



Registration form for interested parties and contributors

Case No.: AS0076

Type of investigation: Anti-subsidy investigation into Boom Lifts and Components thereof from the Peoples Republic of China (PRC)

Completed on behalf of (provide the name of your business or organisation):	Dingli Machinery UK Limited ("Dingli UK")
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Note:

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

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

- Confidential
 Non-confidential (will be made available on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	19 January 2026
Case team contact:	AS0076@traderemedies.gov.uk



Introduction

Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation by **completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
 - an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
 - a UK producer of goods that are like the goods subject to the investigation; or
 - a trade or business association representing one or more of the above parties.
- A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in the investigation.

Scope of the investigation

Goods concerned	<p>Boom lifts (alternative names for the same product – cherry pickers, mobile access equipment (MAE), Mobile Elevating Work Platforms (MEWP), aerial work platforms (AWP) and elevating work platforms (EWP)) described as:</p> <p>Boom lifts designed for the lifting of people, equipment and/or materials, with a maximum working height of 6 metres or more, and pre-assembled or ready-to-assemble sections thereof, excluding individual components when presented separately (but not excluding the sections, presented individually or together, listed below). The goods concerned may contain additional features that provide for functions beyond the primary lifting function.</p> <p>The goods concerned may be imported as finished boom lifts, assembled or unassembled, or in the following sections presented individually or together:</p> <ul style="list-style-type: none"> • booms including articulated and telescopic or straight (with or without jibs) or sub-assemblies thereof, assembled or not;
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	<ul style="list-style-type: none"> • chassis or sub-assemblies thereof, assembled or not; • boom turret or turntables or sub-assemblies thereof, assembled or not; • platforms or baskets or sub-assemblies thereof, assembled or not. <p>The scope excludes scissor lifts, forklifts, vertical mast lifts (including where described as a 'boom' or otherwise), mobile self-propelled cranes and motor vehicles that incorporate a scissor arm assembly or boom assembly.</p> <p>The imported goods are commonly classified under the commodity codes:</p> <ul style="list-style-type: none"> • 8427 1010 10. • 8427 1010 90. • 8427 2019 10. • 8427 2019 90. • 8427 9000 80. • 8428 1020 00. • 8428 1080 00. • 8428 9090 20. • 8428 9090 80. <p>Pre-assembled parts for boom lifts are commonly classified under the following commodity codes:</p> <ul style="list-style-type: none"> • 8431 2000 60. • 8431 3100 00. • 8431 3900 10. • 8431 3900 90.
<p>Period of investigation (POI)</p>	<p>1 October 2024 to 30 September 2025</p>
<p>Alleged subsidies</p>	<p>The Applicant alleges that boom lifts originated in the PRC and imported into UK are being subsidised. The Applicant considers that these subsidised imports are causing injury to the UK industry</p>

For further details, please refer to the *Notice of Initiation* on the public file:
<https://www.trade-remedies.service.gov.uk/public/cases/>.



Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by **12 January 2026** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#)¹ for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation or a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

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



If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We will accept your request providing that:

- you submit the required information on time; and
- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation (only include if relevant for the investigation/review)



Section A: About your business or organisation

A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigation, please select all of the following options that are applicable to your business or organisation. Please refer to the period of investigation (POI) defined on page 2.

[A1.1] During the POI, we produced the goods concerned in the People's Republic of China (PRC).

Note: Please complete sections A2 and B.

[A1.2] During the POI, we directly exported the goods concerned from: the People's Republic of China (PRC) to the UK.

Note: Please complete sections A3 and B.

[A1.3] During the POI, we indirectly exported the goods concerned from: the People's Republic of China (PRC) to the UK via a third party (located either in: the People's Republic of China (PRC), or a third country not subject to the investigation).

Note: Please complete sections A3 and B.

[A1.4] During the POI, we imported the goods concerned originating in the People's Republic of China (PRC) to the UK.

Note: Please complete sections A4 and B.

[A1.5] During the POI, we produced goods that are like the goods concerned in the UK.

Note: Please complete sections A5 and B.

[A1.6] Other.

Note: Please complete section B.

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

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.

Response: This field is not applicable to Dingli UK.



A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A1** that **you are a producer of the goods concerned in the People’s Republic of China (PRC)**

Response: This section is not applicable to Dingli UK.

1. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description, and please further specify the form in which you produce and sell the goods (e.g. in component parts only, as assembled machines only, or in multiple formats.)

2. Please provide your business’ total production volumes and production capacity for the goods concerned during the period of investigation (POI) in the table below.

Total production volume (POI) [units]	
Total production capacity (POI) [units]	
Total production volume (POI) [kg]	
Total production capacity (POI) [kg]	

Consider providing these figures in ranges in your non-confidential version of this form.

3. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).



4. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume (POI) [units]	
Total domestic sales volume (POI) [kg]	
Total domestic sales value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

5. Please provide your views on whether it is more appropriate to measure production volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)*?

6. Has there been a change of demand in UK market for other types of boom lifts that you currently don't produce but may start producing for the UK market in the next few years?



A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A1** that **you are an exporter of the goods concerned from the People’s Republic of China (PRC)**

Response: This section is not applicable to Dingli UK.

1. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship	Producer (Y/N)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).

2. Please provide the total of your direct and indirect export volumes and export values of the goods concerned (both assembled machines and sub-assemblies) to the UK during POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in the: the People’s Republic of China (PRC) or a third country, are to be considered indirect exports.

Total direct export volume (POI) [units]	
Total indirect export volume (POI) [units]	
Total direct export volume (POI) [kg]	
Total indirect export volume (POI) [kg]	
Total direct export value (POI) [£]	
Total indirect export value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

3. What percentage of your total export volumes to the UK is made up of assembled boom lifts only?



4. Please provide your views on whether it is more appropriate to measure export volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)*?

5. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

6. Please provide details of the commodity code(s) under which you export the goods concerned to the UK, and any explanation for the use of certain commodity code(s) over others. If you export component parts/sub-assemblies under particular code(s), please identify these and the reasons for using any particular commodity code(s) over others.

7. Please provide a summary of your boom lift exporting activities, including what types of boom lifts you export to the UK, and whether you export assembled boom lifts only, or component parts/sub-assemblies.



8. Has there been a change of demand in the UK market for other types of Boom lifts that you currently don't export but may export in the next few years?

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

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

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

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



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

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

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

- a. steel;
- b. engines;
- c. tyres;
- d. batteries; and
- e. hydraulic components.

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



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

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



A4. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from the People’s Republic of China (PRC)**.

1. Please provide the total of your import volumes and import values of the goods concerned exported from: the PRC to the UK during the POI in the table below.

Total import volume (POI) [units]	[225-285] PCS
Total import volume (POI) [kgs]	[2,400,000 – 3,000,000] KG
Total import value (POI) [£]	GBP [12,500,000 – 15,800,000]

Consider providing these figures in ranges in your non-confidential version of this form.

2. What percentage of your total import volumes to the UK is made up of assembled boom lifts only?

Response: 100% of Dingli UK’s total import volumes is made up of assembled boom lifts only.

3. Please provide your views on whether it is more appropriate to measure import volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)*?

Response: Please refer to Section A3, question 4 of Zhejiang Dingli’s Registration Form, which states:

From Zhejiang Dingli’s perspective, using kilograms (kg) rather than units (pcs) is the most appropriate basis for measuring boom-lift volumes for the following reasons.

First, although boom lifts are sold on a per-unit basis, there are material differences between models. If sales volumes are measured simply by the number of units, those model-driven differences are disregarded, and the resulting comparisons can be distorted. Unit-based measurement is meaningful only where the products being compared are the same model (or otherwise sufficiently homogeneous).

Second, the current PCN structure is relatively broad, and a single PCN may encompass multiple different models of boom lifts of Zhejiang Dingli. In these circumstances, Zhejiang Dingli considers that measuring sales by units is not sufficiently accurate, whereas measuring sales by weight better reflects the actual situation.



Therefore, Zhejiang Dingli finds it more appropriate to measure export volumes of boom lifts in kilograms (kg).

4. Please provide details for your suppliers of the goods concerned [originating in/exported from]: the People’s Republic of China (PRC). in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship
Zhejiang Dingli	[Redacted – commercially sensitive information], PRC	Production of goods concerned, domestic sales of goods concerned, export sales of goods concerned to the UK and third countries	[Redacted – commercially sensitive information].

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).

5. Please specify the purpose of the goods concerned that you are importing from the People’s Republic of China (PRC). Select **all** of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.
- We use the goods as input in our production of _____ (specify the product/s).
- Other.

6. If you selected ‘Other’, please specify the purpose of the goods concerned that you are importing from the PRC in the field below.

Response: For a portion of boom lifts sold by Dingli UK to unaffiliated UK customers, Dingli UK [redacted - details as to the company’s operations that is not available in the public domain and whose disclosure would have an adverse impact on the company providing the information and/or would provide an unfair advantage to competitors]. Apart from [redacted - details as to the company’s operations that is not available in the public domain and whose disclosure would have an adverse impact on the company providing the information and/or would provide an unfair advantage to competitors], Dingli UK made no further changes to the goods concerned.



7. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

Response: One key distinguishing characteristic of boom lifts is maximum working height. Boom lifts with a working height exceeding 28 meters are primarily used for specialised applications, including large-scale infrastructure maintenance, industrial operations, and high-rise work requiring extended height and outreach. Typical uses include inspection and repair of wind turbine blades at onshore wind farms, as well as maintenance of large or complex structures. By contrast, boom lifts with a working height below 28 meters are predominantly used for routine construction and building maintenance on low- to mid-rise sites, such as curtain wall installation on mid-rise office buildings.

UK manufacturers, such as Niftylift, predominantly focus on compact and lightweight boom lifts designed for manoeuvrability and use in confined environments. Notably, the Applicant, Niftylift, does not manufacture boom lifts with a working height exceeding 28 meters. Conversely, during the POI, Dingli UK sold boom lifts with a working height exceeding 28 meters to customers in the UK.

As further elaborated in Zhejiang Dingli's response to question B2.1 of its AD Registration Form, boom lifts exceeding 28 metres are fundamentally different from lower-reach models in terms of purpose, application, and engineering design. These high-reach machines are not merely scaled-up versions of smaller boom lifts. They require substantially different engineering solutions, including heavier-duty chassis structures, more complex stabilisation systems, and increased structural reinforcement, which in turn result in materially different raw material requirements.

For end-users, maximum working height is a critical and non-substitutable specification. A project requiring a 35-metre working height cannot be serviced by a 28-metre machine. As a result, boom lifts exceeding 28 metres serve a distinct market segment and application profile that is not addressed by the lighter, compact models typically manufactured in the UK.

Accordingly, boom lifts with a working height exceeding 28 metres are not directly comparable to UK-produced boom lifts in terms of physical characteristics, end-use, or engineering design. They serve different customer needs and are not substitutable in practice. For these reasons, and as set out in greater detail in Zhejiang Dingli's response on scope, Dingli UK supports the exclusion of boom lifts with a maximum working height of 28 metres and above from the scope of the investigation.

8. Please provide a summary of your boom lift importing activities, including the types of boom lifts you import, and whether you import assembled boom lifts only, or component parts/subassemblies.

Response: During the POI, Dingli UK imported [redacted - number] types of boom lifts (i.e., [details as to types of boom lift produced and sold by Zhejiang Dingli]) that that fall within the description of the goods concerned as set out in the Scope of Investigation from



Zhejiang Dingli. Dingli UK did not import any component parts or sub-assemblies that fall within the description of the goods concerned during the POI.

9. Please provide the total of number of fully assembled boom lifts (in units and in kgs) as a percentage of the total import volumes of boom lifts (which includes sub-assemblies) you import to the UK.

Response: 100% of Dingli UK's total import volumes is made up of assembled boom lifts only.

10. Please provide details of the commodity code(s) under which you import the goods concerned to the UK, and any explanation for the use of certain commodity code(s) over others. If you import component parts/sub-assemblies under particular code(s), please identify these and the reasons for using any particular commodity code(s) over others.

Response: Dingli UK imports the goods concerned to the UK under commodity code 8428108000.

In the UK Integrated Online Tariff, commodity code 8428108000 sits within Chapter 84 and Heading 8428 ("Other lifting, handling, loading or unloading machinery"), under subheading 8428 10 ("Lifts and skip hoists"). This code is used consistently because the exported goods are supplied as complete boom lifts and are declared on the basis of their objective characteristics and principal function as lifting equipment.

Dingli UK did not import any component parts or sub-assemblies that fall within the description of the goods concerned during the POI.

11. Has there been a demand in the UK market for other types of boom lifts that you currently don't import from the PRC but may import from the PRC in the next few years?

Response: Dingli UK is not aware of any demand in the UK market for other types of boom lifts beyond those it currently imports from the PRC, nor does it anticipate importing additional types of boom lifts from the PRC in the next few years.



A5. Production and sales of goods produced in the UK that are like the goods concerned

Complete this section if you indicated under **A1** that you are a producer in the United Kingdom of goods that are like the goods concerned.

Response: This section is not applicable to Dingli UK.

1. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.

2. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during the POI in the table below.

Total production volume (POI) [units]	
Total production capacity (POI) [units]	
Total production volume (POI) [kg]	
Total production capacity (POI) [kg]	

Consider providing these figures in ranges in your non-confidential version of this form.

3. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the POI in the table below.

Total domestic sales volume (POI) [units]	
Total domestic sales volume (POI) [kg]	
Total domestic sales value (POI) [£]	
Total export sales volume (POI) [units]	
Total export sales volume (POI) [kg]	
Total export sales value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.



4. Please provide your views on whether it is more appropriate to measure production and export volumes of boom lifts in *kilograms (kg)* or *units (i.e. 55 boom lifts)*?

5. In the field below, please provide any other comments or evidence related to injury you believe your company is suffering as a result of alleged subsidised imports of the goods concerned into the UK from the PRC. This can relate to the prices, volumes and/or profits associated with your business, in the context of the goods concerned or goods that are like the goods concerned.



Section B: Additional information

B1. Notifying other interested parties

1. If you believe there are other interested parties that should register an interest in this case, please provide their business' or organisation's name and website details below.

Response: Dingli UK is not aware of any other interested parties that should register an interest in this case.

Name	Website

Add additional rows as required

B2. Scope

1. If you consider that the scope of the investigation should be different, please provide your reasons in the field below.

Response: Please refer to Section B2, question 1 Zhejiang Dingli's Registration Form, which states:

Zhejiang Dingli respectfully request the exclusion of boom lifts with a maximum working height of 28 meters and above from the product scope of this investigation for the following reasons.

- 1. First, the UK industry, as represented by the Applicant, does not manufacture boom lifts with a maximum working height exceeding 28 meters. (See Section A.2, paragraph 7 in the non-confidential version of the Application). Furthermore, the Applicant suggests that producing models with greater working heights would require new and significant capital expenditure (See Section A.2, paragraph 7 in the non-confidential version of the Application). This admission strongly implies that the Applicant's current production facilities, engineering capabilities, and supply chains are not equipped to manufacture boom lifts exceeding 28 meters.*
- 2. Second, the imported goods with a maximum working height exceeding 28 meters are not "like" the goods produced by UK industry. They differ fundamentally in terms of physical characteristics, and they are not interchangeable.*
 - (i) The Applicant's products are primarily compact, lightweight, and electric-powered, designed for manoeuvrability in confined spaces. A boom lift*



- exceeding 28 meters is not merely a scaled-up version of a smaller model. Boom lifts exceeding 28 meters require entirely different engineering foundations, including heavy-duty chassis, sophisticated stability/counterweight systems, and specialized engine power to ensure safety at extreme heights.*
- (ii) *For customers, maximum working height is one of the most critical, non-negotiable specifications in the boom lift market. To be specific, a project requiring a 35-metre reach cannot be serviced by a 28-metre machine. The boom lifts that are exceeding 28 meters serve specialized application scenarios where the Applicant's products that are below 28 meters simply cannot reach or perform.*
- High-Altitude Infrastructure: Maintenance of iconic structures (e.g., St. Paul's Cathedral dome, or Windsor Castle exterior), maintenance of modern high-rise buildings (the Swiss Re Building in London Forth Bridge), and maintenance and inspections of infrastructure, like bridge, airport terminal and railway station.*
 - Energy and Industry: Onshore wind turbine blade maintenance, and high-pressure pipe/tank maintenance and high-voltage transmission towers and substations maintenance.*
 - Special Projects: Rigging lighting, cameras, and large sets at major studios in the scenario of film and media production, main stage rigging for the festival, heavy-duty hull maintenance for cruise ships, working on large aircraft within aerospace hangars etc.*
3. *Third, the exclusion of boom lifts with a maximum working height exceeding 28 meters would not undermine the protection afforded to the UK industry, as the Applicant does not compete in this high-reach segment. Conversely, including these products would impose unnecessary costs on critical UK infrastructure, energy, and media sectors. Therefore, the inclusion of boom lifts with a working height exceeding 28 meters would run contrary to the UK economic interests.*

In addition to the above, Zhejiang Dingli considers the scope of the present investigation to be too broad due to the inclusion of "sub-assemblies" within the definition of the product concerned. This is because sub-assemblies (e.g., boom sections or platforms) are intermediate inputs that may be produced, traded, and used within broader supply chains (e.g., for repair and replacement). The inclusion of such sub-assemblies materially expands the product definition beyond the goods under investigation and gives rise to uncertainty and enforceability concerns, as the boundary between a "sub-assembly" and a collection of parts is inherently indeterminate.

Expanding the scope further to include the individual parts constituting such sub-assemblies appears even less justified. Individual components are typically multi-purpose, are commonly sourced for maintenance and spare-part purposes and lack the functional completeness and technical characteristics of either the finished machine or a finished sub-assembly.



2. Please provide any further remarks relating to the goods concerned and the like goods. Areas may include, for example: the interchangeability of component parts/sub-assemblies between different types and brands of boom lifts.

Response: Dingli UK has no further remarks relating to the goods concerned and the like goods.

3. Please provide any views on the categorisation of sub-assemblies which have been listed in the scope, which consists of:
- booms including articulated and telescopic or straight (with or without jibs) or sub-assemblies thereof, assembled or not;
 - chassis or sub-assemblies thereof, assembled or not;
 - boom turret or turntables or sub-assemblies thereof, assembled or not;
 - platforms or baskets or sub-assemblies thereof, assembled or not.

Response: Dingli UK does not have comments on this.

B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the country/ies subject to an investigation or review.

Draft PCN table:

Instructions: For all goods, please complete Table 0. Then:

- For assembled boom lifts, complete Table 1.
- For chassis sections, complete Table 2.
- For turret sections, complete Table 3.
- For boom sections, complete Table 4.
- For cage sections, complete Table 5.



Table 0		
Description	Answer	Value
Assembled Machine or Section?	Assembled Machine	1
	Chassis Section	2
	Turntable/Turret Section	3
	Boom Section	4
	Basket/Cage Section	5

Table 1: Assembled Boom Lifts		
Description	Answer	Value
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Tracks or Wheels	Tracked	1
	Wheeled	0
Extendable Stabilisers	Yes	Y
	No	N
Maximum Working Height (m)	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m	28
Power Type	Combustion	C
	Electric	E
	Hybrid	H
Boom Type	Telescopic	1
	Articulated	0

Table 2: Chassis Sections		
Description	Answer	Value
Vehicle Type	Trailer Mounted	M



	Self Drive	D
	Self Propelled	P
Tracks or Wheels	Tracked	1
	Wheeled	0
Extendable Stabilisers	Yes	Y
	No	N
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m	28
Power Type	Combustion	C
	Electric	E
	Hybrid	H

Table 3: Turret Sections		
Vehicle Type	Trailer Mounted	M
	Self-Drive	D
	Self-Propelled	P
Maximum Working Height (m) of the machine it is designed for	6m≤9m	06
	>9m≤13m	09
	>13m≤18m	13
	>18m≤23m	18
	>23m≤28m	23
	>28m	28
Power Type	Combustion	C
	Electric	E
	Hybrid	H

Table 4: Boom Sections



Description	Answer	Value
Lower boom structure*	Links	L
	Riser	R
	None	NA
Lower boom maximum extended length	≤5m	5
	>5m	6
	Not applicable	NA
Upper boom assembly: fly boom/jib included?	Yes	Y
	No	N
Telescopic boom assembly: maximum extended length	≤12m	12
	>12m	13
Telescopic boom assembly: number of booms	≤2	2
	>2	3

Table 5: Basket/Cage Sections		
Description	Answer	Value
Cage width	≤1.6m	6
	>1.6m	7
Cage rotation	≤100 degrees	100
	>100 degrees	101
Cage floor	Metal	M
	Non-metal (e.g. composite)	N

*For stick booms, select 'NA'.

Example PCN for an electric, articulated self-drive boom lift with a 14m maximum working height and no extendable stabilisers: **1D0N13E0**

Example PCN for a chassis section for an electric, self-drive boom lift with a 14m maximum working height and no extendable stabilisers: **2D0N14E**

1. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise



the goods produced, exported and/or imported by your business. In particular, we are interested in your opinions on:

- The categorisation of product features; and
- If there is any overlap in our PCN structure where products could be more than one PCN. If so, please suggest alternatives.

Response: Please refer to Section B3, question 1 of Zhejiang Dingli’s Registration Form, which states:

One of the most commercially significant characteristics of the boom lifts is the ability to lift people or goods to a certain height. The working height is necessarily reflective of the amount of material that is required to “reach” to a given height. A boom lift with a greater working height requires more material than a boom lift with a lesser working height, a boom lift with a greater working height must take into consideration the need for greater counterweighting, a wider wheel base, and greater power consumption.

In this connection, it is noted that, in the U.S. Antidumping Duty Administrative Review of Mobile Access Equipment and Subassemblies Thereof from the People’s Republic of China², “maximum platform/lifting height”—substantially equivalent to “maximum working height”³—was treated as a physical characteristic of the equipment, and it was incorporated into the Product Control Number for reporting sales and factors of production of the merchandise under consideration.

Zhejiang Dingli thus respectfully proposes to subdivide the machines with the maximum working height exceeding 28 meters in the PCN structure as follows.

Description	Answer	Value	Note
Maximum Working Height (m)	6m≤9m	06	
	>9m≤13m	09	
	>13m≤18m	13	
	>18m≤23m	18	
	>23m≤28m	23	
	>28m≤33m	28	
	>33m≤38m	33	Proposed by Zhejiang Dingli
	>38m≤43m	38	Proposed by Zhejiang Dingli
	>43m	43	Proposed by Zhejiang Dingli

² Please refer to [Exhibit B3.1](#): U. S. Antidumping Duty Administrative Review of Certain Mobile Access Equipment and Subassemblies Thereof from the People’s Republic of China (Period of review: April 1, 2024, through March 31, 2025).

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



B4. Economic Interest Test

1. If, following an investigation or review, we conclude that a measure should be imposed or extended, we conduct an Economic Interest Test (EIT) to determine whether the proposed measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the goods concerned) and UK customers (downstream companies buying the goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y



Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Y

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).



B5. Questions for the Foreign Government of the exporting country (PRC)

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

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

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



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

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

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



B6. Other comments

1. Threat of injury is defined as "injury which, although it has not yet occurred, is clearly foreseen and imminent." Do you have any information in relation to the threat of injury which may be being caused by the goods concerned? If so, please explain this here, and substantiate your claims with evidence.

Response: Dingli UK considers that the Application does not provide any evidence (let alone sufficient or positive evidence) of a threat of material injury to the UK domestic industry on account of the goods concerned.

2. Please use the field below to provide additional information that you consider relevant to this investigation.

Response: At this stage, Dingli UK does not have any additional information that it considers relevant to this investigation beyond the information already provided in this registration form.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).