature market.

C. Availability of data

HMCZ has provided the Applicant with all necessary data, which, as explained, is particularly important for the present application and the ensuing investigation given the complexity of Robot Mower components.

HMCZ's data was verified by the Commission in the context of the ongoing EU anti-dumping investigation on Chinese Robot Mowers.

3. **Please use Annex 4** to calculate the Normal value based on the third country data, amending the listed adjustments to better reflect the adjustments made. Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or

14 *World Bank, GDP,* ***Annex E.2.5.1****.*

15 *World Bank, Country classification,* ***Annex E.2.5.2****.*

16 *World Bank, Life expectancy,* ***Annex E.2.5.3****.*

17 *World Population Review, Literacy rate,* ***Annex E.2.5.4****.*

18 *World Bank, Employment in industry,* ***Annex E.2.5.5****.*

Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level.

*See **Annex 4**.*

E.3. Export price of the goods

The export price is the selling price of the goods from the exporting country to a UK importer or a third party for export to the UK. This is adjusted to account for export costs and calculated back to the ex-works export price in the country of export. In most cases, you can base the export price on the price charged by the exporter to an unrelated importer in the UK. If your complaint concerns more than one exporting country, calculate the export price for each country

However, you may need to construct export price based on sales to first independent buyers or another reasonable method if:

- there is no export price;
- the price is unreliable due to an association or compensatory arrangement between the exporter and UK importer or third party.

Before providing the export price of the goods, please explain which basis you are using to calculate this and why. If you have constructed the export price, please give your reasoning for doing this and evidence to support this.

Please give your export price calculations in the appropriate table below. Make sure you use the basis you described above and delete tables for any methodologies you are not using. Please note that whichever methodology you use, you will need to provide an export price on a CIF and EXW level. You should use price information from the POI.

The evidence you provide of the export price should, as far as possible:

- be representative of different product types or models within the goods you are applying to us to investigate, if there are substantial differences in the normal value between these product types and models; and
- relate to normal value spread over the POI

If either/both of these are not possible, please explain why. If you consider that export prices would not have varied significantly over the last year and so prices over the period outlined above would not be relevant for establishing representative export prices, please explain why you consider that to be the case.

The Applicant constructed the export price as the price information for Chinese Robot Mowers on the UK market that is available is the price to the final customer.

Sales to the final customer are typically made by unrelated parties, such as retailers or dealers. Further, Chinese Robot Mower producers typically use related entities in the UK to import Robot Mowers, rendering import prices unreliable due to an association between the UK importer and the Chinese Robot Mower exporter.

To establish a representative export price, the Applicant selected seven of the most popular Chinese Robot Mower models produced by four of the largest Chinese exporters:

- *Five BWF Robot Mower models:*
  - *[Sensitive information derived from copyrighted information removed – Chinese Robot Mower model]*
  - *[Sensitive information removed – Chinese Robot Mower model]*
  - *[Sensitive information removed – Chinese Robot Mower model]*
  - *[Sensitive information removed – Chinese Robot Mower model]*
  - *[Sensitive information removed – Chinese Robot Mower model]*
- *Two BW Robot Mower models:*
  - *[Sensitive information removed – Chinese Robot Mower model]*
  - *[Sensitive information removed – Chinese Robot Mower model]*

In the granular [large EU markets] market data available to the Applicant (for which there is no UK equivalent), [Sensitive information removed – Chinese Robot Mower models] were the five highest-selling models by volume. [Sensitive information removed – Chinese Robot Mower model] was the seventh-highest selling model. The Applicant added a [Sensitive information removed – Chinese Robot Mower model] because of [Sensitive information removed – Chinese Robot Mower producers' export strategy].

The seven selected models are directly comparable to the four models the Applicant used to construct the normal value.

E.3.1. Export price based on the selling price of the goods from the exporting country to a UK importer or a third party for export to the UK

Provide the export prices of the allegedly dumped goods using Annex 5 Evidence and individually itemise the costs subtracted from this selling price to bring it back to an ex-works level, such as publicly available freight rates. Explain how the amounts were established.

Provide documentary evidence for the selling price to the importer in the UK, such as:

- sales invoices;
- written offers;
- price quotations;
- sales correspondence; or
- official statistics.

N/A. The Applicant has constructed the export price.

E.3.2. Constructed Export Price

Calculate the constructed export price(s).

You may need to adjust for any costs included in the selling price which relate to the movement of the goods to the UK. If you are using sales to the first independent buyer as a basis for constructing, establish the details of the first sale to an independent buyer in the UK and deduct taxes, costs, charges, expenses and profit margins to obtain an ex-works price in the country of origin.

If there are different models or types of product for the imported goods, please construct a price for each one. Provide each adjustment separately. If your starting point is a CIF value, you will only have to find and deduct costs incurred by the exporter in the country of export from CIF back to the ex-works level.

Provide evidence to show how you have calculated or estimated the export prices. Include all the evidence you have on the resale price of the imported goods in the UK. Provide the basis for the costs and profits subtracted from this selling price to bring it back to an ex-works level such as published industry mark-ups or publicly available freight rates and give evidence to support each cost adjustment.

*To construct the ex-works ("**EXW**") export price of Chinese Robot Mowers for the selected representative models, the Applicant:*

- *Started from publicly available prices to end consumers in the UK. As historical pricing for the POI is not publicly available, the Applicant used recent prices.*

  As there is no significant difference in production cost used for the normal value between the POI and H1 2026, this does not affect the reliability of the dumping calculations.

- *Deducted the applicable VAT, which is 20%.*

- *Deducted a [20-30]% markup for the first independent buyer, typically a retailer. This markup is an estimate based on the Applicant's knowledge of the Robot Mower market.*

  The Applicant corroborated this estimate with the average gross margin (i.e., the sales revenue minus the cost of goods sold) reported by all listed companies in Western Europe in the general retail sector.[19] This was 24.9% for 2025. A 24.9% margin amounts to a ~33% markup.[20] Deducting [20-30]%, as the Applicant has done, is thus conservative.

- *Deducted an SG&A margin of 21.5% for the involvement of the related UK importer, as the largest Chinese Robot Mower exporters use related importers to import Robot Mowers into the UK.*

  *The Applicant used the actual SG&A of Positec (UK & Ireland) Ltd. ("**Positec UK**"), the related importer for Positec, one of the largest Chinese Robot Mower exporters.[21]*

  Mammotion appears to use its German entity Mammotion Technik GmbH to import into the UK.[22] However, Mammotion Technik GmbH's accounts are not available in the German company register.[23] Ecovacs uses its UK entity Ecovacs Robotics UK Ltd, which does not publish full accounts.[24] Segway may use its Dutch entity Segway Europe BV but as this is speculative, the Applicant did not use its data. In any event, its SG&A margin is comparable to that of Positec UK.

- *Deducted a profit of 6.3% for the involvement of the related UK importer. This profit is the average of the 2025 profit reported by two importers of Robot Mowers that are related to EU producers of Robot Mowers. AL-KO Gardentech Ltd. is related to EU Robot Mower producer AL-KO,[25] while Stiga Ltd. is related to EU Robot Mower producer Stiga.[26]*

- *Deducted from the UK border ("**CIF**") export price GBP [20.0-30.0] per unit in freight, insurance, and importation-related costs from the UK border up to EXW PRC. This is an estimate based on the Applicant's knowledge.*

19 *Aswath Damodaran, Profit margins Western Europe,* ***Appendix E.3.2.1****.*

20 *The formula from margin to markup is 24.9%/(100%-24.9%).*

21 *See Positec (UK & Ireland) Ltd., Full accounts 2024,* ***Appendix E.3.2.2****.*

22 *See UK Trade Info, Mammotion Technik GmbH,* ***Appendix E.3.2.3****.*

23 *See German Company Register, Mammotion Technik GmbH,* ***Appendix E.3.2.4****.*

24 *See Ecovacs Robotics UK Ltd., Micro accounts 2024,* ***Appendix E.3.2.5****.*

25 *See AL-KO Gardentech, Accounts 2025,* ***Appendix E.3.2.6****.*

26 *See Stiga, Accounts 2025,* ***Appendix E.3.2.7****.*

E.4. Fair Comparison

To achieve an appropriate price comparison, the export price and the normal value should be compared at a fair level, in terms of their basic physical and chemical characteristics and the terms and conditions of sale. To achieve this comparison, please adjust your calculations to account for any differences which affect price comparability. This means that the comparison should be made at the same level of trade (such as wholesale or retail), at ex-factory level (EXW), and where possible, at the same time.

For certain types of adjustment, only the normal value may need to be adjusted. Sometimes both the normal value and export price will need to be adjusted. Use the table of adjustments below to check if the adjustment can be applied to export price or normal value or both. For more information, please consult our fair comparison guidance.

Table of adjustments	Export Price	Normal Value
Physical characteristics	No	Yes
Import charges and indirect taxes	No	Yes
Discounts, rebates, quantities	Yes	Yes
Level of trade	No	Yes
Transport, insurance, handling	Yes	Yes
Packing	Yes	Yes
Credit	Yes	Yes
After sales costs	Yes	Yes
Commissions	Yes	Yes
Currency Conversion	Yes	Yes

1. Provide the relevant adjustments so you can compare the export price and normal value.

N/A. The Applicant has made the relevant adjustments when constructing the export price.

2. Provide, for all adjustments you make, the following:

- details of the differences that resulted in an adjustment;
- details of how you produced the estimate of the allowances for the differences; and
- supporting evidence concerning these differences.

N/A.

E.5. Dumping Margin

If the overall dumping margin calculated across all product types/models and across all transactions is **less than 2%**, the Regulations consider this to be minimal and we cannot initiate an investigation.

1. Calculate the dumping margin. **Complete Annex 7**, repeating the calculation for each different model of the imported goods you have previously identified. Make sure you do this for each export price you have provided and for the normal value you have provided which is most closely comparable to that export price. If your complaint concerns more than one exporting country, calculate the dumping margin for each country.

If the normal value or the export price (or both) you have used was not an ex-works price, please describe the level of trade it relates to.

*See **Annex 7**. The Applicant calculated a simple average dumping margin of **227.3**%. The individual dumping margins for each representative model range from 171.6% to 345.9%.*

F. Subsidised imports

Complete this section if you are making an application for a subsidy investigation.

In order for us to investigate whether the goods are subsidised, we must be satisfied that the application contains enough evidence:

- that the goods are being imported
- that the goods are subsidised
- that the goods are causing injury to UK industry
- that the volume of goods and injury is more than negligible and the amount of subsidy is more than minimal
- that the market share is met or waived.

'Minimal', for developed countries, means a subsidy amount that is less than 1% of the estimated value of the goods (2% in the case of a developing country).

'Negligible' is where the exporting country accounts for less than 3% of imports of the goods in question into the UK (less than 4% in the case of a developing country). The other exception to this is where the exporting countries individually account for less than 3%, but collectively account for more than 7% of imports of the goods being imported.

F.1. Volume of subsidised imports

1. List all countries (or territories) that export the goods to the UK, noting whether they are the country of origin or just the exporting country; in the latter case, please provide the identity of the country of origin.

N/A.

Appendix reference: N/A

2. **Complete the Annex 2**, giving the volume and value of the imported goods for the POI, to demonstrate percentage of total imports.

N/A.

3. Provide details and evidence of how the volume and value of subsidised imports have been calculated.

N/A.

Appendix reference: N/A

F.2. Countervailable subsidies in the exporting country

A subsidy exists if there is a financial contribution by a foreign authority which confers a benefit on the recipient (usually an industry or business manufacturing goods) or a form of income or price support received from a foreign authority which confers a benefit on the recipient. Forms of income and price support are defined in Article XVI of the General Agreement on Tariffs and Trade 1994 (part of Annex 1A to the WTO Agreement).

Not all subsidies are countervailable. A subsidy is countervailable if it is specific to certain companies or industries (rather than general) and when it is granted either directly or indirectly for the manufacture, production, export or transport of goods.

Please refer to our guidance on How we carry out a subsidy investigation for further information.

1. Using the table below, list all known countervailable subsidy programmes in the exporting country which relate to the production and/or sale of the goods you are asking us to investigate. Subsidy programmes can include, but are not limited to:

- Grants
- Loans and loan guarantees
- Tariff/tax exemptions (including VAT/Sales Tax)
- Debt for equity swaps
- Land use rights
- Export credits and financing
- Equity infusions
- Provision of goods and services
- Purchase of goods
- Income or price support arrangements.

Subsidy programmes

Subsidy name	**Subsidy type**
N/A.	

To understand if there has been a financial contribution, we need to identify if:

- there has been a direct transfer of funds from a foreign authority, including making money and financial resources available;
- there has been a potential direct transfer of funds from a foreign authority, including a commitment to transfer funds;
- revenue that is rightfully due to government has not been collected (waived or deferred), including, taxes, debt, derivatives, or dividends;
- goods and services have been provided for by a foreign authority, at a lower amount than normally would have been paid;
- goods were purchased from a producer by a foreign authority, that artificially increases the revenue gained from selling the goods; or
- a foreign authority has:
    - made payments through a financial mechanism, or
    - entrusted or directed a private body to carry out any of the above functions.

2. For all subsidy programmes listed above, please explain and provide documentary evidence of the subsidy programme (the financial contribution), including:

- the subsidy programme's commencement date;
- the subsidy amount or value; and
- the frequency of subsidy i.e. one-off or re-occurring.

N/A.
Appendix reference: N/A

3. For all subsidy programmes listed above, please explain and provide documentary evidence that the subsidy has been (or is still being) provided by a foreign authority.

N/A.
Appendix reference: N/A

As well as establishing that a subsidy is in place, we need to understand the benefit it confers on the recipient. A benefit cannot exist theoretically – it has to be received by a recipient. It is important to note that the recipient of the benefit doesn't necessarily need to be the same recipient that received the financial contribution. For example, a subsidy provided to an upstream industry provides a benefit to a downstream industry.

4. For all subsidy programmes listed above, please explain and provide documentary evidence of the effect of the subsidy on the production and sales of the goods being imported to the UK.

N/A.

Appendix reference: N/A

5. For all subsidy programmes listed above, please explain and provide documentary evidence of the specific nature of the subsidy, including:

- conditions of eligibility to receive the subsidy;
- all known recipients of the subsidy;
- whether the subsidy is only available to certain regions or territories within the exporting country.

N/A.

Appendix reference: N/A

F.3. Calculating how much subsidy the imported goods attract

We need to understand the amount of subsidy which the subsidised imports receive. If we establish that a measure is needed to counteract the injury the goods are causing to the UK market, this will help us determine what sort of measure to recommend and at what level.

To make this calculation, we will need to establish:

- the total amount of the countervailable subsidy;
- the amount of the countervailable subsidy that can be attributed to the POI; and
- which goods the countervailable subsidy can be allocated to during the POI.

1. For all subsidy programmes listed above, please explain and provide documentary evidence about the total amount of countervailable subsidy that the imported goods attract. You will need to explain the calculation methodology used. It is the benefit to the recipient that matters, not the cost (or opportunity cost) to the foreign authority. You should refer to our How we assess the benefit a subsidy provides guidance to understand what is required.

N/A.

Appendix reference: N/A

2. For all subsidy programmes listed above, please explain and provide documentary evidence relating to the amount of the countervailable subsidy that can attributed to the period of investigation, including the calculation methodology you used. You should refer to our guidance on Determining the amount of the subsidy that can be attributed to the period of investigation when completing this section.

N/A.

Appendix reference: N/A

3. For all subsidy programmes listed above, please explain and provide documentary evidence relating to the goods the countervailable subsidy that can be attributed to during the period of investigation, including any calculation methodologies used. You should refer to our guidance on Determining the amount of the subsidy that can be attributed to the period of investigation when completing this section. We will be specifically looking at whether the subsidy is linked to the export of certain goods, the sale of certain goods, or to sales to a certain market.

N/A.

Appendix reference: N/A

G. Injury

This section is about injury which the imports may be causing to the UK industry for the goods.

Injury as defined by the Act can refer to:

- Material injury, or the threat of material injury to the industry, or
- Material retardation of the establishment of the industry.

If your industry has suffered or is suffering material injury, all companies/associations involved in this application must complete the section G1 separately. This section should also be completed to represent the entire UK industry. Label each completed section clearly showing who it relates to.

If your industry is threatened with material injury but there is no injury yet, all companies/associations involved in this application must complete the section G1 separately. This section should also be completed to represent the entire UK industry. Label each completed section clearly showing who it relates to.

If your industry is nascent and is being or has been materially retarded, please contact us at contact@traderemedies.gov.uk.

G.1. Material injury

Material injury is determined through a number of injury indicators. Not all the injury factors need to indicate material injury, but all the factors need to be considered in order to establish material injury. These include, but are not limited to:

- Actual and potential decline in: sales, profit, output, market share, productivity, return on investments, or use of capacity;
- Factors affecting domestic prices of the goods;
- The magnitude of the margin of dumping and/or the amount of subsidy; and
- Actual and potential negative effects on: cash flow, inventories, employment, wages, growth, ability to raise capital, or investments.

1. Please describe, with appropriate figures, how the UK industry for these goods has performed in terms of each of the above injury indicators for the POI, and injury period.

- Explain how you have calculated the figures and substantiate your figures with evidence.

- Provide evidence for each indicator.
- If you don't know the exact figures for other UK producers, provide an estimate based on reasonable assumptions.
- State the methodology and assumptions that you used.

The UK Robot Mower industry is suffering material injury. As per Regulation 27(2) of the D&S Regulations, to establish injury, the Applicant considers:

- *The volume of dumped Chinese Robot Mowers (Sub-section A).*
- *The prices of dumped imports of Chinese Robot Mowers (Sub-section B).*
- *The economic state of the UK Robot Mower industry (Sub-section C).*

The Applicant concludes with a summary of the injury suffered by the UK Robot Mower industry (Sub-section D).

A. Volume effects

A.1. UK consumption of Robot Mowers

*As **Table 3** reports, UK consumption of Robot Mowers increased by 20% over the Injury Period. Consumption is expected to further increase significantly. That is because current market penetration of Robot Mowers on the UK market is still relatively low compared to more mature markets, such as Germany. This means that, looking forward, the economic relevance of the Robot Mower market will continue to grow.*

Table 3 – UK consumption of Robot Mowers[27]				
	2022	***2023***	***2024***	***2025***
Consumption	*[25,000-40,000]*	*[25,000-40,000]*	*[30,000-45,000]*	*[35,000-50,000]*
Index	100	101	111	121

*As explained in **Section E.1** above and in **Sub-section A.2** below, the Applicant's estimate of the growth of the UK Robot Mower market is likely conservative because the import volume of Chinese Robot Mowers is likely much higher than estimated.*

A.2. Import volumes of Chinese Robot Mowers

*As **Table 4** reports, import volumes of Chinese Robot Mowers increased by more than half over the Injury Period. As this increase significantly outpaces growth in UK consumption, Chinese Robot Mower producers increased their market share from [50-60]% to a whopping [70-80]%.*

[27] *See **Annex 2**. See also **Section E.1** above, where the Applicant explained the methodology used to estimate UK consumption.*

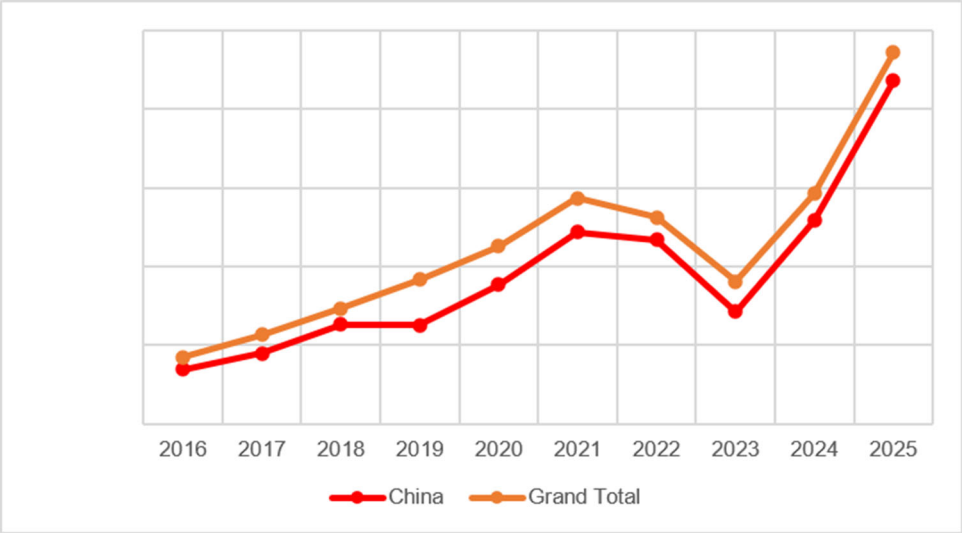
Table 4 – Chinese imports of Robot Mowers[28]				
	2022	2023	2024	2025
Import volume (units)	*[15,000-20,000]*	*[15,000-20,000]*	*[22,000-27,000]*	*[28,000-33,000]*
Index	100	103	128	155
Market share (%)	*[50-60]%*	*[50-60]%*	*[60-70]%*	*[70-80]%*
Index	100	102	116	128

*As explained in **Section E.1** above, the Applicant's estimate of the growth of Chinese imports and the market share of Chinese Robot Mower exporters on the UK Robot Mower market is likely conservative. The true volume of imports of Chinese Robot Mowers is likely significantly higher than the Applicant's estimate. [Sensitive information removed – Applicant's market knowledge].*

[Sensitive information removed – Applicant's market knowledge].

The trend in imports from the PRC is corroborated by import statistics. To recall, the commodity code that includes Robot Mowers – 8433 11 10 – also includes other electric motor mowers for lawns, parks, or sports grounds with the cutting device rotating in a horizontal plane. Historical import statistics thus do not permit isolating Robot Mowers. That said, as Figure 5 demonstrates, import statistics for 8433 11 10 show a continuous and steep increase in imports from the PRC over the Injury Period.

Figure 5 - UK imports under 8433 11 10 (units)[29]



This trend reflects a longer-term trend: in the past 10 years, imports from the PRC almost quintupled. Import statistics also show that almost all imports under 8433 11 10 have been and continue to originate from the PRC.

B. Price effects

Chinese Robot Mower producers have, since their entry on the UK market, consistently used price to grab market share in the price-sensitive Robot Mower market. In recent years, their pricing behaviour has become much more aggressive, as a swath of new Robot Mower producers vie for market share, essentially trying to become a dominant force in the global Robot Mower market. The Applicant explains the acceleration of price competition in ***Section G.2****.*

The Applicant provides more information on the impact of prices of Chinese Robot Mowers on its prices and business in ***Sections G.1.4*** *to* ***G.1.6****.*

C. Injury indicators

As the Applicant is the UK Robot Mower industry, the Applicant does not split the injury indicators between macro- and micro-economic indicators.

C.1. UK sales and market share

As ***Table 5*** *reports, despite the growing UK Robot Mower market, the UK industry's total sales volume of Robot Mowers to unrelated customers decreased by 12% over the Injury Period. Sales dropped sharply from 2022 to 2023, then rebounded partially from 2023 to 2024, before dropping slightly from 2024 to the POI.*[30]

As a result of the decreased sales in a growing market, the UK industry's market share decreased by more than a quarter over the Injury Period. Market share dropped sharply from 2022 to 2023, remained stable from 2023 to 2024, and then again dropped significantly from 2024 to the POI. This is likely a conservative estimate of the Applicant's lost market share, as the Applicant's estimate of Chinese import volumes is, as noted, also conservative.

Table 5 – UK industry UK sales[31]				
	2022	*2023*	*2024*	*2025*
Sales volume (units)	*[Sensitive information removed – Applicant's business data]*			
Index	100	82	90	88
Market share (%)	*[Sensitive information removed – Applicant's business data]*			
Index	100	81	82	73

C.2. UK sales values and prices

As ***Table 6*** *reports, the Applicant's UK sales value and price increased respectively*

28 *See* ***Annex 2****. See also* ***Section E.1*** *above, where the Applicant explained the methodology used to estimate Chinese import volumes.*

29 *HMRC import statistics by origin, retrieved from a paid service provider,* ***Appendix A.3.3****.*

30 *For completeness, the Applicant notes that it included sales of UK-produced Robot Mowers on the UK market that were made through a related party that operates the Husqvarna Group's online store. The volume of these sales increased over the POI but remained small: it was [a very minor share] of the Applicant's total UK sales in the POI.*

31 *Source: Applicant data.*

by 30 and 49% over the Injury Period. This increase reflects that, over the Injury Period, demand shifted substantially from BW to BWF Robot Mowers. BWF Robot Mowers are more expensive than BW Robot Mowers and [Sensitive information removed – Applicant's business operations].

Table 6 – UK industry UK sales values and prices[32]				
	2022	2023	2024	2025
Sales value (GBP)	[Sensitive information removed – Applicant's business data]			
Index	100	88	108	130
Sales price (GBP/unit)	[Sensitive information removed – Applicant's business data]			
Index	100	107	119	149

C.3. Production capacity, production volume, capacity utilization, and stocks

*As **Table 7** reports, the Applicant's production capacity remained stable throughout the Injury Period at more than 10 times UK consumption. The Applicant calculated production capacity based on a one-shift manning and production for nine months. Production is, in practice, typically limited to a period of approx. six months (because of the seasonality of Robot Mowers).*

The Applicant's production volume decreased from 2022 to 2024 before increasing again from 2024 to the POI. Production volumes are primarily driven by demand for exports, so that production is not a key indicator for the economic health of the UK industry.

Capacity utilization followed the trend in production volume as production capacity remained stable.

Stocks are low. They decreased from 2022 to 2023 and remained at low levels for the remainder of the Injury Period.

Table 7 – UK industry capacity, production, utilization, and stocks[33]				
	2022	2023	2024	2025
Production capacity (units)	[Sensitive information removed – Applicant's business data]			
Index	100	100	100	100
Production volume (units)	[Sensitive information removed – Applicant's business data]			
Index	100	96	70	94
Capacity utilization (%)	[Sensitive information removed – Applicant's business data]			
Index	100	96	70	94

32 Source: Applicant data.

33 Source: Applicant data.

Stocks (units)	*[Sensitive information removed – Applicant's business data]*			
Index	100	78	78	71

C.4. Export sales

[Sensitive information removed – Applicant's business operations].

*As **Table 8** reports, [Sensitive information removed – Applicant's business operations]. The export volume to related parties decreased slightly over the Injury Period. Export sales first decreased slightly from 2022 to 2023, and then significantly from 2023 to 2024. In the POI, the export sales volume increased again to 2022-2023 levels.*

Table 8 – UK industry export sales[34]				
	2022	***2023***	***2024***	***2025***
Sales volume to unrelated parties (units)	*[Sensitive information removed – Applicant's business data]*			
Index	100	0	0	25
Sales volume to related parties (units)	*[Sensitive information removed – Applicant's business data]*			
Index	100	97	69	94

C.5. Cost of production

*As **Table 9** reports, the Applicant's total cost of production increased every year of the Injury Period. The total cost increase is 66% over the Injury Period. As with sales prices, this increase reflects that, over the Injury Period, demand shifted substantially from BW to BWF Robot Mowers. It also reflects that the Applicant [Sensitive information removed – Applicant's business operations]. BWF Robot Mowers are more expensive to produce than BW Robot Mowers. BWF Robot Mowers require more R&D costs as they are newer products, with shorter product lifecycles, and contain more expensive components, such as sensors and cameras.*

*The cost of production reported in **Table 9** consists of (1) manufacturing costs; (2) selling, general, and administrative ("**SG&A**") costs; and (3) other costs, covering primarily research and development ("**R&D**") and warranty costs. Each bucket of costs increased following a similar trend as the total cost of production.*

[34] *Source: Applicant data.*

Table 9 – Average UK industry cost of production[35]				
	2022	***2023***	***2024***	***2025***
Total cost of production (GBP/unit)	*[Sensitive information removed – Applicant's business data]*			
Index	100	113	136	166
Cost of manufacturing (GBP/unit)	*[Sensitive information removed – Applicant's business data]*			
Index	100	108	137	161
SG&A on UK sales (GBP/unit)	*[Sensitive information removed – Applicant's business data]*			
Index	100	115	129	164
Other costs (GBP/unit)	*[Sensitive information removed – Applicant's business data]*			
Index	100	120	141	177

*As **Table 9** demonstrates, the cost of R&D is a crucial component of the total cost of Robot Mowers.*

C.6. Profit, investments, return on investment, finance costs, and cashflow

An assessment of the Applicant's profitability must start with the fact that the Applicant already exited production of Robot Mowers in the entry-level segment and the lower tier of the retail segment because of price pressure from Chinese Robot Mowers.

[Sensitive information removed – Applicant's business operations].

[Sensitive information removed – Applicant's business operations].

*Despite the Husqvarna Group's efforts to focus production at the Applicant maximally on profitable Robot Mowers, as **Table 10** reports, the Applicant's net operating profit after tax ("**NOPAT**") decreased significantly over the Injury Period as sales revenues decreased and costs increased. In the POI, NOPAT was down by 45% compared to 2022.*

The NOPAT margin also continued to go down, [decreasing by more than 75% from 2022 to 2024]. There was a rebound [to half the 2022 level] in the POI because [Sensitive information removed – Applicant's business operations]. [Sensitive information removed – Applicant's business operations], the Applicant sees that Chinese Robot Mower producers are increasingly targeting also the [Sensitive information removed – Applicant's market knowledge] professional Robot Mower market. For instance, while Positec brand Kress has targeted golf courses for some time,[36] other Chinese Robot Mower producers such as Altverse are now also targeting this market.[37]

Investments increased from 2022 to 2023 and then decreased to 2024 and the POI. This reflects the Husqvarna Group's continued commitment to its UK production facility specifically and the Robot Mower business specifically.

Return on investment decreased as profits decreased. Finance costs increased but remain small. Cashflow was negative in 2022 because of a large decrease in working capital due to a build-up in stocks [Sensitive information removed – Applicant's business operations]. In 2023 and 2024, stock reductions led to significantly higher working capital and thus cashflow. In the POI, stock value was flat and the limited cashflow reflects the Applicant's weakened operating result.

Table 10 – UK industry profit, investment, ROI, finance cost, and cashflow[38]				
	2022	***2023***	***2024***	***2025***
NOPAT (GBP)	*[Sensitive information removed – Applicant's business data]*			
Index	100	58	25	55
NOPAT (%)	*[Sensitive information removed – Applicant's business data]*			
Index	100	66	23	44
Investments (GBP)	*[Sensitive information removed – Applicant's business data]*			
Index	100	152	123	92
ROI (%)	*[Sensitive information removed – Applicant's business data]*			
Index	100	65	29	72
Finance cost (GBP)	*[Sensitive information removed – Applicant's business data]*			
Index	100	200	233	238
Cashflow	*[Sensitive information removed – Applicant's business data]*			
Index	-100	302	132	122

C.7. Employment

*As **Table 11** reports, UK industry employment (including external/agency workers not on the Applicant's payroll) decreased from 2022 to 2023 and again from 2023 to 2024. In the POI, employment increased because [Sensitive information removed – Applicant's business operations]. Median wages increased every year, reflecting the Applicant's commitment to providing quality jobs that pay proper wages.*

35 *Source: Applicant data.*

36 *Kress, Golf courses, **Appendix G.1.1**.*

37 *Altverse, Commercial robotic lawn mowers, **Appendix G.1.2**.*

38 *Source: Applicant data.*

Table 11 – UK industry employment[39]				
	2022	*2023*	*2024*	*2025*
Employees (FTE)	*[Sensitive information removed – Applicant's business data]*			
Index	100	91	80	108
Median wage (GBP/FTE)	*[Sensitive information removed – Applicant's business data]*			
Index	100	107	114	116

Unfortunately, because of the competitive pressure from unfairly traded Chinese Robot Mowers that the Applicant faces both on the UK market and the EU market (which is the most important export market), [Sensitive information removed – Applicant's business operations].

D. Conclusion on injury

In sum, during the Injury Period, imports of Chinese Robot Mowers increased rapidly, grabbing ever more market share from the Applicant. In the POI, Chinese Robot Mowers held a [70-80]% market share. This rapid rise is fuelled by aggressive, predatory pricing reflecting how a "legion" of Chinese Robot Mower producers vies for dominance on the fast-growing UK market.

The impact of the increased imports of dumped Chinese Robot Mowers on the UK industry was stark. In a growing market, the UK industry not only lost market share but even absolute sales volumes. The UK industry's costs increased, as technological developments drive up cost, but the increasingly cut-throat price pressure from Chinese imports meant the UK industry could not pass on its cost increases. As a result, the profitability of the Applicant decreased sharply – [Sensitive information removed – Applicant's business operations].

It follows that the Applicant is suffering material injury, even based on the conservative estimates the Applicant used for this application. In reality, the injury suffered by the Applicant is significantly worse.

2. Is your company suffering injury which you believe to have been caused by the imported goods? If so, please describe the injury. You may want to include the prices, volumes or profits associated with your production and sale of the goods you manufacture or describe other aspects of your business. Please specify and substantiate your claims with evidence. Please estimate the date when the injury began to affect your business. Explain how it has developed since this date.

[39] *Source: Applicant data.*

*See **Section G.1**.*

3. Report your total cost to make and sell like goods in the UK. Please clearly separate your costs of production (direct manufacturing costs and indirect costs), from your administrative, selling and general expenses (AS&G). Provide costs for each model that you produce. When giving your labour costs, please ensure you include all labour costs, directly or indirectly incurred by any activity related to the goods.

*See **Section G.1**.*

4. For the goods that you produce, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve if there was no injury from the imported goods and explain how you arrived at this figure.

The Applicant would expect a profit margin before tax of at least [10-20]%. This is the profit margin that the Applicant made in 2022.

Profit margins before 2022 were significantly higher – in the range of 20-25%.

*See **Annex 8**, in which the Applicant calculated an underselling margin of **291.8%**.*

To calculate underselling, the Applicant compared the retail price of the seven Chinese Robot Mower models used in the export price calculation worked back to the retailer price (i.e., the price paid by the first independent customer) with the fully loaded cost of the closest competing Applicant models plus a target profit (i.e., the price that the Applicant would expect to get when selling to the retailer). The difference was expressed as a percentage of the Chinese Robot Mower models used.

5. Explain if your current sales prices for the goods are the same as your target sales prices. If not, please explain the reasons for this.

No. Current sales prices are far below target sales prices, because of ever-increasing price pressure from Chinese Robot Mowers. It follows that Chinese Robot Mowers undersell the Applicant.

6. Provide details of any price undercutting and/or if the prices of the dumped and/or subsidised imports are reducing or negatively affecting prices in the UK. Compare the sales prices of the dumped and/or subsidised imports with the sales prices of your goods on the UK market. Include any supporting evidence.

*See **Annex 9**, in which the Applicant calculated an undercutting margin of **48.0%**.*

To calculate undercutting, the Applicant compared the retail price of the seven Chinese Robot Mower models used in the export price calculation with the retail price

of the closest competing Applicant models.[40] The difference was expressed as a percentage of the Applicant's model's retail price.

*As explained in **Section E.3.2**, the Applicant had to use current Chinese Robot Mower prices. Hence, to ensure a fair comparison, the Applicant also used its current Robot Mower prices.*

*In addition to price underselling, as explained in **Sections G.1.4** and **G.1.5**, and price undercutting, as explained in this section, Chinese Robot Mowers also suppress and depress the UK Robot Mower industry's prices. As further detailed in **Section G.2**, prices of Chinese Robot Mowers continue to decrease rapidly, putting ever bigger price pressure on the Applicant's pricing – both requiring the Applicant to decrease its prices to stay competitively priced and impeding the Applicant from raising its prices to ensure the sustainability of the generated profits in view of the research- and capital-intensive nature of the Robot Mower industry.*

G.2. Threat of injury

1. Describe the change in circumstances that means the threat of material injury from dumping and/or subsidisation is foreseeable and imminent. The factors behind these changes could include:

   - the rate of increase of dumped and/or subsidised imports;
   - changes to the available production capacity of the exporters;
   - changes to inventories of the imported goods (i.e. if large stocks of these goods are building up in their country of origin ready for export);
   - expected price depression or price suppression of further imports; and
   - any other relevant factors.

In addition to causing material injury to the UK Robot Mower industry, dumped imports of Chinese Robot Mower also threaten to cause further material injury to the UK Robot Mower industry.

The threat is clear and imminent because of the significant rate of increase in dumped Robot Mower imports (Section A), the large free capacity and likely large stocks of the Chinese Robot Mower industry (Section B), and the injuriously low prices of Chinese Robot Mowers (Section C).

A. Significant increase in dumped Chinese Robot Mower imports

The Robot Mower market is concentrated almost entirely in the UK, Europe, and the United States, as these are high-income markets where homeowners tend to have lawns with a sufficiently sized lawn to warrant using a Robot Mower as well as a

[40] *Applicant, Website, **Appendix G.1.3**.*

desire for automated lawn maintenance. Therefore, the UK market is particularly attractive for Chinese Robot Mower producers, who are likely to further increase their exports to the UK. This effect will be exacerbated by large-scale trade diversion if the Commission imposes EU anti-dumping duties on Chinese Robot Mowers.

The UK, Europe, and the United States are also the largest markets for Robot Mowers used in professional contexts, such as on sporting grounds or golf courses. In contrast, there is no material Chinese domestic market for Robot Mowers.[41]

The absence of a Chinese domestic market has not stopped many new market entrants from launching Robot Mowers in the past years. Until 2012, the Applicant estimates that there were ~10 Robot Mower producers globally, with one large Chinese player: Positec (with brands such as Worx, LandXCape, and Kress).

The growth in the market from 2012 onwards increased the number of Chinese Robot Mower producers to ~20 by 2023, with many new Chinese Robot Mower producers – both startups and established companies in other products – having entered the market:

- *Cleva (with brands such as Lawnmaster)*
- *Daye (Einhell, Grizzly and Mowox)*
- *Dreame (Dreame)*
- *Ecoflow (Ecoflow)*
- *Ecovacs (Ecovacs)*
- *Globe Tech (Cramer, Greenworks and Powerworks)*
- *Kowoll Garden (Kowoll)*
- *Mammotion (Mammotion)*
- *Ninebot (Segway)*
- *Ryobi (Ryobi)*
- *Sunseeker (Orbex, Scheppach and Texas)*
- *Sumec (Yard Force)*
- *YAT (Hookii and Senix)*

Since 2024, at least 13 new brands entered the market with Robot Mowers produced in the PRC:

- *Airseekers*[42]
- *Altverse*[43]
- *Anthbot*[44]
- *Aquark*[45]

41 *See, e.g., PingWest, Like vacuum robot, China's robotic lawn mowers are the disruptor wannabes of the market, 20 November 2022,* ***Appendix G.2.1****.*

42 *Airseekers, Kickstarter,* ***Appendix G.2.2****.*

43 *Altverse, Homepage,* ***Appendix G.2.3****.*

44 *Anthbot, Homepage,* ***Appendix G.2.4****.*

45 *Aquark, Record holder,* ***Appendix G.2.5****.*

- *Heisenberg Robotics*[46]
- *iSward*[47]
- *Joybee*[48]
- *Lymow Tech*[49]
- *MOVA*[50]
- *Novabot*[51]
- *RoboUP*[52]
- *Yarbo*[53]

As one source summarized the emergence of Chinese Robot Mower producers and brands, "[t]he Chinese brands charging into overseas markets … aren't just one or two companies—it's an entire legion."[54] *And absent a domestic Robot Mower market, as one analyst put it, this legion of Chinese exporters are "aggressively expanding overseas."*[55]

Public statements show the rapid growth in Chinese Robot Mower exports. Segway, one of the most successful Chinese Robot Mower exporters to date, reported in late 2024 that its Robot Mowers are "projected to exceed an annual sales volume of over 100,000 units,"[56] *with sales more than tripling in H1 2024 compared to H1 2023.*[57] *In its 2024 annual report, Ecovacs reported that its "overseas revenue and sales volume for robotic lawnmowers soared by 186.7% and 271.7% year-on-year respectively."*[58] *Late 2024, Greenworks, one of the brands produced by Globe Tech, "reported that revenue related to its third-generation products surged 68.92% year-on-year after launching in Europe."*[59]

The rise in Chinese Robot Mower exports accelerated further in 2025. One analyst reported that "China's intelligent robotic lawnmower exports reached $1.01 billion in

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46 *Heisenberg Robotics, Homepage,* ***Appendix G.2.6****.*

47 *iSward, Homepage,* ***Appendix G.2.7****.*

48 *Joybee, Homepage,* ***Appendix G.2.8****.*

49 *Lymow, Robot Mower page,* ***Appendix G.2.9****.*

50 *MOVA, Amazon listing,* ***Appendix G.2.10****.*

51 *Novabot, Homepage,* ***Appendix G.2.11****.*

52 *RoboUP, Homepage,* ***Appendix G.2.12****.*

53 *Yarbo, Robot Mower,* ***Appendix G.2.13****.*

54 *DemarkChina Laser, "No World Cup? getting USed to it. Chinese Robotic Lawn Mowers Are Already Taking Over North American Yards,"* ***Appendix G.2.14****.*

55 *Benzinga, "Chinese AI Lawnmowers Gain Ground In Europe,"* ***Appendix G.2.15****.*

56 *Xinhua Net, "Family lawns in Europe, U.S. "mow-tivated" by Chinese robots", 9 December 2024,* ***Appendix G.2.16****.*

57 *KrASIA, "Mowing lawns, delivering meals, cleaning homes: Chinese service robots are making waves globally", 10 September 2024,* ***Appendix G.2.17****.*

58 *Ecovacs, Annual report 2024,* ***Appendix E.2.1.42****, p. 15.*

59 *Benzinga, "Chinese AI Lawnmowers Gain Ground In Europe,"* ***Appendix G.2.15****.*

the first quarter of 2025, up nearly 60% year-on-year" from 2024.[60] Looking at the first three quarters of 2025 "China's exports of robotic lawn mowers reached approximately $2 billion, a year-on-year increase of about 50%" from 2024.[61] In the words of one source, "[s]ome brands have seen annual mower revenue surge two to three times. Some have grown ten to twenty times in Germany in a single quarter."[62] Such growth in Germany, the largest individual Robot Mower market and a very mature market, is staggering.

Looking further ahead, a Chinese source reported that "Chinese tech firms are rapidly expanding into the booming global market for smart lawn-mowing robots – especially in Europe."[63] A Chinese analyst framed the strategy of Chinese Robot Mower exporters as follows:

> *"… lawn mowing robots have become a new outlet for Chinese companies to go overseas, and lawn mowing robot brands have begun to emerge like mushrooms after a rain. …*
>
> *Faced with the increasingly hot lawn mowing robot market, more and more companies and manufacturers have begun to participate in the competition and go overseas to seize the market.*
>
> *… The sales logic of [outdoor power equipment products, such as Robot Mowers] is to first supply them to local dealers in Europe and the United States on a small scale, and then ship them on a large scale after market verification."[64]*

Despite these public announcements shaping market expectations of the flood of Chinese imports into the UK market, the Applicant knows [Sensitive information removed – Applicant's market intelligence].

*With all these new market entrants, the almost 100% export-oriented Chinese Robot Mower producers and brands now account for the large majority of global producers and brands. This demonstrates that, through heavy state intervention, the Government of China ("**GOC**") has created an ecosystem that artificially eliminates the investment and R&D entry barrier, both in terms of cost and time to market, and overfinances Chinese Robot Mower producers.*

In this ecosystem, Chinese Robot Mower exporters also benefit from GOC intervention in other sectors, such as the battery electric vehicles sector in which the

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60 *Benzinga, "Chinese AI Lawnmowers Gain Ground In Europe," **Appendix G.2.15**.*

61 *DemarkChina Laser, No World Cup? getting USed to it. Chinese Robotic Lawn Mowers Are Already Taking Over North American Yards, **Appendix G.2.14**.*

62 *DemarkChina Laser, No World Cup? getting USed to it. Chinese Robotic Lawn Mowers Are Already Taking Over North American Yards, **Appendix G.2.14**.*

63 *Caixin Global, "Exports boom for China's smart lawn-moving robots, a cut above the rest", 17 April 2025, **Appendix G.2.18**.*

64 *Equal Ocean, "Lawn mowing robots go overseas: The road to overseas lawn mowing is long", **Appendix G.2.19**, pp. 4-5.*

Commission imposed anti-subsidy duties of up to 35.3%.[65] For example, Aquark claims that its Robot Mowers use "specialized electric-vehicle-grade battery and fast-charging technology,"[66] while Positec's brand Worx boasts that it uses electric vehicle motor technologies:

> *"Driven by top-notch motors*
>
> *Landroid features the very same technology used in the powertrains of modern EVs. Its 3-phase sensorless brushless DC motors are efficient, powerful and smooth.*
>
> *… Landroid's motors deliver impressive performance in terms of speed control in every situation, including slopes."[67]*

In recent years, the GOC's interventions also affected BWF technologies. In the words of a Chinese tech media company, "China's technological advancements and industrial advantages allow Chinese businesses to enter the field" of BWF Robot Mowers.[68]

Through its interventions, the GOC is incentivizing Chinese producers to enter the Robot Mower industry – which, as noted, is almost 100% export-oriented. Taking a page out of the now-familiar playbook of Chinese expansion, these Robot Mower exporters have to compete on price to vie for market share and, after shaking out non-Chinese competition, reconsolidate the Chinese Robot Mower industry into the hands of a few dominant players. This exact same pattern happened with the robotic vacuum cleaner industry: the robotic vacuum cleaner was invented in the United States, but through aggressive expansion and competition, no major non-Chinese producer is still in business in 2026. The last U.S.-owned producer, iRobot, had already outsourced production to the PRC but nonetheless had to declare bankruptcy in 2025, before – ironically – being bought by its Chinese contract manufacturer. All major producers are now Chinese, with five producers (including Ecovacs and Dreame, which also produce Robot Mowers) holding the vast majority of the global market.

That strategy is working: the unfair competition from Chinese Robot Mowers has already forced several non-Chinese players to largely exit the Robot Mower market.

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65 *See Article 1 to Commission Implementing Regulation (EU) 2024/2754 of 29 October 2024 imposing a definitive countervailing duty on imports of new battery electric vehicles designed for the transport of persons originating in the People's Republic of China, OJ L, 29.10.2024.*

66 *Aquark, Aquark Mr. Silence robotic mower delivers hassle-free lawn care with unique TurboSilence technology,* ***Appendix G.2.20****.*

67 *Worx, Landroid – Technology,* ***Appendix G.2.21*** *(emphasis added).*

68 *PingWest, Like vacuum robot, China's robotic lawn mowers are the disruptor wannabes of the market, 20 November 2022,* ***Appendix G.2.1****.*

Producers and brands such as John Deere,[69] Kärcher,[70] and Wolf-Garten[71] have already exited the Robot Mower market. Other non-Chinese Robot Mower producers are relocating production to the PRC. In July 2025, Stihl, historically a major EU Robot Mower producer, announced that it is halting production of Robot Mowers in the EU and moving production and development to the PRC.[72]

The number of new Chinese players on the Robot Mower market, together with the already established large Chinese players, are a strong indication that the import volume of Robot Mowers from the PRC will continue to increase, both in absolute terms and in terms of market share, in line with the trend that has been ongoing for years.[73]

As the bar graph in Figure 6 shows, extrapolating 2022-2025 data using the exponential triple smoothing (ETS) algorithm results in a projected increase of 150% in imports from the PRC from 2022 to 2030. Although already highly worrying, based on the evidence set out above, the Applicant believes that this is a very conservative estimate.

In contrast, as the line graph in Figure 6 shows, LeadLeo, a Chinese analyst, estimates a bullish compound annual growth rate (CAGR) (by value) for the Robot Mower market of no less than 30.34% from 2025 to 2030.[74] This CAGR would result in a quadrupling of the global market in the coming five years.[75] LeadLeo's estimates are mainly driven by the fact "overall penetration of robotic lawnmowers remains below 10% globally, leaving substantial room for future growth" as "annual shipments of traditional lawnmowers total around 30 million units, all representing potential replacement demand."[76]

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69 *See TurfPro, John Deere to Exit Walk-behind Rotary Mower Business, 6 July 2020,* ***Appendix G.2.22****.*

70 *See Kärcher, Robotic Lawn Mower RLM 4,* ***Appendix G.2.23****.*

71 *See DIY International, Wolf-Garten divests itself of power tools,* ***Appendix G.2.24****.*

72 *See, e.g., Agrar-Technik, Stihl to focus on China for robotic mowers, 31 July 2025,* ***Appendix G.2.25****.*

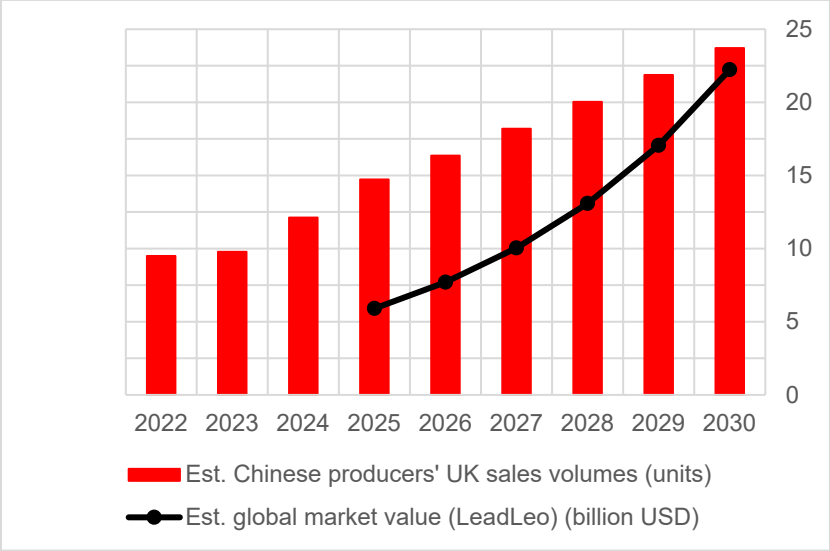
73 *See above,* ***Section G.1****.*

74 *Benzinga, "Chinese AI Lawnmowers Gain Ground In Europe,"* ***Appendix G.2.15****.*

75 *See* ***Annex 2****.*

76 *Benzinga, "Chinese AI Lawnmowers Gain Ground In Europe,"* ***Appendix G.2.15****.*

Figure 6 - Projected UK sales of Chinese Robot Mowers (units) and global market size (billion USD)[77]



As current penetration on the UK market is middle of the range, the Applicant expects that actual growth of Chinese imports on the UK market will land somewhere in between an increase of over half and a quadrupling. Either way, Chinese Robot Mower producers' additional UK sales volumes will result in ever-higher market shares for Chinese Robot Mowers, further reducing the UK industry's market share.

Finally, Chinese Robot Mower producers are already ramping up duty avoidance schemes, signalling a further threat of injury from unfair trading practices. One source reports, for example, that "To counter the impact of the 145% tariff imposed by the U.S. government, many companies have diversified their production bases. Positec invested $200 million in a Vietnam factory, which is expected to produce 300,000 units annually by 2025. … Similarly, Greenworks has relocated assembly lines to Vietnam."[78] *This suggests that Chinese Robot Mower producers may pursue similar duty avoidance strategies in response to anti-dumping investigations and measures in other jurisdictions.*

In sum, Chinese Robot Mowers have been dumped on the UK market with a significant rate of increase. Since 2022, sales have consistently and continuously increased. The addition of many new market entrants, who are almost 100% export-oriented, strongly suggests that import volumes will continue to rise. This indicates the likelihood of substantially increased dumped imports.

B. Large free capacity and likely large stocks of Chinese Robot Mower producers

As noted, a significant majority of Robot Mower producers and brands in the world are now Chinese, with an unprecedented number of new, Chinese market entrants ramping up production. As a news agency reports:

> *"Production [of service robots, including Robot Mowers] is expected to ramp up at a rapid pace, and companies plan to boost their market penetration in developed regions, where growth is expected to accelerate."*[79]

Producing Robot Mowers requires the production of significant volumes, as it is economically and practically inefficient to produce small volumes. The combined production capacity and volume of the high number of new market entrants together with established Chinese players cannot but exceed demand.

This can only lead to high stock volumes, whereas the speed at which new generations of Robot Mowers are developed has significantly shortened. As explained in ***Sub-section C****, this is already resulting in sharply decreasing prices.*

Further, the additional volumes will largely suffice to continue rapidly increasing Chinese producers' market share on the relatively small UK market at the continued expense of the UK Robot Mower industry.

All of these factors contribute to the downward price trend detailed below and to the injury to the UK Robot Mower industry.

In sum, the facts strongly suggest that Chinese Robot Mower producers have large free capacity, which will be directed towards the attractive UK market, which is one of the only major markets that can absorb additional exports. This risk will be even greater if the Commission imposes EU anti-dumping duties.

C. Low prices of Chinese Robot Mowers

Chinese Robot Mower producers have consistently used a low-price strategy to gain market share in the UK. As explained,[80] *Chinese Robot Mower producers undercut and undersell the UK Robot Mower industry during the POI, and the price pressure they exert results in price depression and suppression.*

Taking a page out of their well-known playbook, the Chinese Robot Mower producers have used this strategy since they started targeting the UK market.

For instance, the granular data for [Sensitive – Large EU markets] reported in ***Figure 7*** *shows that, since 2016, the average per unit price of Chinese Robot Mowers has consistently been 40-60% lower than the average per unit price of non-Chinese Robot Mowers, despite Chinese Robot Mower producers' advances in product quality. As pricing is similar on the UK market (with the same brands competing using the same or very similar models), this same gap will exist on the UK market.*

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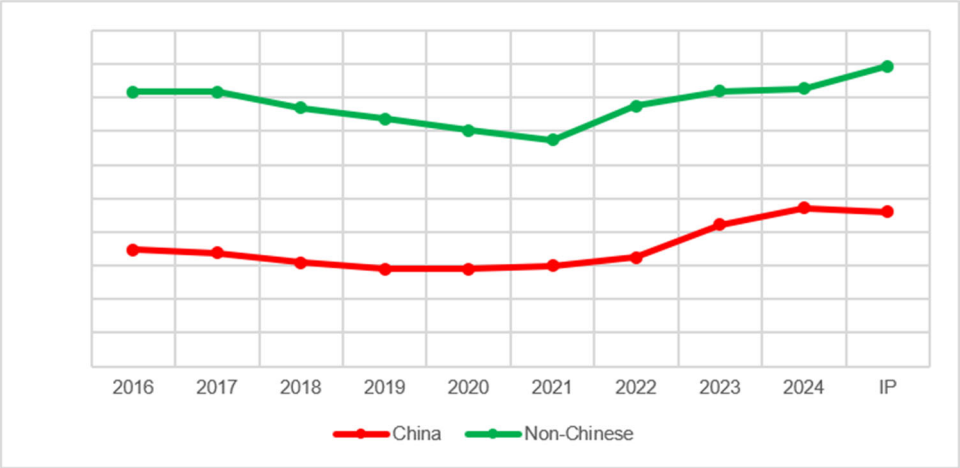
77 *Source:* ***Annex 2****. [Sensitive information removed – Est. Chinese producers' UK sakes volumes redacted].*

78 *Cisivis, "Chinese Lawn Mowers Push into North America, Hit by Tariffs,"* ***Appendix G.2.26****.*

79 *KrASIA, "Mowing lawns, delivering meals, cleaning homes: Chinese service robots are making waves globally", 10 September 2024,* ***Appendix G.2.17****.*

80 *See above,* ***Section G.1****.*

Figure 7 – Average Robot Mower price in [Sensitive – Large EU markets] (EUR/unit)[81]



In the last 18 months, competition has intensified sharply, resulting in ever-decreasing prices. These are driven by the large Chinese overcapacities and stocks, and short product lifecycles that require stock clearance. For instance, towards the end of the POI, Positec's high-end brand Kress offered customers eye-watering discounts of 70% on all its BW models and 50% on all its BWF models.[82] *Ecovacs offers UK customers its best-selling GOAT G1-800 at a 45% discount, and its GOAT O500 at a ~40% discount.*[83]

This predatory pricing behaviour has a single objective: grabbing market share.

The strategy is working, as consumers are price-sensitive, helping Chinese Robot Mower producers multiply their sales on the UK market. This trend is continuing and will continue to lead to increasing Chinese Robot Mower sales on the UK market.

D. Conclusion on threat of injury

The consistent increase in imports from the PRC over the past ten years will continue as a "legion" of new Chinese market entrants vie for consumers.

The large free capacity and large stocks of Chinese Robot Mower producers, who are virtually 100% export-oriented, coupled with these producers' low prices compared to those of the UK Robot Mower industry, suffice to further injure UK Robot Mower producers.

It follows that there is a clear and imminent threat of material injury to the UK Robot Mower industry.

81 *Source: [Sensitive information removed – Name of a market intelligence provider].*

82 *Kress, Website,* ***Appendix G.2.27****.*

83 *Ecovacs, Website,* ***Appendix G.2.28****.*

2. If appropriate, include an analysis of trends (or a projection of trends) and market conditions illustrating that the threat is both foreseeable and imminent.

*See **Section G.2.1**.*

3. Explain why you believe the threatened injury to your industry will be material.

*See **Section G.1**.*

H. Causal link between the imported goods and injury to your industry

For the TRA to initiate an investigation, there must be evidence of a causal relationship between the injury to the UK Industry and the alleged dumping and/or subsidisation.

1. If your company is suffering injury, please explain and provide evidence that shows how this has been caused by the goods you want us to investigate. Describe how the volumes and prices of the imported goods have affected your industry, basing your answer on the injury indicators in the previous section.

The volume and price levels of Chinese Robot Mowers sold on the UK market are the sole reason for the material negative impact on the economic health of the UK Robot Mower industry.

The increase in the volume of dumped imports of Chinese Robot Mowers on the UK market at low prices that undercut, undersell, suppress and depress the UK Robot Mower industry's prices on the UK market coincides in time with the injury to the UK Robot Mower industry. As Figure 8 demonstrates, the increase in market share for Chinese Robot Mower producers caused a decrease in the Applicant's market share and, at the same time, a sharp decrease of the Applicant's profitability – driven by the aggressive, injuriously low prices of Chinese Robot Mowers, with a further aggravation in the POI. This has deteriorated the UK Robot Mower industry's economic health to the point that it is suffering material injury.

Figure 8 - Attribution

[Sensitive information removed – Applicant's business data]

The negative effects of Chinese Robot Mower imports are compounded by the GOC-enabled ecosystem that staunchly reduces time to market and R&D costs, which resulted in a flurry of Chinese producers competing for sales.

The simultaneous occurrence strongly suggests a causal link between the dumping and subsidisation of Chinese Robot Mowers and the injury suffered by the UK Robot Mower industry. This occurrence confirms the existence of a "genuine and substantial relationship of cause and effect,"[84] in particular as there is no other factor that explains the performance of the UK Robot Mower industry.

[84] *WTO Appellate Body Report, EC – Large Civil Aircraft, WT/DS316/AB/R, para. 1232. While the jurisprudence relates to the WTO Subsidies and Countervailing Measures Agreement, this jurisprudence also applies in anti-dumping investigations. See, e.g., recital 181 to Commission Implementing Regulation (EU) 2023/934 of 11 May 2023 imposing a definitive anti-dumping duty on imports of high tenacity yarns of polyesters originating in the People's Republic of China following an expiry review pursuant to Article 11(2) and a partial interim*

2. Please indicate if the injury to your industry could be attributable in part or in full to any factors other than dumped or subsidised imports, for example:

- volume and prices of imports not sold at dumped prices;
- contraction in demand or changes in patterns of consumption;
- restrictive trade practices of, and competition between, third country and UK producers;
- developments in technology; and
- export performance and the productivity of the UK industry.
- This may be relevant as an industry weakened by other events may be more susceptible to injury from dumped or subsidised goods.

There are no factors other than the dumped imports of Chinese Robot Mowers that attenuate the causal link between dumped imports of Chinese Robot Mowers and the injury suffered by the UK Robot Mower industry.

The Applicant analysed the following other factors: (1) imports of Robot Mowers from third countries; (2) exports of the UK Robot Mower industry to the world; (3) increased costs of production; and (4) consumption patterns.

*First, imports of Robot Mowers from third countries do not cause injury to the UK Robot Mower industry. As **Annex 2** reports, imports from third countries accounted for [2-7]% of UK consumption in the POI, as opposed to the [70-80]% market share held by Chinese Robot producers. This small volume of imports does not cause injury to the Applicant.*

*Second, the export performance of the UK Robot Mower industry does not cause injury to the industry. As **Sub-section C.4** to **Section G.1** demonstrates, the Applicant's export volume decreased by only 6% from 2022 to the POI.*

*In any event, the only reason the Applicant's export volume decreased is because of competition from dumped Chinese Robot Mowers. As explained in **Sub-section C.6** to **Section G.1**, the Applicant was forced to stop producing certain product lines in the UK because of Chinese price pressure, affecting export volumes. In addition, competition on the main export market – the EU market – is subject to the same unfair trading practices from Chinese Robot Mower producers as the UK market. This is why the Commission is currently investigating the dumping of Chinese Robot Mowers on the EU market.*

*Third, changes to the cost of production of the Applicant do not attenuate the causal link. As reported in **Sub-section C.5** to **Section G.1**, the Applicant's cost of production increased significantly over the Injury Period, driven mainly by the*

review pursuant to Article 11(3) of Regulation (EU) 2016/1036 of the European Parliament and of the Council.

technological developments – the shift to and increased complexity of BWF Robot Mowers – that increase production costs.

In normal circumstances, the UK industry has always been able to pass on cost increases to its customers. However, due to price suppression and price depression caused by Chinese imports on the UK market, the Applicant was unable to increase its prices in line with the increase in costs. Thus, any injury caused by the increased costs of production is attributable to Chinese imports.

Fourth, there is no change in consumption patterns that might attenuate the causal link. The largest change in consumption pattern is from BW to BWF Robot Mower. However, it was the Applicant that pioneered BWF Robot Mowers – and its current models continue to be at the forefront of the industry. Therefore, the change in technological development and linked consumption pattern is no cause of injury.

Consumers' price elasticity for Robot Mowers may have increased due to cost of living and purchasing power concerns, which in turn resulted in consumers becoming more receptive to purchasing unfairly priced Chinese Robot Mowers, which benefit from the distorted, subsidised ecosystem set up by the GOC.

It follows that there is no factor other than dumped imports of Chinese Robot Mowers that attenuates the causal link between the dumped imports and the injury suffered by the UK Robot Mower industry.

3. Please provide evidence to support this information.

*See **Sections H.1** and **H.2**.*

Request for registration

The Applicant hereby requests that the Secretary of State publish a notice requiring HMRC to register imports of Chinese Robot Mowers from the day of initiation of the anti-dumping investigation on Chinese Robot Mowers.[85]

Registration is necessary because, without registration, Chinese Robot Mower exporters can seriously undermine the remedial effect of any anti-dumping duties by building up large inventories in the UK. This is particularly so because of the seasonality of Robot Mowers, where retailers and dealers will buy Robot Mower stock well in advance of the next season, essentially covering the largest part of sales for the entire year.

In view of the aggressive pricing behaviour of Chinese Robot Mower exporters on the UK (and EU) markets, coupled with their large unused production capacities, there is a real risk that Chinese Robot Mowers exporters in effect circumvent any forthcoming anti-dumping duties for a significant period of time by stockpiling Robot Mowers to cover the next season.

Real-time monitoring of imports by way of registration is key to enabling the TRA to, if imports of dumped Robot Mowers increase, impose anti-dumping duties retroactively.[86]

85 *Paragraph 29(1) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018.*

86 *Regulation 91 of the D&S Regulations.*

Declaration

This application is made by, or on behalf of, a UK industry that produces like goods to those that are the subject of this application.

This UK industry has at least 1% market share, taking into account the goods and particular market for those goods.

This application has the support of that UK industry as required in the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019. Specifically, producer support for this application is greater than producer opposition and represents at least 25% of all UK production of the like goods.

The information contained in this application:

- provides evidence that goods have been or are being dumped and/or evidence that subsidised goods have been or are being imported into the UK (as per schedule 1(g) and 2(g) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019);
- provides evidence that the dumped and/or subsidised goods are causing injury to the UK industry (as per schedule 1(i) and 2(i) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019);
- is sufficient to initiate an anti-dumping and/or subsidy investigation as per schedule 4 paragraph 9(1)(b) of the Taxation (Cross-border Trade) Act 2018; and
- is accurate and complete.

Name:	*[Sensitive information removed – Personal data]*
Company/Association:	*Husqvarna*
Position:	*[Sensitive information removed – Personal data]*
Company Registration number (if applicable):	*00974979*
Date:	*30 June 2026*
Signature:	X _____

Checklist

Important

Please ensure that you have completed this application fully and refer to any attached documents using the corresponding appendix reference.

Complete the checklist above, to demonstrate you have covered all of the points, and attach evidence to support your claims and calculations.

Keep a copy of this application for your reference in case any queries arise when we are assessing the application. You will also need to refer to it if we initiate an investigation.

☒ The details of the UK producers making the application and level of UK industry support for the application

☒ The details of all known UK producers/associations of UK producers of like goods

☒ The volume and value of the domestic production of the like goods both by producers making the application and all other known UK producers

☒ Information that the market share requirement is met

☒ A complete description of the imported goods

☒ The names of countries/territories of origin and export of the imported goods

☒ The details of the exporters or overseas producers of the imported goods

☒ The details of the companies or individuals known to be importing the goods

☒ Normal values of the goods ***Dumping applications only***

☒ Export prices of the goods ***Dumping applications only***

☒ Changes in import volumes of the goods

☒ Effects of the imported goods on prices of like goods produced in the UK

☒ Impact of the imports have caused to the UK industry