

20 February 2026

From: The Applicant, Niftylift Limited

To: The Trade Remedies Authority

Via: Email to the functional inboxes:

AD0075@traderemedies.gov.uk and AS0076@traderemedies.gov.uk

Subject: Response to Notification of Proposed Sample – Case References AS0076 and AD0075

1. Introduction

1.1 Niftylift Limited (the "**Applicant**") acknowledges receipt of the Trade Remedies Authority's ("**TRA**") notifications regarding the proposed sample for investigations AS0076 and AD0075 (the "**Investigations**"). The Applicant would like to hereby provide its view on the proposed sample as outlined below.

2. Sampling of UK producers

2.1 The Applicant has reviewed the details of the TRA's proposed sample. The Applicant confirms its willingness to cooperate fully with the TRA and provide the required information in accordance with the established procedures and timelines of the Investigations.

2.2 The Applicant also notes that Snorkel Europe Limited ("**Snorkel**") did not register their interest in the Investigations, although Snorkel was chosen as a sampled UK producer. The Applicant already indicated in the Application that the origin of Snorkel's boom lifts is unclear and therefore appreciates the TRA's efforts in obtaining that information by issuing the questionnaire. If, however, Snorkel refuses to cooperate during the Investigations, the Applicant requests that the TRA treats the Applicant's responses to the questionnaires as responses of the UK industry, so that any lack of cooperation by Snorkel does not negatively impact on the Investigations.

3. Sampling of registered exporters and importers

3.1 The Applicant agrees with the inclusion of Dingli and LGMG in the sample.

Zoomlion

3.2 Given that the purpose of sampling is to ensure that the Investigations can be conducted efficiently whilst being representative of the exporting producers, the Applicant requests that Zoomlion is included in the sample for both Investigations.

3.3 Even though Zoomlion allegedly exported only between 101-130 units (total of direct and indirect exports) during the POI, the Applicant notes that Zoomlion was one of the main exporters whose predatory pricing severely undercut the Applicant's prices during the injury period. Moreover, a publicly available [source](#) indicates that Zoomlion sold 114 units to one of their UK customers in 2025 with another order of 300 units to follow in years 2026 and 2027, which represents a significant market share (noting that Zoomlion has more than one customer in the UK and the total numbers are expected to be higher). The Applicant therefore believes that conducting verifications at Zoomlion's facilities (in addition to those of Dingli and LGMG) will allow the TRA to complete the full picture and enable a more accurate imposition of measures with the view of remediating the injury suffered by the Applicant.

- 3.4 Equally, from the perspective of the anti-subsidy investigation, Zoomlion's subsidy margin was the highest based on the Applicant's calculations and publicly available information.
- 3.5 The Applicant could not have calculated a subsidy margin for LGMG as they are a private company which is not obliged to publish their annual reports. Given that the subsidy margin of LGMG is completely unknown to the Applicant, the Applicant considers it necessary to include Zoomlion in the sample for both Investigations. Otherwise, there is a risk of obtaining a fragmented view of the subsidy levels for boom lifts in China, negatively affecting the final level of duties and resulting in a lack of remedial effect thereof.
- 3.6 In addition, in the event that LGMG does not cooperate, it would result in final countervailing measures being imposed based on one exporting producer only, which will not be representative of the market.

Sinoboom

- 3.7 The Applicant notes that there is a risk that Sinoboom's responses to the pre-sampling questionnaire might misrepresent reality given: (i) Sinoboom's increasing commercial activities in the UK suggesting an upcoming surge of imports; and (ii) their recent establishment of operations in the EU.
- 3.8 First, based on the publicly available information, it appears that the low levels of Sinoboom's imports (if confirmed) are a result of a temporary business decision not to export boom lifts to the UK for unknown reasons, which does not represent a permanent change in their business operations. To the contrary, Sinoboom appears to be ramping up their business activities:
- In June 2024, a rental company [added](#) further Sinoboom machines to their fleet (different electric articulated and straight telescopic booms).
 - In July 2025, Sinoboom [announced](#) the opening of a Sinoboom UK subsidiary with a 2,500 m² warehouse in Derby, including a technical training center and parts storage facility. The subsidiary was actually established in August 2024 (according to [Companies House records](#)).
 - In October 2025, Sinoboom [ended](#) their partnership and distribution agreement with Pinnacle.
 - In December 2025, it was confirmed that a UK rental company [added](#) two new models of Sinoboom's articulated boom lifts from their local [dealer](#).
 - Finally, in January 2026, Sinoboom [hosted](#) Access Link (the UK and Ireland association of independent aerial lift rental companies). The meeting also included representatives from IPAF, showing Sinoboom's serious and continued intent in importing significant quantities of boom lifts to the UK.
- 3.9 Second, as stated in the Application (p. 26), the US Customs and Border Protection determined there is substantial evidence that Sinoboom North America, LLC imported finished MAE comprised of numerous Chinese-origin subassemblies and subassembly components into the US as a product of Poland only, without appropriately disclosing China as the country of origin. It is therefore likely that machines exported to the UK by Sinoboom are of Chinese origin, but have not been marked as such.

4. Request

- 4.1 Both Zoomlion and Sinoboom had high injury, dumping and subsidy margins in the EU investigations into MAE,¹ and it is likely that similar patterns have been followed in their exports to the UK market.
- 4.2 Considering the above, the Applicant respectfully requests the TRA to:
- (a) include Zoomlion as a third sampled exporter; and
 - (b) investigate further the size of Sinoboom's imports to the UK and, if these imports are significant, include Sinoboom as a fourth sampled exporter.
- 4.3 The Applicant remains committed to supporting the TRA's work and to promoting a fair and transparent investigation process.

Yours sincerely,

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For Niftylift

¹ Commission Implementing Regulation (EU) 2025/796 of 24 April 2025 imposing a definitive countervailing duty on imports of mobile access equipment originating in the People's Republic of China and amending Implementing Regulation (EU) 2025/45 imposing a definitive anti-dumping duty on imports of mobile access equipment originating in the People's Republic of China, available [here](#); Commission Implementing Regulation (EU) 2025/796 of 24 April 2025 imposing a definitive countervailing duty on imports of mobile access equipment originating in the People's Republic of China and amending Implementing Regulation (EU) 2025/45 imposing a definitive anti-dumping duty on imports of mobile access equipment originating in the People's Republic of China, available [here](#).