

Response to the Applicant's Submission of 16 March 2026

At the outset, and to start on a positive note, our client agrees with the Applicant that it would be more objective and transparent to "*rely on publicly available and official Mexican statistical sources for cost data (including input, raw material and utility prices), rather than company-specific data from Mexican producers.*"⁴

The Dingli Group, however, disagrees with the Applicant's claims that Mexico would not be an appropriate representative country and that Brazil should be picked instead.

First, the Applicant claims that Brazil would be the most appropriate choice because: (i) it was the country picked by the TRA in *Case AD0047 – Excavators from China*; and (ii) Brazil was also used as the representative country in the EU anti-dumping investigation concerning import of mobile access equipment from China (where the European Commission used publicly available data to establish the relevant benchmarks instead of company-specific data⁵). However, these two investigations concerned very different investigation periods (i.e., 1 July 2022 to 30 June 2023, and 1 October 2022 to 30 September 2023, respectively). As such, the mere fact that Brazil was selected in those cases does not, in itself, demonstrate that it remains the most appropriate representative country in the present investigation, which must be assessed on the basis of current and case-specific data.

As noted in our client's submission of 19 March 2026, recent publicly available data show that Mexico – and not Brazil – is the most similar country to China with respect to the economic indicators that have been considered by the TRA. The Applicant seems to dismiss the relevance of these indicators, which is nevertheless clear from the wording of Regulation 13(5)(b) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 ("UK basic Regulations").⁶ In this regard, the Applicant does not explain why these objective and expressly relevant criteria should be given less weight, nor does it provide alternative indicators demonstrating that Brazil would constitute a closer comparator to China.

⁴ Applicant, "Response to Notification of Proposed Appropriate Representative Third Country" (16 March 2026), available at <<https://www.trade-remedies.service.gov.uk/public/case/AD0075/submission/385431b2-7bbe-40c8-89c0-406135ad956f>>, para. 4.3.

⁵ Commission Implementing Regulation (EU) 2024/1915 of 11 July 2024 imposing a provisional anti-dumping duty on imports of mobile access equipment originating in the People's Republic of China, recital (205); and Commission Implementing Regulation (EU) 2025/45 of 8 January 2025 imposing a definitive anti-dumping duty and definitely collecting the provisional duty imposed on imports of mobile access equipment originating in the People's Republic of China, recital (69)-(70).

⁶ Regulation 13(5)(b) of the UK basic Regulations provides that: "[...] the TRA may determine whether a third country or territory is an appropriate representative third country or territory taking into account [...] (b) whether the country or territory has a similar level of economic development to the exporting country or territory [...]."

Second, the Applicant claims that Mexico would not be an appropriate representative country because (i) boom lift manufacturers in Mexico are related to Chinese boom lift manufacturers and (ii) "*foreign investors are encouraged to manufacture in Mexico by well-established incentives.*"⁷ According to the Applicant, these factors combined would "*mean that the costs of production, as well as AS&G costs together with profits necessary for constructing the normal value do not reasonably reflect Mexican market realities.*"⁸ However, this argument lacks both evidentiary support and a sound legal basis.

The Applicant's argument appears to conflate the existence of structural features (such as investment incentives or corporate affiliations) with the existence of distortions affecting costs and profits. The mere existence of corporate affiliations between Mexican and Chinese producers, or the presence of foreign investment incentives, does not in itself demonstrate that costs of production, SG&A, or profit levels in Mexico are distorted or unrepresentative.

Moreover, cross-border investment and corporate linkages are common features of modern, globalised industries. Such factors cannot, in themselves, justify excluding an otherwise appropriate representative country. If the Applicant's reasoning were accepted, it would significantly narrow (if not eliminate) the pool of potential representative countries, as similar characteristics are present across many economies and sectors.

In this connection, it is noted that Brazil is itself a significant destination for Chinese investment, including in manufacturing sectors.⁹ Therefore, applying the Applicant's reasoning consistently would call into question the suitability of Brazil as well.

Third, Mexico has been widely used as a representative country in other jurisdictions, including the US and the EU. This consistent use supports the suitability of Mexico as a reliable and objective benchmark in anti-dumping proceedings.

For instance, Mexico was selected as a representative country in the context of the EU expiry review concerning imports of certain corrosion-resistant steel products from China.¹⁰ This

⁷ Applicant, "Response to Notification of Proposed Appropriate Representative Third Country" (16 March 2026), available at <<https://www.trade-remedies.service.gov.uk/public/case/AD0075/submission/385431b2-7bbe-40c8-89c0-406135ad956f/>>, para. 3.2.

⁸ *Ibid*, para. 3.3.

⁹ See, for example: China Global South, "Why Chinese Companies Are Pouring Money Into Brazil" (16 September 2025), available at <<https://chinaglobalsouth.com/podcasts/china-brazil-investment-surge-2024/>>; and Energy Connects, "Brazil Is Set for a Battery Boom. China Is Poised to Benefit" (23 January 2026), available at <<https://www.energyconnects.com/news/utilities/2026/january/brazil-is-set-for-a-battery-boom-china-is-poised-to-benefit/>>.

¹⁰ Commission Implementing Regulation (EU) 2024/819 of 8 March 2024 imposing a definitive anti-dumping duty on imports of certain corrosion resistant steels originating in the People's Republic of China following an expiry

example is particularly relevant in the present investigation, given that steel accounts for a significant share of the total costs in the production of boom lifts. In fact, the use of Mexico as a representative country in anti-dumping investigations involving steel products demonstrates that Mexican cost data can provide a reliable and appropriate benchmark for such inputs in the present case.

In conclusion, the Dingli Group respectfully submits that there are no grounds to depart from the TRA's provisional choice of Mexico as the appropriate representative third country under Regulation 13(5) of the UK basic Regulations. The Dingli Group nevertheless agrees with the Applicant that, for the purposes of (eventually) establishing the benchmarks, reliance on publicly available data from sources, such as Platts Connect and Global Trade Atlas (rather than company-specific data), would ensure a more objective and transparent approach.

review pursuant to Article 11(2) of Regulation (EU) 2016/1036 of the European Parliament and of the Council, recital (32).