



Statement of Essential Facts

REVIEW No. ER0084

5 August 2026

**Anti-dumping expiry review of biodiesel products originating in the
United States of America (including biodiesel consigned from
Canada)**



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Section A: Introduction

A1. Background

1. On 10 November 2022, the TRA published its final determination for anti-dumping transition review [TD0004](#): Biodiesel originating from United States and Canada.
2. The TRA recommended in that final determination to vary the anti-dumping duty on fatty-acid mono-alkyl esters (“FAME”) originating in the US (including FAME consigned from Canada, whether declared as originating in Canada or not) so that it applies for 5 years from 30 January 2021. The TRA recommended to revoke the anti-dumping duty on hydrogenated vegetable oil (“HVO”) originating in the US (including HVO consigned from Canada, whether declared as originating in Canada or not), from 30 January 2021.
3. The recommendation was accepted by the Secretary of State and enacted by [Trade remedies notice 2022/08](#).
4. On 28 January 2026, the TRA published a notice of initiation for this review to confirm the start of the expiry review for this measure ([ER0084](#)).
5. [Trade remedies notice 2026/06](#) confirmed the application of the anti-dumping measure relating to biodiesel products originating from the US (including biodiesel consigned from Canada) will continue during this review, pursuant to regulation 70(9) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations). This will be until the TRA makes a determination that the anti-dumping measure should expire, the Secretary of State for Business, Innovation, Science and Trade (Secretary of State) has accepted or rejected the TRA’s recommendation, or the Secretary of State has made a decision to apply an alternative remedy.



A2. Legal obligations

6. This SEF is made pursuant to regulation 62 of the Regulations.¹ It includes:
 - the determination that the TRA intends to make;
 - a summary of the facts considered during the review;
 - those facts referred to in the summary that formed the basis of the intended determination;
 - details of how the TRA has used the information supplied by interested parties and contributors in making the intended final determination; and
 - details of the analysis forming the basis of the intended recommendation.
7. This SEF should be read in conjunction with other public documents available for this case, which are available on the public file.
8. Pursuant to regulation 62(2) of the Regulations, interested parties, contributors, and any other person who has supplied information to us are invited to make submissions within 21 calendar days of the publication date of this SEF, i.e., before 23:59 hours (BST) on Friday, 28 August.
9. We are not obliged to consider submissions made after this date if it is determined this would significantly impede the progress of the review. Where we reject information for any reason, we will publish the reasons for the rejection in the final determination.

A3. Period of investigation and injury period

10. The period of investigation (POI) is 1 January 2025 to 31 December 2025.
11. To assess the injury likelihood, the TRA has chosen the period from 1 January 2022 to 31 December 2025 as the injury period (IP).

¹ Regulation 62 and Parts 2, 3, 4 and 6 of the Regulations apply to reviews to the extent that the TRA considers relevant pursuant to regulation 68(8) of the Regulations.



Section B: Summary and findings

B1 Dumping likelihood assessment

12. In accordance with regulation 70(6)(a) of the Regulations, the TRA has considered whether dumping of the goods subject to review ([Section D1: Goods subject to review](#)) is continuing or is likely to recur if the application of the anti-dumping amount were to expire.
13. We concluded that dumping of the goods subject to review, originated from the US and consigned from Canada is likely to recur if the application of the anti-dumping amount were to expire ([Section F: Dumping likelihood assessment](#))

B2 Injury likelihood assessment

14. In accordance with regulation 70(6)(b), the TRA has considered if the injury has been removed or reduced in whole or in part by the application of the anti-dumping amount. In accordance with regulation 70(6)(c) the TRA has considered whether injury to UK industry caused by the dumped goods is likely to continue or recur, if application of the anti-dumping amount were to expire.
15. We conclude that injury to UK industry caused by dumped goods is likely to recur, if the application of the anti-dumping amount were to expire (see [Section G: Injury likelihood assessment](#)).

B3 Economic Interest test (EIT)

16. In accordance with regulation 70(12) and 75(2E) of the Regulations, if the TRA determines that the anti-dumping amount should be extended, the TRA must conduct the EIT and advise the Secretary of State on whether, and why, it considers that extending the anti-dumping amount would meet the EIT.
17. In accordance with paragraph 25 of Schedule 4 to the taxation (Cross-border Trade) Act 2018 ('the Act'), the EIT is met in relation to the application of an anti-dumping measure if the application of the measure is in the economic interest of the UK. The EIT is presumed to be met unless we are satisfied that the application of the measure is not in the economic interest of the UK.



18. The TRA considers that the proposed extension of the measure in accordance with our intended final recommendations does meet the EIT, as per regulation 75(2E) of the Regulations (see [Section H: Economic Interest Test](#)).

B4 Intended final determination

19. The TRA's intended final determination is that the application of the anti-dumping amount to the goods subject to review should be extended, pursuant to regulation 70(11)(b) of the Regulations, so that they apply to all of the goods subject to review imported into the UK until 30 January 2031. This is five years subsequent to the date when the measure would have expired on 30 January 2026 had no expiry review been initiated. No information was received to lead us to consider that it was appropriate to amend the level of the anti-dumping amounts.
20. We intend to recommend to the Secretary of State that the anti-dumping amounts be extended, pursuant to regulation 75(1)(c) of the Regulations.
21. In accordance with regulation 70(8) of the Regulations, where the goods subject to review are subject to an anti-dumping amount, the TRA must have regard to the current and prospective impact of the anti-dumping amount when making a determination regarding the future application of an anti-dumping amount. You can find further detail on this in Sections F, G, and H.
22. The relevant duty amounts are specified in [Trade remedies notice 2022/08](#), and repeated in [Annex A](#).
23. The description of the goods to which the measures applies (that is, the goods subject to review) is set out in [Section D: The goods](#)



Section C: Background

C1. Participation in the review

24. In accordance with regulation 54(1), the TRA invited interested parties and contributors to register in order to participate in the review. The TRA requested that completed registration forms be submitted to the TRA by no later than 12 February 2026. The TRA published questionnaires for completion by interested parties on 2 March 2026, with the deadline for submission on 1 April 2026.
25. The relevant non-confidential submissions made to this review by each of the parties are available on the public file. [Annex B](#): Interested parties and contributors contains a summary of information received from all interested parties and contributors.
26. The following interested parties and contributors registered to this investigation:

UK Producers:

- Argent Energy (UK) Limited (Argent)
- Olleco
- Greenergy Fuels Limited (Greenergy)

Trade Bodies:

- Renewable Transport Fuel Association (RTFA) (the applicant)
- Advanced Biofuels Canada Association

Foreign Governments

- United States of America, Department of Commerce
- Global Affairs Canada (GAC)

Contributors:

- UK Oil Industry Tax Committee
- Valero Energy Ltd
- Philips 66 Ltd



C1.2 UK producers

27. The TRA received email correspondence from Olleco on 10 March 2026 outlining that the business had decided not to complete a questionnaire. As such, we do not have questionnaire-level data for Olleco to include in assessments. We nonetheless consider Olleco to be part of the UK industry for the purposes of this assessment.
28. Argent provided information in the form of:
 - A confidential and non-confidential pre-sampling questionnaire (PSQ) response;
 - a confidential and non-confidential questionnaire and various confidential and non-confidential supporting appendices; and
 - a confidential and non-confidential questionnaire annex.
29. Argent provided permission for data it submitted in investigations AS0067 and AD0068 to be used for assessments in this review.
30. Greenergy provided information in the form of:
 - a confidential and non-confidential pre-sampling questionnaire (PSQ) response; and
 - a confidential and non-confidential questionnaire annex
31. Greenergy withdrew its full participation and did not submit a full questionnaire.
32. It provided permission for information given in other cases to be used for the purpose of assessments in this review.
33. The TRA published a Notification of Sampling Decision on 2 March 2026. The TRA chose not to limit the issuing of questionnaires to a sample of certain interested parties. Where we refer to the UK producers in this SEF, we refer specifically to UK producers Greenergy and Argent.



34. The TRA received requests from Argent for an extension of time to submit its questionnaire responses. The TRA granted Argent an extension until 8 April 2026.

C1.3. Exporters/Producers from the US

35. No exporters or overseas producers from the US registered interest in this review.

C1.4. Importers

36. No importers registered interest in this review.

C1.5. Trade bodies

37. The RTFA and Advanced Biofuels Canada Association registered an interest in this case. The RTFA provided comments to the TRA related to the review on 6 May 2026 and the 8 June 2026.

C1.6. Foreign government

38. The United States Department of Commerce registered an interest in this review. It provided comments related to the review to the TRA on 3 April 2026.
39. Global Affairs Canada registered an interest in this review on 11 February 2026. It provided comments related to the review to the TRA on 27 May 2026 and 23 June 2026.

C1.7. Contributors

40. The UK Oil Industry Tax Committee registered an interest in this review.
41. Valero Energy Ltd registered an interest in this review. It also provided a questionnaire. Philips 66 Ltd registered an interest in this review on 12 February 2026.

C2. Data used in this review

42. Data on the goods subject to review available to us was limited as a result of no participation from overseas producers.



43. The commodity codes relevant to this review likely include blends of mineral diesel. This impacts the value and volume of HMRC import data for this review and any mineral diesel represented in the HMRC data is likely to significantly distort the data. It is not possible to remove any mineral diesel component as the goods subject to review can be blended at different ratios for different purposes. Consequently, HMRC data has been used for the purpose of assessing imports, and otherwise with special circumspection.
44. We have used data from the Renewable Transport Fuel Obligation (RTFO), published by the Department for Transport (DfT). DfT publishes the supply of renewable road and non-road mobile machinery fuels under the RTFO in the UK. The TRA has used data from [Renewable fuel statistics 2025: fourth provisional report](#).
45. Within this statement of essential facts, there are instances where Argus Media (Argus) is identified as a source of the data which the TRA has aggregated and republished under licence from Argus. This data has not been prepared specifically for the TRA nor with any knowledge of any of the materials into which the TRA is incorporating it. Argus makes no warranties, express or implied, as to the accuracy, adequacy, timeliness, or completeness of its data or the TRA's presentation of that data, or its fitness for any particular purpose. Argus shall not be liable for any loss or damage arising from any party's reliance or use of such data and disclaims any and all liability related to or arising out of use of the data to the fullest extent permissible by law.
46. For the purposes of this assessment, and elsewhere in this document where export figures sourced from the USDA are referred to, these figures represent the export figures from the US declared under commodity code 3826000000. The TRA considers that this code is reasonably representative as it does not include diesel or imports of HVO, which can be included in other in-scope commodity codes. It is the TRA's understanding that 3826000000 also contains the greatest proportion of exports.



C3. Verification of data

47. The TRA has had regard to the information supplied by interested parties and contributors, provided that this:
- complied with the TRA's statutory obligations and public guidance;
 - was verifiable;
 - could be used without undue difficulty; and
 - was supplied within an applicable time limit and in a form that the TRA requested.
48. The TRA considers all submitted data upon which it has based its findings in this SEF to be verifiable.
49. Following a review of the information provided, knowledge of the industry and participants from previous investigations the TRA considers it has sufficient assurance in respect of the verifiable data for the purposes of its use in this investigation.
50. Secondary source information was used in accordance with the Regulations. This secondary information was treated with special circumspection and, where practicable, verified using independent sources. This included, but was not limited to, official import statistics and data pertaining to relevant markets.



Section D: The goods

D1 Goods subject to review

51. The goods subject to review are defined in regulation 2 of the Regulations as “the goods described in the relevant notice of initiation of review under paragraph 1 of Schedule 3 [of the Regulations]”.
52. The goods subject to review in this expiry review are biodiesel products imported into the UK, originating in the US and consigned from Canada, as described in the Notice of Initiation as:

Category 1 Goods (biodiesel, pure or blend, greater than 20% biodiesel content)

Fatty-acid mono-alkyl esters (FAME) and/or paraffinic gasoil obtained from synthesis of non-fossil origin, commonly known as ‘biodiesel’. In a pure form or in a blend containing by weight more than 20%, fatty-acid mono-alkyl esters and/or paraffinic gasoil obtained from synthesis of non-fossil origin, originating in the United States of America and consigned from Canada.

AND

Category 2 Goods (biodiesel, blend, less than 20% biodiesel content)

Fatty-acid mono-alkyl esters and/or paraffinic gasoil obtained from synthesis of non-fossil origin, commonly known as ‘biodiesel’, in a blend containing by weight 20% or less of fatty-acid mono-alkyl esters and/or paraffinic gasoil obtained from synthesis of non-fossil origin, originating in the United States of America.

53. The goods subject to review are subject to the following commodity codes (which are subject to change and are only provided for information):

1516 2098 21	2710 2011 21	3826 0010 29
1516 2098 29	2710 2011 29	3826 0010 50
1516 2098 33	2710 2011 33	3826 0010 59
1518 0091 21	2710 2016 21	3826 0010 89
1518 0091 29	2710 2016 29	3826 0010 99
1518 0091 33	2710 2016 33	3826 0090 11



1518 0095 21	2710 2016 93	3826 0010 19
1518 0099 21	2710 2019 10	3826 0090 33
1518 0099 29	2710 2019 90	3826 0010 20
1518 0099 33		

D2 Like goods

54. In accordance with paragraph 7 of Schedule 4 to the Act, the TRA refers to 'like goods' as those which are like the goods subject to review in all respects or have characteristics which closely resemble them.
55. For clarification, the US goods produced goods can be 'like goods' if they are not imported into the UK.

D3 Comparison of goods subject to review and like goods

56. In assessing whether the goods produced by the UK industry are like the goods subject to review in all respects or with characteristics closely resembling them, the TRA has considered:
- a) physical likeness, including physical characteristics;
 - b) commercial likeness, including competition and distribution channels;
 - c) functional likeness, including end-use or interchangeability of the goods;
 - d) similarities in production, including method of production and inputs; and
 - e) other relevant characteristics.
57. The TRA has found that:
- Like goods are produced by UK industry. These have the same general physical, commercial and functional likenesses as the goods subject to review and share similar production processes.
 - Like goods are also produced by overseas producers for sale in US and third-country domestic markets. These have the same general characteristics as the goods subject to review.



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58. The TRA has determined that the goods produced by the UK industry defined in [Section D: The goods](#) are like the goods subject to review in all respects or have characteristics closely resembling. Therefore, they qualify as “like goods” for the purposes of paragraph 7 of Schedule 4 to the Act.



Section E: Comments received from interested parties

E1. Overview

59. Since publishing questionnaires, the TRA has received comments from:
- a. GAC; and
 - b. The RTFA.
60. These comments are available on the public file and can be found in Annex B.
61. The TRA intends to address these comments in this section.

E2. Comments

E2.1. Global Affairs Canada

62. GAC submitted comments on 27 May 2026.
63. GAC stated that the anti-dumping and countervailing measures on biodiesel consigned from Canada should expire because there is no evidence that Canada has been used to circumvent measures on US biodiesel. It contended that the UK inherited the EU's anti-circumvention measures without making a UK-specific finding of circumvention and that neither the transition reviews nor the current expiry reviews contain evidence of a change in trade patterns between Canada and the UK or injury caused by Canadian imports. GAC also noted that the TRA previously found imports from Canada to be minimal.
64. GAC further submitted that circumvention cannot be presumed based on historic findings relating to the EU market and that the current review contains no evidence that transshipment through Canada is occurring or likely to recur. It submitted that there is no basis for maintaining the measures on Canadian consignments.
65. Alternatively, if the measures are continued, GAC requested that existing exemptions for Canadian biodiesel producers be maintained and extended to



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other legitimate Canadian producers, noting that there are no allegations of dumping or subsidisation applicable to Canadian producers themselves.

66. The TRA notes that the finding of circumvention by the European Commission in 2011² represents positive evidence relevant to exporters' past conduct and incentive to circumvent dumping and countervailing measures applicable to UK imports. The TRA therefore considers this evidence relevant to its assessment as to the likelihood of recurring injury caused by subsidised or dumped imports consigned from Canada.
67. The TRA acknowledges the GAC's request that existing exemptions for Canadian biodiesel producers be maintained. Other Canadian biodiesel producers may apply for exemptions.
68. GAC submitted comments on 23 June 2026 in response to the RTFA's 8 June 2026 response to GAC's 27 May 2026 submission.
69. GAC described three points that it considered were made by the RTFA:
 - a) The TRA has no obligation to apply the legal test for an initial circumvention investigation in an expiry review;
 - b) There is evidence of transshipment to the United Kingdom because it was part of the EU during the original investigation; and
 - c) Canadian producers may apply for an exemption review, and to revoke the measures applicable to Canada would create a risk of circumvention.
70. In relation to points 69 a) and b), GAC noted that while the Regulations do not specifically require the TRA to reassess previous findings of circumvention in an expiry review, these requirements are relevant in the present case because they were not assessed when the United Kingdom transitioned the EU's measures and there is no other positive evidence of transhipped US biodiesel to the United Kingdom. GAC also asserted that the TRA should not apply the EU's determination to the UK without reassessment.

² [Council Implementing Regulation \(EU\) No 443/2011](#)



71. In relation to point 69 c), GAC states that applying for exemption to duties through an exemption review could be lengthy or expensive for Canadian biodiesel producers.
72. The TRA appreciates that Canadian producers seeking to export biodiesel to the UK might choose to apply for an exemption to the measures, and that this might require time and some effort on their part. Some Canadian biodiesel producers may make the commercial decision not to engage with the exemption process at their discretion. Nonetheless, the TRA maintains its position outlined in paragraph 666, and the TRA does not consider it a requirement to reassess the findings of circumvention from first principles in this expiry review.

E2.2. The RTFA

73. The RTFA submitted comments to this review on 6 May 2026. These comments explicitly provide a response to the questionnaire submission from the USTR dated 3 April 2026 and to the questionnaire submission from Valero dated 1 April 2026.
74. The RTFA rebuts five main points it states were raised by the USTR and Valero, which are as follows:
 - Volume of biodiesel imports into the UK are marginal and several injury indicators of the UK biodiesel industry improved, preventing a likelihood of recurrence of injurious dumping practices on the UK market;
 - The countervailing duties are no longer necessary as the main subsidy programme the Blender's Tax Credit (BTC) was discontinued during the POI and that the Clean Fuel Production credit (CFPC) has allegedly not replaced the BTC.
 - Imports of the goods subject to review benefiting from subsidisation were below de minimis during the POI.



- The countervailing duties are no longer necessary as the UK domestic industry does not appear to be injured nor vulnerable to injury and the expiry of the subject measures would not lead to the recurrence of injury.
- Terminating the anti-dumping/countervailing duties would serve the UK's economic interests.

75. These points are considered in turn below.

76. The RTFA made an additional submission on 8 June 2026 to respond to comments submitted by GAC. These comments are discussed under [E2.1](#).

E2.2.1. Import volume of the goods subject to review

77. The RTFA note the TRA received no cooperation from US FAME exporting producers and that this lack of cooperation requires the TRA to default to conducting its assessments on a facts-available basis.

78. The TRA confirms that it did not receive participation from any US FAME exporting producers in this review, despite notifying parties known to us. The TRA acknowledge that low volumes of the goods subject to review suggests a very small selection of US FAME exporting producers active during the POI. Nonetheless, there was no participation from either US FAME exporting producers or US FAME producers.

79. The RTFA comments that the low import volumes of the goods subject to review do not prevent a determination that imports would likely recur, should the measures be discontinued.

80. The RTFA submits evidence to suggest a likelihood that imports of the goods subject to review would recur. The RTFA suggests that the evidence submitted shows the following:

- Significant spare capacity in the US biodiesel industry, particularly compared with UK consumption;
- Large US biodiesel inventories compared with UK consumption.



81. The TRA has addressed this evidence and the likelihood that imports of the goods subject to review would recur in [Section F](#).
82. The RTFA states that the US biodiesel industry is heavily subsidised and submitted evidence to suggest that biodiesel prices since January 2025 reflect a cost of production below the shutdown price. The RTFA suggests that this creates incentive to sell to export markets such as the UK. The RTFA then outlines that the US is limited in its available third-country export markets.
83. The TRA has discussed incentive to dump in [Section F](#)

E2.2.2. Expiry of the BTC and likelihood of continuation or recurrence of subsidisation

84. RTFA comments that despite the expiry of the BTC, there is a likelihood of recurrence of subsidisation because the CFPC and other subsidy schemes remain in place and provide a benefit to US FAME producers.
85. RTFA argues that the CFPC has a close nexus with the BTC because both:
 - Support the same product (biodiesel/FAME);
 - Take the form of federal tax credits constituting revenue foregone;
 - Are administered by the US Internal Revenue Service (IRS);
 - Provide a maximum benefit of up to USD 1.00 per gallon; and
 - Operate through the same taxpayer registration mechanism.
86. RTFA concludes that the expiry of the BTC cannot be equated to the end of subsidisation in the US FAME industry. The RTFA also notes that other subsidy programmes have been put in place by the US federal and state governments to the benefit of the US biodiesel industry and remain active. These subsidies should also be considered on the same basis as the CFPC.

E2.2.3. de minimis threshold as applies in this review

87. In its questionnaire response, Valero stated that “*FAME imports during the POI would fall below the 1% de minimis threshold for a qualifying countervailable*



*subsidy under Regulation 25(4) of the 2019 Regulations,” and that consequently imports of the goods subject to review benefitting from a subsidy amount attributable to the CFPC in 2025 would be considered *de minimis*.*

88. The RTFA expresses the view that *de minimis* thresholds should not be analysed in the context of an expiry review as this appears to contradict with the assessment of a likelihood of continuation or recurrence of subsidisation.
89. The TRA has not considered it appropriate to recalculate the duty and reassess the amount of the subsidy for this review because this is an anti-dumping expiry review and the current state of subsidisation is not relevant. The TRA has also not considered it appropriate to recalculate the anti-dumping duty for this review. Therefore, the TRA has not considered it relevant to apply regulation 25 of the Regulations to this review.

E2.2.4. UK biodiesel industry likelihood of injury

90. The US Government and Valero argue that the anti-dumping and countervailing measures should be allowed to expire because the UK biodiesel industry does not appear to be injured or vulnerable to injury. They point to increasing sales, higher productivity and lower inventory levels as evidence of a healthy industry. The RTFA rejects this argument, contending that it applies the wrong legal test. They state that in an expiry review, the relevant question is not whether the industry is currently injured, but whether injury is likely to continue or recur if the measures are removed. The RTFA argues that improvements in industry performance may instead demonstrate that the measures are functioning as intended and that any assessment should focus on the likely future impact of removing protection rather than the industry's current position.
91. RTFA argues that Valero selectively relies on favourable indicators while overlooking broader signs of weakness and the RTFA maintains that the UK biodiesel industry remains financially fragile and vulnerable, and that removing the measures could lead to a recurrence of injury.
92. The TRA has assessed whether injury caused by imports of the goods subject to review is likely to continue or recur. This assessment is detailed in [Section G](#)



E2.2.5. The economic interest test as applied to this review

93. The RTFA rebuts Valero's argument that revoking this measure would be in the economic interest of the UK.
94. The TRA has assessed whether maintaining this measure would be in the economic interest of the UK. This assessment is detailed in [Section H.](#)



Section F: Dumping likelihood assessment

F1 Introduction

95. In accordance with regulation 70(6)(a) of the Regulations, the TRA is required to consider whether dumping of the goods subject to review is continuing, or is likely to recur, if the application of the anti-dumping amount were to expire.
96. We considered the likelihood of dumping of biodiesel products originating in USA and consigned from Canada on a countrywide bases rather than exporter-by-exporter, as there were no cooperating exporters registered to this case. Accordingly, there was insufficient available data relating to individual exporters.
97. The dumping likelihood assessments considered: the continued imports of biodiesel products; the ability and incentive to dump into the UK and any other relevant factors.
98. The TRA based its assessment on the best available data, having sought information from exporters known to the TRA at the initiation of the review.

F2 Continued dumping of US biodiesel product in the UK

99. The TRA requested and reviewed HMRC raw customs declaration data for the relevant commodity codes of the goods subject to review. The data shows that since the extension of the anti-dumping measures in January 2021 following the transition review [TD0004](#), the volume of FAME imported into the UK from the US was negligible as shown in Table F2.
100. Although the index figures for 2023 and 2024 appear relatively high, proportionally to 2022 and 2025 figures, HMRC 10-digit raw customs declaration data indicates that actual import values of the goods subject to review in each year of the injury period were below 2% of total imports of the goods subject to review, indicating a negligible level of imports.



Table F2: HMRC FAME volume imported from US to the UK (Metric Tons)

Year (Indexed figures)	2022	2023	2024	2025
Value (£'000)	100	5,388	9,465	8
Volume (Mt)	100	198,015	475,444	3
Unit Price (£/Mt)	100	3	2	249
<i>Source: HMRC 10-digit raw customs declaration data</i>				

101. We consider that the unit price in the POI does not reflect standard commercial pricing as it is significantly higher than the normal biodiesel price range and therefore cannot be considered a reliable representation of the export price of the goods subject to review to the UK. The TRA considers that this is likely a result of the very low volume imported to the UK.
102. Due to the negligible imports, we could not draw any conclusions on the continuation of dumping during the injury period. Therefore, we considered the likelihood of whether dumping would recur if the application of the anti-dumping measure were to expire.

F3 Assessment of ability to dump the goods subject to review in the UK

F3.1 Production Capacity

103. The [US Energy Information Administration \(EIA\)](#) data shows that the production capacity of US biodiesel for 2025 was 1,986 million gallons (6,613,380 metric tonnes). The production capacity remained consistently stable throughout the injury period with an average of 7 million metric tons per year.
104. The US biodiesel sector could be shifting towards fewer but larger scale facilities. While the plant count dropped from 72 to 48 (a 33% decrease) between 2022 and 2025, production capacity fell from 7.5 million to 6.6 million metric tons (a 12% decrease), suggesting that the reduction in plant count may be due to the closure of smaller, less efficient facilities rather than simply a loss of technical capability.



105. In addition to the production capacity, the US biodiesel production volume during the POI was 3.8 million tonnes. Given the production capacity and production volume for the POI, the US biodiesel industry had spare capacity of approximately 3 million metric tons which is 42% of the production capacity. Table F3.1 demonstrated that the US consumption fell by 33% from 2022 to the POI. During the same period, the volume of spare capacity rose by 32%. This shows that the US has significant capacity to increase exports to foreign markets.

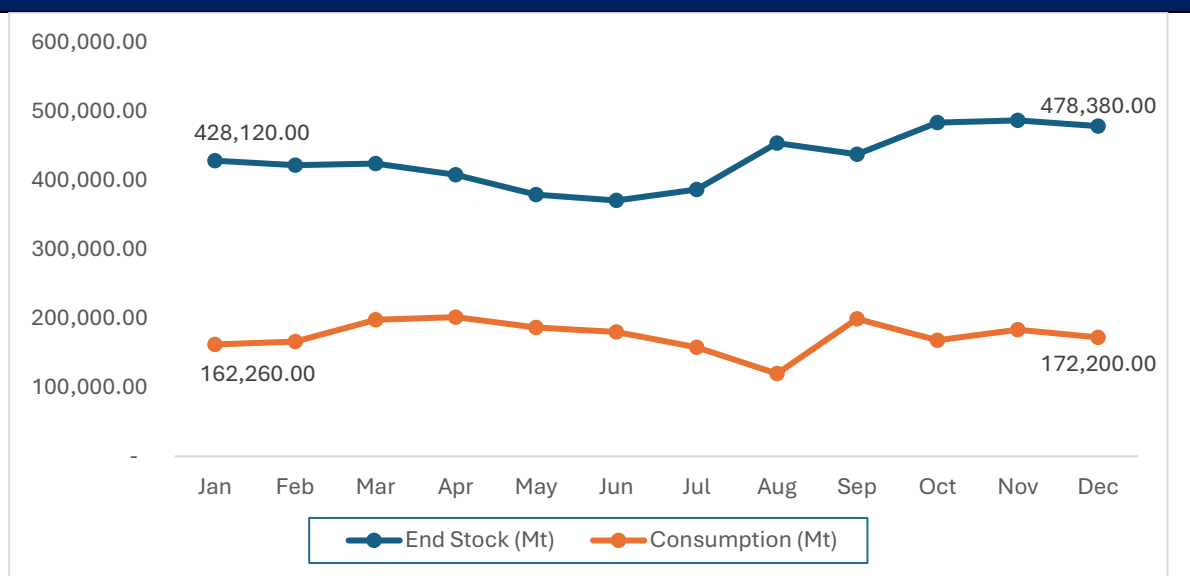
Table F3.1: Production Capacity and Spare Capacity of US biodiesel product				
In metric tons	2022	2023	2024	2025
Number of Plants	72	59	56	48
Production Capacity (Mt)	7,509,150	6,946,380	6,959,700	6,613,380
Average Capacity per Plant (Mt)	104,294	117,735	124,280	137,779
Production Volume (Mt)	5,401,260	5,651,010	5,564,430	3,829,500
Spare Capacity (Mt)	2,107,890	1,295,370	1,395,270	2,783,880
US biodiesel Consumption (Mt)	5,521,140	6,426,900	6,430,230	3,692,970
Capacity Utilization (%)	72%	81%	80%	58%
Spare capacity (%)	28%	19%	20%	42%
Source: U.S Energy Information Administration				

F3.2 Inventory

106. [EIA](#) data indicates that during the POI, the US month-on-month biodiesel stocks averaged 429,858 metric tons, while average domestic consumption, calculated using a simple average stood at 174,568 metric tons. Figure F3.2 illustrates the month-on-month changes in both biodiesel end stocks and consumption. Although both variables show regular monthly fluctuations, the average stock level is almost three times higher than the average domestic consumption, demonstrating a high inventory-to-consumption ratio. This pattern is also reflected at the end of the POI, where inventories reached 478,380 metric tons compared with a monthly consumption 172,200 metric tons.



Figure F3.2: US Biodiesel End Stock vs Consumption for the POI (2025)



Source: [US Energy Information Administration](#)

107. In addition, the stock-to-use ratio is 23%, which is calculated as the percentage of end stock value (478,380 metric tons) to the total consumption (2,094,820 metric tons) for the period. This value represents the total amount of surplus (buffer) stock left in the US at the end of the POI. A 23% ratio means the US biodiesel market has enough stock to cover roughly 84 days (0.23×365 days) of its total demand without producing anything.
108. With a high inventory-to-consumption ratio, coupled with high stock-to-use ratio, the US producers could dump excess volumes into the export market like the UK to prevent excess storage.

F3.3 Ability to shift production to the goods subject to review

109. Although HVO and SAF are produced through high-pressure [hydrotreatment](#), and FAME is produced through low pressure transesterification, all three fuels rely on broadly similar feedstocks such as soybean oil, tallow and used cooking oil. This shared feedstock base provides US producers with significant feedstock flexibility, even if they cannot directly shift hydrotreating capacity into FAME production without major reinvestment.
110. During the POI, the US biodiesel industry had a spare capacity of 42% as shown in Table F2. This significant level of unused capacity provides an ability



for the US producers to increase output beyond domestic demand and direct additional volumes to export markets. By utilising this spare capacity, the US producers can expand production without incurring additional fixed costs, making increased exports economically attractive.

111. Soybean oil is the primary feedstock for FAME production in the US³, but producers can be flexible in the feedstock used as a key input. Therefore, US producers have the ability to shift production to use inputs depending on feedstock prices, product values and mandate schemes by country, such as used cooking oil or tallow, that may make their product more attractive to the UK market.

F3.4 Conclusions on ability to export dumped goods subject to review

112. The TRA reviewed the factors outlined in [Sections F3.1 to F3.4](#) holistically and concluded that the evidence indicates an ability for the US exporters to dump biodiesel product in the UK if measures were allowed to expire.
113. The significant production capacity and spare capacity (42% during the POI) in the US, a high inventory-to-consumption ratio, and a substantial proportion of US producers able to switch feedstock strongly suggests that if measures were removed, US exporters would be able to export to the UK at potentially dumped prices (see [Section F4.2](#)).

F4 Assessment of incentives to dump the goods subject to review to the UK

F4.1 Whether overseas exporters have previously or habitually circumvented or absorbed the effects of trade remedies

114. The EU initiated trade remedy measures on biodiesel originating in the US in 2009. During the application of these measures, the [European Commission](#) identified circumvention practices by the US exporters, which includes the

³ [University of Illinois – Farmdoc Daily](#)



transshipment of biodiesel through Canada and modifications to biodiesel blends designed to fall outside the product scope of the measures.

115. Due to these findings, the [Commission](#) extended the anti-dumping duties to biodiesel consigned from Canada, regardless of whether the goods were declared as originating in Canada or the US. Such an extension is only adopted where circumvention is found or strongly indicated. This demonstrates there is a practice by US producers to penetrate markets where there are anti-dumping and countervailing duties in place via third-country routes.

F4.2 Current and projected conditions in third countries

Third country export volumes and prices

116. In the absence of overseas exporter/producer data from the US, the TRA relied on information provided by the applicant and 'facts available' through secondary data for the purpose of a price analysis between the US domestic price and export prices to third countries.
117. The TRA has determined an indicative normal value (INV) of biodiesel in the US based on two secondary data sources; the US Department of Agriculture (USDA) and Oil Price Information Service (OPIS), as reported by Iowa State University's Centre for Agricultural and Rural Development ([CARD](#)).
118. The USDA indicated an average biodiesel price of \$2.91 per US gallon (£661/Mt) during the POI. This price represents the amount US producers sell to US customers at ex-works (EXW). On the other hand, OPIS indicates an average biodiesel EXW price of \$3.77 per US gallon (£857/Mt) during the POI.
119. Before August 2021, USDA and OPIS prices followed each other closely, however, from mid-2021 through 2023, the USDA reported prices began to lag significantly behind OPIS benchmark, with a record gap of \$1.78 per US gallon in June 2023. While the USDA reported no changes to their survey process, [farm daily](#) sources suggest that the USDA may have changed how they report their prices.



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120. Recent research from farmdoc daily advised that OPIS biodiesel data is a more reliable benchmark than USDA data because the USDA stopped providing real market updates in February 2025. Since then, the price has been stable at \$2.82 per US gallon, which no longer reflects actual market price.
121. Therefore, the TRA considers the OPIS price to be more appropriate and representative of the US biodiesel market price and has used £857/Mt as the normal value for the US biodiesel product for the purpose of comparison during the POI.
122. To establish the export price, the TRA assessed the US biodiesel export price to third countries during the POI, as reported by [USDA](#). For the purposes of this assessment, and elsewhere in this document where export figures sourced from the USDA are referred to, these figures represent the export figures from the US declared under commodity code 3826000000. The TRA considers that this code is reasonably representative as it does not include diesel or exports of HVO, which can be included in other in-scope commodity codes. It is the TRA's understanding that 3826000000 also contains the greatest proportion of exports.
123. [USDA](#) export statistics reported total export volume from the US was 274,599.60 metric tons during the POI. The three largest export markets of US FAME during the POI were Canada (71%), Peru (27%) and the EU (1.5%).

Table F4.2: Exports of US biodiesel product to third markets during the POI

Countries	Total Export Volume (Mt)	% of Total Export	EXW price (£/Mt) Export price?	Indicative Normal Value (£/Mt)	Price Difference (£/Mt)
Canada	194,958.30	71.00%	937.00	857.00	(80.00)
Peru	73,959.30	26.93%	547.00	857.00	310.00
EU	4,112.00	1.50%	729.00	857.00	128.00
Others	1,570.00	0.57%	976.00	857.00	(119.00)
Total	274,599.60	100%			

Source: [FAS – US Department of Agriculture](#) - Code 3826000000 (Biodiesel & Blends > B30)



124. The higher export price to Canada can be attributed to feedstock composition, as canola-based biodiesel is commonly used in the Canadian market. Canola oil is preferred in Canada because of its better resistance to extreme cold weather. As mentioned by the [European Commission's](#) 2021 expiry review of biodiesel imports from the US, the high-cost price of the canola feedstock explains the expensive export price observed for biodiesel exports to Canada. The [USDA Economic Research Service](#) estimated that the average price of canola oil over 2024/25 is around 55 cents/pound, compared with 48 cents/pound for soybean oil over the same period.
125. The [USDA's export statistics](#) show that the size of the US's export market to Canada is shrinking. Between 2024 and 2025, the volume of US biodiesel exports to Canada fell by 62% year-on-year. When comparing the period January to April in 2026 against 2025, the volume of exports fell a further 55%.
126. With less opportunity for US biodiesel producers to export to their largest export market, US producers are likely to be incentivised to search for other export markets such as the UK to export to instead of their traditional markets.
127. [Farmdoc daily](#) reported that biodiesel exports to Peru, the EU and others typically contain soybean oil as the feedstock, as soybean oil is the primary feedstock for FAME in the US, accounting for about 55% to 60% of total annual production.
128. As shown in Table F4.2, the biodiesel US export prices to EU and Peru are lower than the INV (£857/Mt) in the POI, which suggests dumping may be occurring. The export prices to Peru and the EU are both below the INV by £310 and £128 per metric tonne respectively.
129. This price disparity could be attributed to differences in the products subject to the measures, as [Peru](#) does not impose measures on biodiesel blends below B50. Biodiesel blends comprised of higher proportions of mineral diesel are typically cheaper per gallon than higher biodiesel blends, due to mineral diesel being cheaper than biodiesel.



130. The EU market is more comparable to the UK than Peru is in terms of market characteristics related to biodiesel demand, such as the feedstock used and tariff structures.

131. As there is evidence of US exporters dumping in their second and third largest export markets, the TRA concludes that the price analysis indicates that dumping of the goods subject to review in the UK would be likely to recur should the measure expire.

Third country trade barriers

132. Peru has consistently maintained anti-dumping and countervailing duties against US biodiesel over the years, and as of February 2025, the Peruvian National Institute for the Defense of Competition and the Protection of Intellectual Property (INDECOPI) initiated a sunset review of the duties applied to imports of pure biodiesel (B100) and blends with more than 50% biodiesel (B50) originating in the US. Peru's trade remedies authority maintained the duties against US biodiesel in December 2025.⁴

133. Similarly, the [EU](#) conducted an expiry review in 2021 on biodiesel imports from the US. The anti-dumping and countervailing duties already in force were maintained and extended to cover all imports of the same product produced in the US, and includes those consigned from Canada. The measures applied by the EU are the same significant duty rates as applied currently by the UK.

134. Despite the presence of these ongoing measures, there is evidence of indicative dumping in both Peru and the EU. This suggests that in the absence of UK measures, the likelihood of dumping would increase further.

Other third country restrictions

135. The Renewable Energy Directive (RED) serves as the legal framework governing the advancement of renewable energy in the EU. The third iteration of the directive, known as [RED III](#), sets limits on biodiesel produced using food

⁴ [Final Report on the Sunset Review Procedure to the Countervailing Duties in Force on Imports of Pure Biodiesel \(B100\) and Blends Containing More Than 50% of Biodiesel \(B50\) Originating in the United States of America](#)
(Translated title but report remains in Spanish)



or feed crops. RED III is also strict with regard to feedstocks determined to have high indirect land-use change ([ILUC](#)), defined as feedstocks for which increased demand leads to agricultural expansion and the conversion of natural lands. RED III policy caps biodiesel produced using high ILUC feedstocks to 2019 consumption levels, with the limit decreasing to zero by 2030.

136. A [report](#) published in January 2026 by the European Commission found that soybeans should be classified as a high ILUC-risk feedstock. The EU has proposed to implement the findings of the report with [legislation](#) that is set to reduce the proportion that high ILUC-risk biofuels can form a share of the renewable energy and greenhouse gas intensity reduction targets for each Member State down to 0% by 2030.
137. This cap limiting the mandate for soybean-based biodiesel reduces demand in the EU for US biodiesel.
138. While the UK has a crop cap in place (discussed in greater detail below), the UK has no equivalent to the ILUC directive that targets soybean-based biodiesel so directly. Moreover, the UK's crop cap is not so strict as to limit single-counted biodiesel to zero by 2030. Given this and the US's continued reliance on soybean oil as a raw material, the UK remains a more open market for US biodiesel exports compared to the EU, its closest comparable market.

F4.3 Current and projected market conditions in the UK

UK Demand/Consumption

139. The UK biodiesel market is typically fuel suppliers (often acting as blenders), who are the main purchasers of biodiesel. Their preferences are driven by the end-user's demand and the Renewable Transport Fuel Obligation (RTFO), set by the Department for Transport (DfT) that involves the technical requirements to meet a specific standard, such as sustainability criteria for feedstocks and certificates through RTFCs.
140. The RTFO came into force in 2008 and aims to reduce greenhouse gas emissions from vehicles, ultimately supporting the Government's target of net zero by 2050. The [RTFO scheme](#) places an obligation on suppliers of road

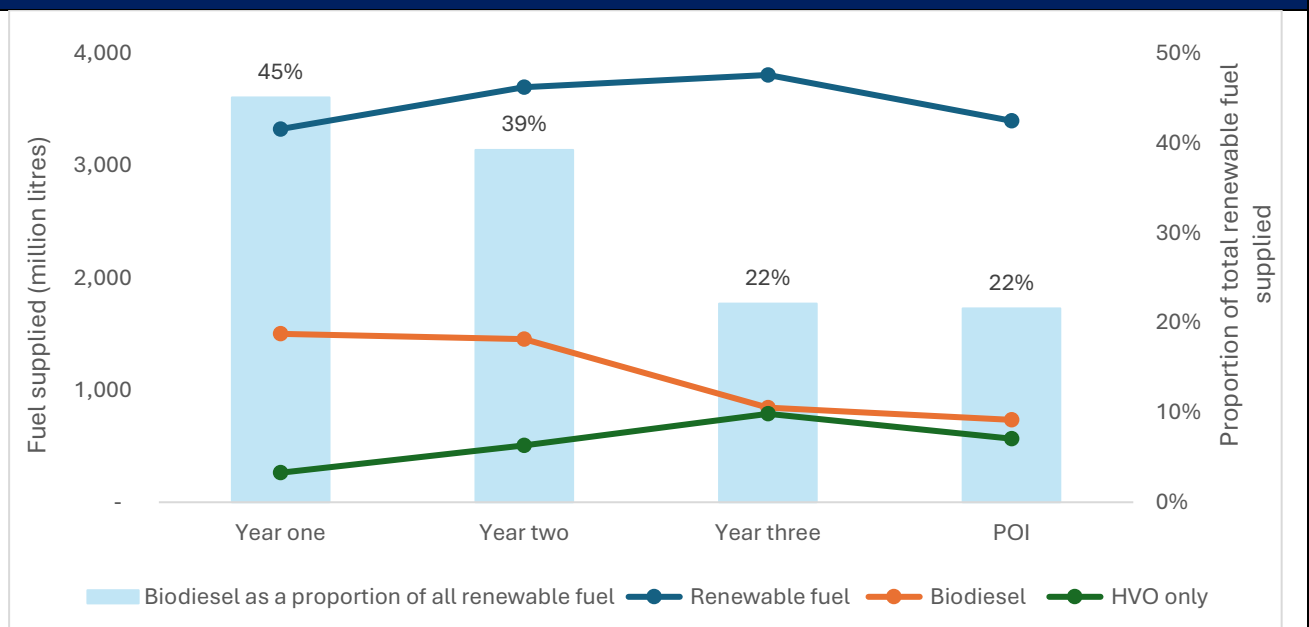


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transport fuels who supply more than 450,000 litres or more to demonstrate that a proportion of the fuel they supply for use in the UK each calendar year comes from renewable sources (blending obligation). Suppliers may meet their obligation by redeeming Renewable Transport Fuel Certificates (RTFCs) or by paying a fixed sum for each litre of fuel for which they wish to 'buy-out' of their obligation.

141. The UK market is highly attractive for the biodiesel exporters because of the RTFO. The obligation increases gradually annually, rising from 14.05% in 2025 to 17.68% by 2032. This creates a growing demand gap for UK fuel suppliers who currently need to rely on imported biodiesel to meet compliance requirements.
142. According to [RTFO statistics](#), UK biodiesel consumption decreased by 51% across the injury period. In the same period, relative to renewable fuel supply, biodiesel decreased by 23% as illustrated in Figure 4.3.1. Given the similar end user between HVO and FAME, the RTFO figures suggest that some of the demand has been met by the increase in HVO supply across the injury period.

Figure F4.3.1: RTFO Data on supply of renewable fuel, biodiesel, and HVO to the UK



Source: [RTFO Statistics](#)



143. In a commodity market where consumption is reducing, competition on price is likely to increase. Hence, overseas exporters may offer lower prices to gain market share, thereby supporting the likelihood of dumping. This is an advantage for US exporters with excess production capacity to offload surplus production at dumped prices.

144. In addition, the RTFO mandate ensures consistent demand for renewable fuels, which increases reliance on imports where domestic supply is insufficient. Even though the US soybean biodiesel is single-counted under the RTFO while the waste-based biodiesel is double-counted, a fuel supplier who is required to meet their legal quota may be incentivised to buy the lower-priced US product.

Product standards in the UK

145. The [RTFO Crop Cap](#) could create a barrier to the US biodiesel industry. This cap, set by the UK government, limits the proportion of crop-based biofuels (such as US soybean-origin biodiesel) that can be used to meet the RTFO blending target. This limit decreases over time, falling from 3% in 2026 to 2% by 2032 as illustrated in Table F4.3.2. The fuel target is an additional target specifically designed to encourage the use of advanced renewable fuels, such as fuels from waste feedstock or other low-carbon sources.

Table F4.3.2: RTFO Crop cap	
Obligation Year	Crop cap %
2023	3.50
2024	3.33
2025	3.17
2026	3.00
2027	2.83
2028	2.67
2029	2.50
2030	2.33
2031	2.17
2032 onwards	2.00
Source: Renewable Transport Fuel Obligation compliance guidance: 2026	

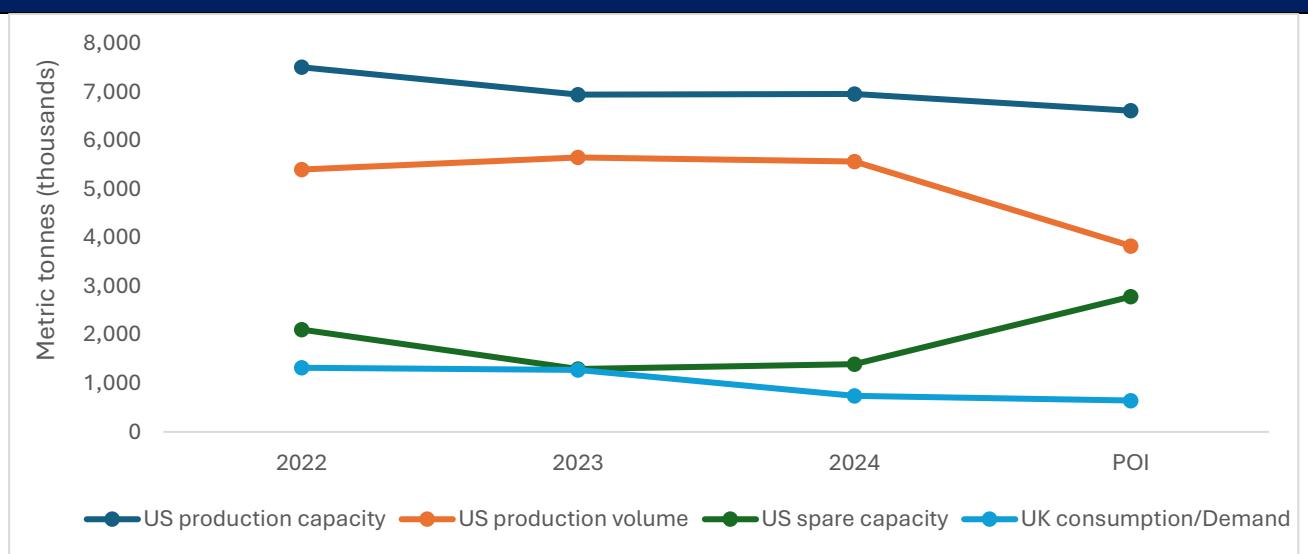


146. In 2023, [crop-based feedstock](#) used in the production of US biodiesel comprised of soybean oil, canola oil and corn oil, which was approximately 78% of total feedstock, compared to 22% waste-based feedstock used in US production. Crop-based feedstocks are subject to the crop cap, which limits the number of RTFCs that can be claimed from crop-based fuels. Waste-based fuel receives double credits (two certificates per litre), and crop-based fuel receives one certificate per litre. This makes crop-based biodiesel less valuable to the UK suppliers and reduces the attractiveness of the UK market to the overseas market.
147. However, waste-based US biodiesel remains a substantial proportion of US biodiesel production (22%). Waste-based US biodiesel is not subject to the crop cap and is eligible for double-counted RTFCs. It is because of this that US biodiesel producers would be incentivised to export this type of biodiesel to the UK market should measures expire.

UK consumption compared to US production and spare capacity

148. Figure F4.3.3 shows the UK's consumption of biodiesel during the injury period in relative to the US production volume, production capacity and spare capacity.

Figure F4.3.3: UK Consumption vs US production and Spare Capacity (Metric tonnes)



Source: [RFTO Statistics](#)



149. The data shows that the US biodiesel production capacity and production volume consistently exceeded the UK consumption throughout the injury period. US Production capacity ranged between 6.6 and 7.5 million metric tonnes, while production volumes ranged between 3.8 to 5.6 million metric tonnes. On the other hand, UK consumption was significantly lower, declining from 1.3 million metric tonnes in 2022 to 0.6 million metric tonnes in 2025. This indicates that the US producers have sufficient capacity to supply the entire UK market, with the potential to provide an increase in supply that could lower prices significantly.
150. In addition, the US producers maintained a substantial spare capacity throughout the injury period. Spare capacity amounted to approximately 2.11 million metric tonnes in 2022, declined in 2023, and then increased in 2024, reaching its highest level of around 2.78 million metric tonnes in 2025.
151. By contrast, UK biodiesel consumption was significantly lower throughout the injury period, falling from 1.3 million tonnes in 2022 to 0.65 million tonnes in 2025. In each year of the injury period, US spare capacity was sufficient to meet total UK consumption. In 2025, US spare capacity was more than four times the size of the UK market.
152. These figures indicate that US producers possessed significant spare capacity that could be incentivised to target the UK market, and could lower prices significantly if they did so.

F4.4 Current and projected conditions in the overseas exporter's domestic market

Reduced US domestic demand

153. As discussed in [Section F3.1](#), the US production capacity remained relatively stable throughout the injury period. However, domestic consumption declined by 38%, resulting in a 69% increase in spare capacity.
154. In the POI, the inventory level in the US biodiesel industry was around three times the average level of consumption (see [Section F3.2](#)). The combination of



surplus inventory and increasing spare capacity over time creates a strong incentive for the US producers to seek external markets.

155. Unlike the RTFO that requires fuel suppliers to meet an annual renewable fuel target or alternatively pay a buy-out fee based on eligible feedstocks, the US Renewable Fuel Standard (RFS) is largely volume based, with mandates the quantity of renewable fuel expected to be produced and consumed within the domestic market. Also, the RFS compliance framework is more rigid compared to the RTFO. Non-compliance to RFS results in regulatory penalties, which encourages US producers to meet the required volumes.
156. The RTFO operates as a more flexible market-based system, which allows both domestic producers and qualified importers to obtain RTFC on equivalent terms. This flexibility makes the UK market more accessible to the US exporters. In circumstances where US producers experience surplus production or reduced margin in the domestic market, they may find it beneficial to export biodiesel to the UK, where participation in the RTFO scheme is not restricted.

Subsidy programmes incentivising production

157. The Statement of Essential Facts for the expiry review of countervailing duties on US biodiesel products (ER0083) states that there are ongoing subsidy programmes in the US that incentivise biodiesel production.
158. Biodiesel producers can benefit from several of the subsidy programmes based on export sales, although none of the subsidy programmes specifically incentivise export sales over domestic sales.
159. Based on the existence of subsidy programmes, biodiesel producers may be incentivised to increase production to levels beyond domestic demand, which leads to biodiesel producers seeking export markets to sell their excess supply.

F4.5 Conclusions on incentive to dump goods subject to review

160. The TRA reviewed the factors outlined in [Sections F4.1 to F4.5](#) holistically and determined that the evidence indicates that it is reasonable to conclude that



there is an incentive for the US exporters to dump biodiesel product in the UK if measures were allowed to expire.

161. The expected increase in price competition in the UK market due to decreasing consumption, higher indicative normal value compared with indicative export price observed in third-country markets – particularly the EU - the flexibility of the RTFC scheme, combined with existing EU anti-dumping and countervailing measures on US biodiesel and evidence of previous circumvention, collectively suggests that if measures were removed, US exporters would be incentivised to redirect exports to the UK, at dumped or otherwise unfairly low prices.

F5 Conclusion on the dumping likelihood assessment of biodiesel products originating from the US and consigned from Canada

162. The TRA reviewed each factor individually and together to provide a holistic picture when determining the likelihood of dumping for US biodiesel products should the measure expire without replacement. The TRA reviewed all factors outlined at the outset of [Section F](#). Having done so, the TRA concluded that:
- a. It is likely that the producers of biodiesel products within US have the ability to dump; and
 - b. It is likely that the producers of biodiesel products within US have an incentive to dump.
163. The TRA therefore concludes that dumping is likely to recur if the application of the anti-dumping duty were allowed to expire.



Section G: Injury likelihood assessment

164. In accordance with regulation 70(6)(b) and (c), we will consider whether injury has been removed, or reduced, in whole or in part due to the application of the anti-dumping amount and whether the injury caused by the dumped goods would be likely to continue or recur if the application of an anti-dumping amount to the goods subject to review were to expire.

G1 UK industry

165. In accordance with paragraph 6(1) of Schedule 4 to the Act, the UK industry is defined as all the UK producers of the like goods, as outlined in [C1.2 UK producers](#)

166. For the purposes of this assessment, we have used Argent and Greenergy's consolidated data unless otherwise specified, as noted in [C1.2](#).

G2 Volume analysis

167. When determining whether the UK industry is suffering injury, the TRA has considered whether there has been a significant increase of imports of the goods into the UK either in absolute terms (the volume of dumped goods being imported into the UK market) or relative to domestic production or consumption.

G2.1 Volume of goods subject to review in absolute and relative terms

168. The TRA assessed changes in the total volume of imports of the goods subject to review imported into the UK from the US or consigned from Canada using confidential HMRC raw customs declarations data.



Table G2.1: Imports of biodiesel from the US during the injury period and POI

	Year one	Year two	Year three	POI
All imports (tonnes)	(4.5 million to 5.5 million)	(6 million to 7 million)	(2.5 million to 3.5 million)	(0.5 to 1 million)
Import proportion of goods subject to review	0%	0.2%	1.17%	0%
All imports (indexed)	100	138	63	13
Import volume of the goods subject to review from the US (indexed)	100	198,070	475,577	3
<i>Source: Confidential HMRC 10-digit raw customs declaration data</i>				

169. The analysis shows imports of the goods subject to review were insignificant in proportion to all imports.

170. We also assessed imports of the goods subject to review relevant to both UK production and UK consumption using UK producer submissions and facts available. In both assessments, we determined the volume of imports of goods subject to review were insignificant compared to UK production and UK consumption. We have therefore conducted a likelihood assessment to determine whether injury is likely to recur should the measures expire.

G2.2 Likelihood of significant import volumes to recur should the measure expire.

171. In section [F2 Continued dumping of US biodiesel product in the UK](#), the TRA assessed the likelihood that significant dumped import volumes would recur if the measures were to expire. In this section, the TRA considers whether a significant volume of imports would recur.

172. In Section F2, the TRA considered the ability of the US to dump, and considered it was likely to resume dumping if the measures were revoked.

173. The factors reviewed relevant to the ability to dump to cause a likelihood of significant import volumes were:



- Production capacity;
- Inventories; and
- Ability to shift production.

174. The factors reviewed relevant to the incentive to dump significant volumes were:

- Historic import volumes
- Current and projected market conditions in the UK;
- Conditions and projected market conditions in the US; and
- Current and projected market conditions in third countries

175. The same factors which would indicate a higher likelihood of dumping also mean there is a higher likelihood of significant volumes of imports.

176. The TRA therefore concludes that should the measure expire without replacement, significant volumes of imports originating in the US and consigned from Canada would be likely.

G2.2.1 Historic import volumes

177. No exports of biodiesel from the US to the UK were recorded in the period immediately preceding the introduction of EU anti-dumping⁵ and countervailing⁶ measures in 2009.

178. The TRA used Global Trade Tracker (GTT) data to assess the historic import volumes of biodiesel of US origin. The volumes remained negligible or zero. HMRC import data corroborates that import volumes were negligible in 2020 and 2021. This might demonstrate an effect of the countervailing and anti-dumping duties that are currently in place.

⁵ [Council Regulation \(EC\) No 1225/2009](#)

⁶ [Council Regulation \(EC\) No 598/2009](#)



G2.2.2. Current and projected market conditions in the UK market

179. Current and projected market conditions in the UK market have been addressed in [F4.3](#). This indicates that the UK will remain an attractive destination for US biodiesel suppliers. As biodiesel consumption is declining, competition on prices has increased. Should the measure expire, these market conditions would encourage US biodiesel exporters to dump significant volumes of biodiesel to the UK market.

G2.2.3. Current and projected market conditions in the US

180. Current and projected market conditions in the US have been addressed in [F4.4](#). While US production capacity remained stable, domestic consumption declined heavily, resulting in spare capacity. Inventory levels also rose to around three times the consumption. These conditions create strong incentives for US producers to seek external markets. US exporters would have ability and incentive to dump significant volumes of biodiesel to the UK market were the measures removed.

G2.2.4. Current and projected market conditions in third countries

181. Information concerning current and projected market conditions in third countries has been addressed in [F4.2 Current and projected conditions in third countries](#). Export activity during the POI was concentrated in a number of destinations, particularly Canada and Peru, demonstrating export capability. Peru and the EU have introduced measures against biodiesel of US origin, which can constrain US export opportunities. When considered alongside the UK's RTFO framework, the TRA considers that the UK would be an attractive destination for US biodiesel exporters.

G2.3 Volume analysis conclusion

182. The TRA believes that there is evidence that biodiesel producers in the US would seek to export to the UK.

183. Currently, import volumes of the goods subject to review are low. However, the evidence indicates that significant import volumes from the US are likely to



recur if the measure were allowed to expire. The US retains substantial biodiesel production capacity and inventories, while market conditions in the US provide incentives for producers to seek export opportunities. While third countries import US biodiesel, there are restrictions in place that limit US ability to export to these countries. Projected market conditions in the UK make the UK an attractive market for these exports.

184. The TRA's findings in relation to these factors allows for a determination that US biodiesel exporters have the ability and incentive to dump significant volumes of biodiesel to the UK if the measures were to expire.

G3. Price analysis

185. To assess the effect of the dumped goods on prices of the like goods in the UK during the injury period, the TRA has considered whether the dumped goods have undercut, depressed or suppressed domestic prices of the like goods produced in the UK to a significant degree.
186. Where volumes of imports are not found to be significant, the TRA has assessed the likelihood that injury would recur should the measures be allowed to expire and significant import volumes resume.

G3.1 Significance of price undercutting, depression or suppression and likelihood of continuation

187. When considering the impacts or likely impacts of imports upon prices, the TRA first assesses whether the imports continued over the injury period at sufficient levels to perform an analysis on actual impacts.
188. Due to the negligible imports of US biodiesel addressed in [G2.2](#), it is not possible for the TRA to assess the likelihood of significant price undercutting, depression or suppression continuing.

G3.2 Likelihood of recurrence of significant price effects

189. The TRA has undertaken a likelihood assessment of whether, if the measure were removed, significant price effects would recur.



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190. In [Section F2](#), the TRA considered the ability of the US to dump, and considered it was likely to resume dumping.

191. In order to consider the likelihood of significant price effects to recur, the TRA has considered the following factors:

- Historic import prices
- Current and projected market conditions in the UK;
- Conditions and projected market conditions in the US; and
- Current and projected market conditions in third countries;

G3.2.1 Historic import prices

192. The TRA assessed the historic import prices of biodiesel of US origin. Given the absence of significant imports outlined in [Section G2.2.1](#), the corresponding import prices are not considered meaningful for the purposes of assessing pricing behaviour.

G3.2.2 Current and projected market conditions in the UK

193. Current and projected market conditions in the UK market have been addressed in the [Section F2](#). As biodiesel consumption is declining, competition on prices has increased. Should the measure expire, these market conditions would encourage US biodiesel exporters to export significant volumes of biodiesel to the UK market.

194. Imports from third countries into the UK declined substantially between year 3 and the POI. This was likely due to the introduction of anti-dumping measures against the People's Republic of China (PRC), reducing imports of biodiesel. Nonetheless, imports from third countries remain high compared with UK industry domestic sales.

G3.2.3 Current and projected market conditions in the US

195. There is a parallel [expiry review](#) of the countervailing duty applied on the goods subject to review imported from the US into the UK. This has determined subsidisation exists in the US market. Subsidy programmes would help



overseas exporters to lower prices of the goods subject to review that may significantly impact the price of the UK like goods.

G3.2.4 Current and projected market conditions in (major) third countries' domestic market

196. In the absence of significant UK imports of the goods subject to review, we have assessed third-country imports from the US to establish the likelihood that US imports to the UK could impact the UK industry if the measures expired.
197. Table G3.2.4 shows the global and specific country import prices of the like goods from the US. The global price is an average biodiesel price to all import destinations

Table G3.2.4: Global and country import price of US biodiesel				
	Year one	Year two	Year three	POI
Global import price (£/mt)	1,693	1,500	1,136	1,035
Canada (£/mt)	1,659	1,460	1,104	976
Peru (£/mt)	960	749	619	570
Germany (£/mt)	788	954	694	877
<i>Source: Global Trade Tracker⁷</i>				

198. We compared the global import price from the US to the UK domestic price during the injury period. We observed that the average global US global import price was consistently lower than the UK domestic sales price.
199. We also compared specific countries (based on largest proportion of imports during the injury period) and assessed their import price of the goods from the US. Imports made to Canada, Peru and Germany were all made at prices lower than the UK domestic price; although Canada and Peru are geographically closer to the US than the UK, the German import price of the goods suggests that the import price would still undercut the UK industry price, despite both Peru and the EU currently having measures in place against US biodiesel.
200. We further assessed the import prices from the US against the average price of imports into the UK; with the exception of the POI, average import prices into

⁷To note: Global, Canada and Germany prices established using commodity code 382600. Peru established using code 271020; US exports indicated volumes exported under 382600, however Peru import data only recorded imports under 271020; due to the recorded export price of 382600 and 271020 from US to Peru being similar, we have decided to include Peru import data under code 271020 for the purposes of this assessment.



the UK were lower than import prices from the US; however, this was due to low-priced imports from the PRC that were a significant proportion of all UK imports that drove the UK average import price down. Excluding imports from the PRC, we observed third country import prices from the US - including imports to Germany - were consistently below the UK import price throughout the injury period.

G3.3 Price analysis conclusion

201. The TRA considers there is a likelihood of significant price effects recurring if the measures were expired. While historic import prices provide limited evidence due to the absence of significant imports during the injury period, the evidence indicates that the US biodiesel industry retains spare production capacity, continues to benefit from government support mechanism and faces declining domestic demand. In addition, US producers continue to export significant volumes of biodiesel to third-country markets, with evidence indicating that these imports are below UK market prices. Taken together, these factors indicate that US imports would likely enter the UK market at prices which would undercut the UK industry if the measures were to expire.

G4. Economic factors analysis

202. In considering the impact of the dumped goods on the UK industry, the TRA has considered relevant economic factors and indices having a bearing on the UK industry, including:

- actual and potential decline in sales, output, market share, productivity, return on investments, and utilisation of capacity;
- factors affecting domestic prices of the like goods;
- actual and potential negative effects on cash flow, inventories, employment, wages, growth, the ability to raise capital or investments.



G4.1 Sales

203. The TRA assessed the changes in the volume and the value of the UK industry's sales during the IP.

Table G4.1: UK producers' sales by volume and value (Indexed)				
	Year one	Year two	Year three	POI
Domestic sales volume	100	50	242	231
Domestic sales value	100	44	149	149
Domestic sales price	100	87	62	65
Export sales volume	100	100	77	63
Export sales value	100	68	49	43
Source: Questionnaire responses				

204. Domestic sales value and volume showed an overall increase over the injury period while export sales fell. The increase in year three of domestic sales may be due to the repeal of HMRC's inward processing relief in mid-2024. Inward processing relief had allowed biodiesel importers to pay the diesel customs duty of 0% at the border if they blended FAME with diesel before crossing UK customs. This increase in UK domestic sales may have been maintained into the POI as a result of UK implementation of anti-dumping duties against biodiesel from the PRC in 2025.

205. The TRA found that while the volume of UK producer domestic sales (either sold as B100 or as a blend) increased across the injury period, the UK producers' domestic sales of biodiesel (either sold as B100 or the bio-content sold in blended fuel) declined over the injury period.

206. Sales price trends show that the UK producers domestic sales price decreased across the injury period. This may reflect ongoing competition with third-country imports, as discussed within [Section G5](#).



G4.2 Output, capacity, capacity utilisation and market share

Table G4.2.1: UK industry output, by volume and value (Indexed)

	Year one	Year two	Year three	POI
Output by volume	100	97	80	63
Output by value	100	75	57	47
Capacity	100	100	95	74
Capacity utilisation	100	97	84	86
UK industry market share	100	85	141	126
<i>Source: Questionnaire responses</i>				

207. The TRA assessed the changes in the production output, capacity and capacity utilisation of the UK producers across the injury period.

208. Output is measured by the volume of the like goods produced by the UK producers during the injury period. Production capacity is a measure of the maximum biodiesel that can be produced over a respective period. The output and capacity data used in this review is based on biodiesel in pure form.

209. Output by volume and production capacity decreased 37% and 26% respectively over the entire injury period. The loss of capacity was due to the closure of Argent's Motherwell biodiesel plant and the closure of Greenergy's Immingham biodiesel plant. Both companies cited injurious imports as a factor in the decision-making behind these closures.

210. Capacity utilisation shows an overall decrease, which is reflected in output volumes. Despite falling capacity, producers continue to operate at below their potential output volumes.

Table G4.2.2: Market size

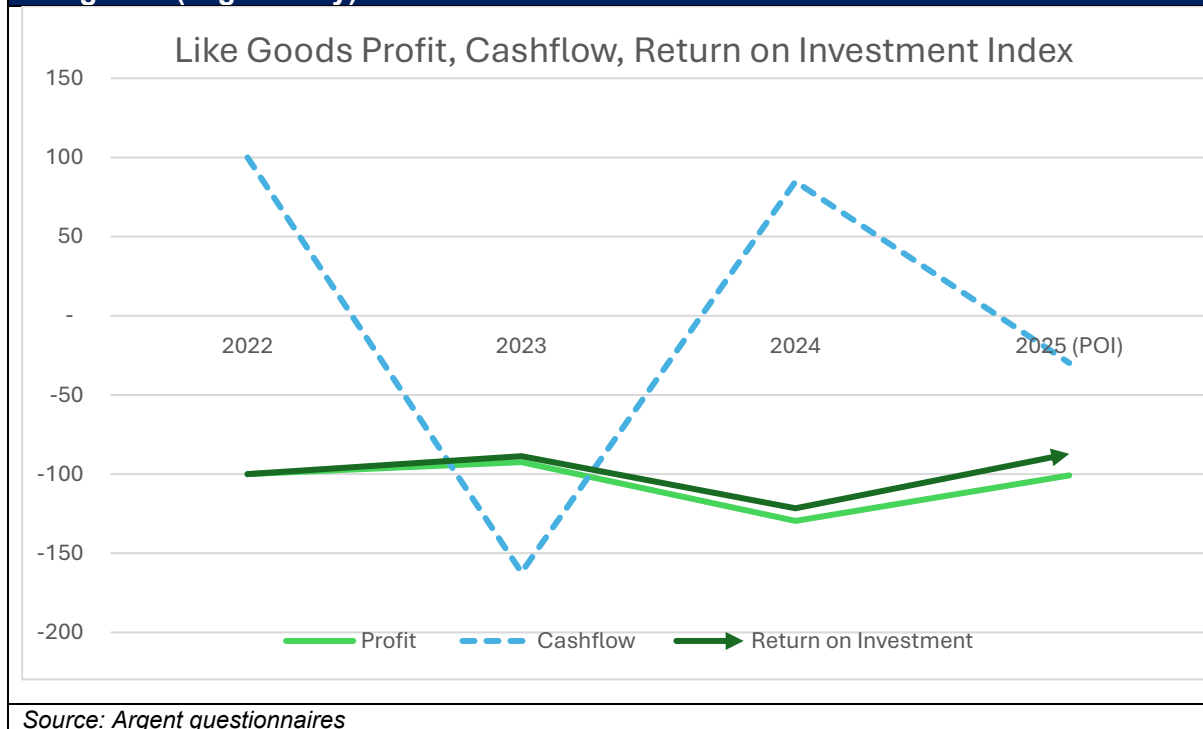
	Year one	Year two	Year three	POI
Total Market (million litres)	1,501	1,453	843	734
<i>Source: RTFO data</i>				



211. The UK producers market share fluctuated over the injury period, ultimately increasing by 26%. However, the UK industry continued to account for only a small share of the UK biodiesel market. Total UK biodiesel consumption declined substantially over the injury period by approximately 51%. Despite a decrease in output, the UK producer market share increased. The UK producer increase in market share occurred in a context of a contraction in the market and did not reduce the injury experienced by UK producers.

G4.3 Profit, cashflow and return on investment

Graph G4.3: Net operating profit before tax, cashflow and return on investment for like goods (Argent only)



212. The graph above provides Argent's like goods profits, cashflow and return on investment (ROI) for the injury period. Greenergy did not provide profit data for the purpose of this analysis and is therefore not represented in the table. Profits from the like goods and cashflow show similar trends to Argents publicly available financial statements data for the whole company.⁸

⁸ [Argent Energy Limited - Full Accounts - Companies House](#). Argent demonstrates an operating loss of -£29,985,000 in the POI and -£24,797,000 in year three across the organisation.



213. The cashflow and ROI trends indicates restrictions in Argent's ability to invest and to respond to challenging market conditions. This restricts the producers' ability to respond during periods of injury.

214. The continued losses observed indicate an ongoing financial vulnerability to dumped and subsidised imports.

G4.4 Stock levels

Table G4.4: UK industry stock levels, by volume and value (Indexed)				
	Year one	Year two	Year three	POI
Volume of closing stock	100	81	72	87
Value of closing stock	100	63	69	59
Source: Questionnaire responses				

215. Stock levels declined over the injury period, falling by 13% from year one to the POI. Stock values also declined by 41%. The decline in stock is consistent with a decline in output and sales volumes. While lower stock levels can indicate improved sales performance, the evidence in this review suggests that the levels reflect reduced production and market activity.

G4.5 Productivity, employment and wages

Table G4.5: Argent employment and productivity figures (Indexed)				
	Year one	Year two	Year three	POI
Total FTE for like goods	100	102	79	74
Productivity in volume per FTE for like goods	100	96	102	86
Source: Questionnaire responses. Argent and Greenergy FTE for like goods figures and average output in volume used for all four years. Greenergy figures for POI adjusted using audited financial statements.				

216. The TRA assessed the changes in the employment and productivity of the UK producers during the injury period. Information pertaining to Greenergy concerning the median wage for FTE engaged in activities to the like goods has not been provided in this table.

217. The number of employees producing the like goods declined over the injury period. While employee numbers increased between year one and year two,



they fell significantly in year three and to an indexed value of 74 during the POI. While the median annual wage of employees who produced biodiesel rose over the period of injury, the average output in volume decreased from year one to the POI. We are also aware the median annual wage is benchmarked to similar industries.

28. Argent's biodiesel plant near Motherwell closed in May 2024.⁹ This is during year three of the period of review. Greenergy confirmed consultations to cease production in July 2025.¹⁰ This had a negative impact on the number of employees.

218. This suggests that the UK industry was required to significantly reduced staffing level in response to injury. It also indicates that producers would be more liable to further injury were imports from the US to recur, as there would be further pressure on employment levels.

G4.6 Growth

219. As identified in Table G4.2.2, biodiesel consumption in the UK decreased by 51% between year one and the POI. This indicates that the overall UK biodiesel market contracted during the injury period. UK producers were operating in a declining market where it is difficult to achieve significant growth in sales, output or investment.

220. In addition, we have observed decline in a number of key factors for the UK producers. We found that output showed significant decline, as did capacity (following the closure of Immingham and Motherwell plants). We found that Argent's UK profits, ROI and cashflow demonstrated negative trends across the injury period.

221. Holistically, these trends are not indicative of an UK industry showing growth.

⁹ [Argent Energy is to close Newarthill plant 'within weeks' | Glasgow Times](#)

¹⁰ [Greenergy proposes to end production at its Immingham plant](#)



G5. Other factors that could cause injury

222. The TRA has considered whether any other factors have caused or are likely to cause injury to UK industry.

G5.1 Imports of biodiesel from third countries

223. Third countries exported a large amount of biodiesel to the UK during the period of review. As indicated in [Section G4.6](#), UK producers make up a small percentage of the UK biodiesel market.

Table G5.1: Average third country import price (£/mt) (indexed)

	Year one	Year two	Year three	POI
Average third country import price (£/mt)	100	76	69	98

Source: Confidential HMRC 10-digit raw customs declaration data

224. The average import price from third countries fell in year two and remained below the UK industry price throughout the period of review, including during the POI. The lower prices observed in year two and three were significantly influenced by dumped biodiesel imports from the PRC. This demonstrates that UK producers have been required to compete against low-priced imports, which contributed to the loss of market share between year three and the POI.

225. Although the average third-country import price increased during the POI, it remained below UK industry price, demonstrating that price competition from imports persisted. This indicates that there is demand within the UK for biodiesel, as indicated in [Section G4.6](#), and that should the measures expire, there is a likelihood that US imports could enter the UK market and exert further pressure on UK production.

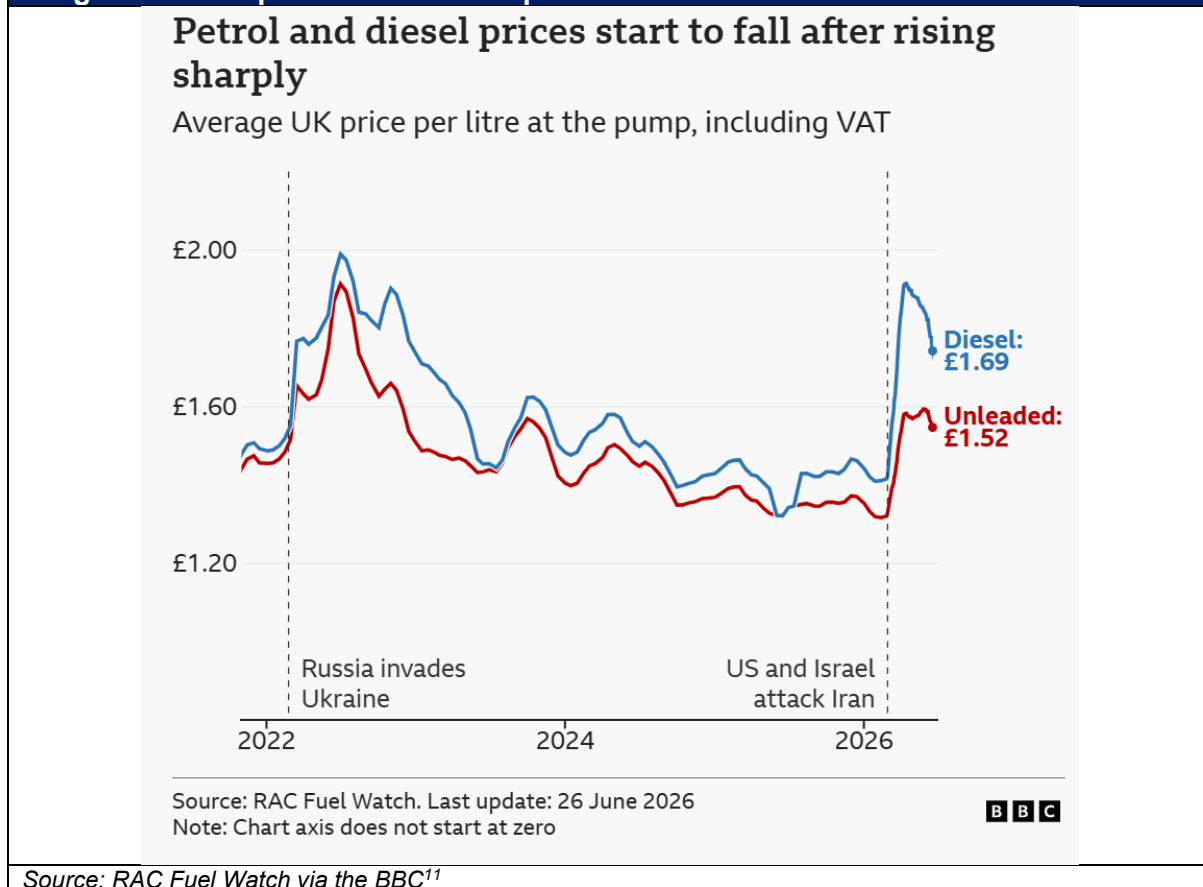
226. The UK import price of biodiesel during year two and year three fell due to significant volumes of dumped imports from the PRC. The UK import price remained low during year one due to significant import prices from third countries.



G5.2 The war in Iran

227. The war in Iran that began in February 2026 has impacted fuel security and made the price of oil volatile, mostly due to the closure of the Strait of Hormuz. This disruption has pushed up the price of oil and made the cost of shipping unstable.

Image G5.2: The price of diesel and petrol in the UK



228. Higher or volatile mineral diesel prices makes biodiesel more attractive, as markets seek to reduce exposure to mineral diesel price fluctuations.¹² While this can be beneficial to UK producers, exporters with spare capacity, such as the US, have a stronger incentive to sell to markets where biodiesel demand is higher.

¹¹ [Why are UK fuel prices rising again? - BBC News](#)

¹² [What impact is the Iran war having on the British food sector? - LSE Business Review](#)



229. The war has also increased the cost for UK manufacturers.¹³ They have experienced higher input costs and delivery delays, and higher transport and fertiliser costs have increased the cost of producing agricultural feedstocks.

These factors have rendered the UK industry more vulnerable.

230. Should the measures expire, these market conditions are likely to increase the attractiveness of the UK market to US exporters. A market characterised by declining demand for biodiesel and greater emphasis on energy security may provide opportunities for exporters with production to supply the UK.

G6 Conclusion on likelihood of injury assessment

231. The TRA has considered whether that injury has been removed or reduced due to the measure being in place and whether the circumstances in the exporting country are such that the injury is likely to continue or recur if the measure were no longer maintained.

232. The TRA concludes that injury to the UK industry would be likely to recur if the anti-dumping measure were no longer applied. Although imports of biodiesel originating in the US and consigned from Canada remained at low levels during the POI, this reflects the continued effectiveness of the measure rather than a lack of interest in export by US biodiesel producers.

233. The UK industry remains vulnerable, with a number of injury indicators deteriorating or remaining weak during the injury period, including sales price and sales volume of bio-content, stock, output, capacity and capacity utilisation, market share and growth, number of employees, and Argent's profitability, ROI and cashflow. In the absence of the measures, US producers would have the ability and incentive to increase exports to the UK market ([see Section F](#)) and would likely cause injury to UK producers and adversely affect them.

¹³ [UK factories, hit by Iran war, brace for higher costs and more delivery delays | Reuters](#)



Section H: Economic Interest Test

H1 Introduction

H1.1 Legislative framework

234. This EIT is conducted in accordance with paragraph 25 of Schedule 4 to the Act and the Secretary of State's Statutory Guidance on how the TRA should apply the EIT. In expiry reviews the TRA can consider the EIT we conducted during the original investigation and assess data and evidence on the economic impact of the measures since they have been applied.
235. In accordance with regulations 70(12) and 75(2E) of the Regulations, the TRA must conduct the EIT and advise the Secretary of State whether and why the extension of the measure meets the test.
236. For anti-dumping and countervailing measures, the EIT is presumed to be met unless the evidence demonstrates that continuation of the measure is not in the economic interest of the UK.
237. In line with paragraph 25(4) of Schedule 4 to the Act, we have taken account of the following factors in conducting the EIT:
- the injury caused by the dumping of the goods to a UK industry in the goods and the benefits to that UK industry in removing that injury;
 - the economic significance of affected industries and consumers in the UK;
 - the likely impact on affected industries and consumers in the UK;
 - the likely impact on particular geographic areas, or particular groups, in the UK;
 - the likely consequences for the competitive environment, and for the structure of markets for goods, in the UK; and,
 - such other matters as the TRA considers relevant.



H1.2 Evidence base

238. The analysis underpinning this assessment is drawn from:

- the transition review [TD0004](#) EIT findings;
- questionnaire responses and submissions for this investigation from interested parties; and
- additional background research.

H2. Injury to the UK industry and benefits of removing that injury

H2.1 Previous findings

239. In [TD0004](#) the injury likelihood assessment concluded there would be further injury to UK industry were the measure revoked. This was due to the vulnerability of the UK industry and the likelihood that dumped imports would re-enter the UK market at prices that would undercut and suppress domestic prices.

H2.2. Current assessment

240. Evidence indicates that since [TD0004](#) the UK market has contracted in size, and UK producers may have become more vulnerable.

241. The injury likelihood assessment ([Section G](#)) finds that, in the absence of the current measures, the import of goods subject to dumping would likely recur, leading to the recurrence of injury to the UK industry.

H3. Economic significance of affected industries and consumers in the UK

H3.1 Previous findings

242. In [TD0004](#), the significance assessment found that UK biodiesel production was important for domestic producers. For upstream suppliers (e.g. feedstock



providers), dependence on sales for biodiesel production ranged from not important to important. Importers and downstream businesses were more diversified and less dependent on biodiesel sales. The largest biodiesel consumer group was found to be diesel car users. Biodiesel was not found to be important to this group.

H3.2 Current assessment

243. We found limited evidence to suggest that the structure of the biodiesel supply chain had changed significantly. While overall FAME market size has declined over recent years, we do not believe this has materially changed the economic significance of affected industries and consumers. We consider that the previous findings remain relevant and reflect the current economic circumstances.

H4. Likely impact on affected industries and consumers in the UK

H4.1 Previous findings

244. In [TD0004](#), the impacts assessment found that extending the measure would:

- benefit UK producers and upstream industries by preventing injury and supporting domestic production;
- lead to importers and downstream businesses facing higher costs when sourcing from countries subject to the measure; and
- have a limited impact on downstream businesses and consumers, reflecting the small share of biodiesel in final product costs and the availability of alternative supply.

245. If the measure were revoked, the impacts assessment found lower-priced imports from the US could increase, which could negatively impact UK producers through price undercutting and loss of market share, while potentially benefiting importers, downstream businesses and consumers through lower prices.



H4.2 Current assessment

246. Evidence indicates that FAME demand in the UK continues to be driven by regulatory requirements, including the RTFO which has gone up.
247. But overall FAME consumption has declined since [TD0004](#), from 1762 million litres in 2019 to 843 million litres in 2024, according to RTFO yearly data releases.
248. No evidence has been found showing significant changes to price or availability of FAME.
249. Whilst this increased competition and the reduction in total market size may affect the absolute scale of impacts, there is no evidence to suggest that it has altered the direction or relative distribution of impacts across stakeholders.
250. We therefore consider there to have not been significant material changes, and that the findings of the previous assessment as to the impacts of the measure reflect the current economic circumstances.

H5. Likely impact on particular geographic areas or particular groups

H5.1 Previous findings

251. [TD0004](#) found that the available evidence did not suggest that there were areas where a significant portion of local employment would likely to be affected by the measure being extended or revoked.
252. There were no findings of specific or disproportionate impacts to particular groups or protected characteristics.

H5.2 Current assessment

253. Further to the Public Sector Equality Duty, when the TRA carries out its functions, including making determinations and recommendations, it must have due regard to the need to:



- eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share and people who do not share a relevant protected characteristic; and
- foster good relations between people who share and people who do not share a relevant protected characteristic.

254. The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

255. Having had due regard, the TRA considers that the proposed determination does not have an impact on the three aims of the duty.

256. Since TD0004, risks to producer vulnerability have increased. However, we believe these are insufficient to materially change the geographic distribution of impacts or the particular groups impacted.

H6. Likely consequences for the competitive environment, and for the structure of markets for like goods, in the UK

H6.1 Previous findings

257. [TD0004](#) found that extending measures would not significantly reduce competition, as multiple suppliers remain active; revoking the measure could increase the number of suppliers but may distort competition through dumped imports; and overall market functioning would remain competitive under either scenario.

H6.2 Current assessment

258. Since [TD0004](#) evidence indicates that competition within the FAME market may have decreased due to an increase in UK trade remedy measures against third country FAME producers; however, downstream businesses do continue to have access to multiple international suppliers of FAME. In addition,



competition from a second-generation biodiesel (HVO) and other biofuels is likely to have increased, providing an alternative competitive constraint.

259. Taken together, these changes appear to offset one another, therefore we believe there is no clear evidence of a material deterioration or distortion in the competitive environment.

H7. Other relevant factors

H7.1 Previous findings

260. [TD0004](#) did not identify any additional factors that would materially affect the EIT.

H7.2 Current assessment

261. We have not identified any additional factors that would materially affect the outcome of the EIT. There is no evidence of new regulatory, environmental, or market development that would fundamentally alter the balance of costs and benefits.

H8. Conclusion

262. In accordance with paragraph 25 of Schedule 4 to the Act, the EIT is presumed to be met unless the evidence demonstrates otherwise.

263. Having considered all relevant factors, we find that:

- extending the measure continues to provide benefits to UK producers, preventing the recurrence of injury from dumped imports;
- negative impacts on importers and downstream users remain limited and not disproportionate; and
- upon a full evaluation of the factors relevant to the EIT, the findings in [TD0004](#) remain relevant and reflect the current economic circumstances. Therefore, the expiry review did not necessitate a more detailed assessment of the EIT.



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264. In short, while the measure may contribute to marginally higher input costs for certain downstream users, these impacts are outweighed by the need to prevent renewed injury to a domestically important industry, particularly in the context of increasing competitive pressures from alternative fuels.

265. Therefore, the TRA considers that the extension of the anti-dumping measure meets the economic interest test.



Section I: Intended final recommendation

266. We have found that it is likely that dumping of the goods subject to review into the UK originating in the US and consigned from Canada is likely to recur if the application of the anti-dumping amount were to expire ([See Section F Dumping likelihood assessment](#)).
267. It is also likely that injury to UK industry caused by the goods subject to review is likely to recur, if the application of the anti-dumping amount were to expire ([see Section G Injury likelihood assessment](#)).
268. The TRA considers that the proposed extension of the measure in accordance with our intended final recommendation meets the EIT, as per regulation 75(2E) of the Regulations ([see Section H EIT](#)).

I1: Intended final recommendation

269. The TRA's intended final recommendation to the Secretary of State is that the period of the application of the anti-dumping amounts to the goods subject to review should be extended, pursuant to regulation 75(1)(c) and 75(2E) of the Regulations, so that it applies to the goods subject to review imported into the UK until 30 January 2031. This date is five years subsequent to the date when the measure would have expired (30 January 2026) had no expiry review been initiated (see [Trade Remedies Notice 2022/08](#)).
28. No information was received to lead us to consider that it was appropriate to amend the level of the anti-dumping amounts. Therefore, we intend to recommend to the Secretary of State that the anti-dumping amount for all the goods subject to review be extended at the same level, pursuant to regulation 70(2)(a) of the Regulations. The rates of the anti-dumping duty applicable to the goods subject to review, and manufactured by the companies listed, shall be a fixed amount as shown in Tables B.1 and B.3 within [Annex A](#).
29. The companies listed in Table B.2 in [Annex A](#) are exempted from the duty on category 1 goods.



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270. The description of the goods to which the measures apply (that is, the goods subject to review) is set out in [Section D](#) The goods. We have not considered it necessary to vary the goods subject to review or the description of those goods, nor have we received any comments or indications that we should consider doing so.

271. We intend to make this recommendation based on the conclusions we have reached, as summarised above.



Annex A: Intended recommended rates

Table A.1: Recommended fixed-duty rates

Duty amount and additional codes for category 1 goods

Country	Overseas exporter/producer	Duty amount (£/mt net)	Additional codes
Canada	All overseas exporters (except those specified in Table 3)	144.109	B999
United States	Archer Daniels Midland Company, Decatur	57.409	A933
United States	Cargill Inc., Wayzata	Nil	A934
United States	Green Earth Fuels of Houston LLC, Houston	59.083	A935
United States	Imperium Renewables Inc., Seattle	64.021	A936
United States	Peter Cremer North America LP, Cincinnati	165.7	A937
United States	World Energy Alternatives LLC., Boston	69.209	A939
United States	Overseas exporters specified in Table 4	96.742	As per Table 4
United States	Overseas exporters specified in Table 5	144.109	As per Table 5
United States	All other overseas exporters (residual amount)	144.109	A999

Duty amount and additional codes for category 2 goods

Country	Overseas exporter/producer	Duty amount (£/mt net)	Additional codes
United States	Archer Daniels Midland Company, Decatur	57.409	A933
United States	Cargill Inc., Wayzata	Nil	A934
United States	Green Earth Fuels of Houston LLC, Houston	59.083	A935
United States	Imperium Renewables Inc., Seattle	64.021	A936
United States	Peter Cremer North America LP, Cincinnati	165.7	A937
United States	World Energy Alternatives LLC., Boston	69.209	A939
United States	Overseas exporters specified in Table 4	96.742	As per Table 4
United States	Overseas exporters specified in Table 5	144.109	As per Table 5
United States	All other overseas exporters (residual amount)	144.109	A999



Table A.2: Exception to duty on category 1 goods for specified overseas exporters

Country	Overseas exporter	Additional codes
Canada	BIOX Corporation, Oakville, Ontario	B107
Canada	Rothsay Biodiesel, Guelph, Ontario	B108
Canada	DSM Nutritional Products Canada Inc., Dartmouth, Nova Scotia	C114

The duty specified in Table 1 does not apply to goods produced by overseas exporters specified in Table 3.

Table A.3: Overseas exporters subject to £96.742 per tonne duty

Overseas exporter	Location	Additional codes
AC&S Inc.	Nitro	A941
AG Processing Inc.	Omaha	A942
Alabama Clean Fuels Coalition Inc.	Birmingham	A940
American Made Fuels, Inc.	Canton	A940
Arkansas SoyEnergy Group	DeWitt	A940
Arlington Energy, LLC	Mansfield	A940
Athens Biodiesel, LLC	Athens	A940
Beacon Energy	Cleburne	A940
Biodiesel of Texas, Inc.	Denton	A940
BioDiesel One Ltd	Southington	A940
BioPur Inc.	Bethlehem	A941
Buffalo Biodiesel, Inc	Tonawanda	A940
BullDog BioDiesel	Ellenwood	A940
Carbon Neutral Solutions, LLC	Mauldin	A940
Central Iowa Energy, LLC	Newton	A940
Chesapeake Custom Chemical Corp.	Ridgeway	A940
Community Fuels	Stockton	A940
Delta BioFuels, Inc.	Natchez	A940
Diamond Biofuels	Mazon	A940
Direct Fuels	Euless	A940
Eagle Creek Fuel Services, LLC	Baltimore	A940
Earl Fisher Bio Fuels	Chester	A940
East Fork Biodiesel, LLC	Algona	A940
ECO Solutions, LLC	Chatsworth	A940
Ecogy Biofuels, LLC	Tulsa	A940
ED & F Man Biofuels Inc.	New Orleans	A940
Freedom Biofuels, Inc.	Madison	A940
Freedom Fuels LLC	Mason City	A941
Fuel & Lube, LLC	Richmond	A940
Fuel Bio	Elizabeth	A940
FUMPA Bio Fuels	Redwood Falls	A940
Galveston Bay Biodiesel, LP (BioSelect Fuels)	Houston	A940
Geo Green Fuels, LLC	Houston	A940
Georgia Biofuels Corp.	Loganville	A940



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Green River Biodiesel, Inc.	Moundville	A940
Griffin Industries, Inc.	Cold Spring	A940
High Plains Bioenergy	Guymon	A940
Huish Detergents, Inc.	Salt Lake City	A940
Incobrasa Industries, Ltd.	Gilman	A940
Independence Renewable Energy Corp.	Perdue Hill	A940
Indiana Flex Fuels	LaPorte	A940
Innovation Fuels, Inc.	Newark	A940
Integrity Biofuels	Morristown	A941
Iowa Renewable Energy, LLC	Washington	A940
Johann Haltermann Ltd.	Houston	A940
Lake Erie Biofuels, LLC	Erie	A940
Leland Organic Corporation	Leland	A940
Louis Dreyfus Agricultural Industries, LLC	Wilton	A940
Louis Dreyfus Claypool Holdings LLC	Claypool	A940
Memphis Biofuels, LLC	Memphis	A942
Middle Georgia Biofuels	East Dublin	A940
Middletown Biofuels, LLC	Blairsville	A940
Musket Corporation	Oklahoma City	A940
Natural Biodiesel Plant LLC	Hayti	A941
New Fuel Company	Dallas	A940
North Mississippi Biodiesel	New Albany	A940
Northern Biodiesel, Inc.	Ontario	A940
Northwest Missouri Biofuels, LLC	St. Joseph	A940
Nova Biofuels Clinton County, LLC	Clinton	A940
Nova Biosource	Senaca	A940
Organic Technologies	Coshocton	C482
Organic Fuels, Ltd	Houston	A940
Owensboro Grain Company LLC	Owensboro	A940
Paseo Cargill Energy, LLC	Kansas City	A940
Peach State Labs, Inc.	Rome	A940
Perihelion Global, Inc.	Opp	A940
Philadelphia Fry-O-Diesel Inc.	Philadelphia	A940
Piedmont Biofuels Industrial LLC	Pittsboro	A941
Pinnacle Biofuels, Inc.	Crossett	A940
PK Biodiesel	Woodstock	A940
Pleasant Valley Biofuels, LLC	American Falls	A940
Prairie Pride	Deerfield	A941
RBF Port Neches LLC	Houston	A940
Red Birch Energy, Inc.	Bassett	A940
Red River Biodiesel Ltd.	New Boston	A940
REG Ralston, LLC	Ralston	A940
Renewable Energy Products, LLC	Santa Fe Springs	A940
Riksch BioFuels LLC	Crawfordsville	A940
Safe Renewable Corp.	Conroe	A940
Sanimax Energy Inc.	DeForest	A940
Scott Petroleum	Itta Bena	A942
Seminole Biodiesel	Bainbridge	A940



Trade Remedies
Authority

Southeast BioDiesel LLC	Charlotte	A941
Soy Solutions	Milford	A940
SoyMor Biodiesel, LLC	Albert Lea	A940
Stepan Company	Northfield	A941
Sunshine BioFuels, LLC	Camilla	A940
TPA Inc.	Warren	A940
Trafigura AG	Stamford	A940
U.S. Biofuels, Inc.	Rome	A940
United Oil Company	Pittsburgh	A940
Valco Bioenergy	Harlingen	A940
Vanguard Synfuels, LLC	Pollock	A940
Vinmar Overseas, Ltd	Houston	A938
Vitol Inc.	Houston	A940
Walsh Bio Diesel, LLC	Mauston	A940
Western Dubque Biodiesel, LLC	Farley	A940
Western Iowa Energy, LLC	Wall Lake	A940
Western Petroleum Company	Eden Prairie	A940
Yokaya Biofuels Inc.	Ukiah	A941

Table A.4: Overseas exporters subject to £144.109 per tonne duty

Overseas exporter	Location	Additional codes
AC & S Inc.	Nitro	A941
BioPur Inc.	Bethlehem	A941
Freedom Fuels LLC	Mason City	A941
Integrity Biofuels	Morristown	A941
Natural Biodiesel Plant LLC	Hayti	A941
Piedmont Biofuels Industrial LLC	Pittsboro	A941
Prairie Pride	Deerfield	A941
Southeast BioDiesel LLC	Charlotte	A941
Stepan Company	Northfield	A941
Yokaya Biofuels Inc.	Ukiah	A941



Annex B: Interested parties and contributors

Table AA1 below lists the information submitted to the TRA by interested parties and contributors to date.

Table B: Summary of submissions on the public file received from interested parties and contributors			
No	Interested party name	Information received	Status
1	Renewable Transport Fuel Association (RTFA)	Registration form Comment Comment	Applicant
2	Greenergy Fuels Limited	Registration form Questionnaire	Domestic Producer
3	Argent Energy (UK) Limited	Registration form Questionnaire	Domestic Producer
4	OLLECO	Registration form	Domestic Producer
5	Valero Energy Ltd	Registration form Questionnaire	Contributor
6	UK Oil Industry Tax Committee	Registration form	Contributor
7	United States of America, Department of Commerce	Registration form Comments	Foreign Government
8	Global Affairs Canada	Registration form Comments Comments	Foreign Government