



Verification report – Overseas Exporter Case AS0076: Investigation into boom lifts originating in the People’s Republic of China (PRC)

Period of Investigation (POI):	1 October 2024– 30 September 2025
Injury Period:	1 October 2021– 30 September 2025
Date of report:	17 September 2026
Case team contact details:	AS0076@traderemedies.gov.uk
Interested Party verified:	Zhejiang Dingli Machinery Co., Ltd

For further details, please see the [Notice of initiation](#) on the public file.



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Executive Summary

The Trade Remedies Authority (TRA) is conducting an anti-subsidy investigation to determine whether injury is being caused to the UK Boom Lift Industry due to subsidisation of Boom Lifts imported into the United Kingdom (UK) from People's Republic of China (PRC).

More information about the case can be found on the public file:

[AS0076 -Boom lifts from China](#)

Zhejiang Dingli Machinery Co., Ltd (Zhejiang Dingli), a sampled overseas producing exporter of the goods concerned, returned a completed exporter questionnaire ('questionnaire response'). Zhejiang Dingli sells domestically in the PRC and exports globally, including to the UK.

The TRA sought to verify the completeness, relevance and accuracy of the information submitted. This included:

- Walkthroughs of Zhejiang Dingli's accounting systems and sales, purchase and production processes to understand how the company generated, recorded and reported information submitted in its questionnaire response.
- Reviewing information relating to company structure and associations, accounting systems and procedures, goods, costs, sales, fair comparison and subsidies.
- Comparing questionnaire responses with supporting company records, financial statements, accounting records, sales and cost data, annexes and other supporting documentation including publicly available information where relevant.
- Performing sales and cost reconciliations and traced selected transactions to underlying source records.
- Performing upward verification procedures on selected sales and cost information to assess completeness.
- Reviewing cost-to-make information, including raw materials, direct labour, manufacturing overheads and AS&G costs.
- Reviewing reported sales adjustments and supporting evidence relevant to fair comparison.
- Reviewing reported subsidy information and supporting documentation to assess whether reported benefits could be traced to underlying records.

Based on the verification activity undertaken the TRA have a reasonable level of assurance on the completeness, relevance and accuracy of the information provided by Zhejiang Dingli and we can use it for the purpose of this investigation.



Purpose of verification

The purpose of the TRA's verification activity is to determine whether the information provided by interested parties is complete, relevant, and accurate and can be used in our investigation. This verification report sets out the conclusions reached for each component part that covers the scope of our work. It also provides an overall conclusion stating the level of assurance reached.

The information verified may then be considered in our assessments and analysis to determine whether subsidisation has occurred and if this is causing the UK industry. This will form the basis for establishing appropriate measures where necessary, and to assess whether these are in the UK's economic interest.

We carried out verification activities onsite. The TRA did not seek to verify all information provided, but undertook the work considered appropriate and possible within the time constraints of the investigation to obtain assurance upon which to base our case decision.

This verification report documents the work completed, providing an overview of the range and scope of verification procedures performed, for each component part that covers the scope of our work, on the information submitted by Zhejiang Dingli. It details the conclusions reached regarding completeness, relevance, accuracy and provides an overall conclusion stating the level of assurance reached.

Confidential information

Zhejiang Dingli must provide a non-confidential version of the verification report marked as 'non-confidential' in the header.

If any information contained in the verification report is considered confidential, Zhejiang Dingli should delete or redact those sections and provide a non-confidential summary of the information which has been removed. It must provide reasons as to why the particular information is considered confidential (see also [public guidance](#)).

The non-confidential version of the verification report will be placed on the public file.



Verification

Please find below a summary of work completed by the TRA to determine whether the information provided by Zhejiang Dingli in their questionnaire response is complete, relevant, and accurate.

A. Company structure and associations

What information was considered
• Company details, including legal name, registered address and business activities. • Organisational structure and group structure. • Shareholder, board, senior management and ownership information. • Associated companies and related party relationships. • Related party transactions relevant to sales, costs and other reported information. • Supporting corporate documentation and records.
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i>
How the information was checked
We reviewed Zhejiang Dingli's questionnaire response and supporting documentation to understand the company's legal structure, ownership arrangements and associated-party relationships relevant to the investigation. We reviewed company details, organisational structure information, shareholder records, board and senior management information and associated-party disclosures to assess whether the information reported in the questionnaire response was supported by the evidence provided. We compared the information reported by Zhejiang Dingli with corporate records, organisational charts and other supporting documentation to assess whether the reported company structure and associations were internally consistent. Where relevant, we also compared the information with publicly available information and company records to assess whether the reported legal name, ownership information and associated-party disclosures aligned with external sources. These procedures allowed us to assess the consistency of the company structure and association information submitted by Zhejiang Dingli and to establish an evidence trail between the questionnaire response and the supporting documentation reviewed. We identified no material inconsistencies during the checks performed.
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i>



Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to company structure and associations provided by Zhejiang Dingli is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for any purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

B. Accounting Systems and Procedures

What information was considered

- Accounting systems and related business applications.
- Accounting policies, chart of accounts and general ledger structure.
- Sales, customer order and invoicing processes.
- Purchase order, supplier invoice and approval processes.
- Production processes and production recording systems.
- System-generated reports and records supporting the questionnaire response.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

How the information was checked

We conducted walkthroughs of Zhejiang Dingli's accounting systems and business processes to understand how the company generates, records and reports the information submitted in its questionnaire response.

We reviewed the accounting systems, chart of accounts, general ledger structure and system-generated reports to understand how information flows from source records to the annexes submitted to the TRA.

We reviewed the sales, purchase and production processes to understand how customer orders, sales invoices, purchase invoices, approvals and production records are created, processed and recorded within the company's systems.



We also reviewed how Zhejiang Dingli extracts information from its accounting and business systems for use in the questionnaire response and supporting annexes.

These procedures allowed us to understand the accounting environment, the flow of transactions through the company's systems and the extent to which we could rely on system-generated information for the purposes of our verification work. We identified no material issues during the walkthrough.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

Based on the work performed, we have obtained a basic understanding of the relevant accounting and associated business systems of Zhejiang Dingli. This enabled us to plan appropriate verification procedures.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

C. Goods

What information was considered

- Goods description and comparability to the goods concerned.
- Product characteristics, technical specifications and model information.
- Internal product coding system and Product Control Number (PCN) mapping.
- PCN allocations for domestic and UK export sales.
- Supporting product documentation and product records.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

How the information was checked



We reviewed Zhejiang Dingli's questionnaire response and supporting annexes relating to the goods concerned to understand the products produced and sold by the company and the basis on which it classified those products for the investigation.

We reviewed product descriptions, technical specifications, model information and PCN allocations to assess whether the reported product characteristics aligned with the PCN structure used in the investigation.

We compared Zhejiang Dingli's internal product coding system with the PCN structure to understand how the company mapped its products to the reported PCNs and to assess whether the reported allocations were supported by the underlying product characteristics.

We reviewed supporting product documentation, including technical documents and product records, to assess whether the information reported in the questionnaire response was consistent with the company's records.

We also cross-checked product information against sales transaction data to assess whether the internal product codes and PCNs reported in the sales listings aligned with the product information submitted by the company.

These procedures allowed us to establish an evidence trail between the questionnaire response, supporting product documentation and transaction data and to assess the consistency of the reported product information. We identified no material inconsistencies during the checks performed.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to the company's goods provided by Zhejiang Dingli is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for any purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):



D. Costs

What information was considered

- Cost to make information for the goods concerned and like goods.
- Raw material costs and supporting purchase records.
- Direct labour costs.
- Manufacturing overheads and cost allocations.
- AS&G costs and allocation methodologies.
- Cost to make reconciliations and upward verification.
- Supporting cost schedules, source documentation and cost allocation explanations.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

How the information was checked

We reviewed Zhejiang Dingli's reported cost information and supporting annexes to understand how the company calculated and reported cost to make for the goods concerned and like goods during the POI. We reviewed the supporting schedules, cost allocation methodologies and explanations provided for raw materials, manufacturing costs, AS&G costs and cost to make to assess whether the reported information aligned with the company's records and whether the allocation methodologies were supported by the evidence provided.

For raw materials, we selected a sample of key material inputs and traced the reported costs to purchase records, supplier documentation and other supporting evidence to assess whether the reported material costs could be linked to underlying source records. We reviewed direct labour, manufacturing overheads and other production costs to understand how Zhejiang Dingli allocated these costs to models and PCNs and to assess whether the allocation methodologies were applied consistently. We reviewed the AS&G information and supporting schedules to understand the basis on which the company allocated these expenses and to assess whether the reported costs were supported by accounting records and allocation calculations.

We performed upward verification by reconciling the cost information reported in the questionnaire response to the underlying accounting records and financial statements. This enabled us to assess the completeness of the reported cost data, and confirm that it captured all the relevant costs incurred during the POI.

These procedures allowed us to establish an evidence trail between the reported cost information, supporting schedules and underlying accounting records and to assess the consistency of the cost information reported in the questionnaire response. We identified no material inconsistencies during the checks performed.



If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to costs provided by Zhejiang Dingli is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for any purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

E. Sales

What information was considered

- Sales reconciliations to accounting records and financial information.
- Sales ledger and supporting accounting records.
- Audited financial statements supporting reported sales figures.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

How the information was checked

We performed upward verification by reconciling the sales information reported in the questionnaire response to the underlying accounting records and financial statements. This enabled us to assess the completeness of the reported sales data, and confirm that it captured the relevant sales transactions during the POI

We performed downward verification by tracing sales transactions from the sales listings reported in the questionnaire response to the underlying accounting records and supporting source documentation. This enabled us to assess the accuracy of the reported



sales data, confirm that the reported transactions were supported by the company's records, and identify any material discrepancies.

These procedures allowed us to establish an evidence trail between the questionnaire response, sales reconciliation annex, accounting records and audited financial statements and to assess the consistency of the reported sales information. We identified no material inconsistencies during the checks performed.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to sales provided by Zhejiang Dingli is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for any purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

F. Fair Comparison

What information was considered

- Fair comparison adjustments for export and domestic sales.
- Domestic freight and CIF adjustments.
- Credit adjustments and payment terms.
- After-sales costs.
- Discounts, rebates and other price adjustments.
- Indirect taxes and other claimed adjustments.
- Supporting documentation for reported adjustment amounts.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):



How the information was checked

We reviewed Zhejiang Dingli's questionnaire response and supporting annexes relating to sales-related adjustments to understand the adjustments claimed for domestic and export sales and the basis on which the company calculated those adjustments. We reviewed information relating to domestic freight, CIF, credit, after-sales costs, discounts, taxes and payment terms to assess whether the reported adjustments aligned with the supporting records and explanations provided by the company.

We reviewed supporting documentation for the claimed adjustments and assessed whether the adjustment amounts could be traced to underlying evidence and applied consistently within the reported sales data.

These procedures allowed us to understand how Zhejiang Dingli calculated and reported sales-related adjustments and to establish an evidence trail between the questionnaire response, supporting documentation and reported adjustment amounts. We identified no material inconsistencies during the checks performed.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to fair comparison provided Zhejiang Dingli is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for any purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

G. Subsidies

What information was considered

- Subsidy information reported in the questionnaire response.
- Supporting evidence for reported subsidies.
- Subsidy reconciliations to accounting records and source documentation.



- Subsidy identification, calculation and reporting methodologies.
- Sales information relevant to export sales and total sales.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

How the information was checked

We reviewed the subsidy information reported by Zhejiang Dingli in its questionnaire response to understand the subsidy programmes reported by the company and the basis on which it calculated and reported any benefit amounts.

We reviewed supporting documentation for the reported subsidies, including relevant programme documentation, accounting records, payment records and other supporting evidence, to assess whether the reported subsidy information could be traced to underlying records.

We reviewed Zhejiang Dingli's explanations regarding the nature of the reported programmes, how the company identified and recorded any benefits, and how it calculated the reported amounts to understand the methodology applied in the subsidy annexes.

We also compared the reported subsidy information with other information submitted in the questionnaire response to assess whether the reported programmes and reported benefits were consistent across the information provided for the investigation.

These procedures allowed us to establish an evidence trail between the reported subsidy information, supporting documentation and the company's records and to assess the consistency of the reported subsidy data. We identified no material inconsistencies during the checks performed.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

None.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to performance provided Zhejiang Dingli is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be



treated as complete, relevant, and accurate and can therefore be used by the TRA for any purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):



Conclusions

Overall, the TRA reviewed the information provided by Zhejiang Dingli across the key areas of the verification, including company structure and associations, accounting systems and procedures, goods, costs, sales, fair comparison and subsidies.

The verification work included reviewing supporting documentation, completing system and process walkthroughs, tracing selected information to underlying records, checking reconciliations and calculation methodologies, and considering whether the reported information was internally consistent and supported by the evidence provided. We identified no material inconsistencies from the work performed.

Zhejiang Dingli provided sufficient and appropriate evidence, which enabled us to conduct verification work on a sample basis as detailed in the above sections. Based on the work performed, we have a reasonable level of assurance that the information provided in its questionnaire response is complete, relevant, and accurate for the purpose of this investigation.



Annexes

Annex 1: Meetings

Date and duration	Type of authentication	Company representatives	TRA representatives
06/07/2026- 09/07/2026	☐ remote ☒ on-site	[Redacted: Zhejiang Dingli - personal information removed JTN Firm - personal information removed VVGB Avocats - personal information removed]	[Redacted: Personal information, 3 individuals]