

Annex 1 - UK Production and Sufficiency

This annex will assess UK production for UK markets of boom lifts

Volume units: Units

Source: Appendix G.1

Conservative (assuming Snorkel has [14-27]% of the UK market)		
POI (Q2 2024 - Q1 2025)		
Value (£)	Volume (units)	

Supporting Producers

Niftylift	[34,193,000-46,263,000]	[700-950]
Snorkel	[7,209,000-9,754,000]	[170-240]
Sub Total	[41,402,000-56,017,000]	[870-1,190]

Opposing Producers

N/A	0	0
Sub Total	0	0

Neutral Producers (Estimated)

N/A	0	0
Sub Total	0	0
Estimated Total UK Production	[41,402,000-56,017,000]	[870-1,190]

Liberal (assuming Snorkel does not produce boom lifts in the UK)		
POI (Q2 2024 - Q1 2025)		
Value (£)	Volume (units)	

[34,193,000-46,263,000]	[700-950]	
-	-	
[34,193,000-46,263,000]	[700-950]	

0	0	
0	0	

0	0	
0	0	
[34,193,000-46,263,000]	[700-950]	

Notes

Snorkel is a UK manufacturer of MAE, including boom lifts, scissor lifts, and vertical masts.

It is unclear whether Snorkel is producing boom lifts in the UK. [SENSITIVE - MARKET INTELLIGENCE INFORMATION ABOUT COMPETITOR]

It has been difficult to obtain any indication of how many machines Snorkel produce in the UK. The Applicant has calculated the scale of Snorkel's manufacturing operations based on the number of production employees (sourced from Snorkel's 2023 financial accounts, the latest available on the UK Companies House). Snorkel's production employees will include those producing boom lifts and other types of MAE (including scissor lifts). So, the value and volume of Snorkel's production would be a maximum, and the likely scale of production of boom lifts would be lower.

Reference Data

Snorkel Europe Ltd - Annual Reports and Accounts (2023), p19

Niftylifts Employment numbers by department - end of 2023

<https://find-and-update.company-information.service.gov.uk/company/06735397/filing-history/MzQ0OTI0NzEzN2FkaXF6a2N4/document?format=pdf&download=0>

Number of employees in Production in the UK as of 2023

Company	Number	% Split
Snorkel Europe Ltd - Annual Reports and Accounts	152	[14-27]
Niftylift	[SENSITIVE]	[73-86]
Total MAE Production Staff	[SENSITIVE]	100

* Snorkel's number will include booms lifts and other types of MAE (including scissor lifts), so the 152 is maximum and likely to be lower for articulated booms.

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Annex 2 - UK Market

This annex will assess UK consumption of boom lifts and market shares

Volume Units: Units

Source:

Appendix E.1

(Please refer to that Appendix for detailed calculations)

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	[7-11] year retention (conservative)	
	2024	
	Volume (units)	Value (GBP)
Domestic Sales		
Total Sales by Applicant Producer	[715-1135]	[27,302,000-45,504,000]
Total (estimated) sales by other domestic producers	-	-
Sub Total	[715-1135]	[27,302,000-45,504,000]
Importation from Country concerned		
China	[330-460]	[15,617,000-21,130,000]
Sub Total	[330-460]	[15,617,000-21,130,000]
Importation from other sources		
Rest of the World	[1,270-1,840]	N/A
Sub Total	[1,270-1,840]	N/A
Estimated Total UK Consumption	[2,315-3,435]	N/A
	Volume (units)	Value (GBP)
	Volume (units)	Value (GBP)
Market Shares (Total Consumption)		
Applicant Producer	[25-35]	N/A
Other Domestic Producers	-	N/A
Imports from China	[12-17]	N/A
Rest of the World	[47-65]	N/A
	Volume (units)	Value (GBP)
	Volume (units)	Value (GBP)
Applicant Market Share (Total Consumption):	[25%-35%]	N/A
Allegedly dumped/subsidised goods as a % of total imports	[17%-24%]	N/A

	[4-6] year retention (liberal)	
	2024	
	Volume (units)	Value (GBP)
	[715-1135]	[27,302,000-45,504,000]
	-	-
	[715-1135]	[27,302,000-45,504,000]
	[760-1,040]	[35,601,000-48,167,000]
	[760-1,040]	[35,601,000-48,167,000]
	[2,840-3,960]	N/A
	[2,840-3,960]	N/A
	[4,315-6,135]	N/A
	Volume (units)	Value (GBP)
	Volume (units)	Value (GBP)
	[13-18]	N/A
	-	N/A
	[14-20]	N/A
	[56-78]	N/A
	Volume (units)	Value (GBP)
	Volume (units)	Value (GBP)
	[13%-18%]	N/A
	[17%-24%]	N/A

Annex 4 - Constructed Normal Value

The cost to produce the export goods plus the selling and administration costs (as if they were sold in the exporter's domestic market) plus an amount for profit.

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Production Costs

Price of raw materials and parts
Direct and indirect labour
Electricity
Natural gas

Total manufacturing costs

SGA Expenses
SG&A

Profit (if applicable)
EBT (pre-tax profit)

Constructed normal value

2024					
Boom lift (equivalent to the Applicant's HR17)					
With depreciation and amortisation as costs (liberal)			Without depreciation and amortisation as costs (conservative)		
Cost per unit (BRL)		Cost per unit (GBP)	Cost per unit (BRL)		Cost per unit (GBP)
[SENSITIVE]		[SENSITIVE]	[SENSITIVE]		[SENSITIVE]
[SENSITIVE]		[SENSITIVE]	[SENSITIVE]		[SENSITIVE]
[SENSITIVE]		[SENSITIVE]	[SENSITIVE]		[SENSITIVE]
[SENSITIVE]		[SENSITIVE]	[SENSITIVE]		[SENSITIVE]
[209,000-284,000]		[30,000-42,000]	[209,000-284,000]		[30,000-42,000]
[36%-49%] of tot COM			[20%-28%] of tot COM		
[88,000-121,000]		[12,000-18,000]	[50,000-69,000]		[7,200-9,900]
[10%-15%] of tot COM			[10%-15%] of tot COM		
[25,000-36,000]		[3,700-5,100]	[25,000-36,000]		[3,700-5,100]
[324,000-439,000]		[47,000-64,000]	[285,000-387,000]		[41,000-57,000]

Note: 2024 data has been used as this is the most recently available public data
Source: Appendix E.4

[INFORMATION REMOVED IN ITS ENTIRETY BECAUSE IT HAS BEEN CALCULATED BASED ON COSTS BREAKDOWN OF ONE SPECIFIC MODEL OF THE APPLICANT]

Annex 5 - Export Price

Export price based on the price charged by the exporter to an unrelated importer in the UK. This price has to be brought back to an ex-factory level

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Q1 2025 Boom lift (equivalent to the Applicant's HR17)	
Per unit	
Export Price	
Average DDP price to independent UK importer	GBP [32,000-44,000]
Adjusted by [13-17]% discount	[27,000-38,000]
Less port charges	[130-180]
Less shipping cost (CN port to UK port)	[1,175-1,675]
Less insurance	[140-200]
Less China inland transportation	[720-970]
Export Price (EXW)	GBP [25,000-35,000]

Note: Q1 2025 prices only have been used as the Applicant has been unable to source 2024 prices

Source: Appendix E.3
Please refer to Appendix E.3 for detailed calculations

Notes:

- Row 14: This is an average of cells C5, C7, C8, C9, C16 and C17 in tab 'Calculations' of Appendix E.3 (i.e. the Chinese DDP prices for machines equivalent to the Applicant's HR17).
- Row 15: The Applicant has applied a [13-17]% discount to Chinese producer prices for boom lifts for Q1 2025. This is because the price list shows dealer prices, so there will be a [8-12]-[13-17]% margin on Chinese producer's machine market prices.
- Row 18: This is an average of cells H5, H7, H8, H9, H16 and H17 in tab 'Calculations' of Appendix E.3 (i.e. average insurance estimated to be paid for machines equivalent to the Applicant's HR17).

Annex 7 - Dumping Margin

Compare the imported model of the goods concerned with the most relevant comparable product in the exporter's home market (after adjusting for any differences affecting price comparability).
Provide on a model-by-model basis for each country which imports originate from.

		Q1 2025	
		Boom lift (equivalent to the Applicant's HR17)	
		With depreciation and amortisation as costs (liberal)	Without depreciation and amortisation as costs (conservative)
Dumping margin calculation			
Ex-Factory normal value per unit (from 4)	GBP	[47,000-64,000]	[41,000-57,000]
Ex-factory export price per unit (from Annex 5)	GBP	[25,000-35,000]	[25,000-35,000]
Per unit dumping amount	GBP	[23,500-32,500]	[17,500-24,500]
CIF Value per unit of Export Price	GBP	[27,000-38,000]	[27,000-38,000]
Dumping Margin as % of CIF value	%	[66%-91%]	[49%-67%]
Country of origin average dumping margin (Sum of dumping amount for China / Sum of CIF value % per unit for China)		[66%-91%]	[49%-67%]
Applicant's margins based on PCN comparison		[69.5-94.5]	[49.5-68.5]

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Please refer to Appendix E.3 for detailed calculations

2024 exchange rates

1 USD = 0.782533 GBP
1 GBP = 1.278284 USD

1 USD = 5.390883 BRL

1 GBP = 6.891081 BRL
1 BRL = 0.145115 GBP

Source: <https://www.bankofengland.co.uk/statistics/exchange-rates>