



Registration form for interested parties and contributors

Case No.: AD0075

Type of investigation: Anti-dumping 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):	Oshkosh JLG (Tianjin) Equipment Technology Co., Ltd.
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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:	AD0075@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 an 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; – chassis or sub-assemblies thereof, assembled or not;
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	<ul style="list-style-type: none">– 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.
Period of investigation (POI)	1 October 2024 to 30 September 2025
Alleged dumping	The Applicant alleges that boom lifts originated in the PRC and imported into UK are being dumped. The Applicant considers that these dumped imports are causing injury to the UK industry.

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.

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.

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



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 investigations.



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 investigations, 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 investigations).
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.
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.

Not applicable



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 PRC**

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.)

Articulated and straight booms, all as assembled machines.

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]	[redacted – commercially sensitive data, non-confidential range: 1,330-1,780]
Total production capacity (POI) [units]	[redacted – commercially sensitive data, non-confidential range: 5,200-7,000]
Total production volume (POI) [kg]	[redacted – commercially sensitive data, non-confidential range: 15.9-21.5 million]
Total production capacity (POI) [kg]	[redacted – commercially sensitive data, non-confidential range: 61.5-83.2 million]

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
JLG Industries, Inc.	McConnellsburg, United States	[redacted – commercially sensitive information about production, sales and resale activities. The information provided in the confidential version is not in the public domain but limited company internal information.]	Indirect 100% shareholder
JLG EMEA B.V.	Hoofddorp, Netherlands	[redacted – commercially sensitive information about purchase and resale activities. The information provided in the confidential version is not in the public domain but limited company internal information.]	100% affiliated company
JLG Industries (United Kingdom) Limited	Middleton, UK	[redacted – commercially sensitive information about sales activities. The information provided in the confidential version is not in the public domain but limited company internal information.]	100% affiliated company



Oshkosh-JLG (Shanghai) Enterprise Development Co., Ltd.	Shanghai, China	[redacted – commercially sensitive information about purchase and resale activities. The information provided in the confidential version is not in the public domain but limited company internal information.]	100% affiliated company
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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]	[redacted – commercially sensitive data, non-confidential range: 100-125]
Total domestic sales volume (POI) [kg]	[redacted – commercially sensitive data, non-confidential range: 900kt-1,200kt]
Total domestic sales value (POI) [£]	[redacted – commercially sensitive data, non-confidential range: 3,300,00-4,300,000]

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)*?

Reporting volumes in units is industry standard.

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?

Not applicable



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 PRC**.

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)
Not applicable			

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 PRC or a third country, are to be considered indirect exports.

Total direct export volume (POI) [units]	0
Total indirect export volume (POI) [units]	[redacted – commercially sensitive data, non-confidential range: 115-150]
Total direct export volume (POI) [kg]	0
Total indirect export volume (POI) [kg]	[redacted – commercially sensitive data, non-confidential range: 1-1.4 million]
Total direct export value (POI) [£]	0
Total indirect export value (POI) [£]	[redacted – commercially sensitive data, non-confidential range: 6,500,000-8,600,000]

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?



Booms produced by JLG Tianjin are exported to the UK as [redacted – commercially sensitive information about JLG’s product range].

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)*?

Reporting volumes in units is industry standard.

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
JLG EMEA BV	Hoofddorp, Netherlands	[redacted – commercially sensitive information about purchase and resale activities. The information provided in the confidential version is not in the public domain but limited company internal information.]	100% affiliated company
JLG Industries (United Kingdom) Limited	Middleton, UK	[redacted – commercially sensitive information about sales activities. The information provided in the confidential version is not in the public domain but limited company internal information.]	100% affiliated company
WAC Mc Candless	Belfast, UK	Unrelated distributor from Northern	Unrelated distributor for Northern Ireland



		Ireland the Republic of Ireland. [redacted – commercially sensitive information about the detailed activity flow of JLG products produced in China]	and the Republic of Ireland. [redacted – commercially sensitive information about purchase activities]
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Add additional rows as required

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

- 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.

JLG imported booms into the UK under tariff heading [redacted – commercially sensitive information about customs heading].

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

[Redacted – commercially sensitive information about the internal operating structure of the JLG group. In sum, the answer describes how JLG Tianjin produces booms and sells those via related companies to the UK, including explanation on responsibilities, rights and obligations of all parties. The inner operating structure of JLG group is not public knowledge].

- 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?

Not applicable



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 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]	Not applicable
Total import volume (POI) [kgs]	Not applicable
Total import value (POI) [£]	Not applicable

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?

Not applicable

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)*?

Not applicable

4. Please provide details for your suppliers of the goods concerned exported from the PRC in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship
Not applicable			

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 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.

Not applicable

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

Not applicable

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

Not applicable

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.



Not applicable

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.

Not applicable

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?

Not applicable



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.**

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

Not applicable

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]	Not applicable
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]	Not applicable
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)*?

Not applicable

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 dumping 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.

Not applicable



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.

Name	Website
Not applicable	

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.

We ask for clarification whether so-called mast boom lifts with jib (see picture) are included in the product scope. As these products have a turntable and a jib, they operate in a similar manner to other boom lifts (rather than vertical masts). They therefore compete directly with other boom lifts and are also treated equally from a regulatory standpoint and market perspective. Vertical mast lifts and scissor lifts on the other hand are treated distinctly from a regulatory standpoint. Please see the attached document for further information.



2. 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.

We have no comments at this stage.

3. 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.

We have no comments at this stage.

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**



- 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.

We have no comments at this stage.

B4. Economic Interest Test

- 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)
Not applicable				

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. Particular market situation

The applicant has alleged that there is a Particular Market Situation (PMS) in the market for goods concerned in the PRC. The TRA will therefore assess whether such a PMS exists as part of its investigations.

- The applicant alleged that there is a particular market situation² in the PRC. If you have any concerns or information about the possible existence of a particular market

² [Determining dumping and anti-dumping duties - GOV.UK](#)



situation in the PRC, 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.

We have no comments at this stage.

2. The TRA has received an allegation of a Particular Market Situation (PMS) in the boom lift market in the PRC which it will assess as part of this investigation. If the TRA determines that there is a PMS in the PRC boom lifts market which does not permit a proper comparison of the domestic sales price in the PRC to the export sales price to the UK, the TRA may construct a normal value in accordance with Regulation 8(1)(a) of the Trade Remedies (Dumping and Subsidisation)(EU Exit) Regulations 2019. If the TRA decides it is appropriate to construct a normal value in this way, it will need to determine the largest inputs by cost and weight of a boom lift. Currently, the TRA considers that the largest material costs to make a boom lift can be grouped into the following categories:

- Electronics;
- Engine;
- Plastics;
- Hydraulics; and
- Steel (where not included in a prior category).

Do you agree with this categorisation of the largest material costs to make a boom lift? If not, provide an alternative list of categories

We have no comments at this stage.

B6. Representative Third country

If the TRA determines that a PMS exists and the effect of the PMS on the domestic sales price is that it is not possible to make a proper comparison between that domestic sales price and the export price, it may not use the domestic sales price for the purpose of determining normal value.



In such circumstances, the TRA may determine normal value using the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. The TRA may also make adjustments to those costs and profits using data from an appropriate, representative third country if it determines that any relevant costs or profits are unrepresentative because they do not reasonably reflect the overseas exporter's costs in a market if those costs or profits were substantially determined by market forces.

1. In the event that the TRA needs to make such adjustments, the applicant has proposed Brazil as an appropriate representative country. Please provide any comments on the applicant's suggested representative country.

In selecting the appropriate representative country, it is important to give due consideration to the level of raw material prices in the reference country, and ensure that the choice of reference country and methodology used does not give undue advantage to Chinese producers that are vertically upstream integrated.

2. If you do not agree with the third country proposed by the applicant, please suggest an appropriate third country for which suitable costs and profit data can be obtained.

The TRA should also consider Mexico as appropriate third country. There are 2 large mobile access producers in Mexico, JLG and Terex. At this stage we do not have any concrete information whether Mexico would be a better choice as representative country. However, we wanted to flag this option to the TRA and offer our cooperation.

3. If you have suggested an appropriate representative third country, please provide contact details of a producer in that country who may be willing to participate in the investigation (if you have them).

Our related company would agree to cooperate with the TRA:

JLG Manufacturing Planta León (100% affiliated company)
[redacted – commercially sensitive contact information]

B7. 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.



We have no comments at this stage.

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

The JLG group also has a production entity in the UK that produces similar mobile access equipment, namely Power Towers and other vertical lifts. These products have partially overlapping uses to booms but are technically outside the scope of this investigation.

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

NOTE re MAST BOOM LIFTS

In JLG's initial sampling questionnaire response, we asked the TRA for clarification regarding the coverage of mast boom lifts with a jib within the scope of the product definition:

We ask for clarification whether so-called mast boom lifts with jib (see picture) are included in the product scope. As these products have a turntable and a jib, they operate in a similar manner to other boom lifts (rather than vertical masts). They therefore compete directly with other boom lifts and are also treated equally from a regulatory standpoint and market perspective. Vertical mast lifts and scissor lifts on the other hand are treated distinctly from a regulatory standpoint.

The TRA deficiency letter asked for clarification of our request :

Please clarify what you mean by 'mast boom lifts with a jib'? Please describe in as much detail as possible the type of machine you are referring to, including any useful information about its characteristics that differ from other types of boom lift, and any alternative names which are used to refer to it.

The type of machine we are referring to, mast boom lifts with a jib, are classified for regulatory purposes as a boom lift and are treated as such commercially as well.

Regulatory classification

The relevant classification criteria are found in EN 280-1:2022 and in documents of the International Powered Access Federation (IPAF). Essentially, both sources classify mobile access equipment based on the functional capability of the lifting structure, specifically whether or not the equipment's work platform can be positioned outside the so-called tipping lines of the chassis. The tipping lines are defined by the chassis footprint.

When the jib of the boom mast lift is deployed, articulated, or extended, the work platform is displaced horizontally relative to the vertical mast axis. As a result, the vertical projection of the work platform and its associated load may extend beyond the tipping lines defined by the chassis footprint. This is the reason it is considered a part of the boom lift category, distinct from those lifts, including vertical mast lifts, where the platform does not extend beyond the tipping lines.

Thus, those lifts where the work platform stays over the chassis (vertical mast lifts and scissor lifts) are considered one category, and those lifts where the work platform may extend beyond the tipping lines are considered a second category. The latter category is the category of the boom lifts.

The fundamental common feature of boom lifts, as opposed to vertical mast lifts, is the boom section (either articulated, straight or a mast with a jib) which allows the lift platform to be placed outside of the chassis footprint. To complement that outreach possibility, boom lifts have a turret/turntable that swings, allowing the outreach to occur in any direction.

These common features determine the applicable design calculations, stability assessments and safety requirements, as well as training for equipment use.

We attach a note which explains in more detail the regulatory classification of boom lifts, including mast boom lifts.

Commercial usage

Mobile access equipment customers clearly distinguish boom lifts, including mast boom lifts, on the one hand, and ordinary mast lifts (and scissors) on the other hand.

Indeed, the key for customers is to know to where the basket (platform) can reach outside the base.

Thus, for example, a mast boom lift will compete with other boom lifts with comparable outreach possibilities, as opposed to mere vertical mast lifts (i.e. those with no jib).

We attach a presentation which shows the differences between boom lifts and vertical lifts.

Conformity Assessment Justification

Classification of Vertical Mast MEWP with Jib in Accordance with EN 280–1:2022

1. Scope (EN 280–1:2022: Scope and application)

This justification defines the functional classification of a mobile elevating work platform (MEWP) comprising a vertical mast lifting structure equipped with an articulated or fixed jib, assessed in accordance with EN 280–1:2022: Mobile elevating work platforms – Part 1: Design calculations – Stability criteria – Construction – Safety – Examinations and tests.

2. Applicable Standard

- EN 280–1:2022: Mobile elevating work platforms – Part 1: Design, calculations, stability, construction, safety

3. Description of the Machine (EN 280–1:2022 : Terms and definitions; General machine description)

A vertical mast machine with an articulated or fixed Jib consists of:

- A self-propelled chassis supported on either wheels or tracks that dictates defining the machines' footprint and thus tipping lines (EN 280–1:2022: definitions – chassis, footprint, tipping lines);
- A vertical mast that provides the vertical elevation of the work platform (EN 280–1:2022: lifting structure);
- A jib mounted on the top end of the mast, permitting a displacement of the work platform relative to the mast axis (EN 280–1:2022 : boom / jib elements).The jib could be articulated, telescopic, or fixed at an angle and is intended to allow positional adjustment of the work platform in the horizontal plane.

4. Functional Assessment per EN 280–1:2022 (Classification principles; Stability assessment basis)

4.1 The platform positioning relative to the chassis can be classified as either Group A or Group B (EN 280–1: 2022 section 1.4 MEWP classification)

In accordance with EN 280–1:2022, the classification of a MEWP is determined by the functional capability of the lifting structure, specifically whether the work platform can be positioned within or outside the tipping lines of the chassis

When the jib is deployed, articulated, or extended, the work platform is displaced horizontally relative to the vertical mast axis. As a result, the vertical projection of the work platform and its associated load may extend beyond the tipping lines defined by the chassis footprint (EN 280–1:2022: Group B definition).

4.2 Stability and Overturning Considerations (EN 280–1:2022: Stability requirements; Design calculations)

The introduction of a jib creates an overturning moment due to horizontal offset of the platform load, which must be considered in the stability calculations (EN 280–1: stability criteria and test conditions).

The stability behavior of the machine in these configurations is equivalent to that of a boom-type MEWP, as the resultant load produces a moment about one or more tipping lines rather than remaining purely axial and within the chassis footprint and tipping lines (EN 280–1:2022: overturning moment assessment).

5. Classification Determination (EN 280–1:2022: MEWP types and groups)

Based on the functional assessment:

- The vertical mast alone would permit only vertical movement of the work platform, with the platform remaining within the tipping lines (EN 280–1:2022: Group A behaviour).
- The addition of the jib enables horizontal displacement of the work platform, resulting in configurations where the platform may be positioned outside the tipping lines (EN 280–1: Group B behaviour).

In accordance with EN 280–1 definitions and classification principles:

- The machine exhibits boom functionality due to the presence of outreach (EN 280–1:2022: boom definition).
- The machine therefore falls within Group B, as the platform can move outside the tipping lines (EN 280–1:2022: Group B).
- As the machine is capable of being positioned from the work platform, it is classified as Type 3 (EN 280–1:2022: MEWP Type 3 definition).

6. Conclusion (EN 280–1:2022: Classification outcome and compliance basis)

Although the primary lifting structure is a vertical mast, the incorporation of a jib enables horizontal displacement of the work platform such that the platform may be positioned outside the tipping lines of the chassis. Consequently, in accordance with the functional definitions, classification principles, and stability criteria of EN 280–1:2022, the machine shall be classified as a boom-type MEWP, specifically Type 3 Group B.

All applicable design calculations, stability assessments, and safety requirements have therefore been applied in accordance with the requirements for Type 3 Group B MEWPs under EN 280–1:2022 (: design, calculation, examination, and test requirements).

IPAF-Based Classification Justification

Vertical Mast MEWP with Jib

1. Scope (IPAF guidance on MEWP classification and safe use)

This justification defines the functional classification of a mobile elevating work platform (MEWP) comprising a vertical mast lifting structure equipped with a jib, based on IPAF guidance, terminology, and classification principles as used in IPAF training materials, technical guidance documents, and industry best practice publications.

2. Applicable Guidance (IPAF technical guidance and training framework)

- IPAF MEWP Classification System
- IPAF Operator Training Manuals
- IPAF Guidance on MEWP Stability, Outreach, and Safe Use

IPAF guidance classifies MEWPs according to how the platform moves in relation to the base of the machine, with particular emphasis on outreach and stability behaviour rather than structural appearance.

3. Description of the Machine (IPAF terminology)

The machine consists of a self-propelled base, a vertical mast providing vertical elevation, and a jib mounted at the top of the mast allowing horizontal displacement of the work platform.

4. Functional Assessment Using IPAF Guidance

When the jib is deployed, the platform is displaced horizontally, introducing outreach. IPAF guidance considers any MEWP with outreach to be boom-type due to the resulting overturning moment and stability behaviour.

5. Classification Determination

A vertical mast without a jib is a vertical-type MEWP. The addition of a jib introduces outreach, therefore the machine must be treated as a boom-type MEWP. Where the machine is self-propelled and controlled from the platform, it aligns with a Type 3 Group B-equivalent classification.

6. Conclusion

Although the primary lifting structure is a vertical mast, the jib enables outreach. In accordance with IPAF guidance, the machine exhibits boom-type characteristics and shall be treated as a self-propelled boom-type MEWP.

Side-by-Side Comparison: EN 280–1 vs IPAF Classification Justification

Assessment Aspect	EN 280–1:2022 Justification	IPAF Guidance Justification
Basis of classification	Formal standard defining MEWP types and groups based on platform position relative to tipping lines.	Industry guidance classifying MEWPs by how the platform moves relative to the base.
Vertical mast only	Platform remains within tipping lines; Group A behaviour.	Platform remains above base; vertical-type MEWP.
Effect of jib	Jib enables platform to move outside tipping lines, introducing outreach.	Jib introduces outreach by moving platform away from the base.
Stability behaviour	Horizontal offset creates overturning moment assessed against tipping lines.	Outreach creates overturning moment requiring boom-type controls.
Boom definition	Any structure enabling outreach is functionally a boom.	Any MEWP with outreach is treated as boom-type regardless of structure.
Final classification	Type 3 Group B MEWP.	Boom-type, self-propelled MEWP (Type 3 Group B equivalent).

[redacted - commercially sensitive information about our products]