



Trade Remedies
Authority

DUMPING INVESTIGATION

CASE No. AD0068

**Hydrotreated Vegetable Oil originating from the United States of
America**

Notice of Termination

Dated: 28 November 2025



Section A: Summary of the investigation

A1. Investigation

1. The investigation covered the alleged dumping of hydrotreated vegetable oil (HVO) imported into the United Kingdom (UK) originating in, and imported from, the United States of America (US). A full description of the goods can be found in [Section A5: the goods concerned and like goods](#).
2. This notice is provided under regulation 64(4)(a) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations), and in accordance with paragraph 8 of Schedule 2 of the Regulations. This notice should be read in conjunction with other public documents available for this case, which are available on the public file at [HVO originating in the United States of America - Trade Remedies Service - GOV.UK](#).
3. The period of investigation (POI) was 1 January 2024 to 31 December 2024.
4. Had dumping been proven, the TRA identified the period to assess injury would be from 1 January 2021 to 31 December 2024, the injury period (IP).

A2. Initiation

5. On 28 November 2024, the TRA received an [application](#) lodged by the Renewable Transport Fuel Association (RTFA), Greenergy Fuels Limited, Argent Energy Limited and Olleco, alleging that the goods concerned that have been, or are being, imported into the UK from the US are being dumped and that the importation of dumped goods concerned from the US is causing injury to a UK industry in the relevant goods/like goods.
6. The TRA was satisfied that the application contained sufficient evidence of the importation of dumped goods and resulting injury to justify the initiation of the investigation, and that the requirements referred to in paragraph 9 of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act) and regulation 51 of the Regulations had been met.
7. The investigation was initiated by the TRA on 17 March 2025, and the [notice of initiation](#) was published on that date.
8. The Secretary of State, the foreign government of the US and other known interested parties and contributors were notified accordingly and invited to register on the [Trade Remedies Service](#) to participate in the investigation.
9. US exporter St. Bernard Renewables LLC (SBR) commented on the application for AS0067/AD0068 in May 2025. These comments covered four main areas:



- I. Lack of explanation as to the nature of the redacted information.
 - II. Over-redacted information which ostensibly appears public.
 - III. Details on source information used in support of confidential responses.
 - IV. Unredacted data formatting does not allow for substantive analysis.
10. SBR asserts that the RTFA and their legal representatives have a statutory requirement to provide a sufficiently detailed non-confidential version of all of their submissions.
11. SBR submitted a “Challenge Document” in which they highlighted:
- I. sections where there is insufficient detail to decide if the information is confidential or not,
 - II. data or information that may in itself be confidential but for which no meaningful summary or explanation has been provided, and
 - III. data or information that cannot be understood as it is both indexed and ranged.
12. SBR comments that the lack of explanation surrounding why information was redacted, in the non-confidential version of the application, limited their ability to respond to the case.
13. The TRA has reviewed this document and the areas of issue. The TRA asserts that a majority of the redacted information is correctly redacted as it covers sensitive commercial information. Where we considered that there was merit to SBR’s comment we asked the applicant to review the redaction.
14. The TRA has considered the comment “*data or information that may in itself be confidential but for which no meaningful summary or explanation has been provided*” and in response we asked the applicant to provide further information to indicate why information had been redacted
15. The applicant addressed the comments regarding redactions and a lack of explanation for excluding information and submitted an amended non confidential application which was published on 24 June 2025, providing more detail on areas of redaction, and clearer ranges on data in accordance with TRA guidance.
16. An updated [non confidential application](#) was published on the [public file](#) on the 24 June 2025 providing more detail on areas of redaction and clearer ranges on data.



A3. Conduct of the investigation

A3.1 Participation in the investigation

17. The following interested parties and contributors registered to this investigation:

UK Producers:

- Argent Energy (UK) Limited (Argent)
- Olleco
- Greenergy Fuels Limited (Greenergy)

Overseas Exporters:

- Diamond Green Diesel LLC (DGD)
- St Bernard Renewables LLC (SBR)
- Phillips 66 Company (P66)

Importers:

- ESL Fuels Limited
- Phillips 66 Limited
- Valero Energy Limited
- Crown Oil Limited
- Certas Energy UK Limited

UK trade bodies:

- Renewable Transport Fuel Association (the applicant) (RTFA)
- UK & Ireland Fuel Distributors Association Limited (UKIFDA)
- UK Oil Industry Tax Committee (UKOITC)

Foreign Governments

- Office of the US Trade Representative (USTR)
- US Embassy to London

Contributors:

- Shell Trading Rotterdam BV
- Kolmar Group AG
- Neste Corporation



- Mitchell and Webber Limited
- Construction Plant Skills Limited t/a the Construction Plant Hire Association

18. The relevant non-confidential submissions made to this investigation by each of the participants are available on the [public file](#) and a summary of the submissions made are outlined in [Annex A: Summary of submissions on the public file received from registered interested parties and contributors.](#)

A3.1.1 UK Producers

19. Three of the largest producers of biodiesel in the UK registered an interest in the investigation: Argent, Olleco, and Greenergy.
20. Following responses to the pre-sampling questionnaire (PSQ) received during the registration period, with respect to regulation 57 of the Regulations, the TRA limited its examination of UK producers.
21. The TRA published a [notice of proposed sample](#) on 11 April 2025, which was based on the two companies with the largest UK domestic sales volumes that the TRA could reasonably investigate.
22. The UK producers selected to be within the sample were:
- Argent
 - Greenergy
23. One comment relating to the proposed sample was received from SBR on 23 April 2025, recommending including Olleco in the sample.
24. The TRA considered the comment, however determined that limiting the investigation to two UK producers was based on a reasonable method, noting that they covered 91% of UK production. The TRA considers this a reasonable method to determine the sample in respect of regulation 57(3) of the Regulations. No further comments relating to the proposed sample were received and the [final sample](#), which included the UK producers listed in the proposed sample above, was published to the public file on 23 April 2025.

A3.1.2 Overseas Exporters

25. SBR commented on the TRA decision not to sample US exporters, and sampling UK producers. They asked that UK producers were not sampled under the same methodology as US exporters.



26. US exporters were not sampled.
27. The TRA received full questionnaire responses from the following US producing exporters:
- Diamond Green Diesel LLC (DGD)
 - St Bernard Renewables LLC (SBR)
 - Phillips 66 Company (P66)

A3.1.3 Importers

28. Due to the number of responses received to the PSQ during the registration period, with respect to regulation 57 of the Regulations, the TRA limited its examination of importers. The [notice of proposed sample](#) published on 11 April 2025 also outlined the sampling of importers, based on the two companies with the largest volume of UK imports from the US that the TRA could reasonably investigate.
29. The importers selected to be within the sample were:
- Valero Energy Limited
 - Crown Oil Limited
30. One comment relating to the proposed sample was received from SBR on 23 April 2025. SBR commented that it did not know how many importers had replied to the PSQ and therefore reserved its right to comment at a later date. SBR requested the TRA to apply the same methodology to the sampling of UK companies as it had to the sampling of US exporters, and by extension to the sampling of UK importers.
31. No further comments were received on the proposed importer sample and the [final sample](#), as detailed above, was published on 23 April 2025.
32. We received a full questionnaire response from:
- Phillips 66 Limited
 - Valero Energy Limited
 - Crown Oil Limited
 - ESL Fuels Limited



33. Phillips 66 Limited responded in respect of the exporter submission from the US producer Phillips 66 Corporation which sold product on an associated sales basis.

A3.1.4 UK Trade Bodies

34. The RTFA was the applicant of the investigation and a non-confidential version of the application can be viewed on the [public file](#). It did not provide a questionnaire response in the period.

35. UKIFDA and UKOITC did not provide questionnaire responses in the period.

A3.1.5 Foreign Governments

36. The USTR registered its interest in the investigation on behalf of the government of the US.

37. The US Embassy to London registered its interest in the investigation on behalf of the government of the US.

A3.1.6 Contributors

38. Other than where stated above, contributors did not submit questionnaires.

A3.1.7 Non-cooperation

39. No registered parties were deemed to be non-cooperative.

A3.2 Registration of Imports

40. The applicants to this investigation requested that imports of HVO be registered, when they submitted their application on 28 November 2024.

41. Reasons for the request to register imports were given as:

- The applicants are suffering material injury due to earlier revocation of measures on US origin HVO.
- A subsequent extension of EU measures on US HVO, resulting in a flood of imports into the UK.
- Registration will allow separation of HMRC data on combined codes where FAME and HVO share the same commodity code.



42. On 8 July 2025, the Secretary of State made the decision under paragraph 29 of Schedule 4 to the Act to require HMRC to register imports of HVO originating in the USA.

A4. How submitted data was used

43. The TRA used data submitted by cooperating parties as part of the evidence upon which we have based our assessments and formed our conclusion. We have compared submitted data against the totality of relevant evidence available to us including submissions from other interested parties and contributors, evidence from TRA data submissions, and publicly available data from government, industry and other sources. A list of data submitted and considered by the TRA is listed in Annex A.

44. We have also used submitted data to corroborate or gain a level of assurance as to that data itself, or other evidence either submitted to us or gathered by us.

A4.1. Verification of data

45. The TRA undertook verification activities in relation to the information provided by the cooperating interested parties, during which the completeness, relevance, and accuracy of that information was assessed.

46. Verification visits took place between July 2025 and September 2025. The TRA has considered the information supplied by cooperative interested parties and contributors, provided that this information:

- complied with the applicable statutory requirements and the TRA's public guidance;
- was verifiable;
- could be used without undue difficulty; and
- was supplied within an applicable time limit and in a form that the TRA requested.

47. The TRA conducted onsite verification activities with Greenergy, Argent, Valero, DGD, SBR and P66. Remote verification activities were completed for Crown Oil.

48. Verification reports were produced for each of the parties visited and non-confidential versions of these reports are available on the public file:

- [Argent](#)
- [Greenergy](#)



- [Crown Oils](#)
- [Valero](#)
- [DGD](#)
- [SBR](#)
- [P66](#)

49. Secondary source information was used in accordance with the Regulations. This secondary information was treated with special circumspection and, where practicable, verified using independent sources. This included, but was not limited to, official import statistics and data pertaining to relevant markets.

A4.2 Submissions from interested parties

50. During the investigation the TRA has received submissions from interested parties on aspects of the investigation.
51. The submissions received have been submitted with both a confidential and a non-confidential version, with the non-confidential version being published on the public file. The TRA received the following submissions:

[SBR submission](#) – April 2025

[SBR submission](#) – May 2025

[USTR](#) – June 2025

[DGD and Valero](#) – Sept 2025

[RTFA](#) – Sept 2025.

Section A5: The goods concerned and the like goods

A5.1 Goods concerned

52. The TRA refers to the goods it investigates as the ‘goods concerned’ as per regulation 2 of the Regulations.
53. The goods concerned are:

Biodiesel (or paraffinic diesel fuel / gasoil) obtained from synthesis or hydrotreatment of oils and fats of non-fossil origin, in pure form or as included in a blend, originating in the United States of America (US). This biodiesel is commonly known as hydrotreated (hydrogenated) vegetable oil diesel (HVO),



renewable diesel or green diesel. Synthetic paraffinic kerosene (also known as sustainable aviation fuel (SAF)) is excluded from this description of biodiesel.

54. The goods concerned are imported into the UK under the following UK Global Tariff commodity codes:

1516209821	1516209829	1516209833	1518009121	1518009129
1518009133	1518009521	1518009921	1518009929	1518009933
2710194221	2710194229	2710194290	2710194421	2710194429
2710194433	2710194621	2710194629	2710194633	2710194721
2710194729	2710194733	2710194810	2710194890	2710201121
2710201129	2710201133	2710201621	2710201629	2710201633
2710201693	2710201910	2710201990	3824999210	3824999214
3824999217	3826009011	3826009019	3826009033	

A5.2. Like goods

55. In accordance with paragraph 7 of Schedule 4 to the Act, the TRA refers to 'like goods' as those which are like the goods concerned in all respects or, if there are no such goods, goods which, although not alike in all respects, have characteristics closely resembling those of the goods in question.

56. The following were considered Like Goods for the purposes of this investigation:

Fatty-acid mono-alkylesters (FAME) from non-fossil origin, in pure form or as included in a blend, excluding sustainable aviation fuel,

and

Biodiesel (or paraffinic diesel fuel / gasoil) obtained from synthesis or hydrotreatment of oils and fats of non-fossil origin, in pure form or as included in a blend, originating in the UK or Rest of World (RoW). This biodiesel is commonly known as hydrotreated (hydrogenated) vegetable oil diesel (HVO), renewable diesel or green diesel. Synthetic paraffinic kerosene (also known as sustainable aviation fuel (SAF)) is excluded from this description of biodiesel.

A5.3 Comparison of goods concerned and the like goods



57. The TRA made an earlier determination in the TD0004 and TS0005 transition reviews that HVO and FAME are comparable products and are like goods. We have outlined our like goods assessment for this investigation below, and there are no material changes from the conclusions that were reached in TD0004 and TD0005.
58. In assessing whether the goods produced by the UK industry are like the goods concerned in all respects or with characteristics closely resembling them, the TRA has considered:
- a) physical likeness, including physical characteristics;
 - b) commercial likeness, including competition and distribution channels;
 - c) functional likeness, including end-use or interchangeability of the goods;
 - d) similarities in production, including method of production and inputs;
 - e) other relevant characteristics.
59. FAME and HVO are produced in the US. While there is evidence that the UK biodiesel industry produces FAME, the TRA has not established any evidence of large-scale production of HVO within the UK, although investment in a potential production plant is known.

A5.4 Conclusion of comparison of goods concerned and the like goods

60. The TRA accepts that there are some differences between FAME and HVO's chemical composition and production process. In its holistic comparison the TRA has determined that the goods produced by the UK industry, although not alike in all respects, have characteristics closely resembling those of the goods in question and therefore constitute "like goods" for the purposes of paragraph 7 of Schedule 4 to the Act.

Section B: Reasons for the Termination

B1. Dumping margin

61. In accordance with paragraph 1(1) of Schedule 4 to the Act, goods are 'dumped' in the UK when those goods are imported into the UK and their export price is less than their normal value.
62. The application presented to the TRA prior to initiation, which supported dumping, relied upon publicly available data and commercially supplied subscription pricing data. This indicated that dumping may be present. At this stage, the calculation was not specific to a particular party's situation. In addition, it did not take into account adjustments for subsidies, which would be excluded



in the dumping calculation in order that the benefit from the subsidy is not double-counted.

63. The TRA has assessed whether the goods concerned are being dumped in accordance with paragraphs 1(1) and 8(1)(a) of Schedule 4 to the Act.
64. Paragraph 1(2) of Schedule 4 to the Act defines the 'normal value' of goods as:
 - a) the comparable price, in the ordinary course of trade, for like goods when destined for consumption in the exporting foreign country or territory, or
 - b) such other price or value as may be determined in accordance with provision made by regulations for specified cases where it is not appropriate to use the price in paragraph (a).
65. The dumping margin is the difference between the export price and the normal value of the goods being dumped, described as a percentage of the export price at a level of the cost of insurance and freight (CIF).
66. The TRA has calculated dumping margins in accordance with paragraph 2 of Schedule 4 to the Act and regulation 6(2) of the Regulations. Calculating the dumping margin involved the following stages:
 - a) calculating the normal value of the goods concerned;
 - b) determining the export price;
 - c) ensuring a fair comparison between the normal value and the export price;
 - d) calculating the dumping margins.
67. The TRA calculated the dumping margin using verifiable data provided by DGD, SBR and P66. The parties provided information in respect of the cost to make, components of the subsidies that were received, sales data and other income.
68. In accordance with regulation 11 of the Regulations, the TRA determined costs of production for US exporters based on their records, as these were maintained in accordance with US GAAP and reasonably reflected the costs associated with the production and sale of the like goods in the US. Additional consideration was given to low carbon fuel standard (LCFS) and renewable identification numbers (RINS), which are collected by US producers in respect of domestic sales, but not for export sales. Adjustments for the level of trade were also taken into consideration where necessary. An adjustment was made to account for the "Blenders Tax Credit" (BTC) that the exporters received, in order that the BTC



was not taken into account in both the dumping investigation and the subsidy investigation.

69. In accordance with regulation 17(1)(a) of the Regulations, the TRA compared a weighted average normal value with a weighted average of prices for all comparable export transactions, from the cooperating US exporters, to calculate an individual dumping margin for each exporter.

Table 1: Dumping Margins		
Company	Country	Dumping Margin %
DGD	USA	(10.15%)
P66	USA	(24.95%)
SBR	USA	(23.18%)

70. Table 1 details the dumping margins calculated. Following verification activities and analysis of the exporter data the TRA has determined that all three US exporters have presented a negative dumping margin. Therefore, there is no evidence of dumping for the US exporters DGD, SBR and P66.

71. In accordance with regulation 64 (1A) of the Regulations the TRA is terminating the anti-dumping investigation in respect of the US exporters, DGD, SBR and P66.

B2. Volume of dumped goods

72. Following the termination of the investigation in respect of DGD, SBR and P66, and as a consequence of that decision, the TRA must remove the volume of the goods exported to the UK by DGD, SBR and P66, so that the volume of those goods no longer form part of the investigation.

73. The US exporters, DGD, SBR and P66 exported 400million-460 million litres in the POI. HMRC confidential 10-digit data indicated that in the POI total US imports were 410 million-460 million litres.

74. The level of imports from the USA following removal of the exporters goods that have been found not to have been dumped are 5.2 million and 6.1 million litres.



75. Total imports of HVO into the UK are between 700 million and 820 million litres, (publicly available HVO consumption data for 2024 shows 787,829,538 litre was consumed), less the volume of US HVO imports, gives total HVO imports of like goods of between 280 million and 320 million litres. The volume of US imports that remain following the removal of the goods exported by DGD, SBR and P66 account for between 1.8% and 2.1% of worldwide imports of HVO like goods into the UK, which is below the 3% negligible level.
76. Adding imports of the like good (FAME) to the total world-wide imports of the like good (HVO) into the UK would reduce the import volume of US goods that could be dumped further from the 1.8%-2.1% calculated above.

Section C: Termination of anti-dumping investigation

77. In accordance with regulation 64 (1A) of the Regulations, the TRA is terminating the dumping investigation AD0068 in relation to all of the goods of the participating US exporters (Diamond Green Diesel LLC, St Bernard Renewables LLC and Philips 66 Co), as there is no evidence that they are dumping and the margin of dumping is therefore minimal, as defined in regulation 2 of the Regulations.
78. As a consequence of terminating the investigation on the above volume of US goods, the remaining volume of US goods is negligible. Therefore, in accordance with regulation 64 (1)(b) of the Regulations, the TRA is terminating the dumping investigation AD0068 in relation to all of the goods from the USA, as the volume of any potentially dumped goods that could be imported is negligible.
79. This notice will come into effect on 28 November 2025.

Dated 28 November 2025



Annex A: Interested parties and contributors

Summary of information received from interested parties and contributors

	Interested party/Contributor	Information received	Status
1	The Road Transport Fuels Association	Application , Pre-sampling questionnaire (PSQ) , Updated Application Submission	Applicant
2	Greenery Fuels Limited	Pre-sampling questionnaire (PSQ) Questionnaire	Sampled UK producer
3	Argent Energy (UK) Limited	Pre-sampling questionnaire (PSQ) Questionnaire	Sampled UK producer
4	Olleco	Pre-sampling questionnaire (PSQ)	Non-sampled UK producer
5	Crown Oil Ltd	Pre-sampling questionnaire (PSQ) Questionnaire	Sampled UK importer
6	Phillips 66 Limited	Pre-sampling questionnaire (PSQ)	Non-sampled UK importer
7	Valero	Pre-sampling questionnaire (PSQ) Questionnaire	Sampled UK importer
8	Diamond Green Diesel	Pre-sampling questionnaire (PSQ) Questionnaire Submission	US Exporter



9	St Bernard Renewables LLC	Pre-sampling questionnaire (PSQ) Questionnaire Submission in regard to the application Submission on Sample	US Exporter
10	Phillips 66 Company	Pre-sampling questionnaire (PSQ) Questionnaire	US Exporter
11	Certas Energy Uk Limited	Pre-sampling questionnaire (PSQ)	Non-sampled UK importer
12	United States of America Department of Commerce	Pre-sampling questionnaire (PSQ) Submission comments on the investigation Additional Submission	US Government
13	US Embassy London	Pre-sampling questionnaire (PSQ)	US Government
14	UK & Ireland Fuel Distributors Association Limited	Pre-sampling questionnaire (PSQ)	Contributor
15	UK Oil Industry Tax Committee	Pre-sampling questionnaire (PSQ)	Contributor
16	Kolmar Group AG	Pre-sampling questionnaire (PSQ) Questionnaire	Contributor
17	Mitchell & Webber Limited	Pre-sampling questionnaire (PSQ)	Contributor
18	Neste	Pre-sampling questionnaire (PSQ)	Contributor



19	Shell Trading Rotterdam B.V.	Pre-sampling questionnaire (PSQ)	Contributor
20	ESL Fuels Limited	Registration of Interest Questionnaire	Non sampled importer
21	Construction Plant Skills Limited t/a the Construction Plant Hire Association	Registration of interest and Submission	Contributor
22	Vitol SA	Pre-sampling questionnaire (PSQ)	Non-sampled UK Importer
23	Business Survey from anonymous downstream users	Overview of survey results	Contributor