



Pre-Sampling Questionnaire (Importer) Subsidy investigation

Case AS0046: Certain Excavators imported from the Peoples Republic of China (PRC)

Period of Investigation:	1 July 2022 – 30 June 2023
Injury Period:	1 July 2019 – 30 June 2023
Deadline for response:	30 November 2023
Case Team Contact:	AS0046@traderemedies.gov.uk
Completed on behalf of:	SANY HEAVY MACHINERY (UK) LTD

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

- Confidential
 Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – 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) by **30 November 2023**.

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The scope of this investigation

Goods concerned

This investigation covers certain excavators exported from the PRC, described as:

- ***Self-propelled track-laying (i.e., tracked) excavators with a 360° revolving superstructure and with an operating weight of 11,000 kg (i.e., 11 tons) or more.***

These excavators are currently classifiable within the following commodity code 8429 5210 00. This commodity code is only given for information, and includes 'mini' excavators under 11 tons.

In this pre-sampling questionnaire, these goods will be referred to as the **goods concerned**. Any reference to the **goods concerned** in this pre-sampling questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are **like** the goods concerned. Any reference to '**like goods**' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than the PRC which are like the goods concerned in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the goods concerned or like goods.

For more information about this case, you may refer to the Notice of Initiation published at: <https://www.trade-remedies.service.gov.uk/public/case/AS0046/>



Instructions

Who should complete this form

You should complete this form if you are a **UK importer** of the goods concerned.

Why you are being asked to complete this pre-sampling questionnaire

You have identified yourself as a UK importer of the goods concerned. We are therefore seeking your cooperation in the investigation.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK importers complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **30 November 2023**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact **David George**, AS0046@traderemedies.gov.uk and see the TRA's guidance on extension requests for further information.

Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date.

Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.

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](#) for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation



46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems.

The non-confidential version of your submission will be placed on the public file, which is available on <https://www.trade-remedies.service.gov.uk/public/case/AS0046/>



Section A – Activities of your company and any associated parties

A1 – Your company’s activities

To determine your company’s role for the purpose of this investigation, please select the activity/activities of your company below. For a definition of goods concerned and like goods please refer to the section above on ‘the scope of this investigation’.

- importer of the goods concerned in the UK
 other (please give details below)

If you have selected ‘other’, please describe the role of your company with regards to the goods concerned or like goods:

N/A.

Please describe your interest in this investigation:

SANY HEAVY MACHINERY (UK) LTD (hereinafter referred to as “SANY UK” or “our company”) is a UK importer of goods concerned. During the period of investigation, SANY UK imported the goods concerned manufactured by its associated companies, i.e., SANY Heavy Machinery Limited, and SHANGHAI SANY HEAVY MACHINERY CO., LTD, to the UK. Whether the anti-subsidy measures will be imposed will have an influence on the imports of SANY UK.



A2 – Associated parties and operational links

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the goods concerned or like goods during the POI. 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](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the goods concerned or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1	SHANGHAI SANY HEAVY MACHINERY CO., LTD	Shanghai, China	Production and sales of excavators	Same ultimate shareholder
Associated Party 2	SANY Heavy Machinery Limited	Kunshan, China	Purchase and local sales of excavators	Same ultimate shareholder
Other Associated Parties	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]

+ Add additional rows as required



Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.
Please confirm in the final column if we are able to contact these companies.

Exporter/Supplier name	Address	Contact Details	Can we contact Y/N
SHANGHAI SANY HEAVY MACHINERY CO., LTD	NO.318 LIANGGANG AVENUE, PINGAN TOWN, FENGXIAN DISTRICT SHANGHAI, CHINA	[redacted – contact name]	Y
SANY Heavy Machinery Limited	SANY INDUSTRIAL PARK, ECONOMIC AND TECHNOLOGICAL DEVELOPMENT ZONE, KUNSHAN, JIANGSU, CHINA.	[redacted – contact name]	Y

+ Add additional rows as required



Section C – Sales, imports and domestic purchases

C1 – Total company revenue

Please provide your company’s total revenue and the revenue of the goods concerned:

POI: 01 July 2022 – 30 June 2023	Value in GBP (£)
Total revenue of your company during the POI	[commercially sensitive data: non-confidential range: 37,500,000-50,500,000]
Total revenue of your company for the goods concerned during the POI	[commercially sensitive data: non-confidential range: 13,500,000-17,000,000]

C2 – Your imports of the goods concerned

Please provide the total volume and value of the goods concerned imported by your company from the PRC during the POI:

POI: 1 July 2022 – 30 June 2023	Volume (KG)	Volume units	Value in GBP (£)
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The goods concerned imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	[commercially sensitive data: non-confidential range: 2,700,000-3,600,000]	[commercially sensitive data: non-confidential range: 140-185]	[commercially sensitive data: non-confidential range: 8,210,000-11,000,000]
The goods concerned imported into the UK during the POI and resold in the UK	[commercially sensitive data: non-confidential range: 1,500,000-2,400,000]	[commercially sensitive data: non-confidential range: 100-130]	[commercially sensitive data: non-confidential range: 5,700,000-7,500,000]
The goods concerned imported into the UK during the POI and consumed by your own company	0	0	0
The goods concerned imported into the UK during the POI and exported	0	0	0
Row added by SANY UK: The goods concerned imported into the UK during the POI and stored in the warehouse	[commercially sensitive data: non-confidential range: 900,000-1,150,000]	[commercially sensitive data: non-confidential range: 41-51]	[commercially sensitive data: non-confidential range: 2,600,000-3,400,000]

Please provide the total volume and value of the like goods **imported** by your company from **all other countries** during the POI:

POI: 1 July 2022 – 30 June 2023	Volume (KG)	Volume units	Value in GBP (£)
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The like goods imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	0	0	<u>0</u>
The like goods imported into the UK during the POI and resold in the UK	0	0	<u>0</u>
The like goods imported into the UK during the POI and consumed by your own company	0	0	<u>0</u>
The like goods imported into the UK during the POI and exported	0	0	<u>0</u>

C3 – Like goods purchased from a UK producer

If you have also **purchased like goods** from a **UK producer** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.

POI: 1 July 2022 – 30 June 2023	Volume (KG)	Volume units	Value in GBP (£)
Like goods purchased from UK producers during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	0	0	0
Like goods purchased from UK producers during the POI and resold in the UK market	0	0	0
Like goods purchased from UK producers during the POI and consumed by your own company	0	0	0
Like goods purchased from UK producers during the POI and exported	0	0	0



Section D – Additional information

D1 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below.

Organisation name	Website

D2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the exporting country or territory, please provide details in the box below. This can include examples such as:

- Prices are artificially low
- There is significant barter trade (e.g. goods exchanged for other goods)
- Prices reflect non-commercial factors; or
- Anything else

N/A.



D3 – Scope

Do you agree with the scope of the investigation as outlined on page 3?

Yes

No

If you have answered no to the above question, please can you explain why?

N/A.

D4 – Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

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 domestic UK market and those produced in foreign markets.

Given the relatively low number of sales in the UK Excavator market and the large number of configurations available for purchase (e.g., air conditioning for the cab, dozer blades or not, and different sizes of track shoes), we consider it is not useful to add further PCNs. Instead, any differences in physical characteristics relevant to the calculations (e.g., any costly attachments or options) should be addressed through adjustments.

Category	Description	Basic Operating weight
S	Small Excavators	>=11 tons <15 tons



M	Medium Excavators	>=15 tons <20 tons
L	Large Excavators	>=20 tons <30 tons
XL	Extra-Large Excavators	>=30 tons

Please review the draft PCN structure for this investigation shown in the table above. Please include any comments on the PCN structure in the box provided.

We have no comment on the PCN structure in the box provided above.

D5 – Economic Interest Test

It is a requirement of the investigation to conduct an Economic Interest Test (EIT). The aim of the EIT is to determine whether the implementation of the proposed trade remedy 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 your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods). Please confirm in the final column if we are able to contact these companies.

	Company name	Company location (city, country)	Company Contact Information (email/telephone)	Relationship	Can we contact Y/N
1	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
2	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y



3	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
4	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
5	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	n
6	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
7	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
8	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
9	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
10	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
11	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
12	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
13	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y



14	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
15	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
16	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
17	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	y
18	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	n
19	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
20	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
21	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
22	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
23	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
24	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y



25	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
26	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
27	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
28	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
29	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
30	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y

D6 – Anything else

Please use the box below to provide information about anything else you consider relevant to this investigation.

N/A.

Now you have reached the end of this questionnaire please ensure that you have prepared a confidential and non-confidential version and indicated the status of each



within the header. The non-confidential version should redact personal contact information, names, signatures, and exact sales quotes. Redacted figures should be replaced with a range where possible. Please return both versions to the TRA using the Trade Remedies Service (trade-remedies.service.gov.uk).