



Registration form for interested parties and contributors

Case No.: AS0076

Type of investigation: Anti-subsidy 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).

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:	AS0076@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).

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 the 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"> • booms including articulated and telescopic or straight (with or without jibs) or sub-assemblies thereof, assembled or not;
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	<ul style="list-style-type: none"> • 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. <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"> • 8427 1010 10. • 8427 1010 90. • 8427 2019 10. • 8427 2019 90. • 8427 9000 80. • 8428 1020 00. • 8428 1080 00. • 8428 9090 20. • 8428 9090 80. <p>Pre-assembled parts for boom lifts are commonly classified under the following commodity codes:</p> <ul style="list-style-type: none"> • 8431 2000 60. • 8431 3100 00. • 8431 3900 10. • 8431 3900 90.
<p>Period of investigation (POI)</p>	<p>1 October 2024 to 30 September 2025</p>
<p>Alleged subsidies</p>	<p>The Applicant alleges that boom lifts originated in the PRC and imported into UK are being subsidised. The Applicant considers that these subsidised 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).

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](#)¹ 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.

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



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.

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 investigation (only include if relevant for the investigation/review)



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 investigation, 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 investigation).

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.

If you are not a Foreign Government body, please **do not complete** section B5.

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 People's Republic of China (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 two types of boom lifts (i.e., articulating boom lifts and telescopic boom lifts) that fall within the scope of the investigation. The said boom lifts were only sold in the form of assembled machines.

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 goods concerned to the UK and third countries	The Exporting Producer itself



Company name	Company location (city, country)	Activities	Relationship
[Redacted – other related parties]	[Redacted – commercially sensitive information], PRC	[Redacted – commercially sensitive information]	[Redacted – commercially sensitive information]
Dingli Machinery UK Limited (Dingli UK),	[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], PRC	[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.

- 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.
- 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 People's Republic of China (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: the People's Republic of China (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 what types of boom lifts you export to the UK, and whether you export assembled boom lifts only, or component parts/sub-assemblies.

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.

9. If your company is part of a larger group of associated companies and subsidiaries, please describe the organisational structure of this group. Please include all subsidiaries and associated companies and list their location. Highlight where your company lies in the organisational structure of the group of companies.

Response: Zhejiang Dingli is a publicly listed company. Please refer to [Exhibit A3.9](#) for the organisational structure of Zhejiang Dingli, including all its subsidiaries and associated companies with their locations. [Please note that Exhibit A3.9 contains commercially sensitive information concerning Zhejiang Dingli's organizational structure that is not available in the public domain, that cannot be meaningfully summarized in a non-confidential manner, and whose disclosure would have an adverse impact on the company providing the information and/or would provide an unfair advantage to competitors. Hence, confidentiality is hereby requested pursuant to Article 6.5.1 of the WTO Anti-Dumping Agreement].



10. Are the resources of the group of companies pooled or consolidated in any way? If so, please:
-) Outline how they are consolidated; examples could include (but are not limited to) cash-pooling, revenue sharing or any other mechanisms for the consolidation of resources.
 -) If the pooled resources are distributed among subsidiaries and associated companies, please describe how. Examples could include (but are not limited to) intra-group loans, supply of materials, access to credit lines or other mechanisms.

Response: [Redacted – commercially sensitive information].

11. If resources are not pooled and distributed among group companies, is there any other mechanism for intra-group utilisation of resources? Please describe how this is carried out.

Response: [Redacted – commercially sensitive information].

12. Please outline how you finance your operations, including (if applicable) how you obtain finance from third parties. How do you meet your working capital requirements? Please include all sources additional to operational cash flows, such as external financing.

Response: As a publicly listed company, Zhejiang Dingli generally finances its operations through operating cash flows, equity financing (e.g., issuance of shares) and bank loans to meet its working capital requirements.

During the POI, [Redacted – commercially sensitive information].

13. Please describe the process by which your company secures land for use in the manufacturing and sale of the goods concerned, including any previous acquisition of land. Is access to any land used in the manufacturing and sale of your goods, gained, or transferred (with or without compensation) from other members of the wider corporate group? If so, please provide details.

Response: Most of Zhejiang Dingli's land-use rights were acquired through bidding, auction or quotation procedures.

[Redacted – commercially sensitive information].



14. In relation to all the goods (both in scope and out of scope) your company manufactures, is any of the research and development performed by other companies within the same corporate group? If so, please provide details.

Response: Virtually all of the goods manufactured by Zhejiang Dingli are the result of Zhejiang Dingli's independent in-house research and development. One of Zhejiang Dingli's associated companies [Redacted – name and location of associated company] also performs limited R&D activities for certain goods or sections, focusing on [Redacted – commercially sensitive information].

15. For key inputs for the production of boom lifts (such as those listed below), what proportion of the cost of manufacturing do these inputs make up?

- steel;
- engines;
- tyres;
- batteries; and
- hydraulic components.

Response: The proportion of the cost of manufacturing of these inputs are the following:

- Steel: [20-45]%;
- Engines: [0-20]%
- Tyres: [0-18]%
- Batteries: [0-18]%
- hydraulic components: [10-35]%.

In this connection, please note that Zhejiang Dingli does not consider tyres and batteries as the key material inputs, as the production cost of these two inputs accounts for a low proportion—each less than [0-18]% as shown above.

16. Please provide details of how you obtain inputs for the goods concerned, including details of entities from whom you purchase inputs, including where inputs are obtained from a company within the larger group you are affiliated with, or any other third party from whom you obtain inputs. If your company purchases unfinished goods/sections (such as a chassis, cage etc) that are used by you in the manufacturing process for the goods concerned, please include details.

Response: Please refer to **Exhibit A3.16 - CONFIDENTIAL** for the List of Suppliers of Zhejiang Dingli. There is only one associated company in the list, which [Redacted – name and location of associated company]. During the POI, Zhejiang Dingli purchased a very limited quantity of certain spare parts, including: [Redacted – spare parts] from [Redacted – name and location of associated company]. It is important to note that Zhejiang Dingli originally intended to source these spare parts from unrelated third-party suppliers [Redacted – country]. However, due to the supplier's lack of export licenses, the procurement was conducted through [Redacted – name and location of associated company], which acted solely as a trading intermediary. To sum up, nearly all inputs were procured by Zhejiang Dingli from unrelated third parties in the open market.



Zhejiang Dingli did not purchase any unfinished goods or sections (such as chassis, cages, etc.) for use in the manufacturing process.

17. Please describe how your company uses robotics in the Boom Lifts production process, and how your company obtains robotics.

Response: Zhejiang Dingli uses [Redacted – commercially sensitive information regarding the use of robotics in the manufacture process of boom lifts].

18. Please list your energy providers for the manufacture of the goods concerned.

Response: The electricity providers are [Redacted – name of company]. [Redacted – name of company] is a private company, which is not a public authority.



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 People’s Republic of China (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) [kg]	
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 [originating in/exported from]: the People’s Republic of China (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 People's Republic of China (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 the 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 subsidised 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 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.

3. 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.

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

Table 3: Turret Sections		
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

Table 4: Boom Sections		
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**

- 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 China², “maximum platform/lifting height”—substantially equivalent to “maximum working height”³—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

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

² Please refer to [Exhibit B3.1](#): 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).

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



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



information]				
[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. Questions for the Foreign Government of the exporting country (PRC)

Please complete this section if you are a Foreign Government body of the exporting country.

The below table sets out the allegations of subsidies provided to exporters of the goods concerned.

Subsidy programme
Preferential loans and credit lines from State policy banks and State-owned commercial banks
Preferential access to bond financing
Preferential access to bank acceptance drafts
Preferential access to export credit insurance and support funds
Provision of land-use rights for less than adequate remuneration
Provision of electricity for less than adequate remuneration
Robot purchase incentives
Provision of inputs for less than adequate remuneration (such as steel, tyres, batteries, engines and hydraulic components)
Provision of shipping and logistics services for less than adequate remuneration
Reduced corporate income tax rates for High and New Technology Enterprises and certain industries based in the Western Regions
Pre-tax deductions of research and development (R&D) expenses (corporate income tax)
Accelerated depreciation of machinery and equipment used by High-Tech enterprises (corporate income tax)
Dividend exemption between qualified resident enterprises (corporate income tax)
National and sub-national grants for innovation and industrial upgrading in construction machinery
Other ad-hoc grants, such as infrastructure and relocation subsidies, operating support and patent awards



1. Please identify the level of government which these programmes are granted/managed at (e.g. national, provincial/municipal, prefectural, county). Please name the relevant authorities.

2. For tax exemptions, how does the responsible authority ensure that companies are applying the exemptions appropriately? Please provide a summary of the oversight process, including any documentation requirements.

3. Please provide any further information on the programmes in the table that you consider relevant.



B6. 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: We respectfully submit the following comments regarding certain subsidy programs alleged in the Application. Should Dingli be selected in the sample of exporting producers, Dingli hereby formally reserves its right to submit further comments and evidence regarding the countervailability of the alleged subsidy programs and selection of appropriate benchmarks throughout the course of this investigation.

I. Preferential Loans and Credit Lines from State Policy Banks and State-Owned Commercial Banks

A. This program does not constitute a countervailable subsidy as no benefit is conferred.

To the best of Dingli's knowledge, since July 2013, the People's Bank of China has fully relaxed the control of loan interest rates for financial institutions, completing the market-oriented reform of loan pricing. Since then, commercial banks in China have operated on commercial principles and are no longer subject to government-imposed lending rate floors or ceilings. Furthermore, in August 2019, the People's Bank of China reformed the Loan Prime Rate (LPR). The LPR is fully market-oriented and is calculated based on quotations provided by a panel of representative commercial banks (currently 20 banks).

The interest rates applied to Dingli's loans are determined by commercial banks based on the LPR and adjusted strictly in accordance with commercial pricing principles, reflecting the company's specific credit rating, solvency, and risk profile. Given Dingli's sound financial condition and low default risk, the interest rates it receives are commensurate with its creditworthiness and reflect prevailing market rates for prime borrowers. Accordingly, Dingli has not obtained financing at rates below applicable market benchmarks for comparable borrowers, and no benefit has been conferred.



B. Benchmark Selection (If found countervailable)

1. Rejection of External Benchmarks:

Should the TRA proceed to calculate a benefit, there is no legal or factual basis to resort to an out-of-country (external) benchmark. As explained above, Chinese banks lend on commercial terms without statutory caps or floors.

2. Adoption of In-Country Benchmark:

The benchmark used must reflect prevailing market conditions in China. The LPR itself, or interest rates available from commercial sources in China for comparable loans, would constitute the most appropriate benchmarks.

II. Preferential Access to Bank Acceptance Drafts (BADs)

A. This program does not constitute a countervailable subsidy because it neither confers a benefit nor is specific.

1. Lack of Specificity:

BADs are standard trade financial instruments used globally to facilitate commercial settlements. This payment tool is recognized and utilized not only in China, but also globally in the world.

BADs are offered by commercial banks in China and are available to all companies across all industrial sectors, regardless of industry, size, or ownership, provided that standard credit requirements are met. They are neither *de jure* nor *de facto* limited to the boom lift industry or any specific group of enterprises and therefore fail to meet the "specificity" requirement under the SCM Agreement and UK Regulations.

2. No Benefit Conferred:

The Applicant's attempt to characterise BADs as interest-free short-term loans reflects a misunderstanding of their financial nature. BADs are a payment guarantee instruments, not loans.

Under a BAD, the bank guarantees payment to a supplier at a future date but does not advance funds to the issuing company at the time of issuance. Because no funds are transferred, no interest-bearing loan exists, and the absence of interest payments cannot be construed as a benefit.

B. Benchmark Selection (If found countervailable)

In-Country Benchmark Required: As with loans, external benchmarks are inappropriate. The Applicant's proposal to use the 1-year LPR is overly simplistic and does not reflect its specific characteristics of BADs. Any benchmark must reflect comparable short-term financing costs in China, adjusted for the term of the BAD and the issuer's creditworthiness.



III. Preferential Access to Export Credit Insurance and Support Funds

A. Dingli did not receive any countervailable benefit under this program during POI

The Applicant alleges that exporters benefit from preferential export credit insurance provided by Sinosure. However, a benefit exists only if the recipient is placed in a more favourable financial position than it would have been absent the program.

Established practice, specifically in U.S. countervailing duty investigations, holds that a benefit exists under export insurance programs only if insurance payouts received by a company exceed the premiums paid during the POI. Where no payouts are received, or if the payouts are less than the premiums paid, no countervailable benefit is conferred. For example, in *Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China (C-570-980)*, DOC determines that:

“16. Export Guarantees and Insurance for Green Technology. The Department found this program to be not used in the Preliminary Determination because neither respondent received payouts during the POI related to products exported to the United States” (See Issues and Decision Memorandum, Barcode: 3101683-01, dated October 9, 2012, Barcode 4824418-01)

During the POI, Dingli did not receive insurance payouts and therefore received no countervailable benefit under this program.

B. Benchmark selection (In the alternative)

Should the TRA nevertheless determine that a benefit exists and decide to apply a benchmark premium rate for calculation, Dingli submits that the rates provided by the **Export-Import Bank of the United States (EXIM Bank)** would serve as a reasonable and appropriate benchmark. This is consistent with the TRA's own recent practice. In paragraphs 773-774 of the *Final Determination on Excavators case (AS0046)*, the TRA specifically identified the **Export-Import Bank of the United States** as an appropriate source for benchmark premiums. Dingli reserves the right to submit further comments and evidence in this regard if selected for the sample of exporting producers.

IV. Provision of Electricity for Less Than Adequate Remuneration

A. This program does not constitute a countervailable subsidy as no benefit is conferred

We submit that this program does not confer a countervailable benefit, as electricity prices in China are determined by competitive market transactions and Dingli purchases electricity at market-determined prices during the POI. Therefore, the TRA should terminate the investigation into this program and exclude it from any subsidy margin calculations.

1. The Pricing Mechanism is Market-Based: Since the market-oriented reform of



China's power sector in 2021, the electricity prices for industrial and commercial users are no longer determined based on the electricity price lists published by government departments and are instead determined by electricity users and power suppliers by themselves in the electricity trading market. Due to the fact that enterprises purchase electricity at market prices, electricity is not provided at LTAR.

2. **The Electricity Market is Competitive:** China's electricity market is a fiercely competitive market. The electricity purchase prices of industrial and commercial users are formed through market transactions, and market-oriented transaction prices are formed by market entities through electricity trading platforms and are not subject to third-party intervention. There are multiple power sellers in the electricity market that will provide multiple power sales offer programs. Electricity users can compare and select the appropriate offer to make purchases and sign electricity contracts. Offers that are not advantageous will not be selected by power users. During the POI, Dingli followed standard commercial procedures by comparing quotes from multiple electricity suppliers before making its procurement decision.
3. **Consistency with Recent EU Practice:** Notably, in recent anti-subsidy investigations conducted by the European Commission, including the investigation into Electric Vehicles and Mobile Access Equipment (MAE) from China, the Commission has reportedly ceased calculating a subsidy margin for the provision of electricity. This shift in practice recognizes that, following the market-oriented reform of China's power sector, the provision of electricity in China no longer confers a countervailable benefit.

B. Benchmark selection (In the alternative)

Should the TRA determine that a benefit exists, despite the comments presented above, and decide to apply a benchmark premium rate for calculation, Dingli submits that the rates provided by the **U.S. Energy Information Administration (EIA)** would serve as a reasonable and appropriate benchmark in the present case, should one be required. This is consistent with the TRA's own recent practice. In paragraph 741 of the *Final Determination on Excavators case (AS0046)*, the TRA specifically identified the **U.S. Energy Information Administration** as an appropriate source for benchmark premiums. We reserve the right to provide further comments and data on this matter as the investigation proceeds if selected.

V. Provision of Inputs and Services for Less Than Adequate Remuneration (LTAR)

We submit that these programs do not constitute countervailable subsidies in light of reasons below.

A. Lack of Evidence on Upstream Specificity and Benefit Pass-Through

The Applicant claims that upstream industries (such as steel, tyres, batteries, engines and hydraulic components) and logistics providers receive specific subsidies. However, the Ap-



plicant did not provide sufficient evidence to demonstrate that any alleged subsidies to upstream producers or service providers are "specific" within the meaning of the SCM Agreement and UK Regulations. A mere allegation of the existence of state-owned enterprises in these sectors does not constitute sufficient evidence.

Even if the Applicant were to prove that upstream producers received specific subsidies (which is not the case), it must further demonstrate how such subsidies were "passed through" to the manufacturers of the product under investigation. Yet, there is no such analysis or evidence to bridge the gap between upstream allegations and the actual purchase prices paid by Boom Lift producers in the application.

B. This program does not constitute a countervailable subsidy as it confers neither benefit nor is it specific

1. Lack of Specificity:

The inputs in question are multi-purpose commodities utilized across a vast array of downstream industries in China, ranging from automotive to construction and consumer electronics. There is no evidence that the Government of China (GOC) limits the access to these inputs through law or policy to a "limited group of enterprises" or specifically to Boom Lift manufacturers.

2. No Benefit Conferred:

The markets for raw materials, components, and logistics services 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. Dingli has over [redacted – number] suppliers, out of which only [redacted – number] are SOEs. Purchases from SOEs account for only about [redacted – percentage] % of Dingli's total procurement, representing a negligible proportion. These private companies make their pricing and sales decisions based on commercial considerations aimed at maximizing their own profits, not implementing government policy.

VI. Pre-tax Deductions of Research and Development (R&D) Expenses

A. This program is not a countervailable subsidy because it is not specific, as previously determined by the TRA

We submit that the program allowing for the pre-tax deduction of R&D expenses does not constitute a countervailable subsidy because it lacks the requisite specificity.

The TRA has already thoroughly investigated this exact program in its recent anti-subsidy investigation on Excavators from China (Case AS0028). In its Final Determination, at paragraphs 510 to 516, the TRA conducted a detailed analysis and concluded that it "*had not identified sufficient evidence to meet the criteria for specificity, in accordance with regulation 22 of the Regulations.*" Consequently, the TRA determined that the R&D deduction



program was not a countervailable subsidy.

The legal and factual basis for this program has not changed since that determination. The program remains generally available and is not limited to certain enterprises or industries. Therefore, we respectfully assert that the TRA should, for the sake of consistency and legal certainty, follow its own recent and well-reasoned precedent.

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