



UK TRA Subsidy Investigation of
Certain Excavators from the People's Republic of China
(AS0046)

CCCME Comments on TRA Statement of Essential Facts

Submitted on Behalf of
China Chamber of Commerce for Import and Export of
Machinery and Electronic Products
("CCCME")

9 January 2025



CCCME Comments on TRA Statement of Essential Facts

I. INTRODUCTION

- [1] As mandated by the China Chamber of Commerce for Import and Export of Machinery and Electronic Products (“CCCME”), we hereby submit the CCCME’s Comments on the TRA’s AS0047 Statement of Essential Facts (SEF) as was published on 12 December 2024. The deadline for submission of comments on the SEF was fixed as 9 January 2025.
- [2] These CCCME Comments address the TRA’s SEF relating to 1) deficient factual disclosure relating to key issues raised in the SEF, 2) overly broad assessment concerning product scope and UK market indicators, 3) deficiencies in the analysis of injury factors, and 4) deficiencies in the analysis of imports and market effects / causation of the alleged injury.

II. CCCME COMMENTS

In general:

- [3] The CCCME throughout this investigation has expressed its serious concerns about the insufficiency and/or total lack of certain non-confidential data disclosure by the UK industry as regards multiple key elements of the investigation and crucial to the CCCME’s exercise of its rights of defence in this investigation. Despite adequate time for the UK industry to remedy the data deficiency, the deficiency has not been remedied prior to the publication of the SEF. As will be elaborated below, this data deficiency deriving from the UK industry cannot be cured by data which has been disclosed for the first-time in the SEF by the TRA itself.
- [4] CCCME is highly concerned about the very broad and imprecise analysis carried out by the TRA regarding crucial elements of the investigation. The TRA thus fails to provide the detailed analysis that is essential in order for the TRA’s respective conclusions to be sufficiently explained and meaningful for the CCCME to exercise its rights of defence. The SEF disclosure must therefore also be deemed to be insufficiently objective and reasonably grounded having regard to the disclosure obligations applying to the TRA. The TRA admits in the SEF to several of these analytical deficiencies (notably that key elements of the TRA’s injury and causation analyses cannot be restricted to data concerning only the like goods) but despite possible solutions as suggested previously by the CCCME, the SEF does not address these possible solutions or otherwise make any attempt to provide more precise and meaningful analyses. The respective SEF conclusions drawn from these analyses must therefore be deemed to be deficient and inadequately reasoned.



Detailed Comments:

1. Deficient Data Disclosure

- [5] CCCME strongly objects to the TRA's determination (para. 641) that the published non-confidential versions of the UK industry's various submissions provide "appropriate context" for other interested parties. To the contrary, the CCCME has in successive submissions explained in detail how the continuing absence of adequate non-confidential summaries regarding key market indicators was precluding a reasonable CCCME understanding and own analysis of key injury indicators and market trends and hence precluding an effective CCCME exercise of its rights of defence.
- [6] The CCCME has also explained and cited legal requirements to supports its specific claim that, in certain instances, disclosure solely of indexed data would not be sufficient to provide a meaningful understanding of the market situation¹. Not only has the UK industry failed to remedy its non-disclosure of the requested meaningful non-confidential summaries of essential data but the SEF perpetuates the deficiency in part by continuing in the SEF to provide solely indexed data on key indicators such as overall UK market growth (consumption) and respective market shares². In these regards, the CCCME thus considers that the SEF fails to provide the required meaningful disclosure of the essential facts which form the basis of the TRA's intended final determination in this investigation.
- [7] Conversely, to the extent that the TRA's SEF provides certain data indications that have not previously been provided in any form by the UK industry itself, e.g., average cost of production per unit, indexed (SEF, Table 17), this disclosure in the SEF by the TRA is not responsive to the legal requirements. In particular, the CCCME refers to the WTO Panel Report in *China-GOES*, which found that,

"In order to allow an interested party the opportunity to defend its interests, the summary of the confidential information needs to be provided before the investigating authority has reached its determination. Further, Articles 12.4.1 of the SCM Agreement and 6.5.1 of the Anti-Dumping Agreement expressly provide that the authorities shall require '*interested parties* providing confidential information to furnish non-confidential summaries thereof'. It is difficult to read this obligation as being fulfilled when an *investigating authority* produces a summary of information submitted to it."³ (Panel emphases)

¹ See CCCME Reply to JCB Comments, para. 20

² As previously explained by the CCCME, where data is justified to be business sensitive such as sales volume and prices, the data can still be provided meaningfully in non-confidential form using appropriately ranged absolute figures, as is common practice in other major trade remedy jurisdictions such as the EU.

³ Panel Report, *China – GOES*, para. 7.190



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[8] While the SEF would not be considered a “final determination”, the above-noted UK industry COP data as set out in SEF Table 17, for example, constitutes a key element of the TRA’s intended final determination. Consequently, unless the UK industry disclosure deficiency in this regard is quickly remedied⁴, the current COP indications in the SEF do not resolve the UK industry’s disclosure deficiency. It thus remains incumbent on the UK industry to provide the necessary additional non-confidential COP and other data and for the TRA to ensure that this disclosure happens, and provides appropriate time for the CCCME to review and comment, before the final determination of the TRA⁵.

2. Overly Broad TRA Level of Analysis

2.1.1 Overly Broad Like Product Scope

[9] The CCCME objects to the intended inclusion in the “like goods” determination (SEF Section D6, para. 89) and hence inclusion in potential UK AD measures on excavators imported from China, of excavators falling within the PCN category XXL (≥ 55 tonnes < 80 tonnes). Just like excavators in the XXXL PCN category (≥ 80 tonnes), the XXL excavators were not produced by the UK industry in the POI (SEF para. 79), nor were they produced by the UK industry at any time during the whole of the injury period⁶, nor is there any UK industry intention reported in the SEF to enter into this category of the UK excavator market in the future⁷. For that matter, neither in the SEF Section D6 context

⁴ The CCCME would recall that it has requested disclosure not only of the average COP trend per unit but also, due to cited important market factors impacting UK industry COP during the injury period (e.g., major supply chain constraints and related costs post-COVID and the energy price/general inflation spike following the 2022 start of the Russia/Ukraine conflict), the disclosure of the cost trends for the major COP inputs including both main purchased raw materials/components and energy, which sub-COP elements are commonly disclosed in appropriate non-confidential form in other trade remedy jurisdictions – see para. 19 and footnote 12 of the CCCME’s submission dated 1 August 2024.

⁵ The legal requirements in these regards, concerning both the responsibilities of the applicant industry and of the investigating authority, are cited in detail in section 2 of the CCCME’s submission dated 1 November.

⁶ A 2020 private expert report on the UK excavator industry indicates that JCB has not since 2015 produced crawler excavators above 38.6 tonnes (Table 14) and that sales of excavators over 50 tonnes have never constituted more than 1% of total annual UK excavator market sales (Table 5). This and significant other UK market data in this 2020 report, some of which has already been cited in prior CCCME submissions, provides an important baseline for the TRA’s analysis of the UK market over the injury period. The full report, hereinafter referred to as the “submitted private industry report”, is being separately submitted to the TRA in confidence for reference and potential cross-verification of data already submitted by interested parties. The CCCME assumes that this same report is already in the TRA files provided by the UK industry or that, if not the same, that the private expert report(s) submitted by the UK industry in conjunction with its Application or subsequently provides essentially the same type of detailed data and market trend commentary bearing on UK crawler excavator consumption, production, UK sales of market suppliers, market shares etc., for the specified year(s) of the injury period.

⁷ The CCCME notes that SEF para. 77 specifies that “like goods” are defined as identical to or closely resembling the goods concerned and which “are produced by the UK industry.” On this basis and given that the UK industry does not produce XXL excavators, it would appear that XXL excavators could not by definition be deemed as “like” products.



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or elsewhere in the SEF does the TRA disclose the number of units or volume(Kg) specifically of XXL excavators imported from China during the POI or injury period overall such that these Chinese XXL excavators not produced by the UK industry could realistically be a cause of injury. To the CCCME's knowledge, such imports of XXL excavators would be negligible, so would request the TRA to address this specific point in supplemental SEF disclosure.

[10] Moreover, to the CCCME's view the SEF's overall causation of injury determination is insufficiently reasoned in the absence of a sound assessment that the XL excavators produced in the UK and the XXL excavators imported from China "have no fundamental differences in physical or commercial characteristics" (SEF para. 80).

[11] The CCCME contends that the SEF "like goods" assessment is deficient. In particular, and contrary to the SEF finding (para. 83) that excavators with an operating weight between ≥ 30 tonnes and < 55 tonnes (XL) and excavators with an operating weight of ≥ 55 tonnes and < 80 tonnes (XXL) are "substitutable or interchangeable one for the other", the CCCME highlights the following points which have not been duly taken into account in the SEF analysis:

- In terms of end-use scenarios, excavators with an operating weight of ≥ 55 tonnes are mainly used in niche sectors, notably in large iron ore, coal and other mines;
- In terms of work efficiency, excavators with an operating weight of ≥ 55 tonnes are specially designed and engineered to be more productive for their niche end use as they have a larger amount of digging per unit time, high construction efficiency, and are specifically configured for use with large mining transport vehicles, characteristics which excavators with an operating weight between ≥ 30 tonnes and < 55 tonnes do not have and cannot substitute. Further in terms of key physical features, the bucket capacity of excavators with an operating weight between ≥ 30 tonnes and < 55 tonnes is much smaller and for efficiency purposes will not be purchased for use in the above-mentioned large mining/quarrying scenarios where XXL excavators are targeted. XL excavators with the smaller buckets are thus predominantly used instead on construction sites or with non-excavator buckets in waste recycling sites.
- In terms of purchase decisions, customers in the UK will not purchase excavators with an operating weight of ≥ 55 tonnes where the intended end use does not absolutely require the additional specifications and costs of the XXL excavator, for the reason that the cost performance will be too low if they do so and then use the XXL for less-demanding use scenarios.



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- [12] For the above reasons, XL and XXL excavators are not, in commercial reality, substitutable or interchangeable one for the other. This lack of interchangeability would also be confirmed that the fact that UK demand for excavators over 50 tonnes has been reported reduced as a result of the UK’s significant decline of operations in the opencast coal sector⁸. Such a reduction in demand for these larger/XXL excavators would not have occurred if the SEF para. 83 conclusion on substitutability and interchangeability were correct.⁹ The CCCME thus strongly urges the TRA to re-evaluate its “like goods” findings and to finally exclude XXL excavators from the “like goods” scope. There is simply no sound reason to impose AD duties on these larger excavators that the UK industry does not currently produce or have a commercial interest in. Such duties would only unnecessarily increase UK downstream users’ costs for the XXLs that are imported from China.
- [13] The CCCME additionally takes issue with the TRA’s reasoning and consequent intention to include electric excavators in the scope of the intended measures (SEF paras. 84 - 88). The TRA concedes exporters’ explanations that there are production and/or manufacturing processing differences that clearly distinguish the two engine types. The TRA also accepts that electric-powered excavators will not be an alternative to an internal combustion excavator in various end use scenarios, having regard to battery life and the need to recharge - perhaps most notably where the work area does not have the necessary infrastructure or the infrastructure is distant such as to make it impractical to recharge the excavator’s batteries (SEF para. 85). However, in the latter, rather crucial, regards concerning lack of adequate charging infrastructure, the TRA draws two conclusions: 1) that such scenarios are “sufficiently rare” and, 2) that “[scenarios of inadequate charging infrastructure] are not likely to be a deciding factor in purchasing decisions of downstream users.” (SEF para. 87)
- [14] The CCCME notes that the TRA does not explain the source/factual basis for its conclusion about instances of inadequate charging infrastructure being “sufficiently rare”, nor to support its conclusion that such instances would not be of importance in purchasing decisions. In the first regard, to the CCCME’s understanding JCB produces solely a single mini-electric excavator model (JCB 19C-1E), which at 1.9 tonnes is well outside the product-weight scope of this investigation and whose operating environment and charging requirements would be very dis-similar to those for the much larger excavators covered by this investigation. Indeed, the transition to electric excavators is only in the

⁸ See the submitted private industry report, p. []. See also fn. 9.

⁹ The reported decline in demand for the larger excavators over 50 tonnes due to reduced opencast coal mining in the UK has apparently continued through the injury period. The UK government reported in 2023 that, “[R]educed demand for coal drove a substantial contraction in supply, with UK coal production down 96 per cent since 2013....Surface mine production was down 28 per cent to a new record low of 0.4 million tonnes due to mine closures and declining demand for coal use.” https://assets.publishing.service.gov.uk/media/66a7a172a3c2a28abb50d8be/DUKES_2024_Chapter_2.pdf.



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very early stages and the sales of electric excavators of sizes/weights covered by this investigation are miniscule. It is therefore entirely speculative for the TRA to arrive at any conclusion about sufficiency of the charging infrastructure needed across the range of excavators covered by this investigation.

- [15] Secondly, as regards the TRA conclusion about non-impact on purchasing decisions, this conclusion is equally wholly speculative given the absence of any significant commercial experience in the UK relating to sales of electric excavators. As is quite evident regarding the non-take-up of electric cars, for example, one of the fundamental and well documented reasons for the hesitancy of consumers is their very-justified concern about the continuing lack of adequate recharging infrastructure. For the types and likely the heavier excavators where the operational environments and charging infrastructure will be more complicated than for small mini-electric excavators, it is entirely reasonable to assume that the adequacy or not of the charging infrastructure for the intended operations will, in fact, be a major factor in the purchaser's decision-taking.
- [16] The CCCME thus questions the basis and adequacy of the TRA reasoning in these regards and requests the TRA to seriously review the SEF assessment with a view to finally exclude electric excavators from the scope of the products concerned. Rather than drawing speculative conclusions presently, if upon a potential future review of measures the UK excavator market has changed substantially as regards sales of electric excavators, the review can take the facts of such substantial change into account at that time.

2.2 Overly Broad and Imprecise Analysis of the UK Excavator Market

- [17] For purposes of its injury assessment, the TRA indicates (SEF para. 640) that TRA has used certain secondary sources of information including HMRC import data and "data pertaining to relevant markets". However, the market data used by TRA for purposes of assessment of injury trends appears to be based solely on the all-in eight-digit commodity code (84295210) and thus includes potentially significant sales of excavators which are presently outside the product scope of this investigation i.e., excavators which are both lighter (mini-excavators) and very much heavier (XXXL excavators¹⁰) than the goods concerned. The TRA methodology using solely the all-excavator-inclusive eight-digit commodity code classification thus renders the TRA's volume and price conclusions based on this data insufficiently precise or reliable for final trade remedy determinations.
- [18] The TRA has had at least two other options to appropriately narrow its product market analysis and hence improve the precision and reliability of its SEF conclusions. First, the UK industry for purposes of its original Application provided to the TRA detailed UK market data (e.g., for total UK market/consumption, imports, and respective market

¹⁰ See also paras. 9-12 above regarding CCCME objections to inclusion of Chinese XXL excavators in the scope of the products concerned.



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shares) based both on its own figures and on figures said to be compiled by a private data processing company, albeit labelling all of this data “confidential/impossible to summarise non-confidentially and subject to copyright”¹¹. The CCCME has disputed the claimed “impossibility” to provide adequate non-confidential summaries of these key market indicators. As already brought to the TRA’s attention, these indicators are commonly provided in non-confidential form in other trade remedy jurisdictions such as the EU and would enable a proper narrowing of the respective market analyses closer to the “in-scope” excavators. Moreover, and notwithstanding the CCCME’s requests and even suggestions on how to timely and reasonably remedy the failure of the UK industry to provide adequate non-confidential disclosure relating to the data set out, for example, in the submitted expert private publication(s)¹², neither the UK industry nor the TRA has evidently taken steps to enable the required disclosure.

- [19] The CCCME understands that key data set out in the one or more expert private publications submitted by interested parties and which the TRA therefore holds in its investigation files, includes data on the UK excavator market generally as well as regarding the situation specifically of the UK industry (JCB). For example, figures are provided on annual overall UK market sales/consumption of “crawler excavators” by units, annual production of the two UK domestic producers (JCB and Komatsu) by units, key purchased components of the two UK producers and the suppliers of their main purchased components, and the individual annual market shares of all UK market suppliers of crawler excavators (domestic producers and all foreign producers), again measured in unit sales.
- [20] As the CCCME does not have access to this data for each of the years across the injury period, the CCCME finds it wholly unacceptable that for purposes of this TRA international trade remedy investigation JCB labels all such market data “confidential” and “not susceptible to non-confidential summary” in order to prevent CCCME and other interested parties from seeing this detailed market data and properly exercising their rights of defence. This holds true especially when JCB will have necessarily disclosed all or most of the underlying JCB-specific data to the expert private publisher for general public access¹³ (for a fee). It is equally wrong and contrary to the TRA’s responsibilities as the

¹¹ See JCB Application, section D.2.1 and Appendix G.1.001.

¹² The CCCME’s suggestions included simply requesting the publisher’s permission to disclose the data in at least non-confidential form for purposes of this UK government investigation, but apparently even that simple possibility was not pursued.

¹³ Indeed, the publisher of one of the expert publications on the UK excavator market specifically explains in the introduction of the publication (also indicated in freely-available online Table of Contents) that its findings (which include detailed data on production, sales, market shares, etc.) are based in part on “information collected during an extensive interview programme ... which included all domestic manufacturers and leading importers.” (CCCME emphasis) See **Annex 1** hereto. If JCB thus has provided its detailed production and sales data, for example, for public consumption via the private publisher, the CCCME contends that JCB cannot justifiably claim confidentiality or “impossibility” to summarise this data in an effort to avoid disclosure of this same data to interested parties for purposes of this UK trade remedies investigation. The TRA should inform JCB accordingly and require appropriate disclosure.



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competent investigating authority that the TRA appears to facilitate this denial of the CCCME's rights of defence.

- [21] Second, it appears that the TRA has also failed to address in its SEF reasoning key data and market commentary originating from yet other important and reliable secondary sources - which are publicly available for free and provide important data and commentary on UK excavator market developments. These other sources, such as reports of the UK Construction Equipment Association (CEA), have been referenced in detail by the CCCME during the course of this investigation and thus have been fully available to the TRA had it decided to take into account additional reliable information in order to better focus its SEF market analyses. The CEA, for example, has regularly published key data over the injury period as well as explanatory comments regarding the current UK market trends. Importantly, the CEA and related UK construction industry reporting break out data relating specifically to the above-referenced "crawler excavator" category of the market - which category is more focused product-wise than the 8-digit commodity code data that the TRA has solely used for its SEF analyses.
- [22] In particular and has been highlighted in the CCCME's prior submissions, the UK CEA consistently collects and publishes detailed data relating to key UK market trends, including overall sales by units and year-by-year percentage changes in UK production and on sales for each of the distinct machinery segments of the industry including the above-cited category of "crawler excavators" (notably excluding the smaller and lower-priced "mini-excavators").
- [23] CEA expert commentary is also provided on significant market trend factors. For example, CEA reports concerning 2022 noted depressed excavator sales through the majority of the year due to supply chain constraints on supply of components for UK machine production as well as of whole machines from some Asian countries, particularly from Japan (where JCB has been reported by an expert UK market publication to source important components including larger engines and hydraulics¹⁴). While late 2022 and early 2023 saw growth due to a catch-up effect as earlier supply constraints eased, several public sources including the CEA indicated concerning 2023 overall that crawler excavator sales were down significantly (-18%) due to declining levels of UK construction activity¹⁵, a fact relevant to both causation of injury and non-attribution.
- [24] Consequently, important UK market data and understanding which clearly has not been taken into account for purposes of the SEF analysis relating to causation of injury is, in fact, highly relevant and, not least, focuses on a narrower segment of excavators than covered by commodity code 84295210. The CEA information is directly relevant to this investigation (also the non-attribution analysis concerning causation by "other factors")

¹⁴ Submitted private industry report, p. [].

¹⁵ See CCCME Comments of August 2, para. 39.



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than imports from China), has been expressly referenced by the CCCME and thus has been “known” by the TRA, is publicly available and must be duly addressed for purposes of the TRA’s final determination.

- [25] In short, the TRA has had available to it for purposes of providing a more focused excavator market analysis both 1) detailed expert private-source UK market data which the CCCME contends could have been rendered at least in significant part into meaningful non-confidential summary form, as well as 2) expert market data and trends commentary that is publicly available from the UK construction equipment industry itself and which in all likelihood was at least a partial source of key data contained in the private publications¹⁶. To the CCCME’s view, the TRA’s SEF should have made use of both of these additional, more focused data resources for purposes of drawing its respective UK injury and causation conclusions.
- [26] Conversely, to the extent that the TRA has used for its SEF determinations any data provided by the UK industry originating from the privately published industry reports and which is, in fact, susceptible to meaningful non-confidential summary, that data must either be disclosed to the CCCME and other interested parties in adequate non-confidential form or should not be used by the TRA for purposes of formulating its final determination¹⁷. Further, if, in fact, the TRA has assessed but dismissed the CCCME-referenced publicly available UK construction equipment industry’s UK excavator market information which appears to conflict with the TRA’s conclusions, for transparency purposes that information and the TRA’s reasoning for not taking that data and/or market explanations into account should be explained for the CCCME’s and other interested parties’ understanding.

2.3 Injury Indicators Assessment

2.3.1 SEF Market Share Indications

- [27] As explained herein, the respective market shares of the UK industry and of imports and their trends over the injury period are a key indicator regarding injury, so merely providing indexing without an indication of the baseline values does not provide sufficient transparency or understanding of the situation across the injury period. The CCCME has already highlighted WTO precedent in this respect and has explained, for example, that even a rapid percentage increase from a baseline of a negligible volume of imports from China in 2019¹⁸ would not necessarily result in a significant market share

¹⁶ Both the referenced private UK excavator report and the CEA focus on the “crawler excavator” category which excludes the mini excavators that are included in the 84295210 commodity code data used by the TRA.

¹⁷ WTO SCM Agreement, Article 12.4.2.

¹⁸ In 2019 the total Chinese producer market share of the UK market consumption was only 2% of total excavator units sold (Chinese producer figures cited in the submitted private industry report, p. 18).



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overall¹⁹. Nor would that change in Chinese market share necessarily cause a significant impact on the UK industry market share, as addressed later below in the context of CCCME comments concerning causation of injury by known “other factors” (“non-attribution” analysis).

- [28] In addition, the CCCME is highly concerned that the SEF provides its market share indications solely in volume (Kg) terms. In light of the current investigation analysis per the 84295210 commodity code covering the smallest excavators up to even Extra-Extra-Extra Large excavators ≥ 80 tonnes (PCN XXXL), this Kg indicator alone can be highly misleading given the different and also evolving product mixes of the respective suppliers into the UK market over the course of the injury period. For example, first-time sales by one exporter mid-way into the injury period of even a small number of the XXL excavators not produced by the UK industry would skew the Kg analysis. The CCCME thus rejects SEF conclusions being drawn on the basis of the Kg volumes alone and particularly when the TRA has had other, supplementary and highly relevant unit and PCN-based based sales and market share data available to it and whose disclosure in appropriate non-confidential form would provide essential additional rights of defence transparency on these issues.
- [29] As already highlighted, the CCCME understands that the TRA holds in its investigation records certain data submitted by the UK industry in the form of a private, independent industry report and which indicates, amongst substantial other relevant UK excavator industry data, the respective individual UK domestic producers’ and foreign suppliers’ UK market shares denoted in excavator unit sales, by year. This data can not only bring unit sales to the market share analysis but is also more precise than what is presently set out in the SEF because it covers only excavators in the UK construction industry’s own category of “crawler excavators” (closer to AD0047 in-scope excavators than the all-inclusive 84295210 commodity code). The CCCME therefore requests that this additional market share data held by the TRA, redacted into appropriate non-confidential summary form if necessary²⁰, be provided to the CCCME and other interested parties in order to enable essential additional transparency and analysis compared with what is provided presently in the SEF.
- [30] To be very clear, the CCCME does not accept that SEF para. 102, which is the sole instance in the SEF where any absolute figures are indicated for either overall consumption during the injury period or concerning UK industry market share, indicates solely that UK industry supplied “between 10% and 25%” of “approximately 180,000

¹⁹ CCCME Comments submitted 2 August 2024, para. 19, fifth and six indents and explanations in the respective footnotes.

²⁰ CCCME has already asserted that this data is publicly available (for a fee) and that if provided in appropriate redacted form should not breach any copyright and, in any event, JCB should have requested the publisher to grant permission to disclose the data for purposes of this UK government investigation (also good industry marketing for the publisher).



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tonnes sold in the UK” in the POI (only), is sufficiently precise to give interested parties a meaningful picture of market share developments across the injury period for the key suppliers. To provide the necessary transparency concerning this important indicator, the TRA needs to provide a full table giving the actual total value of total UK consumption in each year of the injury period, and underneath provide the respective sales and consequent market share development of each of the major suppliers to the UK market, both domestic and foreign, by unit and volume. In a market such as the UK where imported excavators have historically and throughout the injury period represented over 75% of total sales, it is essential for the TRA to provide full clarity in these regards. Once again, the CCCME highlights that the UK industry’s (JCB’s) market shares are publicly available information (for a fee) and, at worst, can and should be provided in ranged non-confidential summary form, albeit tightly ranged (e.g., + or – 2%).

- [31] Pending receipt of the requested supplemental market share data/SEF analysis, the CCCME has attempted to work out an estimate of the UK industry’s market share in the POI by reverse calculation from the consumption figure given in the above-mentioned para. 103 of the SEF (thus market share by Kg volume only). Starting with the indicated market consumption figure of 180,000 tonnes in the POI, we derived a 2019 consumption figure (60% less than in POI) and then used the UK industry’s market share indicated in the CCCME’s Comments published 2 August, footnote 22, to estimate the UK industry’s 2019 sales volume. Then adding to that the 43% increase to the JCB 2019 volume indicated in SEF Table 20 to the POI, derived an estimate of JCB Kg volume in the POI which, when divided by the referenced 180,000 tonnes consumption in the POI, would give the UK industry an approximate 9-10 % market share in the POI. On this rough basis and notwithstanding the SEF-indicated 19% reduction from 2019 when seen only in the SEF’s indexed manner, it appears that the actual market share shift for the UK industry over the whole of the injury period was very small, in the range of 1–2%.
- [32] To the CCCME’s view, such a small change in the UK industry’s market share over the whole of the injury period would not be indicative of material injury as alleged by JCB. It would further tend to confirm that the SEF analysis based solely on indexation is very misleading. Moreover, the apparent small market share change of the UK industry should also be seen in light of a comment from the submitted private expert report which has indicated specifically regarding market share developments in the UK market that this market is highly competitive and that a single order from only one of the major UK rental companies can determine a significant change in market share.²¹
- [33] Consequently, if in the view of an UK industry expert the loss of a single order from a large customer can significantly impact a supplier’s UK market share, it would appear highly doubtful that the UK industry and TRA can realistically contend that a small absolute JCB market share change over the course of four-year the injury period can be

²¹ Submitted private expert report, p. [].



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reliably pinned to Chinese exports in particular. If the loss of only one large rental company order can importantly change JCB's market share in any one of these years, it could also be contended that the JCB impact of that purchase order could have benefitted Hitachi, Hyundai, Volvo or Caterpillar amongst the largest of the imported excavator suppliers to the UK market, or Komatsu as the second UK producer and who increased significantly its own market during the same period, rather than the Chinese exporters. See also below concerning import substitution effects.

- [34] Consequently, the CCCME concludes that the analysis of the TRA regarding the market share injury indicator is neither 1) an adequate or objective TRA disclosure of the essential facts underlying the intended final determination, nor 2) an adequately reasoned analysis relating to market share developments during the investigation's injury period.

2.3.2 SEF Profitability analysis

- [35] The CCCME would first note that the UK industry profitability results set out in SEF Table 21 are significantly inconsistent with the profitability results reported directly by JCB in its Application for this investigation and also with the results reported by JCB in its Questionnaire deficiency reply²². The JCB Application reported strong profitability growth from 2019 to 2020 (194%) and lower but still relative growth up to 2021 (+26%). The CCCME is also concerned that the SEF provides no explanations concerning this first-time disclosure of profitability data inconsistent with prior disclosures, e.g., when and how this new data was generated, and notably why it has not been disclosed to the CCCME and other interested parties prior to this SEF. Moreover, the CCCME notes that the SEF section on profits provides data and comments solely on profit results with no reference or analysis whatsoever concerning the impact of constituent factors which would normally and necessarily be assessed in the profitability context. For example, the Application (Table 13) highlighted a huge surge in finance costs in both 2022 and the POI, but the relevance of finance costs are not addressed anywhere in the SEF²³. Issues relating to cost of production (COP) trends are addressed next.
- [36] Given the fact that important variations in the Costs of Production (COP) may have a very significant impact on the profitability of a manufacturing company such as JCB, the CCCME would highlight that the indexed COP trend indications set out in the SEF (Table 17), albeit given in relation to sales prices, not profitability) appear to not conform with publicly available data which is directly relevant to charting UK industry COP trends over

²² Published in the public files on 3 May 2024 (Deficiency Annex 11).

²³ The SEF separately addresses ROI and cash flow, indicating that ROI remained negative in line with profitability but there was significant improvement to ROI in the POI, and that cash flow was negative throughout the whole injury period – see CCCME comments below relating to the SEF final conclusion that profitability was negative throughout the whole injury period.



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the course of the injury period, e.g., UK producer input price inflation index data²⁴ and UK energy spot price data²⁵. Nor do the SEF's COP figures appear to reflect important pressures clearly exerted on UK industry COP by yet other factors that have been cited by JCB itself, such as general inflation and increased cost for imported raw materials due to significantly rising shipping costs from Asia²⁶.

- [37] The apparent very large discrepancy between the COP trend data appearing in SEF Table 13 and the documented inflation realities for UK industry over the same time period thus raises major doubts over the reliability of the Table 13 COP trend figures. In these circumstances, the CCCME requests an expanded analysis and related TRA disclosure to all interested parties before final determinations. The COP data also needs to be assessed not just in relation to JCB price trends but also expressly in connection with the disclosed trend of profitability in Table 17.
- [38] Due to the potential direct and significant impact of COP variations on a company's profitability, the CCCME would also recall its prior express requests to receive meaningful non-confidential disclosure by the UK industry itself of its detailed COP data, having regard to at least raw material/purchased component costs (covering both domestic and imported raw material/component purchases) and of energy inputs. While JCB claimed that its COP and COS data are not susceptible to non-confidential summary, the CCCME rejected this claim and submitted that such company data could be disclosed in meaningful non-confidential form and is indeed provided in non-confidential form in other important trade remedy jurisdictions. The fact that the TRA is now including in the SEF a non-confidential summary of JCB's overall COP trend over the injury period confirms the importance of COP disclosure for proper assessment in the injury context.
- [39] The continuing objection of the CCCME, however, concerns the insufficient level of detail concerning the TRA's COP disclosure and consequent reliability of the COP trend disclosed in the SEF. Moreover, as indicated above, COP disclosure has never been made by JCB itself and, as indicated in para. 7 above, the TRA's first-time disclosure of JCB

²⁴ See **Annex 2** hereto showing a major spike in UK producer input price inflation starting in late 2020 and surging upward through mid-2022.

²⁵ See Table on page 17 of "Comments of the CCCME" dated 1 August 2024. As noted in relation to that table showing major spikes in UK electricity spot prices from late 2021 through the end of 2022 (covering first half of the POI), JCB itself in its original Application (page 48, footnote 62) highlighted the negative effects of the high inflation rate (+24%) affecting the UK market over the injury period.

²⁶ See JCB deficiency Producer Questionnaire reply published 3 May 2024, Section E.3 response to the TRA question, "Please provide details if your cost of production of the like goods has changed *significantly* during the injury period" (CCCME emphasis), and related Figures 1 and 2. The major increase in container freight rates through at least mid-2022 and continuing very high UK inflation through early 2023 raise serious credibility concerns relating to the SEF COP trend indicators set out in SEF Table 17. The fact that JCB itself cites significantly increased container shipping rates would also tend to confirm the CCCME's earlier contention that JCB imports for its UK production operations significant levels of larger engines and other componentry from Japan – see also para. 23 herein.



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COP data (correct data or in sufficient detail or not) in the SEF does not absolve JCB from its own responsibility to timely provide the requested COP data to other interested parties in meaningful non-confidential form.

- [40] The CCCME would also highlight the TRA conclusion set out in SEF para. 722 relating to JCB profitability: “[The] UK industry has made losses on its sales of domestically sold like goods in *every year of the injury period*” (CCCME emphasis). This conclusion is not only revealing about important deficiencies in JCB commercial operations overall but is especially relevant to the SEF’s conclusions on causation of injury. As highlighted later below, the fact that JCB was not profitable even in the first year of the injury period and when the quantity of imports from China was negligible would serve to negate the TRA’s finding that the imports from China were the sole or even a main cause of the alleged material injury over the injury period.

2.4 Analysis of UK imports and market effects / Causation of Injury

- [41] While the TRA indicates that it treats HMRC import data with an “appropriate level of caution” (para 649), such caution is not apparent from the TRA’s findings. Indeed, the CCCME during this investigation has submitted data output from other reliable international trade data sources (notably Eurostat and ITC data bases) using the identical commodity code (84295210) and which seriously conflicts with the HMRC import figures and trends cited in the SEF. The CCCME has consequently re-checked and updated the data provided from these other normally reliable trade data sources and confirms that their data continues to conflict with the HMRC data. TRA must therefore, at least, address the fact of the seriously conflicting trade data (on volume, value and consequent GBP price/Kg) with a view to explaining at least the basis for the very major discrepancy between the EU export data, the ITC data on UK imports, and the UK HMRC OTC import data. Given that the SEF uses the HMRC OTS data for both injury and causation analyses, the requested explanation from the TRA will be important for all parties to correctly assess how the significant differences in the data impact both the TRA’s injury and causation determinations.
- [42] For example, regarding imports of excavators from the EU and especially imports from the historically largest Member State exporters, Belgium and The Netherlands, the HMRC OTS figures on imported quantities are significantly different from the Eurostat figures. As seen in the Tables below, HMRC OTS figures on imports from Belgium consistently understate the Eurostat export figures for the last three years of the injury period by roughly 10,000 tonnes per year. A significantly greater disparity in figures exists relating to the trend of excavators shipped to the UK from The Netherlands, historically the EU’s largest exporter to the UK. The most important disparity involves HMRC OTS data showing a significant increase in imports from The Netherlands from 2021/2022 to the POI, while Eurostat shows an even more significant decline in Dutch exports to the

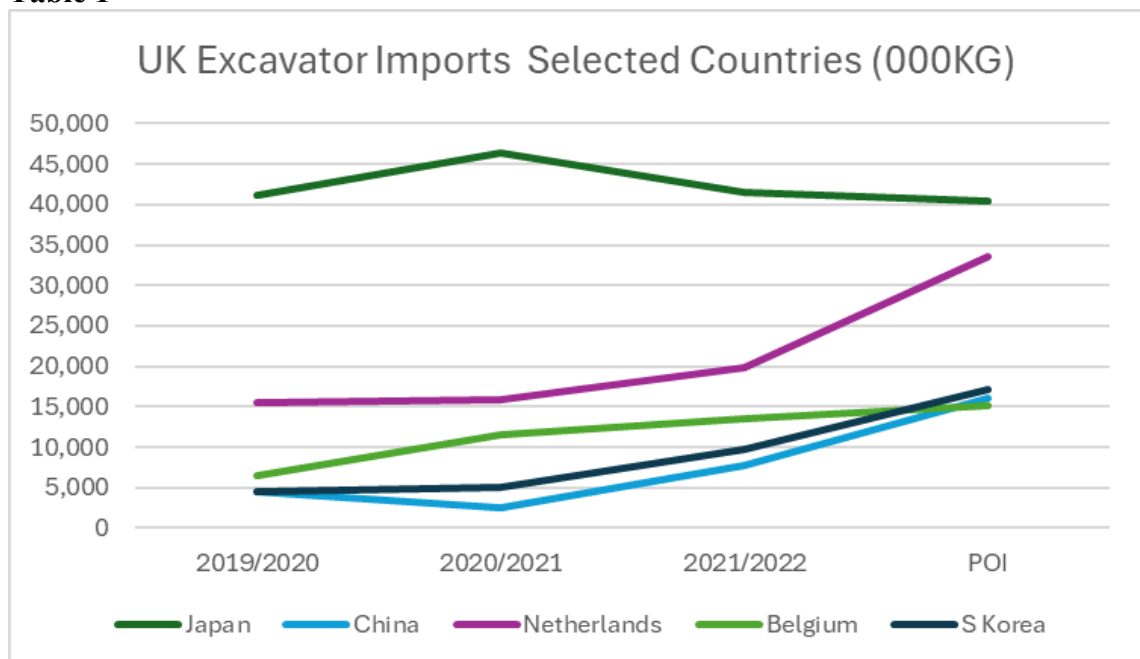


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UK 2021/2022 to the POI. (The CCCME notes that an important decline in Dutch exports to the UK is also reported in the ITC data).

- [43] The disparity in the excavator trade data is reflected in the Tables 1 and 2 below, respectively showing UK HMRC OTS data on import volumes ('000Kg) from certain selected third countries (Japan, China, Netherlands, Belgium and S. Korea) and the Eurostat data (extracted on 29.11.2024) showing exports to the UK from The Netherlands, Belgium, Italy and France ('000Kg) (both data sets based on the eight-digit commodity code 84295210). The time periods for both Tables are the split-year periods used by the TRA in the SEF (2019/2020, 2020/2021, 2021/2022, POI). The detailed figures on which the Table 2 Eurostat export graph is based are set out in **Annex 3**. The detailed HMRC OTS data underlying Table 1 is set out in para. 49 below.
- [44] It is very clear that the single most significant volume disparity relates to excavators from The Netherlands. The HMRC OTS data shows a continuing increase from The Netherlands 2019/2020-POI and, overall, a 100% increase from The Netherlands up to the POI from 2019/2020 to reach the highest-ever level of Dutch exports to the UK, 33,521 tonnes, in the POI. In great contrast, the Eurostat export figures show a very significantly larger highpoint of Dutch exports in 2020/2021 and then a rapid and very major continuing decline to reach only 25,572 tonnes in the POI. This Eurostat data provided the basis for the CCCME's contention in its August 2 submission that the imports from China from 2022 – POI were merely substituting only a part of the major decline in exports from The Netherlands (and overall EU exports).

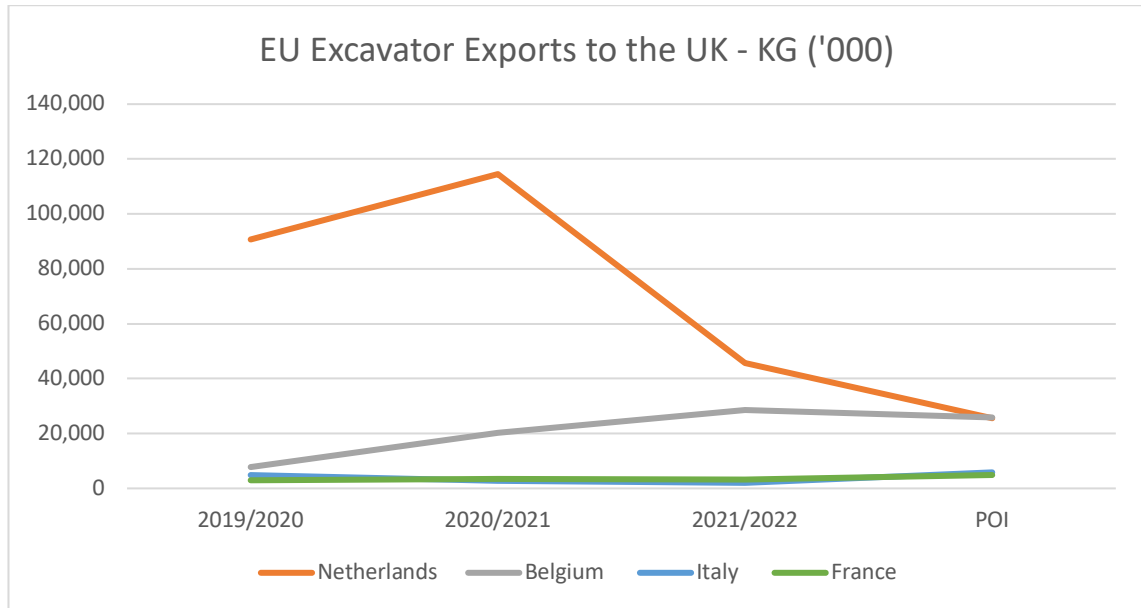
Table 1



Source: HMRC OTS



Table 2



Source: Eurostat (extracted 29.11.2024)

NB: A Table showing the referenced ITC data (extracted on 30.11.2024) to document UK imports from the UK’s largest supplier countries is not included because the ITC data could not be extracted on a split-year basis as possible with the HMRC OTS and Eurostat. However, the full year by year ITC raw data, which importantly also shows a major drop in UK imports from The Netherlands and notably from 2022 to 2023, is set out in **Annex 4** hereto.

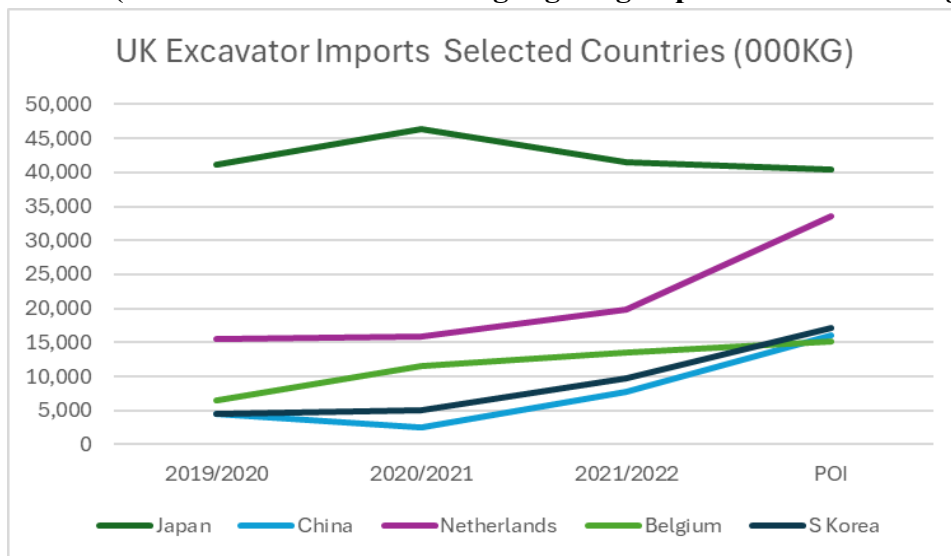
- [45] Again, the CCCME expects the TRA to provide at least a timely explanation regarding the major disparities in the trade data between the HMRC OTS and Eurostat (and ITC). Any need to revise the trade data currently set out in the SEF can be provided in a SEF supplement.
- [46] However, after examining the basis for the discrepancies between the HMRC OTS and Eurostat (and similar ITC) trade data, if the TRA decides that the Eurostat data is not reliable and decides finally to use only its own UK HMRC OTS import data, the CCCME nonetheless would point out certain important conclusions that need to be drawn solely from the HMRC OTC import data.
- [47] In particular, in the context of assessing the impact of imports from various non-EU excavator suppliers and especially for purposes of assessing whether factors other than the imports from China could have been a significant cause of the injury allegedly suffered by the UK industry, the CCCME would highlight that the TRA appears to have failed in its “causation and non-attribution” analysis (SEF Section G2.) to include assessment of important excavator imports from the Republic of Korea (S. Korea).



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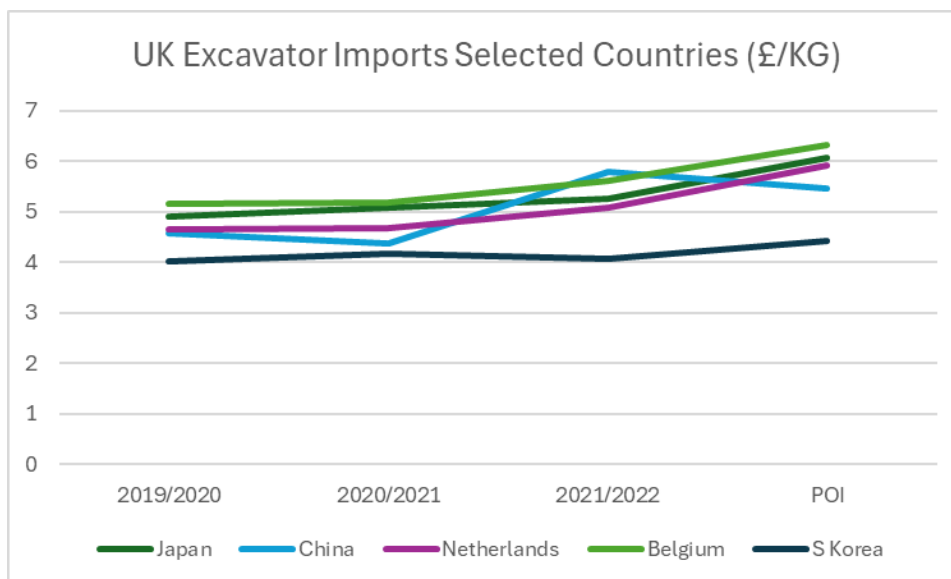
[48] The TRA’s omission to assess the impact of imports from S. Korea is highly surprising given that the UK, firstly, imported a higher volume of excavators than from China over each of the 4 years of the injury period including in the POI. Secondly, the import price of the excavators imported into the UK from S Korea were substantially lower than the import price of the Chinese excavators and in each of the 12-month time periods of the injury period. The volume and £/Kg figures are set out respectively in Tables 3 and 4 below.

Table 3 (same as Table 1 but here highlighting import data concerning S Korea)



Source: HMRC OTS

Table 4



Source: HMRC OTS



[49] The comparative HMRC OTS data for China and S. Korean excavators imported into the UK over the injury period are highlighted in the two boxes below:

UK Excavator Imports Selected Countries ('000KG)

	2019/2020	2020/2021	2021/2022	POI
All Imports	100,963	111,775	134,709	163,792
EU	46,091	51,455	65,990	83,057
Japan	41,112	46,430	41,465	40,365
China	4,537	2,587	7,716	15,958
Netherlands	15,554	15,855	19,923	33,521
Belgium	6,498	11,558	13,579	15,082
S Korea	4,554	5,010	9,668	17,101
Ireland	3,370	3,598	4,055	4,516

UK Excavator Imports Selected Countries (£/KG)

	2019/2020	2020/2021	2021/2022	POI
All Imports	4.5	4.73	5.28	5.8
EU	4.27	4.59	5.44	6.09
Japan	4.91	5.09	5.26	6.06
China	4.57	4.38	5.78	5.45
Netherlands	4.66	4.67	5.07	5.92
Belgium	5.15	5.17	5.6	6.31
S Korea	4.02	4.16	4.06	4.42
Ireland	1.89	2.14	2.6	2.6

[50] The CCCME therefore highlights the fact that the SEF's import volume and price analyses (paras. 795 – 798 and Figures 5 and 6, respectively) compare the volume of imports from China and Chinese prices only with the volumes and prices of imports from Japan, The Netherlands and Belgium, while the SEF Table 29 indications concerning imports from "all third countries" fails to capture the significance of the imports from S. Korea individually. With all due respect, the SEF analysis in these regards is therefore too restrictive if not misleading, and notwithstanding the fact that the CCCME already in its August 2 submission expressly referenced the lower prices of imports from S. Korea²⁷ and included in its UK import trade data (source ITC) both volume and price figures concerning S. Korea. The above HMRC OTS data, extracted on 3 December 2024 following publication of the SEF, confirms the fact that UK imports of excavators from S. Korea were both larger in volume than those from China and sold at significantly lower

²⁷ Concerning prices of UK imports from S Korea see para. 30 and Table 3 of CCCME Comments submitted 2 August 2024.



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prices than the imports from China, in each of the referenced 12-month periods throughout the injury period.

- [51] Therefore, the CCCME calls on the TRA to seriously reconsider the SEF conclusions firstly as regards injury, that “the goods from China were also generally priced lower than all other imports into the UK, including in the POI” (SEF para. 807), that the imports from China [therefore] “suppressed the domestic sales prices of the like goods”, “were the main cause of injury to UK industry during the injury period”, and that “[t]here were also no other known factors that broke the causal link” (SEF para. 811).
- [52] Secondly, the SEF conclusions must also be wholly reconsidered as regards “other known factors and causation” (SEF paras. 813 – 817), in particular and without the SEF even noting imports from S. Korea, that “PRC import prices were below that of imports from third countries throughout the injury period and in particular in the POI”, and “[t]he TRA therefore determined that the impact of third country imports was not sufficient to break the causal link between the relevant goods and the injury suffered by the UK industry”. Again, given the larger volumes and significantly lower prices of the imports from S. Korea throughout the injury period (based on the UK’s own HMRC OTS data), the CCCME asserts that imports from China could not have been the main cause of the alleged injury and that the imports from S. Korea broke the alleged causal link.
- [53] As regards the relevant legal requirements applying to the TRA’s methodology of analysis, given the CCCME’s express reference in its August 2 submission to the fact of and significance especially of the very low prices of the UK imports from S. Korea, these imports would thus be amongst “known [evidentiary] factors” by the TRA within the meaning of Article 15.5 SCM Agreement and therefore should have caused the TRA to objectively assess in the context of the SEF the importance of these imports from S. Korea and as regards both causation of price suppression/injury and in the SEF’s non-attribution analysis. Such TRA failure to assess the impact of the known larger-volume/lower-priced imports from S. Korea would conflict with the requirements of Article 15.5 and result in the respective SEF conclusions being deemed neither objective nor adequately reasoned.
- [54] On this basis and having regard as well to the multiple CCCME criticisms herein of the analytical methodology applied by the TRA to reach other conclusions in the SEF, the CCCME respectfully urges the TRA to ensure not only that the CCCME receives the requested meaningful disclosures from the UK industry concerning the referenced essential facts of this investigation but also to significantly rework its injury and causation analyses with a view to terminating this investigation without imposition of anti-subsidy measures.



III. CONCLUSIONS

[55] The CCCME is pleased to comment on the TRA's Statement of Essential Facts (SEF) in its AS0046 subsidy investigation of excavator imports from China. Key conclusions of the CCCME include:

1. The TRA has been requested and is required to ensure the disclosure to the CCCME of important additional non-confidential data relating to key injury and causation issues addressed in the SEF, in order to enable the CCCME to adequately exercise its rights of defence in this investigation. The CCCME believes that such further disclosure is required pursuant to the provisions of the WTO SCM Agreement and can still be timely provided in the form of a supplement to the SEF which would also enable the CCCME and other interested parties to timely submit responsive comments before finalisation of the TRA's Final Determination.
2. The TRA has not adequately justified its reasoning to include the category of "XXL" (Extra-Extra-Large) excavators in the scope of Chinese excavators to be covered by the intended subsidy measures, which excavators are not even produced or intended to be produced by the UK industry, notably in light of the small market and declining demand for these niche excavators due to the major scaling back of opencast coal mining in the UK.
3. The TRA's analysis of key injury indicators and related trends in the UK market is overly broad and imprecise while ignoring more precise data and expert market trends commentary that was available to the TRA during the course of the investigation, thus causing the TRA's analysis to be both non-objective and inadequately reasoned under the relevant WTO SCM Agreement rules.
4. The TRA's analyses of UK excavator imports and market effects bearing on the crucial issues of causation of injury and non-attribution of other causative factors are defective for multiple reasons, including ignoring/not addressing directly conflicting trade data that has been submitted by the CCCME and generated from reliable other international trade data resources using the identical commodity code, and further wholly failing to take into account the known fact, based on the UK's own import trade data (HMRC OTS), that excavator imports into the UK from S. Korea were throughout the whole of the injury period imported in larger volumes and at substantially lower prices than the Chinese excavators that are targeted by this anti-subsidy investigation, which failure would also contravene the relevant requirements of the WTO SCM Agreement.

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The CCCME stands ready to reply to any TRA questions in follow-up to these CCCME Comments on the SEF.

Submitted on behalf of the CCCME:

[Name withheld by request of TRA]

Searles & Associates

[Name withheld by request of TRA]

East & Concord Partners

Annexes:

Annex 1 – Publisher statement on sources of its data including the two UK producers

Annex 2 – UK Product Price Index 2013-2023

Annex 3 – Detailed Eurostat trade data / excavator exports to the UK

Annex 4 – ITC trade data – UK imports of excavators



Annex 1

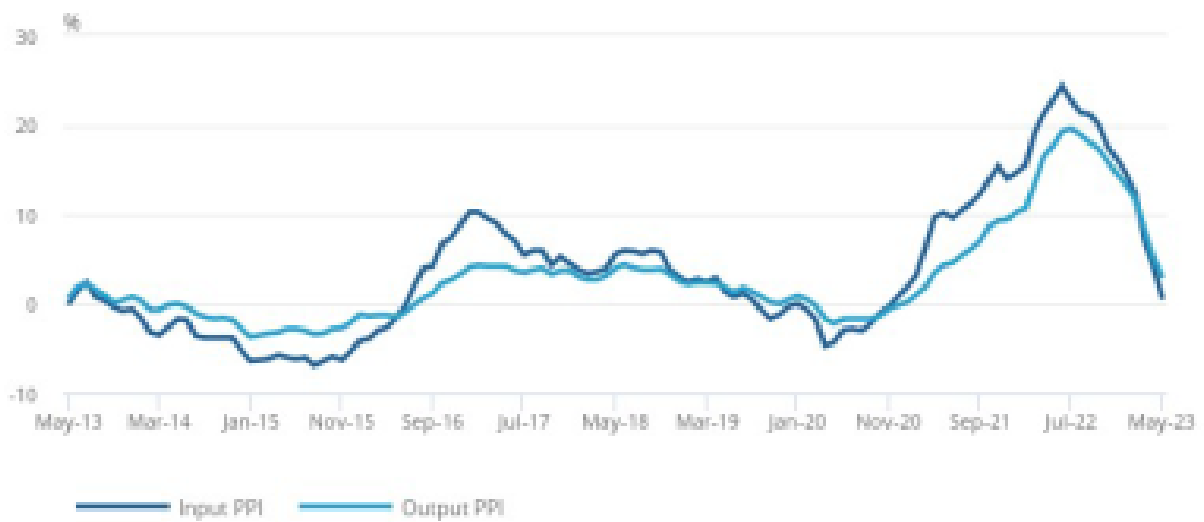
Excerpt from Introduction to submitted private expert report:

“The findings presented in this report are based on [] existing database and on information collected during an extensive interview programme undertaken during September 2020, which included all domestic manufacturers and leading importers.” (CCCME emphasis)



Figure 1: Annual input and output PPI inflation rates have continued to slow in May 2023

Input and output Producer Price Index (PPI) annual inflation rates, UK, May 2013 to May 2023



Source: Producer Price Index (PPI) from the Office for National Statistics



Eurostat export trade data underlying Table 2

Extracted on	2024/11/29 13:17:40			
FLOW	2 - EXPORT			
INDICATORS	VALUE_IN_EUR - VALUE_IN_EUR			
PARTNER	GB - United Kingdom			
PRODUCT	84295210 - Self-propelled track-laying excavators, with a 360° revolving superstructure			
REPORTER/PERIOD	2019-2020	2020-2021	2021-2022	POI
EU 27	344,176,917	446,955,394	500,315,045	564,690,041
Netherlands	174,411,793	191,241,786	163,347,563	189,992,937
Belgium	41,627,745	115,996,280	182,862,741	170,050,028
Ireland	11,486,338	12,029,886	23,297,914	31,404,429
Italy	30,228,369	15,451,546	14,909,817	45,424,935
France	23,104,475	26,448,001	28,600,037	40,509,302
FLOW	2 - EXPORT			
INDICATORS	QUANTITY_IN_KG			
PARTNER	GB - United Kingdom			
PRODUCT	84295210 - Self-propelled track-laying excavators, with a 360° revolving superstructure			
REPORTER/PERIOD	2019-2020	2020-2021	2021-2022	POI
EU 27	118,052,528	156,213,375	95,026,502	78,473,479
Netherlands	90,790,775	114,520,330	45,576,077	25,571,795
Belgium	7,772,879	20,220,811	28,558,653	25,743,369
Ireland	2,549,584	2,770,514	4,742,559	7,398,589
Italy	4,742,043	2,858,782	2,023,032	5,843,765
France	2,957,395	3,486,856	3,261,020	4,883,885
EUR/KG				
REPORTER/PERIOD	2019-2020	2020-2021	2021-2022	POI
EU 27	2.92	2.86	5.27	7.20
Netherlands	1.92	1.67	3.58	7.43
Belgium	5.36	5.74	6.40	6.61
Ireland	4.51	4.34	4.91	4.24
Italy	6.37	5.40	7.37	7.77
France	7.81	7.59	8.77	8.29
£ / KG				
REPORTER/PERIOD	2019-2020	2020-2021	2021-2022	POI
EU 27	3.29	3.32	6.20	8.27
Netherlands	2.17	1.94	4.22	8.54
Belgium	6.05	6.65	7.54	7.59
Ireland	5.09	5.03	5.79	4.88
Italy	7.20	6.27	8.68	8.93
France	8.82	8.79	10.33	9.53
HMRC currency exchange average annual rates				
		Sterling value of Currency Unit	Currency Units per pound	
2020	EUR	0.8858	1.128925	
2021	EUR	0.8626	1.159233	
2022	EUR	0.8489	1.177958	
2023	EUR	0.8700	1.149500	



ITC Trade Data / UK Imports of Excavators

List of supplying markets for a product imported by United Kingdom

Product: 84295210 Self-propelled track-laying excavators, with a 360° revolving superstructure

Exporters	2020	2021	2022	2023
	Imported quantity, Kilograms	Imported quantity, Kilograms	Imported quantity, Kilograms	Imported quantity, Kilograms
World	85,142,503	130,949,228	159,914,663	144,533,806
Japan	33,886,736	45,036,937	42,167,461	61,531,440
China	3,307,563	8,102,313	22,059,938	23,056,972
Korea, Republic of	4,276,082	8,459,064	16,162,660	13,044,679
Germany	4,520,502	5,066,203	8,498,159	10,549,245
Netherlands	13,026,519	25,829,276	33,089,827	8,126,666
Czech Republic	5,600,359	3,299,370	16,413,018	7,926,009
Italy	3,926,140	3,355,439	4,017,625	5,679,558
France	3,844,040	5,333,286	6,253,194	4,799,817
Ireland	2,702,907	3,598,686	3,529,877	3,588,990
Austria	1,878,960	2,112,717	2,268,365	1,350,125
Belgium	5,721,042	14,317,536	733,165	1,191,186

List of supplying markets for a product imported by United Kingdom

Product: 84295210 Self-propelled track-laying excavators, with a 360° revolving superstructure

Exporters	2020	2021	2022	2023
	Imported unit value, British Pound/Kilograms	Imported unit value, British Pound/Kilograms	Imported unit value, British Pound/Kilograms	Imported unit value, British Pound/Kilograms
World	4.54	4.89	5.61	6.06
Japan	4.92	5.28	5.84	6.19
China	4.15	5.18	6.13	5.95
Germany	5.1	4.76	6.87	7.18
Korea, Republic of	3.76	3.99	4.27	4.94
Czech Republic	1.93	2.37	6.35	7.95
Netherlands	4.77	4.75	4.99	4.80
France	5.03	5.54	7.08	7.57
Italy	4.76	5.58	5.69	6.32
Ireland	2.17	2.67	2.54	3.16
Austria	7.03	7.12	7.12	8.07
Belgium	5.27	5.25	6.07	7

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