

Peter Verhaeghe ♦ ●
Edwin Vermulst ♦ ●
Marco Slotboom ♦ ● □
Folkert Graafsma ♦ ●
Peter Kugel ♦ ● ·
Juhi Dion Sud ♦ ● ■
Joris Cornelis ♦ ●
Partners



NON-CONFIDENTIAL

Your Ref: **Email:** [\[CONFIDENTIAL\]@vvgb-law.com](mailto:[CONFIDENTIAL]@vvgb-law.com) **Date:** 19 March 2026
[\[CONFIDENTIAL\]@vvgb-law.com](mailto:[CONFIDENTIAL]@vvgb-law.com)

Subject: AD0075– Anti-dumping investigation concerning boom lifts imported into the United Kingdom from the People's Republic of China – Comments on the proposed appropriate representative country by the Dingli Group

Dear AD0075 Team,

We refer to the Note to the File of 9 March 2026 concerning the potential sources to be used for the determination of the normal value in the above-mentioned anti-dumping proceeding, should the UK Trade Remedies Authority ("TRA") determine that there is a particular market situation ("PMS") in the Chinese boom lifts market which prevents a proper comparison between the domestic sales price in China and the export sales price to the UK. We also refer to your email of 13 March 2026, whereby the deadline for submitting comments on that Note to the File was extended until today.

Our client – the Dingli Group – is most grateful for the opportunity to express its views on the TRA's proposed appropriate representative third country and appreciates the extension granted to submit comments in this regard.

Please find below the observations and comments by our client on the Note to the File of 9 March 2026.

1. Appropriate representative country

The Dingli Group notes that the TRA has considered Brazil, Mexico, Malaysia, India, South Africa and Türkiye as potential appropriate representative countries, and that it has provisionally chosen Mexico due to the availability of cost data and the similarity of economic development to China, based on indicators such as gross national income per capita and the Human Development Index ("HDI").

While our client is currently somewhat limited in providing meaningful comments concerning the TRA's provisional choice of appropriate representative third country due to the absence of relevant data, the Dingli Group does not, at this stage, object to this provisional choice.

This is because, as shown in **Exhibit 1**, Mexico's HDI (0.789 in 2023) is indeed the closest to China's HDI (0.797) among the countries considered, indicating a comparable level of development across key dimensions such as income, education and life expectancy.¹ This is consistent with other macroeconomic indicators, including GDP per capita, industrial employment and manufacturing value added, which also suggest that Mexico is among the closest comparators to China. In contrast, the 2023 HDI index of countries such as Türkiye (0.853), Malaysia (0.819) and India (0.685) differs more significantly from that of China, which may limit their suitability as representative countries.

This assessment is also confirmed by more recent, publicly available data, as shown in the table below.

Indicator	China	Mexico	Malaysia	Brazil	India	South Africa	Türkiye
GDP per capita ²	13,303.1	14,185.8	11,874.43	10,310.5	2,694.7	6,267.2	15,892.7
Level of employment in industry as a % of total employed ³	32	25	26	20	26	21	27
Manufacturing value added ⁴	25	20	23	12	13	13	17
Life expectancy ⁵	78	75	77	76	72	66	77
Literacy rate ⁶	97	96	96	95	82	91	97

In this connection, our client further notes that, in *Case AD0047 – Excavators from China*, "to determine whether the sampled Chinese exporters' input costs [were] artificially low, the TRA used comparator values from Platts Connect (part of S&P Global Inc.)."⁷ Our client has thus reviewed the relevant steel specifications for the investigation period in the present case and

¹ Please refer to **Annex 1** for data extracted from the HDI's website: <<https://hdr.undp.org/data-center/human-development-index#/indicies/HDI>>.

² World Bank, GDP per capita (current US\$), available for download at: <<https://data.worldbank.org/indicator/NY.GDP.PCAP.CD>>.

³ World Bank, Employment in industry (% of total employment) (modelled ILO estimate), available at: <<https://data.worldbank.org/indicator/SL.IND.EMPL.ZS>>.

⁴ World Bank, Manufacturing, value added (% of GDP), available for download at: <<https://data.worldbank.org/indicator/NV.IND.MANF.ZS>>.

⁵ World Bank, Life expectancy at birth, total (years), available for download at: <<https://data.worldbank.org/indicator/SP.DYN.LE00.IN>>.

⁶ World Bank, Literacy rate, adult total (% of people ages 15 and above), available at: <<https://data.worldbank.org/indicator/SE.ADT.LITR.ZS>>.

⁷ Case AD0047 – Excavators from China, Final Determination, para. 342.

confirms that pricing data for both Mexican hot-rolled coil ("HRC") and cold-rolled coil ("CRC") is available in the Platts datasets.⁸ However, such data appears to be incomplete or unavailable for other candidate countries, including Malaysia, South Africa and India (for which, for instance, CRC data is not reported).

In this respect, the Mexican datasets appear to provide a more complete and reliable basis for benchmarking purposes compared to other potential representative countries.

2. Data sources

At this stage, our client is not aware of whether producers in the proposed representative country would be willing to participate in the investigation. However, the Dingli Group would respectfully note that relevant price data can be obtained from international market platforms, such as Platts Connect as noted above and the Global Trade Atlas ("GTA"). GTA data is publicly available and has been widely used in both US and EU anti-dumping proceedings.⁹

Additionally, the cost of energy and labour can be obtained from publicly available sources such as government databases and the International Labour Organization (ILO) website.¹⁰

In our client's view, even if producers in third countries do not participate in the investigation, the TRA may still have access to sufficient information on which to establish a benchmark. Therefore, the fact that producers in one country participate should not necessarily be determinative in the selection of a representative third country.

3. Preliminary comments on PMS

As a final point, since the choice of the appropriate representative country will only become relevant in the case of a finding of PMS, our client would like to respectfully submit that the prices for boom lifts in China are not artificially low and do not represent non-commercial factors. Thus, there is no PMS within the China boom lift market. Moreover, assuming *arguendo* that a PMS exists, such PMS does not impair a proper comparison between domestically sold goods and exports.

⁸ Please refer to **Annex 2** for Platts Connect, "Specifications Guide: Global Steel, Ferrous Scrap, Ferroalloys and Noble Alloys" (September 2025).

⁹ See, for example, Commission Implementing Regulation (EU) 2025/45 of 8 January 2025 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of mobile access equipment originating in the People's Republic of China, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202500045&qid=1773833753389>

¹⁰ ILOSTAT, available at <<https://ilostat.ilo.org/>>.

The Dingli Group also respectfully disagrees with the applicant's allegations that there is a PMS in China with regard to raw materials and critical components used in the production of boom lifts. In this regard, it should be noted that the Dingli Group imports a significant proportion (i.e., approximately [percentage]%) of its [critical components/input], and that the prices for those components are in line with international market prices. Therefore, as far as the Dingli Group is concerned, it can be demonstrated that prices for those components in China are neither artificially low nor do they reflect non-commercial factors.

Finally, the Dingli Group would also respectfully submit [CONFIDENTIAL – information concerning costs of production that is confidential by nature and whose disclosure (even in summarised form) would have an adverse impact on the organization providing the information and/or would provide an unfair advantage to competitors. Hence, confidentiality is hereby requested].

We thank you for your consideration of the above comments and remain at your disposal should you have any questions or require any additional information.

Yours faithfully,

[VVGB Partner name]

[VVGB Associate name]