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TO:
Trade Remedies Authority
Premier House 60 Caversham Road
Reading
Berkshire
RGI 7EB
Dubai, UAE
07.10.2025

Dear TRA Team,

NON-CONFIDENTIAL

Subject: Submission of Comments on the Statement of Essential Facts — Investigation No. AD0059

Dear TRA Team,

We submit this non-confidential version of our comments on behalf of SCT Chemicals FZE and Chempioil FZE, companies incorporated under the laws of the United Arab Emirates and participating as cooperating parties in Investigation No. AD0059 concerning imports of certain engine oils and hydraulic fluids originating in Lithuania and the UAE.

Clarification on Affiliation and Operational Independence

We note with respect that the Statement of Essential Facts ("SEF") makes reference to potential affiliation between our companies and Lubriage Ltd. We wish to place on record the following clarification: while there may exist familial links between certain shareholders, SCT Chemicals FZE and Chempioil FZE are legally and operationally independent entities.

Each company maintains its own governance structure, decision-making processes, management, and commercial strategies. They are not subject to the control, direction, or decisive influence of Lubriage Ltd and conduct their day-to-day business entirely independently.

This distinction is material to the proper application of the Regulations. We respectfully submit that, for the purposes of determining relatedness under Regulation 9(4)(e) and section 128 of the Customs (Import Duty) (EU Exit) Regulations 2018, the existence of familial relationships alone is not sufficient to establish operational affiliation in the absence of evidence of common management or coordinated commercial behaviour.

We therefore request that the final determination explicitly recognise the operational independence of SCT Chemicals FZE and Chempioil FZE.

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Observations on the Proposed Measures

With full respect for the Authority's statutory responsibilities under paragraph 1 8 of Schedule 4 to the Act, we wish to submit the following considerations regarding the proposed anti-dumping measures:

The intended measures — in particular the five-year duration and the significant ad valorem rate of 34.35% — appear disproportionate in light of the available evidence.

The SEF's injury findings appear to rely primarily on data from only two UK producers, representing an estimated 20—30% of total domestic production. We respectfully submit that such a limited evidentiary base raises questions as to the representativeness of the dataset and the robustness of the injury and causation analysis under paragraph 5 of Schedule 4

Moreover, the SEF does not, in our respectful view, demonstrate a clear causal link between the imports concerned and material injury to the domestic industry as required by Article 3.5 of the WTO Anti-Dumping Agreement and reflected in paragraph 8(1)(b) of Schedule 4.

We raise these points not in criticism but in the spirit of constructive engagement and to assist the Authority in ensuring that the final determination is proportionate, evidence-based, and consistent with the applicable legal framework.

Proposal for a Binding Price Undertaking

Pursuant to paragraphs 77—79 of Schedule 4 to the Act and Regulation 63 of the Regulations, we hereby express our willingness to enter into a binding price undertaking as an alternative to the imposition of definitive anti-dumping duties.

Under such an undertaking, SCT Chemicals FZE and Chempioil FZE would commit to exporting the goods concerned to the UK at or above a minimum price agreed with the TRA. We submit that such a measure would effectively remove any injurious effect of alleged dumping while advancing the objectives of traderemedial law in a proportionate and targeted manner.

The adoption of a price undertaking would, in our respectful submission, offer several key advantages:

- It would achieve the remedial purpose of trade remedies without imposing undue costs on UK importers, downstream industries, or consumers, consistent with the Economic Interest Test under paragraph 25 of Schedule 4.
- It would preserve stable commercial relationships and enhance predictability for UK market participants.
- It would provide the TRA with an enforceable mechanism for ongoing oversight and compliance. _
- It would demonstrate the cooperative approach and good faith of the parties concerned.

We would be grateful for the opportunity to discuss the structure and implementation of such an undertaking with the Authority in greater detail at its convenience. We again express our appreciation for the Authority's work and for the opportunity to participate constructively in this process. SCT Chemicals FZE and Chempioil FZE remain committed to full cooperation and to contributing to a balanced, proportionate, and legally sound resolution of this investigation.

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We trust that the clarifications and proposals set out above will assist the Authority in reaching a final determination that is consistent with the objectives and requirements of UK trade-remedy law and the UK's international obligations.

Yours sincerely,

Manager

[NAME REDACTED BY THE TRA]
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