
**AS0067 – Anti-subsidy investigation into imports
of hydrotreated vegetable oil (HVO) originating
in the United States of America**

Input from Third-Country Contributor

The European Biodiesel Board (“EBB”) is the European Association of EU Biodiesel (including FAME, HVO and SAF) Producers. It is a Brussels-based, non-profit organization established in 1997 that represents the vast majority of biodiesel, renewable diesel and Sustainable Aviation Fuel (SAF) producers in the European Union. It acts as the primary voice for the European biodiesel industry, defending the interests of European biodiesel industry to promote sustainable biodiesel use, energy independence, and circular bioeconomy practices.

EBB members producing HVO represent roughly 58% of total HVO production in the EU.

By this letter, EBB provides full support to the Renewable Transport Fuel Association (RTFA) and its biodiesel producer members, in their fight to level the playing field in the UK.

EBB thus fully supports the imposition of countervailing duties on HVO imports from the USA, which is a necessary step to level the playing field in the UK and ensure the long-term viability of the UK biodiesel industry and the development of new biofuel technologies.

European biodiesel producers have faced unfair trading practices from US exporters in the past. US FAME, HVO and SAF producers benefit from massive subsidies that allow them to export their products at dumped and subsidised prices on third-country export markets. The Blender’s Tax Credit, and its statutory successor the Clean Fuel Production Credit (§ 45Z), encourages US biodiesel producers to sell at aggressive prices on export markets to kill domestic biodiesel industries and gain market shares, to progressively dominate export markets and redress prices to the detriment of downstream players and end consumers.


The European Commission has already established, through anti-dumping and countervailing investigations, that US producers were engaged in dumping and subsidised practices on the Union market. The EU has maintained anti-dumping and countervailing measures against imports of biodiesel from the USA since 2009 due to continued and persistent subsidisation in the USA.

EBB supports the imposition of countervailing measures on HVO imports from the USA to level the playing field in the UK. The EU and the UK are naturally interconnected markets due to their geographic proximity and historic integration for European operators. In EBB's view, it is critical that UK authorities offer fair market conditions to all operators involved in the biodiesel sector, from upstream to downstream companies. A level playing field increases fair competition to the benefit of all players, including consumers.

Restoring a level playing field will also create export opportunities for EU HVO producers, to the benefit of the UK downstream sector and end consumers. To date, fair third-country exporters have been prevented to develop market opportunities with the UK, due to the development of US unfair imports into the UK.

We remain available for any question that you may have.

Yours sincerely,

A large black rectangular redaction box covering the signature area.A black oval redaction box covering the name of the signatory.

Secretary General – European Biodiesel Board