



Tuesday 7th October 2025  
Trade Remedies Authority  
Premier House  
60 Caversham Road  
Reading  
RG1 7EB  
United Kingdom

Dear Sir,

NON-CONFIDENTIAL

Statement of essential facts  
INVESTIGATION No. AD0059

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) Statement of essential facts concerning case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates.

As previously mentioned, 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.

We welcome the report and that the TRA has determined that the goods concerned are being dumped into the UK market and that this has or is causing injury.

However, we have identified two significant matters of concern in relation to the report and the final determination and recommendations presented in Section K.

Our first concern relates to the proposal to apply differing ad-valorem duty rates to exporters and producers based in Lithuania and the UAE. This is particularly relevant to SCT Lubricants, which operates in both regions and has been identified by the TRA as an associated party, sharing common ownership structures and distribution networks.

These variations may incentivise the relocation of production and export operations from the Lithuanian entity to the UAE, where the ad-valorem duty rates are more favourable. In this case, the duty rates applied to SCT Chemicals FZE are over 50% lower than those imposed on UAB SCT Lubricants, potentially offering a significant advantage for exports and encouraging a shift in trade routes.



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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.

We therefore request that the ad-valorem duty rates be applied consistently across both UAB SCT Lubricants in Lithuania and SCT Chemicals FZE in the UAE and set at 84.72% for both sites. This approach would help prevent the relocation or switching of operations between countries to exploit more favourable duty rates.

Our second concern relates to the zero-tariff rate applied to Atlantic Grease and Lubricants FZE. Although their registration for the investigation and verification was submitted late, the TRA found that Atlantic Grease and Lubricants FZE was not dumping products into the UK market.

We believe this proposal presents several issues, as it once again results in inconsistent ad-valorem duty rates. Similar to the risk posed by SCT Lubricants and its potential to shift operations between countries, there is also a concern that other domestic producers in the UAE could route their exports through Atlantic Grease and Lubricants FZE to circumvent the 34.55% duty rate.

For the zero-rate to be applied to Atlantic Grease and Lubricants FZE, we request that the TRA take further action to ensure that other producers and manufacturers within the UAE are not able to benefit from this rate. We recommend that the TRA develop and implement an action plan outlining reasonable measures to monitor imports from Atlantic Grease and Lubricants FZE going forward. This could include, but not be limited to, regular audits and compliance checks to ensure that import volumes remain consistent and do not surge as a result of the zero-rate application.

Whilst we appreciate the findings of the TRA's Statement of Essential Facts for case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates. We strongly believe that a single ad-valorem duty rate should be applied consistently across Lithuania and the UAE. Furthermore, the zero-rate applied to Atlantic Grease and Lubricants FZE should be subject to ongoing, robust monitoring to ensure it remains exclusive to that company. If such monitoring proves unfeasible or ineffective, we request that the rate be reviewed and aligned with those established for other UAE producers and exporters.

Yours sincerely,

[NAME REDACTED BY THE TRA]

Commercial Manager

