

13 July 2026

Trade Remedies Authority  
North Gate House  
21-23 Valpy Street  
Reading  
Berkshire  
RG1 1AF

*via UK Trade Remedies Services*

**OPEN**

Dear Mesdames,  
Dear Sirs,

**Re: AR0089 – Evidence of accelerating absorption**  
**Our client: JCB Heavy Products Limited ("Applicant")**

We refer to the captioned investigation ("**Investigation**"), in which the Trade Remedies Authority is investigating the absorption of the anti-dumping duties ("**ADDs**") in force on UK imports of certain excavators ("**Excavators**") originating from China.

In its application ("**Application**") for the Investigation, the Applicant provided evidence that Chinese Excavator exporters, including the SANY Group ("**SANY**"), were absorbing the ADDs.

The most recent evidence obtained by the Applicant shows that SANY is accelerating its absorption of the ADDs. Specifically, the Applicant obtained price quotes from a SANY dealer to a UK customer dated [*in 2026*], in which the SANY dealer is offering:<sup>1</sup>

- [*CONFIDENTIAL – SANY price quote information that is not publicly available*]. This is an extra GBP 1,790 below the [*in 2025*] price quote provided with the Application.<sup>2</sup>
- [*CONFIDENTIAL – SANY price quote information that is not publicly available*]. This is an extra GBP ~5,000 below the [*late 2024*] price quote provided with the Application.<sup>3</sup>

This evidence further confirms that SANY is absorbing the ADDs, thereby denying the Applicant the relief intended by the ADDs. It is therefore necessary to urgently and maximally increase the ADDs on SANY to halt the injurious dumping of SANY Excavators on the UK market.

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<sup>1</sup> SANY customer price quotes, **Annex 1**.

<sup>2</sup> See Application, Annex B.1.3, pp. 15-16.

<sup>3</sup> See Application, Annex B.1.3, pp. 17-18. The Applicant accounted for the [*CONFIDENTIAL – Price comparability*]. See Application, Table 2.