



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):	<i>JCB Access Limited ("JCB")</i>
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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.
<p>Period of investigation (POI)</p>	<p>1 October 2024 to 30 September 2025</p>
<p>Alleged dumping</p>	<p>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.</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 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 investigation, please select all of the following options that are applicable to your business. 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 and your business' interest in this investigation in the field below.

JCB markets mobile access equipment ("MAE") on the UK market. The MAE that JCB markets on the UK market is [CONFIDENTIAL – Information about JCB's business operations]. JCB holds a significant share of the UK market.

In the past, JCB manufactured MAE in the UK. JCB moved its production to [CONFIDENTIAL – Information about JCB's business operations] due to the price pressure of unfairly traded imports on the UK market. JCB is [CONFIDENTIAL – Information about JCB's business operations].



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
N/A	

B2. Scope

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

The scope of the investigation should be expanded to include scissor lifts and relevant sub-assemblies.

JCB disagrees with the Applicant that scissor lifts do not compete with boom lifts. The use of both types of lifts is identical: lifting persons. Boom lifts and scissor lifts compete in many – although not all – applications. This is confirmed by:

- The evidence put forth by the Applicant, which confirms that there is substantial competitive overlap between scissor lifts and boom lifts.²*
- The approach of other investigating authorities. The EU anti-dumping and anti-subsidy duties on MAE from China apply to boom lifts and scissor lifts.³ The U.S. anti-dumping and anti-subsidy duties on MAE from China also apply to boom lifts and scissor lifts.⁴*

² See, e.g., Alpha Platforms, 'Boom Lift vs. Scissor Lift – Pros and Cons of Two Height Access Solutions', Appendix A.26 to the Application; Malcolm Briggs, Horizon Platforms, 'Boom Lift vs Scissor Lift: What are the Differences & Which do I Need?' (13 May 2025), Appendix A.27 to the Application; UK MEWPS Ltd, 'Comprehensive Guide to Mobile Elevating Work Platforms (MEWPs) in the UK', Appendix A.28 to the Application.

³ See recital 21 to Commission Implementing Regulation (EU) 2025/45 of 8 January 2025 imposing a definitive anti-dumping duty and definitely collecting the provisional duty imposed on imports of mobile access equipment originating in the People's Republic of China, OJ L, 2025/45, 9.1.2025; recital 41 to Commission Implementing Regulation (EU) 2025/796 of 24 April 2025 imposing a definitive countervailing duty on imports of mobile access equipment originating in the People's Republic of China and amending Implementing Regulation (EU) 2025/45 imposing a definitive anti-dumping duty on imports of mobile access equipment originating in the People's Republic of China, OJ L, 2025/796, 25.4.2025.

⁴ See Certain Mobile Access Equipment and Subassemblies Thereof From the People's Republic of China: Antidumping Duty Order, 2022-08014 (87 FR 22190); Certain Mobile Access Equipment and



- *The Applicant and a market research company that the Applicant cites speak of “the global boom lift and scissor lift market.”⁵ This confirms that boom lifts and scissor lifts form part of the same market.*
- *There are ever-more products that straddle the applications in which boom lifts were historically preferred over scissor lifts, which further blurs any lines between boom lifts and scissor lifts. For instance:*
 - *Chinese producer XCMG markets a range of rough terrain scissor lifts,⁶ whereas boom lifts were historically preferred for rough terrain applications.*
 - *Chinese producer Dingli’s highest scissor lift height is 37 metres, which is an operating height historically seen only with boom lifts.⁷*
- *The Applicant has submitted voluminous price evidence for scissor lifts sold on the UK market in the context of the export price calculation, further confirming the competitive relation between scissor lifts and boom lifts.⁸*

Leaving scissor lifts out of the scope of the investigation will significantly limit the effectiveness of any redressive measures that the TRA may recommend. For many applications, customers will be inclined to use injuriously priced Chinese scissor lifts rather than boom lifts for which prices should return to non-injurious levels. This dynamic will be aggravated by products that straddle the categories, further shrinking the UK market for boom lifts and thus causing injury to the Applicant and other fair-playing players on the UK market.

Leaving scissor lifts out of the scope of the investigation will also complicate the injury and causation analysis in the investigation because, as the Applicant confirms, the commodity codes used to import boom lifts are also used to import significant volumes of scissor lifts.⁹

Finally, there is no legal impediment to including scissor lifts in the scope of the investigation. The UK MAE industry manufactures both boom lifts and scissor lifts,¹⁰ and the Applicant has standing even if scissor lifts are included in the scope of the

Subassemblies Thereof From the People’s Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination, 2021-26890 (86 FR 70439).

⁵ *Application, p. 44, referring to DataHorizon Boom & Scissor Market, p. 2, Appendix A.35 to the Application.*

⁶ *See XCMG’s scissor lift portfolio, available [here](#).*

⁷ *Planning, Building & Construction Today, ‘World’s Tallest Scissor Lift Coming to UK’ (20 June 2024), Appendix A.30 to the Application.*

⁸ *Application, pp. 87 and 136, read together with Appendix E.7.*

⁹ *See Application, Appendix A.1 read together with Application, pp. 25-26. The same is true for mast lifts, but mast lifts are a niche product so that their imports unlikely change import trends*

¹⁰ *See, e.g., Application, pp. 29, 54, 58.*



investigation.¹¹ The Chinese exporting producers of boom lifts also manufacture and sell scissor lifts on the UK market.¹²

If helpful, JCB, as a major player on the UK MAE market and a former and potentially future UK MAE producer, stands ready to provide additional information to the TRA about the UK market for scissor lifts.

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.

The investigation should also cover sub-assemblies for scissor lifts, i.e.:¹³

- *Scissor arm assemblies, or scissor arm sections, for connection to chassis and platform assemblies. These assemblies include:*
 - *Pin assemblies that connect sections to form scissor arm assemblies*
 - *Actuators that power the arm assemblies to extend and retract.*

These assemblies may or may not also include blocks that allow sliding of end sections in relation to frame and platform, hydraulic hoses, electrical cables, and/or other components.

- *Chassis assemblies for connection to scissor arm assemblies.*

The inclusion of other components not identified as comprising the finished or unfinished scissor lift should not remove the product from the scope of the investigation.

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.

N/A

¹¹ See, e.g., Application, p. 58.

¹² See, e.g., Dingli's scissor lift portfolio, available [here](#); XCMG's scissor lift portfolio, available [here](#); or Zoomlion's scissor lift portfolio, available [here](#).

¹³ The language proposed by JCB mirrors the scope of the U.S. anti-dumping and countervailing duty orders on mobile access equipment from China.



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	Scissor	2
	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.

Table 1 should be revised to include, in the PCN "boom type," an option for scissor lifts. JCB has added this in Table 1 above (in the red-shaded cells).

JCB will revert as soon as possible regarding proposed changes to the PCNs for sections to include scissor lifts, as due to the holiday period and year-end closing, the relevant persons were not available by the deadline for this pre-sampling questionnaire.

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)
<i>Dennison Commercials Limited</i>	<i>8 Ballyhartfield Road Doagh, Templepatrick BALLYCLARE County Antrim, BT39 0RB</i>	<i>[CONFIDENTIAL]</i>	<i>Independent companies that operate as dealers for JCB products and buy and sell MAE manufactured by JCB</i>	Y
<i>Greenshields JCB Limited</i>	<i>Gravel Hill Road Holt Pound FARNHAM Surrey, GU10 4LG</i>	<i>[CONFIDENTIAL]</i>		Y
<i>Gunn JCB Limited</i>	<i>Atlantic Street, Broadheath ALTRINCHAM Cheshire, WA14 5DN</i>	<i>[CONFIDENTIAL]</i>		Y
<i>Holt JCB Limited</i>	<i>Third Way, Avonmouth BRISTOL Avon, BS11 9ZG</i>	<i>[CONFIDENTIAL]</i>		Y
<i>Scot JCB Limited</i>	<i>Townmill Road GLASGOW, G31 3AR</i>	<i>[CONFIDENTIAL]</i>		Y
<i>T C Harrison JCB Limited</i>	<i>8 Brookdale Court Chapeltown SHEFFIELD, 35 2PT</i>	<i>[CONFIDENTIAL]</i>		Y
<i>Watling JCB Limited</i>	<i>Dog and Gun Lane Whetstone LEICESTER Leicestershire, LE8 6LJ</i>	<i>[CONFIDENTIAL]</i>		Y

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.

1. The applicant alleged that there is a particular market situation¹⁴ in the PRC. If you have any concerns or information about the possible existence of a particular market

¹⁴ [Determining dumping and anti-dumping duties - GOV.UK](https://www.gov.uk/guidance/determining-dumping-and-anti-dumping-duties)



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.

N/A

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

JCB agrees with this high-level categorisation.

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.

JCB agrees that Brazil would be a representative third country for the purpose of making particular market situation adjustments to the normal value.

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.

N/A

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).

N/A

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.

JCB agrees that imports of Chinese MAE are significantly disrupting and distorting the UK MAE market and depressing prices on the UK MAE market. The negative impact of Chinese MAE prices on the UK market will become ever-bigger as trade diversion and large overcapacities in China continue to result in Chinese MAE producers exporting to unprotected, high-value markets, such as the UK.

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

N/A