



Registration form for interested parties and contributors

Case No: AR0089

Absorption review

Certain excavators originating in the People’s Republic of China

Completed on behalf of (provide the name of your company):	FINNING (UK) LTD
--	-------------------------

(to note, we use the term “company” to include all forms of business organisation including partnerships and sole traders)

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 an 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:	14 April 2026
Case team contact:	AR0089@traderemedies.gov.uk



Introduction

Registration of interest to the review

We invite interested parties and contributors to **register** their interest in this review **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 review;
- an overseas exporter, an overseas producer or an importer of the goods subject to the review;
- a UK producer of goods that are like the goods subject to the review; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or company who is not an interested party but who wants to register so that they can participate in a review.

Scope of the review

Goods subject to review	Self-propelled track-laying (i.e. tracked) excavators with a 360° revolving superstructure and with an operating weight of 11,000 kg (i.e., 11 tonnes) or more but less than 80,000 kg (80 tonnes).
Period of investigation (POI)	1 January 2025 to 31 December 2025

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 **14 April 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 will not be disclosed (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 review, or a UK producer of goods that are like the goods subject to the review, or a contributor, we will ask you to complete a detailed questionnaire to inform this review.

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 company 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 company 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 company than if it had cooperated.

If we decide to sample overseas exporters, and your company is not selected for this sample, you may submit a request to us to calculate individual margins for your company. 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 review



Section A: About your company

A1. Your company's activities

1. To determine your company's role for the purpose of this review, please **select the most applicable option for your company**. Please refer to the period of investigation (POI) defined on page 2.

Overseas producers and exporters

- [A1.1] During the POI, we both produced and directly/indirectly exported the goods subject to review from the People's Republic of China (PRC) to the UK.

Note: Please complete sections A2, A3, and B.

- [A1.2] During the POI, we produced the goods subject to review in the PRC, but did not export to the UK.

Note: Please complete sections A2 and B.

- [A1.3] During the POI, we directly/indirectly exported the goods subject to review from the PRC to the UK, but did not produce the goods subject to review.

Note: Please complete sections A3 and B.

UK producers and importers

- [A1.4] During the POI, we produced goods that are like the goods subject to review in the UK and imported the goods subject to review originating in the PRC to the UK.

Note: Please complete sections A4, A5, and B.

- [A1.5] During the POI, we produced goods that are like the goods subject to review in the UK (i.e. the UK like goods), but we did not import the goods subject to review originating in the PRC or any other like goods.

Note: Please complete sections A4 and B.

- [A1.6] During the POI, we imported the goods subject to review originating in the PRC to the UK, but we did not produce the goods that are like the goods subject to review (the UK like goods).

Note: Please complete sections A5 and B.

Other

- [A1.7] Other.

Note: Please complete section B.



2. If you selected 'Other' [A1.7], please describe the activity/activities of your company and your company's interest in this review in the field below.

In relation to case AD0047 (Certain excavators originating from the People's Republic of China ("PRC")), Finning (UK) Ltd (**Finning**) was an Importer during the POI of the goods which were subject to the review.

However, we understand that the scope of this absorption review (case no. AR0089) is as follows:

- The goods subject to the review are, "Self-propelled track-laying (i.e. tracked) excavators with a 360° revolving superstructure and with an operating weight of 11,000 kg (i.e., 11 tonnes) or more but less than 80,000 kg (80 tonnes)."; and
- The POI is 1 January 2025 to 31 December 2025.

Finning remains the authorised dealer of Caterpillar excavators in the UK. However, as a matter of fact, Finning has not imported any goods which are subject to review under AR0089 in the relevant POI. As such, we did not consider it appropriate to select option A1.6.

However, as the authorised dealer of Caterpillar excavators, Finning has an interest in the outcome of AR0089. Specifically:

- In a scenario where, at the conclusion of the review, the TRA considers that:
 - PRC producers of the goods subject to review are absorbing the measures in a manner which renders the measures ineffective; and
 - It is therefore appropriate to recommend an increase to the anti-dumping measure applied following AD0047;
- Where Finning were to import any goods subject to review under AR0089 in future, Finning is understood not to have contributed to the identified harm and, consequently, not made subject to any additional measures imposed.

3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.



A2. Production and domestic sales of the goods subject to review

Complete this section if you indicated under **A1** that **you are a producer of the goods subject to review in the PRC.**

4. Please refer to the description of the goods subject to review on page 2. In the field below, describe the goods that you produce and that fall within the description.

5. Please provide your company's total production volumes and production capacity for the goods subject to review during the period of investigation (POI) in the table below.

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

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

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

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 our [guidance](#).

7. If you do not export the goods subject to review to the UK either directly or via associated parties, please describe how your products are exported to the UK (e.g. via unrelated wholesalers).



8. Please provide the total of your domestic sales volumes and sales values of the goods subject to review produced by your company during the POI in the table below.

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

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

9. Were there significant fluctuations in any major input costs since June 2023, which had a material impact on the overall cost to make of the goods in the POI? If yes, please provide details of these fluctuations.

10. Were there significant fluctuations in any non-manufacturing costs or other changes in supply side factors (e.g. production methods, economies of scales) since June 2023 which had a material impact on the selling price of the goods in the POI? If yes, please provide details of these fluctuations.

11. Were these any factors that have significantly impacted the export price or subsequent UK sales prices of the products you have sent to the UK between June 2023 and the POI? If yes, please provide details of these factors.

12. Is your company or any of your associated parties related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods subject to review (the UK like goods)?

A3. Direct and indirect exports of the goods subject to review



Complete this section if you indicated under **A1** that **you are an exporter of the goods subject to review originating from the PRC**

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

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

Add additional rows as required

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

14. Please provide the total of your direct and indirect export volumes and export values of the goods subject to review to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your company), which is located in the 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 value (POI) (£)	
Total indirect export value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

15. If you exported the goods subject to review 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 our [guidance](#).

16. Please provide details of the commodity code(s) you export the goods subject to review to the UK under in the box below.



17. Were there any factors that have significantly impacted the export price or subsequent UK sales prices of the products you have sent to the UK between June 2023 and the POI? If yes, please provide details of these factors.

A4. Production and sales of goods produced in the UK that are like the goods subject to review

Complete this section if you indicated under A1 that you are a producer in the United Kingdom of goods that are like the goods subject to review (the UK like goods).

18. Please describe the goods that you produce in the UK and that you consider to be like the goods subject to review (the UK like goods).

19. Please provide your company's total production volumes and production capacity for UK production of goods that are like the goods subject to review (the UK like goods) during the POI in the table below.

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

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).



20. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods subject to review (the UK like goods) produced by your company in the UK during the POI in the table below.

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

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

21. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods that are like the goods subject to review (the UK like goods)? If yes, please provide details of these fluctuations.

22. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods subject to review (the UK like goods)?

A5. UK imports of the goods subject to review

Complete this section if you indicated under **A1** that **you are an importer of the goods subject to review originating in the PRC**.

23. Please provide the total of your import volumes and import values of the goods subject to review originating in the PRC to the UK during the POI in the table below.

Total import volume (POI) [units]	
Total import value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

24. Please provide details for your suppliers of the goods subject to review originating in the PRC in the table below.



Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required

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

25. Please specify your purpose in importing the goods subject to review originating in the PRC. Select **all** of the following options that are applicable to your company.

- 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).
- We reexport the good to third countries, namely_____
- Other.

26. "If you selected "other", please specify your purpose for importing the goods subject to review originating in the PRC in the field below.

27. Were there any factors that have significantly impacted the subsequent UK sales prices of the goods subject to review originating in the PRC that you imported between June 2023 and the POI? If yes, please provide details of these factors.



Section B: Additional information

B1. 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 subject to review. 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 PRC.

The PCN that was used in the original anti-dumping investigation AD0047 is as follows:

Category	Description	Basic Operating Weight
S	Small Excavators	>= 11 tonnes < 15 tonnes
M	Medium Excavators	>=15 tonnes < 20 tonnes
L	Large Excavators	>= 20 tonnes < 30 tonnes
XL	Extra-Large Excavators	>= 30 tonnes < 55 tonnes
XXL	Extra-Extra-Large Excavators	>= 55 tonnes < 80 tonnes
XXXL	Extra-Extra-Extra-Large Excavators	>= 80 tonnes

28. Please review the above draft PCN structure for this review 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 company.

Finning agrees that the above PCN structure is adequate and proportionate – we would point out for absolute clarity that in respect of the XXXL Category Excavators, (a) a negative determination was made as part of the original anti-dumping investigation AD0047², and (b) these goods are not included within the definition of 'goods subject to review' for the purposes of this AR0089.

² AD0047 Notice of a Final Negative Determination, 14 May 2025.



B2. Other comments

28. Please use the field below to provide additional information that you consider relevant to this review. This should include whether your company considers whether any absorption of the anti-dumping duties previously imposed on Certain excavators originating in the PRC has occurred. If not, please explain why this is the case.

Finning UK is the authorised Caterpillar dealer for the United Kingdom – the import and sale of brand new Caterpillar construction products in the UK, including Excavators, is made exclusively by Finning.

The Application to initiate an absorption review, made by JCB Heavy Products Limited, contains in Section 2.C the following two statements:

"The Applicant's market intelligence confirms that Caterpillar decreased its Excavator prices on the UK market in 2025 by [5-20]%, thereby not just absorbing the ADDs but significantly aggravating its injurious dumping.

Given Caterpillar's purported high share in total UK imports of Chinese Excavators, the steep decline in average UK import prices of all Excavators originating from China corroborates the market intelligence that Caterpillar is absorbing the ADDs"³

Since the imposition of the ADDs (effective 20th December 2024) Finning has not imported any excavators meeting the AR0089 definition of 'goods subject to the review' manufactured by Caterpillar in the PRC for resale in the UK market.

During 2025 Finning did import two Caterpillar 395 excavators manufactured in PRC, but as the basic operating weight of these machines is circa 94 tonnes (i.e. > 80 tonnes), no ADDs applied to these imports. Our clear understanding is that excavators meeting this description are not purported to have contributed to any injury alleged by the Applicant and therefore are out of scope for the purposes of AR0089.

Finning (Ireland) Limited, a sister company of Finning, is the authorised Caterpillar dealer for the Republic of Ireland. Our distribution arrangements with Caterpillar are such that products purchased by Irish end users are landed in UK port, held in Finning's bonded warehouse, and then shipped on to Ireland. In 2025 there were 6 relevant Excavators shipped to UK, held in our bonded warehouse, for onward dispatch to Ireland. As such no import duties, including ADDs, was paid and these machines would not have impacted any analysis conducted by the Applicant. Our assessment is that the "steep decline in

³ Section 2.C., response to B1.2, Absorption Review, Application form (AR0089).



average UK import prices of all Excavators originating from China” is in fact a direct result of:

- there having been no imports of relevant Caterpillar product from China for sale in the UK market in the AR0089 POI; and
- per our submissions under AD0047, Caterpillar product being broadly the most highly priced product on a like-for-like basis, therefore resulting in a significant impact on the apparent cross-market price of imported goods.

Logically it follows that if Finning did not import any in-scope Chinese Excavators manufactured by Caterpillar for sale in the UK market during the POI, the Applicant's statement that Caterpillar prices for such imported products have decreased by [5-20%] is baseless and potentially misleading.

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