



Trade Remedies Authority

Anti-Subsidy Investigation on Hydrotreated Vegetable Oil (HVO) originating from the United States of America (US)

Note to public file

17 September 2025

Business responses

The TRA conducted an online survey to gather the perspectives of downstream businesses on the two separate investigations, Anti-Dumping & Anti-Subsidy, on HVO originating from the US. The survey was open from 18 June to 03 July. This document sets out the evidence received.

Number of responses and verification

We received 19 responses. We reviewed these and removed:

- One duplicate response; and
- One response where the letter “s” had been used to answer each question.

Once these were removed, there were 17 responses.

Business responses (17 responses)

All 17 respondents identified themselves as downstream businesses in Question 2 of the survey which asked: “How does HVO relate to your business”. All respondents were therefore requested to answer Questions 3 to 24. Details of these responses are below.

Q1: How did you find out about this survey?

Social media	0
Email from the TRA	8
TRA website	1
News story	2

Other (please specify)	5 (Answers included: Supplier, Industry contact, Trade Association, and Colleague)
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One business did not respond to the question.

Q3: Please describe what your company does

All businesses described themselves either as distributors, deliverers, suppliers or sellers of fuels. Where additional detail was provided, respondents stated that they supplied road, heating, marine, and film and TV production. Some businesses also mentioned that they supplied users seeking to reduce their carbon footprint.

Q4: Does your company import HVO?

Yes, we import (if yes, go on to Q5)	0
No, we buy from UK producers/retailers (if yes, go on to Q6)	16
Both, import and buy from the UK (if yes, go on to Q7)	1

Q5: Please name your supplier(s) and the country(ies) where they produce or source their products, (i.e. Company name, Country)

No answers were provided to this question.

Q6: Please name your supplier(s)

Respondents listed: Valero Energy, Phillips66, Shell, Greenergy, ESL Fuels, Crown Oil, WFS, Cetras, and New Era.

Q7: Please list your supplier(s) of HVO and their country(ies) where they produce or source their products, (i.e. Company name, Country).

No answers were provided to this question.

Q8: Approximately what percentage of the HVO you purchased in the last year do you estimate originated from the USA?

Less than 1%	0
Over 1% up to 25%	3
Over 25% up to 50%	3
Over 50% up to 75%	0
Greater than 75%	6

Unsure	4
None / We do not buy HVO which originated from the USA	0

One business did not respond to the question.

Q9: If not the USA, which country of origin do you primarily purchase HVO from?

No answers were provided to this question.

Q10: In your experience are there any notable differences in HVO from the USA compared to those from other countries (e.g. in terms of price, quality or characteristics)?

No answers were provided to this question.

Q11: Please provide your company's total sales revenue (in pound sterling) from the last financial year.

Responses ranged from around £500,000 to almost £700 million. Two businesses did not respond to the question.

Q12: Approximately what percentage of your total sales revenue in the last financial year was from sales of HVO?

Less than 1%	2
Over 1% up to 10%	9
Over 10% up to 20%	2
Greater than 20%	2
Unsure	0

Two businesses did not respond to the question.

Q13: Who do you sell to? (Other businesses/final consumers, etc.)

Respondents identified selling to distributors and/or final customers. Where additional detail was given, this included construction, road distribution, the public sector, local authorities, and UK Film & TV production companies. One business did not respond to the question.

Q14: Are FAME and HVO interchangeable for your business and your customer needs?

Twelve businesses answered "No" and four answered "Yes", whilst one did not respond.

Q15: If yes, what are the factors you consider when choosing to purchase HVO instead of FAME?

Of the four businesses that responded “Yes” to Q14, only one answered this question. They referred to “customer demand”.

Q16: If no, what are the uses of HVO that are not applicable to FAME? How do you or your customers use HVO?

Of the twelve businesses that responded “No” to Q14, all answered this question. They referred to factors including: “high carbon saving”, “lower greenhouse gas emissions”, “sustainability”, “cleaner burning”, “ease of use”, “stable and reliable”, “better operational capacity in cold weather”, “better product”, and use in “marine vessel main engines” or “mobile generators”. Multiple respondents also referred to FAME as not being a direct alternative to diesel, whereas HVO can be used as a 100% “drop in replacement”.

Q17: If prices of HVO were to increase, how would you respond?

Reduce purchases of HVO	14
Purchase same quantity of HVO	0
Reduce purchase of other goods to maintain quantity of HVO	0
Purchase cheaper HVO from another country/ies (please specify)	3
Purchase FAME instead of HVO	0
Other (please specify)	1

All but one business responded. Respondents were allowed to select multiple options; two businesses did this. One business which responded that it would “Purchase cheaper HVO from another country/ies” stated that this would be UK HVO, the other two businesses that responded the same way did not provide any additional detail. One business that selected “Other” said “HVO trades at a premium to Road Diesel and this acts as a barrier for adoption.” Beyond the two mentioned, no other businesses left additional comments.

Q18: What proportion of the cost of your product and/or service is made up of the price of HVO?

Less than 1%	1
Over 1% up to 25%	5
Over 25% up to 50%	0
Over 50% up to 75%	0
Greater than 75%	9

Unsure	1
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One business did not respond to the question.

Q19: If prices of HVO were to increase, how much of this price increase would you need to pass on to your customers in the price of the products and/or services you offer?

Almost all respondents (15) said either “100%” or “All”. One business did not answer the question. The remaining business said that HVO was already difficult to sell without the price going up. Where respondents provided additional detail, they talked about low margins for their businesses, that fossil diesel was the alternative to HVO, and that rising costs would likely lead to their customers not meeting their carbon targets.

Q20: Please provide details as to how you reached the above answer.

Comments included reference to slim margins, low operating profits, high levels of competition in the market, and the need to pass on near full price increases. Respondents also mentioned that they expected their customers to switch to higher carbon fossil fuels if the price of HVO were to increase. Three businesses did not respond to the question.

Q21: Are your products more likely to be used by groups who have protected characteristics? Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation (please do not provide any information in your response that may enable an individual - including yourself - to be identified from that information).

Yes, please specify the relevant protected characteristic(s).	0
No	14
Unsure	2

One business did not respond to the question.

Q22: Are your products more likely to be used by groups of people within specific geographical locations?

Yes, please specify the relevant geographic location(s).	4
No	10
Unsure	2

One business did not respond to the question. Of those businesses that selected “Yes”, one each specified “Scotland”, “South West England”, “England” or “North of the Country”.

Q23: Please tell us how a tariff on HVO from the USA would affect your company and industry.

Of the respondents, 15 said that the resulting increase in price would lead to reduced HVO purchases, with their customers switching to higher emitting fuels (e.g. mineral diesel), missing Net Zero or carbon commitments. One business referred to the extra costs of any tariff. The remaining business did not answer the question.

Q24: Is there any other information you would like to provide to help us assess the effects of a tariff on HVO from the USA on the overall economic interest of the UK?

One business mentioned that FAME is sometimes used by “heating customers” but that they need heated storage to handle its cold properties. They said both HVO and FAME were important to the UK, and the economy would suffer if the price of HVO is increased due to a tariff.

Another respondent said they were using HVO to decarbonise home heating. They believed a tariff would have an impact on projects to do this. They believed any restriction on HVO would also reduce competition, as there would be only one major foreign producer remaining.

An additional four business mentioned the negative impact on the UK’s Net Zero and climate change objectives. One respondent identified those most likely to be hardest hit including hauliers, farmers, off-grid businesses, public sector fleets, SMEs, and those in rural communities. The same respondent said that HVO offered a 90% reduction in carbon emissions compared to the alternative to HVO, which is mineral diesel.

Five businesses answered “No” to the question and six didn’t provide an answer to the question.