



Wednesday 30th April 2025

Trade Remedies Authority
Premier House
60 Caversham Road
Reading
RG1 7EB
United Kingdom

Dear Sir,

NON-CONFIDENTIAL

Provisional Affirmative Determination and Recommendation of Guarantee concerning case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates.

Paterson Enterprises Limited comprised of two UK based independent businesses, Morris Lubricants and GB Lubricants. We would like the opportunity to respond to the Trade Remedies Authority (TRA) Provisional Affirmative Determination and Recommendation of Guarantee concerning case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates.

Our primary interest in this investigation has been to protect the UK Lubricants Industry. Also, to ensure that it remains an equal, fair, competitive market that is protected against any unfair trade practices. Therefore, Paterson Enterprises Limited welcomes the preliminary findings from the TRA that dumping of certain products has occurred in our market and that injury to our industry has been incurred.

The TRA has established that underselling, a practice where the goods imported are consistently sold at a price below that of the like goods in the UK has occurred. Their findings suggest that this has been sizable ranging from 69-74% and 74-89% from Lithuania and the UAE respectfully.

This unfair practice has caused significant and sustained injury to our industry, extending beyond domestic producers and impacting a much wider range of businesses related to our sector.



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Morris Lubricants is a division of Paterson Enterprises Limited, Shrewsbury. VAT Registration No. 838420327. Registered In England and Wales No. 4930959.

However, it must also be noted that Point 53 deems that like goods manufactured in the UK are identical to the goods concerned. We feel this aspect is inaccurate. Manufacturers can use a range of raw materials to produce their products with varying results on quality, performance, specification levels and most importantly cost. In our application we have stated

the like goods and the goods concerned may state the same performance specifications on their respective Technical Datasheets. This suggests that the products are similar or almost identical when comparing them against these data sets [...] However, there have been cases listed on the VLS website that at the time of writing this application state that some of the goods concerned or other products within the manufacturers range do not meet the specifications stated or are not compliant.

We believe that the assertion that the like products and the goods concerned are identical is flawed. Both price undercutting and incorrectly claiming performance specifications or OEM approvals on products have undoubtedly caused irrevocable damage and jeopardy to the UK lubricants industry, especially during a time when the industry has faced several unprecedented global challenges.

We recognise that TRA's formula is to apply the lower margin from its respective Dumping and Injury Margin calculations. However, we believe that supplementary tariffs should be considered and employed to account for these additional external factors.

Whilst we appreciate the findings of the TRA's Provisional Affirmative Determination and Recommendation of Guarantee concerning case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates. We strongly feel that the estimated anti-dumping amount/recommended provisional duties should also carry an additional weighting on the premises that further damage and injury to the sector has been imposed.

Yours sincerely



Kyle T Gleeson
Commercial Manager
Morris Lubricants

