



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):	SANY Heavy Machinery Limited (hereinafter referred to as “SANY Kunshan” or the “Company”)
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(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.

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

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



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.



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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.

RESPONSE: Not applicable.

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.

RESPONSE: SANY Kunshan is a member of China Construction Machinery Association. Please refer to **Appendix A1.3** for the Membership Certificate.



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.

RESPONSE: SANY Kunshan produces a range of self-propelled track-laying (tracked) hydraulic excavators with a 360° revolving superstructure. The products falling within the scope of the present review are those with an operating weight of 11 tonnes or more but less than 80 tonnes.

Within this range, SANY Kunshan manufactures excavators with various emission standards depending on the destination market. In addition, SANY Kunshan also develops and produces electrified (battery-powered) tracked excavators within the relevant tonnage range.

While SANY Kunshan also produces excavators outside the above-mentioned weight range, such products (i.e. below 11 tonnes or above 80 tonnes) are not subject to the present review and are therefore not included in this response.

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]	[8,700 – 11,000]
Total production capacity (POI) [units]	[13,700-17,500]

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
SANY Heavy Machinery Limited	Kunshan, China	Production and sales of excavators	The Company
Shanghai SANY Heavy Machinery Co., Ltd.	Shanghai, China	Production and sales of excavators	Subsidiary of SANY Kunshan



Company name	Company location (city, country)	Activities	Relationship
SANY SOUTH EAST ASIA PTE LTD	Singapore	Purchase and sales of excavators to SANY HEAVY MACHINERY (UK) LTD. for subsequent sales in the UK	Ultimately owned by the same shareholder as SANY Kunshan
SANY HEAVY MACHINERY (UK) LTD.	Coatbridge, Scotland, United Kingdom	Purchase (import) and sales of excavators in the UK	Ultimately owned by the same shareholder as SANY Kunshan
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]
[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]	[Redacted – Commercially sensitive information]

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).

RESPONSE: Not applicable.



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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]	[4,300 – 5,500]
Total domestic sales value (POI) (£)	[315,000,000 – 390,000,000]

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.

RESPONSE: Yes. There have been fluctuations in certain major input costs since June 2023, including raw materials and other production-related inputs. In particular, the price of key raw materials such as [input] has decreased by approximately [percentage%] since June 2023. In addition, for certain critical components sourced directly from [country (such as input)], which account for a significant proportion of total production costs, input costs have been affected by exchange rate movements. Since June 2023, the [currency] has depreciated by approximately [percentage]%, which has led to corresponding fluctuations in purchase costs where contracts are denominated in [currency]. However, given the complexity of the cost structure and the need to ensure consistency with the Company’s accounting methodologies, the Company is currently compiling and verifying the relevant information. The company reserves the right to provide a more detailed and comprehensive response at a later stage of the review.

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.

RESPONSE: Yes. There have been changes in non-manufacturing costs and supply-side factors since June 2023, including, *inter alia*, adjustments in production planning, operational efficiencies, economies of scale, exchange rate fluctuation and other market-driven factors. However, given the complexity of the cost structure and the need to ensure consistency with the company’s accounting methodologies, the company is currently compiling and verifying the relevant information. The Company reserves the right to provide a more detailed and comprehensive response at a later stage of the review.



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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.

RESPONSE: Yes. Export prices to the UK and subsequent resale prices in the UK have been influenced by a combination of market-driven and operational factors. In particular, the primary factors affecting export prices have been changes in underlying production costs and exchange rate movements. As noted above, key input costs have declined, including a decrease of approximately [percentage]% in [input] prices, as well as fluctuations in the cost of certain major components sourced from [country] (such as input), which are denominated in [currency] and have been affected by an approximate [percentage]% depreciation of the [currency] since June 2023. These developments have had a direct impact on the cost base and, consequently, on pricing. In addition, general market conditions, including the level of competition in the UK market, have also influenced pricing decisions to a certain extent.

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)?

RESPONSE: Yes. The company is related to SANY HEAVY MACHINERY (UK) LTD., which acts as an affiliated importer and distributor of the goods in the UK.



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)
N/A	N/A	N/A	N/A

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]	[0 – 15]
Total indirect export volume (POI) [units]	[95 – 120]
Total direct export value (POI) (£)	[0 – 15]
Total indirect export value (POI) (£)	[5,500,000 – 6,700,00.00]

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
SANY SOUTH EAST ASIA PTE LTD	Singapore	Purchase and sales of excavators to SANY HEAVY MACHINERY (UK) LTD. for subsequent sales in the UK	Ultimately owned by the same shareholder as SANY Kunshan
SANY HEAVY MACHINERY (UK) LTD.	Coatbridge, Scotland, United Kingdom	Purchase (import) and sales of excavators in the UK	Ultimately owned by the same shareholder as SANY Kunshan

Add additional rows as required

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



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

RESPONSE: Commodity code: 84295212

Description: Excavators, track-mounted, machinery with a 360-degree revolving superstructure

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.

RESPONSE: Export prices to the UK and subsequent resale prices in the UK have been determined on a commercial and market-oriented basis, taking into account competition, cost developments and normal business considerations. Pricing decisions have not been made with the purpose or effect of offsetting or absorbing anti-dumping duties. Please refer to responses in Section A2 for details.



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.

RESPONSE: At the current stage, the Company considers that the proposed PCN structure based on operating weight provides a general framework for categorising the goods.

However, the Company notes that, in practice, significant price differences may also arise from other physical and commercial characteristics, including but not limited to emission standards, technical configurations, and specific end uses across different markets.

In light of this, the Company reserves the right to provide further comments on the PCN structure at a later stage of the review, if necessary.

B2. Other comments



18. 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.

RESPONSE: The Company considers that no absorption of anti-dumping duties has occurred.

Export prices to the UK and subsequent resale prices have been determined on a commercial and market-oriented basis, considering prevailing market competition, cost developments, and normal business considerations. Pricing decisions have not been made with the purpose or effect of offsetting or absorbing anti-dumping duties.

Furthermore, transactions between related parties have been conducted in accordance with arm's length principles and reflect standard commercial practices. Any adjustments to pricing arrangements are driven by ordinary business, operational, and compliance considerations, and are not linked to the existence or level of anti-dumping duties. In light of the above, the Company submits that there has been no practice of absorbing anti-dumping duties.

The Company reserves the right to provide further supporting information and evidence at a later stage of the review.

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