



# Registration form for interested parties and contributors

Case No.: AD0075

Type of investigation: Anti-dumping Investigation into Boom Lifts and Components thereof from the Peoples Republic of China (PRC)

Completed on behalf of (provide the name of your business or organisation):	Zhejiang Dingli Machinery Co., Ltd (Zhejiang Dingli)
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## Note:

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

When you have completed each form, indicate the **confidentiality** status of the document by placing a **x** in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- Confidential  
 Non-confidential (will be made available on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	19 January 2026
Case team contact:	AD0075@traderemedies.gov.uk



## Introduction

### Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
  - an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
  - a UK producer of goods that are like the goods subject to the investigation; or
  - a trade or business association representing one or more of the above parties.
- A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in an investigation

### Scope of the investigation

Goods Concerned	<p>Boom lifts (alternative names for the same product – cherry pickers, mobile access equipment (MAE), Mobile Elevating Work Platforms (MEWP), aerial work platforms (AWP) and elevating work platforms (EWP)) described as:</p> <p>Boom lifts designed for the lifting of people, equipment and/or materials, with a maximum working height of 6 metres or more, and pre-assembled or ready-to-assemble sections thereof, excluding individual components when presented separately (but not excluding the sections, presented individually or together, listed below). The goods concerned may contain additional features that provide for functions beyond the primary lifting function.</p> <p>The goods concerned may be imported as finished boom lifts, assembled or unassembled, or in the following sections presented individually or together:</p> <ul style="list-style-type: none"> <li>• booms including articulated and telescopic or straight (with or without jibs) or sub-assemblies thereof, assembled or not;</li> <li>• chassis or sub-assemblies thereof, assembled or not;</li> </ul>
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	<ul style="list-style-type: none"> <li>• boom turret or turntables or sub-assemblies thereof, assembled or not;</li> <li>• platforms or baskets or sub-assemblies thereof, assembled or not.</li> </ul> <p>The scope excludes scissor lifts, forklifts, vertical mast lifts (including where described as a ‘boom’ or otherwise), mobile self-propelled cranes and motor vehicles that incorporate a scissor arm assembly or boom assembly.</p> <p>The imported goods are commonly classified under the commodity codes:</p> <ul style="list-style-type: none"> <li>• 8427 1010 10.</li> <li>• 8427 1010 90.</li> <li>• 8427 2019 10.</li> <li>• 8427 2019 90.</li> <li>• 8427 9000 80.</li> <li>• 8428 1020 00.</li> <li>• 8428 1080 00.</li> <li>• 8428 9090 20.</li> <li>• 8428 9090 80.</li> </ul> <p>Pre-assembled parts for boom lifts are commonly classified under the following commodity codes:</p> <ul style="list-style-type: none"> <li>• 8431 2000 60.</li> <li>• 8431 3100 00.</li> <li>• 8431 3900 10.</li> <li>• 8431 3900 90.</li> </ul>
<p>Period of investigation (POI)</p>	<p>1 October 2024 to 30 September 2025</p>
<p>Alleged dumping</p>	<p>The Applicant alleges that boom lifts originated in the PRC and imported into UK are being dumped. The Applicant considers that these dumped imports are causing injury to the UK industry.</p>

For further details, please refer to the *Notice of Initiation* on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.



## Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by **12 January 2026** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#)<sup>1</sup> for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

## Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation or a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

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<sup>1</sup> <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We will accept your request providing that:

- you submit the required information on time; and
- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigations.



## Section A: About your business or organisation

### A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigations, please select all of the following options that are applicable to your business or organisation. Please refer to the period of investigation (POI) defined on page 2.
  - [A1.1] During the POI, we produced the goods concerned in the People's Republic of China (PRC).  
**Note: Please complete sections A2 and B.**
  - [A1.2] During the POI, we directly exported the goods concerned from the People's Republic of China (PRC) to the UK.  
**Note: Please complete sections A3 and B.**
  - [A1.3] During the POI, we indirectly exported the goods concerned from the People's Republic of China (PRC) to the UK via a third party (located either in the People's Republic of China (PRC) or a third country not subject to the investigations).  
**Note: Please complete sections A3 and B.**
  - [A1.4] During the POI, we imported the goods concerned originating in the People's Republic of China (PRC) to the UK.  
**Note: Please complete sections A4 and B.**
  - [A1.5] During the POI, we produced goods that are like the goods concerned in the UK.  
**Note: Please complete sections A5 and B.**
  - [A1.6] Other.  
**Note: Please complete section B.**
2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.

**Response:** This field is not applicable to Zhejiang Dingli.



## A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A1** that **you are a producer of the goods concerned in the PRC**

1. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description, and please further specify the form in which you produce and sell the goods (e.g. in component parts only, as assembled machines only, or in multiple formats.)

**Response:** During the POI, Zhejiang Dingli produced and sold [redacted - number] types of boom lifts (i.e., [redacted – details as to types of boom lift produced and sold by Dingli]) that fall within the scope of the investigation. The said boom lifts [redacted – commercially sensitive information that cannot be meaningfully summarized without disclosing information that is confidential by nature].

2. Please provide your business' total production volumes and production capacity for the goods concerned during the period of investigation (POI) in the table below.

Total production volume (POI) [units]	[6,000 – 7,350] PCS
Total production capacity (POI) [units]	[6,200 – 7,700] PCS
Total production volume (POI) [kg]	[80,000,000 – 100,000,000] KG
Total production capacity (POI) [kg]	[160,000,000 – 200,000,000] KG

Consider providing these figures in ranges in your non-confidential version of this form.

3. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

Company name	Company location (city, country)	Activities	Relationship
Zhejiang Dingli Machinery Co., Ltd. (Zhejiang Dingli)	[Redacted – commercially sensitive information], PRC	Production of goods concerned, domestic sales of goods concerned, export sales of	The Exporting Producer itself



Company name	Company location (city, country)	Activities	Relationship
		goods concerned to the UK and third countries	
[Redacted – Other related parties]	[Redacted – commercially sensitive information]	[Redacted – commercially sensitive information]	[Redacted – commercially sensitive information]
Dingli Machinery UK Limited ( <b>Dingli UK</b> ),	[Redacted – commercially sensitive information], United Kingdom	Import and sales of goods concerned in the UK	[Redacted – commercially sensitive information]
[Redacted - Other related parties]	[Redacted – commercially sensitive information]	[Redacted – commercially sensitive information]	[Redacted – commercially sensitive information]

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

4. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume (POI) [units]	[2,130 – 2,650] PCS
Total domestic sales volume (POI) [kg]	[32,000,000 – 40,000,000] KG
Total domestic sales value (POI) [£]	GBP [117,000,000 - 140,500,000]
Total domestic sales value (POI) [CNY]	CNY [1,100,000,000 – 1,320,000,000]

Consider providing these figures in ranges in your non-confidential version of this form.

5. Please provide your views on whether it is more appropriate to measure production volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)*?

**Response:** From Zhejiang Dingli's perspective, using kilograms (kg) rather than units (pcs) is the most appropriate basis for measuring boom-lift volumes for the following reasons.

1. First, the weight of boom lifts varies materially by working height. Boom lifts are not homogeneous products; higher working heights generally require a larger boom structure, heavier chassis which result in larger weight. For example, a boom lift with a working height of 28 meters weighs 18,900 KG, while another one with a working height of 33 meters weighs 22,100 KG.



2. Second, for Zhejiang Dingli, major cost elements scale closely with the machine's physical size/weight, including steel consumption, structural component fabrication, chassis and specification, hydraulic system sizing, and logistics/handling requirements.

Therefore, Zhejiang Dingli finds it more appropriate to measure production volumes of boom lifts in kilograms (kg).

6. Has there been a change of demand in UK market for other types of Boom lifts that you currently don't produce but may start producing for the UK market in the next few years?

**Response:** Zhejiang Dingli is not aware of any material change in demand in the UK market for types of boom lifts that it does not currently produce, and which would lead Zhejiang Dingli to commence production of such products for the UK market in the coming years. Zhejiang Dingli's manufacturing activities remain focused on the types of boom lifts currently produced and sold. There are no plans to expand production to other boom lift types for the UK market in the foreseeable future.



### A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A1** that **you are an exporter of the goods concerned from the PRC**.

1. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the of the goods concerned in the table below.

**Response:** Zhejiang Dingli is the producer of the goods concerned that it exports to the UK. Therefore, the table below is not applicable.

Company name	Company location (city, country)	Relationship	Producer (Y/N)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

2. Please provide the total of your direct and indirect export volumes and export values of the goods concerned (both assembled machines and sub-assemblies) to the UK during POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in the PRC or a third country, are to be considered indirect exports.

Total direct export volume (POI) [units]	[225 – 285] PCS
Total indirect export volume (POI) [units]	0 PCS
Total direct export volume (POI) [kg]	[2,400,000 – 3,000,000] KG
Total indirect export volume (POI) [kg]	0 KG
Total direct export value (POI) [£]	GBP [12,500,000 – 15,800,000]
Total indirect export value (POI) [£]	GBP 0

Consider providing these figures in ranges in your non-confidential version of this form.

3. What percentage of your total export volumes to the UK is made up of assembled boom lifts only?



**Response:** 100% of Zhejiang Dingli’s total export volumes to the UK is made up of assembled boom lifts only.

- 4. Please provide your views on whether it is more appropriate to measure export volumes of boom lifts in kilograms (kg) or units (i.e. 55 boom lifts)?

**Response:** From Zhejiang Dingli’s perspective, using kilograms (kg) rather than units (pcs) is the most appropriate basis for measuring boom-lift volumes for the following reasons.

First, although boom lifts are sold on a per-unit basis, there are material differences between models. If sales volumes are measured simply by the number of units, those model-driven differences are disregarded, and the resulting comparisons can be distorted. Unit-based measurement is meaningful only where the products being compared are the same model (or otherwise sufficiently homogeneous).

Second, the current PCN structure is relatively broad, and a single PCN may encompass multiple different models of boom lifts of Zhejiang Dingli. In these circumstances, Zhejiang Dingli considers that measuring sales by units is not sufficiently accurate, whereas measuring sales by weight better reflects the actual situation.

Therefore, Zhejiang Dingli finds it more appropriate to measure export volumes of boom lifts in kilograms (kg).

- 5. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

**Response:** All of Zhejiang Dingli’s exports were made directly to the UK. Zhejiang Dingli did not export the goods concerned to the UK via third parties located in other third countries. Therefore, the table below is not applicable.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).

- 6. Please provide details of the commodity code(s) under which you export the goods concerned to the UK, and any explanation for the use of certain commodity code(s) over others. If you export component parts/sub-assemblies under particular code(s), please identify these and the reasons for using any particular commodity code(s) over others.



**Response:** Zhejiang Dingli exports the goods concerned to the UK under commodity codes 8427109000 and 8427209000.

In the UK Integrated Online Tariff, commodity code 8428108000 sits within Chapter 84 and Heading 8428 (“Other lifting, handling, loading or unloading machinery”), under subheading 8428 10 (“Lifts and skip hoists”). This code is used consistently because the exported goods are supplied as complete boom lifts and are declared on the basis of their objective characteristics and principal function as lifting equipment.

Zhejiang Dingli did not export any component parts or sub-assemblies of the goods concerned to the UK during the POI.

7. Please provide a summary of your boom lift exporting activities, including the types of boom lifts that you export to the UK, and whether you export assembled boom lifts only, or component parts/subassemblies.

**Response:** During the POI, Zhejiang Dingli exported [redacted – number] types of boom lifts (i.e., [redacted – details as to types of boom lift produced and sold by Dingli]) that fall within the scope of the investigation. The said boom lifts were exported in the form of assembled boom lifts only. Zhejiang Dingli did not export component parts/subassemblies to the UK.

8. Has there been a change of demand in the UK market for other types of Boom lifts that you currently don't export but may export in the next few years?

**Response:** Zhejiang Dingli is not aware of any material change in demand in the UK market for other types of boom lifts that it does not currently produce which would lead Zhejiang Dingli to commence production of such products for the UK market in the coming years. Zhejiang Dingli's manufacturing activities remain focused on the types of boom lifts currently produced and sold, and there are no plans to expand into other boom lift types for the UK market in the foreseeable future.



## A4. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from the PRC**.

**Response:** This section is applicable to Dingli UK, the one and only affiliate of Zhejiang Dingli located within UK. Please refer to the registration form filed by Dingli UK.

1. Please provide the total of your import volumes and import values of the goods concerned exported from the PRC to the UK during the POI in the table below.

Total import volume (POI) [units]	
Total import volume (POI) [kgs]	
Total import value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

2. What percentage of your total import volumes to the UK is made up of assembled boom lifts only?

3. Please provide your views on whether it is more appropriate to measure import volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)?*

4. Please provide details for your suppliers of the goods concerned exported from the PRC in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required



Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

5. Please specify the purpose of the goods concerned that you are importing from the PRC. Select **all** of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.
- We use the goods as input in our production of \_\_\_\_\_.  
(specify the product/s).
- Other.

6. If you selected 'Other', please specify the purpose of the goods concerned that you are importing from the PRC in the field below.

7. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

8. Please provide a summary of your boom lift importing activities, including what types of boom lifts you import, and whether you import assembled boom lifts only, or component parts/subassemblies.

9. Please provide the total of number of fully assembled boom lifts (in units and in kgs) as a percentage of the total import volumes of boom lifts (which includes sub-assemblies) you import to the UK.



10. Please provide details of the commodity code(s) under which you import the goods concerned to the UK, and any explanation for the use of certain commodity code(s) over others. If you import component parts/sub-assemblies under particular code(s), please identify these and the reasons for using any particular commodity code(s) over others.

11. Has there been a demand in the UK market for other types of boom lifts that you currently don't import from the PRC but may import from the PRC in the next few years?



## A5. Production and sales of goods produced in the UK that are like the goods concerned

Complete this section if you indicated under **A1** that **you are a producer in the United Kingdom of goods that are like the goods concerned.**

**Response:** This section is not applicable to Zhejiang Dingli.

1. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.

2. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during the POI in the table below.

Total production volume (POI) [units]	
Total production capacity (POI) [units]	
Total production volume (POI) [kg]	
Total production capacity (POI) [kg]	

Consider providing these figures in ranges in your non-confidential version of this form.

3. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the POI in the table below.



Total domestic sales volume (POI) [units]	
Total domestic sales volume (POI) [kg]	
Total domestic sales value (POI) [£]	
Total export sales volume (POI) [units]	
Total export sales volume (POI) [kg]	
Total export sales value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

4. Please provide your views on whether it is more appropriate to measure production and export volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)*?

5. In the field below, please provide any other comments or evidence related to injury you believe your company is suffering as a result of alleged dumping imports of the goods concerned into the UK from the PRC. This can relate to the prices, volumes and/or profits associated with your business, in the context of the goods concerned or goods that are like the goods concerned.



## Section B: Additional information

### B1. Notifying other interested parties

1. If you believe there are other interested parties that should register an interest in this case, please provide their business' or organisation's name and website details below.

**Response:** Zhejiang Dingli is not aware of any other interested parties that should register an interest in this case.

Name	Website

Add additional rows as required

### B2. Scope

1. If you consider that the scope of the investigation should be different, please provide your reasons in the field below.

**Response:** Zhejiang Dingli respectfully request the exclusion of boom lifts with a maximum working height of 28 meters and above from the product scope of this investigation for the following reasons.

1. First, the UK industry, as represented by the Applicant, does not manufacture boom lifts with a maximum working height exceeding 28 meters. (See Section A.2, paragraph 7 in the non-confidential version of the Application). Furthermore, the Applicant suggests that producing models with greater working heights would require new and significant capital expenditure (See Section A.2, paragraph 7 in the non-confidential version of the Application). This admission strongly implies that the Applicant's current production facilities, engineering capabilities, and supply chains are not equipped to manufacture boom lifts exceeding 28 meters.
2. Second, the imported goods with a maximum working height exceeding 28 meters are not "like" the goods produced by UK industry. They differ fundamentally in terms of physical characteristics, and they are not interchangeable.
  - (i) The Applicant's products are primarily compact, lightweight, and electric-powered, designed for manoeuvrability in confined spaces. A boom lift exceeding 28 meters is not merely a scaled-up version of a smaller model. Boom lifts exceeding 28 meters require entirely different engineering



- foundations, including heavy-duty chassis, sophisticated stability/counterweight systems, and specialized engine power to ensure safety at extreme heights.
- (ii) For customers, maximum working height is one of the most critical, non-negotiable specifications in the boom lift market. To be specific, a project requiring a 35-metre reach cannot be serviced by a 28-metre machine. The boom lifts that are exceeding 28 meters serve specialized application scenarios where the Applicant's products that are below 28 meters simply cannot reach or perform.
- High-Altitude Infrastructure: Maintenance of iconic structures (e.g., St. Paul's Cathedral dome, or Windsor Castle exterior), maintenance of modern high-rise buildings (the Swiss Re Building in London Forth Bridge), and maintenance and inspections of infrastructure, like bridge, airport terminal and railway station.
  - Energy and Industry: Onshore wind turbine blade maintenance, and high-pressure pipe/tank maintenance and high-voltage transmission towers and substations maintenance.
  - Special Projects: Rigging lighting, cameras, and large sets at major studios in the scenario of film and media production, main stage rigging for the festival, heavy-duty hull maintenance for cruise ships, working on large aircraft within aerospace hangars etc.
3. Third, the exclusion of boom lifts with a maximum working height exceeding 28 meters would not undermine the protection afforded to the UK industry, as the Applicant does not compete in this high-reach segment. Conversely, including these products would impose unnecessary costs on critical UK infrastructure, energy, and media sectors. Therefore, the inclusion of boom lifts with a working height exceeding 28 meters would run contrary to the UK economic interests.

In addition to the above, Zhejiang Dingli considers the scope of the present investigation to be too broad due to the inclusion of "sub-assemblies" within the definition of the product concerned. This is because sub-assemblies (e.g., boom sections or platforms) are intermediate inputs that may be produced, traded, and used within broader supply chains (e.g., for repair and replacement). The inclusion of such sub-assemblies materially expands the product definition beyond the goods under investigation and gives rise to uncertainty and enforceability concerns, as the boundary between a "sub-assembly" and a collection of parts is inherently indeterminate.

Expanding the scope further to include the individual parts constituting such sub-assemblies appears even less justified. Individual components are typically multi-purpose, are commonly sourced for maintenance and spare-part purposes and lack the functional completeness and technical characteristics of either the finished machine or a finished sub-assembly.

2. Please provide any views on the categorisation of sub-assemblies which have been listed in the scope, which consists of:



- booms including articulated and telescopic or straight (with or without jibs) or sub-assemblies thereof, assembled or not;
- chassis or sub-assemblies thereof, assembled or not;
- boom turret or turntables or sub-assemblies thereof, assembled or not;
- platforms or baskets or sub-assemblies thereof, assembled or not.

**Response:** Zhejiang Dingli does not have comments on this.

3. Please provide any further remarks relating to the goods concerned and the like goods. Areas may include, for example: the interchangeability of component parts/sub-assemblies between different types and brands of boom lifts.

**Response:** Zhejiang Dingli has no remarks relating to the goods concerned and the like goods at this stage.

### B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the country/ies subject to an investigation or review.

Draft PCN table:

**Instructions:** For all goods, please complete Table 0. Then:

- For assembled boom lifts, complete Table 1.
- For chassis sections, complete Table 2.
- For turret sections, complete Table 3.
- For boom sections, complete Table 4.
- For cage sections, complete Table 5.

Table 0		
Description	Answer	Value



Assembled Machine or Section?	Assembled Machine	1
	Chassis Section	2
	Turntable/Turret Section	3
	Boom Section	4
	Basket/Cage Section	5

Table 1: Assembled Boom Lifts		
Description	Answer	Value
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Tracks or Wheels	Tracked	1
	Wheeled	0
Extendable Stabilisers	Yes	Y
	No	N
Maximum Working Height (m)	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m	28
Power Type	Combustion	C
	Electric	E
	Hybrid	H
Boom Type	Telescopic	1
	Articulated	0

Table 2: Chassis Sections		
Description	Answer	Value
Vehicle Type	Trailer Mounted	M
	Self Drive	D



	Self Propelled	P
Tracks or Wheels	Tracked	1
	Wheeled	0
Extendable Stabilisers	Yes	Y
	No	N
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m	28
Power Type	Combustion	C
	Electric	E
	Hybrid	H

<b>Table 3: Turret Sections</b>		
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m	28
Power Type	Combustion	C
	Electric	E
	Hybrid	H

<b>Table 4: Boom Sections</b>
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Description	Answer	Value
Lower boom structure*	Links	L
	Riser	R
	None	NA
Lower boom maximum extended length	≤5m	5
	>5m	6
	Not applicable	NA
Upper boom assembly: fly boom/jib included?	Yes	Y
	No	N
Telescopic boom assembly: maximum extended length	≤12m	12
	>12m	13
Telescopic boom assembly: number of booms	≤2	2
	>2	3

Table 5: Basket/Cage Sections		
Description	Answer	Value
Cage width	≤1.6m	6
	>1.6m	7
Cage rotation	≤100 degrees	100
	>100 degrees	101
Cage floor	Metal	M
	Non-metal (e.g. composite)	N

\*For stick booms, select 'NA'.

Example PCN for an electric, articulated self-drive boom lift with a 14m maximum working height and no extendable stabilisers: **1D0N13E0**

Example PCN for a chassis section for an electric, self-drive boom lift with a 14m maximum working height and no extendable stabilisers: **2D0N14E**



1. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your business. In particular, we are interested in your opinions on:
  - . The categorisation of product features; and
  - . If there is any overlap in our PCN structure where products could be more than one PCN. If so, please suggest alternatives.

**Response:** One of the most commercially significant characteristics of the boom lifts is the ability to lift people or goods to a certain height. The working height is necessarily reflective of the amount of material that is required to “reach” to a given height. A boom lift with a greater working height requires more material than a boom lift with a lesser working height, a boom lift with a greater working height must take into consideration the need for greater counterweighting, a wider wheel base, and greater power consumption.

In this connection, it is noted that, in the U.S. Antidumping Duty Administrative Review of Mobile Access Equipment and Subassemblies Thereof from the People’s Republic of China<sup>2</sup>, “maximum platform/lifting height”—substantially equivalent to “maximum working height”<sup>3</sup>—was treated as a physical characteristic of the equipment, and it was incorporated into the Product Control Number for reporting sales and factors of production of the merchandise under consideration.

Zhejiang Dingli thus respectfully proposes to subdivide the machines with the maximum working height exceeding 28 meters in the PCN structure as follows.

Description	Answer	Value	Note
Maximum Working Height (m)	6m≤9m	06	
	>9m≤13m	09	
	>13m≤18m	13	
	>18m≤23m	18	
	>23m≤28m	23	
	>28m≤33m	28	
	>33m≤38m	33	Proposed by Zhejiang Dingli
	>38m≤43m	38	Proposed by Zhejiang Dingli
	>43m	43	Proposed by Zhejiang Dingli

<sup>2</sup> Please refer to Exhibit 1: U. S. Antidumping Duty Administrative Review of Certain Mobile Access Equipment and Subassemblies Thereof from the People’s Republic of China (Period of review: April 1, 2024, through March 31, 2025).

<sup>3</sup> “Maximum working height” is typically defined as the “maximum platform/lifting height” plus 2 meters.



## B4. Economic Interest Test

1. If, following an investigation or review, we conclude that a measure should be imposed or extended, we conduct an Economic Interest Test (EIT) to determine whether the proposed measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the goods concerned) and UK customers (downstream companies buying the goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y





y sensitive information]	sensitive information]		sensitive information]	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

## B5. Particular market situation

The applicant has alleged that there is a Particular Market Situation (PMS) in the market for goods concerned in the PRC. The TRA will therefore assess whether such a PMS exists as part of its investigations.



1. The applicant alleged that there is a particular market situation<sup>4</sup> in the PRC. If you have any concerns or information about the possible existence of a particular market situation in the PRC, please provide details in the box below. This can include examples such as:
  - Prices are artificially low;
  - There is significant barter trade (e.g. goods exchanged for other goods);
  - Prices reflect non-commercial factors; or
  - Anything else.

**Response:** We hereby submit these comments in response to the Applicant's allegations concerning the existence of a Particular Market Situation (PMS) in the People's Republic of China (PRC) and in Chinese boom lift market.

### **I. No PMS exists in the PRC or in the Chinese boom lift market**

To the best of our knowledge, while China has national industrial policies, these are non-binding strategic documents, comparable to those found in many other countries in the world. They do not constitute legally enforceable mandates that distort the day-to-day operations or pricing decisions of individual enterprises. The mere existence of such policies is not sufficient evidence of the existence of a PMS.

The market for boom lifts in China operates under standard market conditions where prices are determined by the forces of supply and demand. There is no evidence supporting the Applicant's allegations that prices are "artificially low", that significant "barter trade" exists, or that prices reflect non-commercial factors.

On the contrary, the Chinese boom lift market is open, competitive, and market-driven. The market comprises a wide range of players, including numerous private enterprises and significant manufacturing bases established by world-leading foreign manufacturers. Notable examples include Terex (Changzhou) Machinery Co., Ltd., JLG Equipment Technology Co., Ltd., and Snorkel (China) Construction Machinery Co., Ltd. This high level of market contestability ensures that prices are determined by fierce commercial competition rather than state planning.

### **II. Dingli is an independent, private company operating on commercial principles**

Dingli is a privately-owned, publicly listed company that operates independently from any government control or interference. [redacted – commercially sensitive information].

Dingli's production planning, R&D priorities, and investment strategies are based on market signals and the principle of profit maximisation. Furthermore, the supply chain of Dingli is overwhelmingly market-based, [redacted – commercially sensitive information]. Only [redacted – number] out of more than [redacted – number] suppliers, and only [redacted –

<sup>4</sup> [Determining dumping and anti-dumping duties - GOV.UK](#)



number] out of nearly [redacted – number] domestic customers, are SOEs.

### III. SG&A expenses and cost are market-determined and free from distortion

There is no distortion in the major cost elements of boom lift production, as well as SG&A expenses. All primary input factors, including raw materials and components, electricity, finance, land-use rights and labour are acquired through market-driven mechanisms.

#### Raw Materials and Components

The markets for raw materials and components in China operate under competitive market conditions. Pricing is determined by market participants without government intervention or price controls.

Dingli procures these inputs and services through arm's-length commercial negotiations with a multitude of suppliers. The vast majority of our suppliers for these inputs are privately-owned enterprises, with a negligible presence of SOEs. Only [redacted – number] of Dingli's more than [redacted – number] suppliers are SOEs, and purchases from SOEs account for approximately [redacted – percentage]% of total procurement, which is negligible.

Importantly, approximately [redacted – percentage]% of critical components, such as [redacted – raw materials], are imported from international markets, ensuring that Dingli's cost structure reflects global market prices.

#### Electricity

China's electricity market is a highly competitive. Electricity prices for industrial and commercial users are formed through market-based transactions on electricity trading platforms and are not subject to third-party intervention. Multiple power suppliers compete to offer electricity supply programmes, and users are free to compare offers and select the most competitive terms.

Furthermore, since the market-oriented reform of China's power sector in 2021, electricity prices for industrial and commercial users are no longer set by government-published price lists but are determined through negotiations between electricity users and suppliers.

During the POI, Dingli followed standard commercial procedures by comparing multiple offers and selecting a price determined by market supply and demand.

#### Finance

To the best of Dingli's knowledge, since July 2013 the People's Bank of China has fully liberalised lending interest rates. Commercial banks are no longer subject to government-imposed interest rate ceilings or floors. Furthermore, in August 2019, the Loan Prime Rate (LPR) was fully reformed by the People's Bank of China and is now fully market-oriented,



based on quotations from a panel of representative commercial banks (currently 20 banks).

The interest rates applied to the Dingli's loans are determined by commercial banks based on the LPR, adjusted strictly in accordance with commercial pricing principles reflecting Dingli's financial condition, creditworthiness, and risk profile. Given Dingli's sound financial position and low credit risk, the interest rates applied are consistent with prevailing market rates for prime borrowers. Dingli does not receive preferential access to financing.

### Land Use Rights

Although land in China is formally owned by the state or collectives, land-use rights are traded as commercial assets under market conditions. Since 2007, national regulations have mandated that land for industrial and commercial purposes must be assigned through transparent "Bid, Auction, and Listing" procedures. This competitive bidding mechanism ensures that land-use prices reflect fair market value. Dingli acquired its land-use rights through these public processes at prices consistent with prevailing market levels.

### Labour

The evidence relied upon by the Applicant is outdated and does not reflect the conditions prevailing during the POI. The labour market in which Dingli operates is highly competitive. Dingli complies fully with PRC labour laws, and employee wages are determined by market competition for skilled labour and technical expertise, rather than by government intervention or wage suppression.

### Taxation and R&D

Policies such as enhanced R&D tax deductions and preferential tax treatment for High and New Technology Enterprises (HNTE) do not constitute market distortions. These policies are generally available, non-discriminatory, and consistent with WTO rules. Similar innovation incentives are widely used in developed economies and are neither industry-specific nor specific to Dingli.

## IV. Need to demonstrate a causal link between the existence of a PMS and the inability to conduct a "proper comparison"

Under the applicable legal framework and WTO jurisprudence, the mere allegation – or even the existence – of a PMS does not, in itself, justify the rejection of a producer's domestic sales.

As confirmed by the WTO Panel in *Australia – Anti-Dumping Measures on Paper* (DS529), the investigating authority must establish a causal link demonstrating that domestic sales do not permit a "**proper comparison**" with export prices as a result of the alleged PMS. Where domestic sales remain reliable and are made in the ordinary course of trade, they must be used to determine normal value.

In the present case, even if certain market characteristics were found to exist, they do not



prevent a fair and proper comparison between Dingli's domestic and export sales.

We therefore respectfully request that the TRA examine this causal link in accordance with UK law and established WTO jurisprudence. A finding of a PMS, if any, is only the first step; the authority must then demonstrate that it is not possible to conduct a "*proper comparison*" between domestic and foreign prices "**because of**" the existence of a PMS.

2. The TRA has received an allegation of a Particular Market Situation (PMS) in the boom lift market in the PRC which it will assess as part of this investigation. If the TRA determines that there is a PMS in the PRC boom lifts market which does not permit a proper comparison of the domestic sales price in the PRC to the export sales price to the UK, the TRA may construct a normal value in accordance with Regulation 8(1)(a) of the Trade Remedies (Dumping and Subsidisation)(EU Exit) Regulations 2019. If the TRA decides it is appropriate to construct a normal value in this way, it will need to determine the largest inputs by cost and weight of a boom lift. Currently, the TRA considers that the largest material costs to make a boom lift can be grouped into the following categories:
- Electronics;
  - Engine;
  - Plastics;
  - Hydraulics; and
  - Steel (where not included in a prior category).

Do you agree with this categorisation of the largest material costs to make a boom lift? If not, provide an alternative list of categories

**Response:** Based on Zhejiang Dingli's production data, electronics, engines and steel (including steel structures) constitute the largest material inputs by cost in the manufacture of boom lifts.

Zhejiang Dingli does not agree with the proposed separate categorisation of hydraulics as one of the largest material cost categories. The majority of hydraulic components used in boom lifts are predominantly composed of steel. While the Applicant alleges price distortions in hydraulic by reference to the Excavator case, it has not provided sufficient evidence to substantiate this claim. To the extent that any pricing distortions may exist, they would most likely derive from the steel content of hydraulic components and therefore be attributable to the steel industry.

Zhejiang Dingli also does not agree that plastics constitutes one of the largest material inputs, as plastics account for a relatively small proportion of total production costs—less than [0-20]%.

Furthermore, should the TRA determine that a PMS exists, Zhejiang Dingli submits that the TRA should follow the approach adopted in the Excavator case and calculate the normal value for steel and steel components using Platts Connect data and a representative third



country, namely Brazil. In that case, the TRA relied on Platts Connect Brazilian steel plate prices as a benchmark and use the following datasets to capture a range of steel types reflecting those used in manufacturing:<sup>5</sup>

- SB01080 – CRC (cold-rolled coil) Brazil Dom Prod
- SB01138 – HRC (hot-rolled coil) Brazil Dom Prod

Zhejiang Dingli further submits that, if the adjustments to steel costs are made, such adjustments should be limited to the difference between the Brazilian benchmark prices from Platts Connect and the actual prices paid by Zhejiang Dingli.

For other materials, Zhejiang Dingli proposes that the TRA rely on data from the Global Trade Atlas (GTA). GTA data is publicly available and has been widely used in both US and EU anti-dumping proceedings.<sup>6</sup>

## B6. Representative Third country

If the TRA determines that a PMS exists and the effect of the PMS on the domestic sales price is that it is not possible to make a proper comparison between that domestic sales price and the export price, it may not use the domestic sales price for the purpose of determining normal value.

In such circumstances, the TRA may determine normal value using the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. The TRA may also make adjustments to those costs and profits using data from an appropriate, representative third country if it determines that any relevant costs or profits are unrepresentative because they do not reasonably reflect the overseas exporter's costs in a market if those costs or profits were substantially determined by market forces.

1. In the event that the TRA needs to make such adjustments, the applicant has proposed Brazil as an appropriate representative country. Please provide any comments on the applicant's suggested representative country.

**Response:** At the current stage of pre-sampling questionnaire, Zhejiang Dingli agrees to Brazil as one of the options for the representative countries.

2. If you do not agree with the third country proposed by the applicant, please suggest an appropriate third country for which suitable costs and profit data can be obtained.

<sup>5</sup> Final Determination in Case AD0047 Excavators from China, para. 356.

<sup>6</sup> Final Regulation in the EU MAE from China (case AD698), available at <[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202500045](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202500045)>.



**Response:** At the current stage of pre-sampling questionnaire, Zhejiang Dingli does not have other proposal for the representative third country.

3. If you have suggested an appropriate representative third country, please provide contact details of a producer in that country who may be willing to participate in the investigation (if you have them).

**Response:** At the current stage of pre-sampling questionnaire, Zhejiang Dingli does not have other proposal for the representative third country.

## B7. Other comments

1. Threat of injury is defined as "injury which, although it has not yet occurred, is clearly foreseen and imminent." Do you have any information in relation to the threat of injury which may be being caused by the goods concerned? If so, please explain this here, and substantiate your claims with evidence.

**Response:** Zhejiang Dingli considers that the Application does not provide any evidence (let alone sufficient or positive evidence) of a threat of material injury to the UK domestic industry on account of the goods concerned.

2. Please use the field below to provide additional information that you consider relevant to this investigation.

**Response:** At this stage, Zhejiang Dingli does not have any additional information that it considers relevant to this investigation beyond the information already provided in this registration form.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).