



## Verification report – Importer

### Case AD0058: Biodiesel from the People’s Republic of China (PRC)

<b>Period of Investigation (POI):</b>	1 April 2023 to 31 March 2024
<b>Injury Period:</b>	1 April 2020 to 31 March 2024
<b>Date of report:</b>	14 February 2025
<b>Case team contact details:</b>	AD0058@traderemedies.gov.uk
<b>Interested Party verified:</b>	Greenergy Fuels Limited (“Greenergy”)

For further details, please see the [Notice of Initiation](#) on the public file.



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## Executive Summary

The TRA received an application for a new anti-dumping investigation for biodiesel from the PRC on 27 March 2024 and initiated this investigation on 5 June 2024.

The Trade Remedies Authority (TRA) is conducting this anti-dumping investigation to determine whether injury is being caused to the UK Biodiesel industry due to dumping of biodiesel imported into the United Kingdom (UK) from the PRC.

More information about the case can be found on the [public file](#).

Greenergy, an importer of the goods concerned, returned a completed, importer questionnaire ('questionnaire response').

Greenergy is an importer and blender of biodiesel, and also a producer of waste-based biodiesel in the UK.

The TRA sought to verify the completeness, relevance and accuracy of the information submitted. TRA visited Greenergy to conduct onsite verification in December 2024.

The TRA sought to verify the completeness, relevance and accuracy of the information submitted:

- We conducted a walkthrough of the accounting systems to assess how much reliance we can place on information produced by the system.
- We compared questionnaire responses and other accompanying evidence and information to open sources such as Companies House, Greenergy's websites, etc. checking for consistency.
- We checked information and data (information) provided for consistency with financial statements and responses from other interested parties.

Based on the verification activity undertaken the TRA have a reasonable level of assurance on the completeness, relevance and accuracy of the information provided by Greenergy and we can use it for the purpose of this investigation.

## Purpose of verification

The purpose of the TRA's verification activity is to determine whether the information provided by interested parties is complete, relevant, and accurate and can be used in our investigation. This verification report sets out the conclusions reached for each component part that covers the scope of our work. It also provides an overall conclusion stating the level of assurance reached.



The information verified may then be considered in our assessments and analysis to determine whether dumping has occurred and if this dumping is causing injury to the UK industry. This will form the basis for establishing appropriate measures where necessary, and to assess whether these are in the UK’s economic interest.

We carried out verification activities onsite. The TRA did not seek to verify all information provided, but undertook the work considered appropriate and possible within the time constraints of the investigation to obtain assurance upon which to base our case decision.

This verification report documents the work completed, providing an overview of the range and scope of verification procedures performed, for each component part that covers the scope of our work, on the information submitted by Greenergy. It details the conclusions reached regarding completeness, relevance, accuracy and provides an overall conclusion stating the level of assurance reached.

### Confidential information

Greenergy must provide a non-confidential version of the verification report marked as ‘non-confidential’ in the header.

If any information contained in the verification report is considered confidential, Greenergy should delete or redact those sections and provide a non-confidential summary of the information which has been removed. It must provide reasons as to why the particular information is considered confidential (see also [public guidance](#)).

The non-confidential version of the verification report will be placed on the public file.

### Verification

Please find below a summary of work completed by the TRA to determine whether the information provided by Greenergy in its questionnaire response is complete, relevant, and accurate.

#### A. Company structure and associations

What information was considered
<p>We considered the following from the questionnaire:</p> <ul style="list-style-type: none"> <li>• Company details e.g., founding date, company addresses etc.</li> <li>• General company structure, ownership, and management.</li> <li>• Associations with other companies.</li> </ul>



- Accounting practices and policies

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

We do not wish to share UBO details of our shareholder. This is commercially sensitive information.

How the information was checked

**Company Details**

The TRA cross-checked the details submitted by Greenergy with documents published on Companies House and information provided on the Greenergy company website. These documents include the Greenergy Biofuels Limited and Greenergy Biofuels Teesside’s audited financial statements for 2023 which ends within the Period of Investigation of 1 April 2023 to 31 March 2024. We found that the information submitted in their questionnaire was consistent with information published on Companies House and Greenergy’s website.

**General company structure, ownership and management**

We cross-checked details provided by Greenergy on its structure, ownership, and management with documents published on Companies House and publicly available information. The parent company is Greenergy International Ltd., We found that the information in these documents and websites are consistent with information provided in Greenergy’s submission.

**Associations with other companies**

In its questionnaire response, Greenergy listed companies involved in the import or sale of the goods concerned and with whom it claims an association. We compared this list of companies to information relating to corporate structure and board membership provided by Companies House. We found that the information was consistent with Companies House records and therefore the information in relation to associations can be used during the investigation.

**Accounting practices and policies**

The financial statements for Greenergy are prepared in accordance with the United Kingdom Generally Accepted Accounting Practices (United Kingdom Accounting Standards, comprising FRS 101 “Reduced Disclosure Framework”, and applicable law). The independent auditor’s opinion of the Greenergy 2023 audited financial statements gives an unqualified statement that the Greenergy 2023 accounts give a true and fair view of the companies’ affairs as of 31 December 2023. Greenergy’s accounting policies are shown in the notes to the financial statements. The policies are understood and deemed reasonable if applied as expected.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*



Exceptions/Findings/Adjustments
None
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>
Conclusions
The information relating to company structure and associations provided by Greenergy is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for publications and for any other purpose within the investigation.
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>

## B. Accounting Systems and Procedures

What information was considered
<ul style="list-style-type: none"> <li>• Information Technology Systems and Applications</li> <li>• Accounting policies, significant risks, and chart of accounts</li> <li>• Sales / customer order process and procedures</li> <li>• Purchase order / invoice approval process and procedures</li> </ul>
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>
We would prefer to keep details of our financial systems private. This is commercially sensitive.
How the information was checked
<p><b>Systems Walkthrough</b></p> <p>During our onsite visit to Greenergy, we conducted a systems walkthrough of Greenergy’s financial systems</p> <p>During this walkthrough of Greenergy’s accounting system, we were provided with screenshots and supporting evidence of Greenergy’s sales and purchasing processes. We walked through one sale and one purchase transaction of biodiesel selected by the TRA in order to gain an understanding of end-to-end processes and system controls. We identified through this process the amount of manual intervention, the level of integration with the financial system that Greenergy uses, and the source documents that are accessible to Greenergy. Based on the systems walkthrough, we have a reasonable level of assurance that the financial</p>



systems that Greenergy uses are reliable with sufficient controls in place for the TRA to rely on its submitted data.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

Exceptions/Findings/Adjustments

None

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

Conclusions

Based on the work performed, we have obtained a basic understanding of the relevant accounting and associated business systems of Greenergy. This enabled us to plan appropriate verification procedures.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

C. Goods

What information was considered

- Goods description and comparability to the goods concerned
- PCN allocations
- Internal coding system

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

We do not wish to share details of our accounting coding for purchases. This is commercially sensitive.

How the information was checked

**PCN allocations and internal coding system**

PCN allocations are made in the following ways. FAME biodiesel purchases and HVO purchases are coded to specific accounting books. This distinction will differentiate between PCN allocations for P (HVO) vs F (FAME). The certificate of analysis provided at purchase indicates the CFPP (Cold filter plugging point). Greenergy only buys 100% FAME on import so all import PCNs are de facto P100.



As an importer, there is a degree of uncertainty in differentiating feedstock by ton of biodiesel as the PCN structure requires. Feedstock allocation has been based on the feedstock in the sustainability credentials that that transaction was sold with. Mass balance selling process means that the individual transaction is not sold with its technical sustainability provenance. With consideration to the use of the transaction-by-transaction data in the investigation, the TRA does not consider this material.

**The goods concerned**

FAME and HVO are heavily regulated products. Greenergy sells FAME and HVO (as well as blends thereof) that meet EN 14214 and EN 15940 specifications respectively, and as such the product is required to meet consistent standards. The products listed in the questionnaire submission were consistent with the specifications and production processes listed on the company’s website.

**Visit to the production facility and observed operations**

We visited the production facilities during a pre-initiation facilitation visit in September 2023 and were able to view the storage and preparation of raw materials, the production process, the quality control procedures, the storage of finished goods, and the site facilities available to transport products to its customers. The operations we observed were consistent with the information submitted within the questionnaire.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**Exceptions/Findings/Adjustments**

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**Conclusions**

The information relating to the company’s goods provided by Greenergy is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate except for the feedstock allocation at a transaction-by-transaction level. The information can be used by the TRA with consideration that feedstock is mass balanced.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*



D. Imports and forward orders

What information was considered
<ul style="list-style-type: none"> <li>• Import prices</li> </ul>
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>
We do not wish to share details of our internal pricings. This is commercially sensitive. But we are ok for TRA to confirm pricing is on arm's length.
How the information was checked
<p><b>Cost of Sales Reconciliation</b></p> <p>We were able to reconcile the Cost of Sales in the audited financial statements to 31 December 2023 to Greenergy's trial balance. We then aligned the financial year to the POI by excluding the first 3 months of the financial year and adding 3 months on. We then agreed the aligned figures for the POI to the questionnaire response. Greenergy provided HMRC declarations for the goods concerned which agreed with the figures for the goods concerned provided within the annex. This provided us a reasonable level of assurance on the completeness and relevance of the data.</p> <p>During the verification visit some information was clarified and adjusted as Greenergy initially excluded transactions the legal entity conducted with firms abroad which meant the figures did not agree with the financial statements.</p> <p><b>Import transaction testing</b></p> <p>In December 2024 we performed an on-site verification visit. During that time, we performed downward verification by agreeing details in the questionnaire data to source documents.</p> <p>We asked Greenergy to provide contracts, purchase orders, invoices and proof of payment for a selected sample of transactions. There were two types of transactions, internal transfers and purchases from third parties. For the purchases from external parties, all the source documents were obtained and agreed with the information in the questionnaire. For the internal transfers we were able to confirm transactions were conducted at arm's length. However, Greenergy did not formally order products, invoice themselves or transfer money. Instead, when the order was required, Greenergy completed a trade in their logistical system. We were provided with screenshots and details of all internal transactions.</p>
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>



Exceptions/Findings/Adjustments
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>
Conclusions
The information relating to imports and forward orders provided by Greenergy is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for the purposes of margin calculations, injury assessments and for any other purpose within the investigation.
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>

E. Sales

What information was considered
<ul style="list-style-type: none"> <li>• Sales reconciliations</li> <li>• Price reductions</li> </ul>
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i>
How the information was checked
<p><b>Sales reconciliation</b> Greenergy’s financial year is the calendar year and as such, its financial year does not align with the POI. To reconcile the sales figures for all goods in the POI to their audited financial statements, we used trial balances submitted by Greenergy to align the sales figure provided for all goods in the financial statements to the POI. Greenergy’s sales figure from its audited financial accounts aligned to the POI using trial balances matches with the figure submitted in the Sales Reconciliation Annex with no variance.</p> <p><b>Sales Transaction testing</b></p>



We compared the invoices, contracts and proof of delivery to the information provided together with checking the delivery of goods in their operational system and no issues were found.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

Exceptions/Findings/Adjustments

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

Conclusions

The information relating to sales provided by Greenergy is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant and accurate and can therefore be used by the TRA for publications.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

F. Economic Interest Test

What information was considered

- Other producers of the like good, upstream, and downstream industry
- Employment figures
- Market Share

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

How the information was checked

Being an importer there is less information that informs the EIT than that provided by producers. However, Greenergy provided us with supplier and customer data which was verified during the verification visit. They also provided us with employment figures from their payroll system which was split by area of employment which we were able to verify.



We were able to gauge the price of imports from the verification activities on purchases.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

Exceptions/Findings/Adjustments

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

Conclusions

The information relating to economic interest provided by Greenergy is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for the Economic Interest Test and for any other purpose within the investigation.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

## Conclusions

We gained an understanding of Greenergy, its operations, and associations by comparing information to submitted documents and publicly available information. We verified the company has correctly assigned PCNs to all the like goods it produces and has not made any omissions or incorrect inclusions.

We did a systems walkthrough to understand its systems and controls.

We conducted upwards verification of costs by reconciling questionnaire data to the cost of sales in the audited financial statements. We also conducted downwards verification by comparing detail provided in the questionnaire response to source documentation and found no issues. That gave us a reasonable level of assurance on the completeness, relevance and accuracy of cost data in the questionnaire response.

We conducted upwards verification of sales by reconciling questionnaire data to the turnover in the audited financial statements. We also conducted downwards verification by comparing detail provided in the questionnaire response to source



documentation and found no issues. That gave us a reasonable level of assurance on the completeness, relevance and accuracy of sales data in the questionnaire response.

Greenergy provided sufficient and appropriate evidence, which enabled us to conduct verification work on a sample basis as detailed in the above sections. Based on the work performed, we have a reasonable level of assurance that the information provided in its questionnaire response is complete, relevant, and accurate for the purpose of this investigation.

## Annexes

### Annex 1: Meetings

Date and duration	Type of authentication	Company representatives	TRA representatives
9 to 10 December 2024	<input type="checkbox"/> remote <input checked="" type="checkbox"/> on-site	Redacted – sensitive personal data Redacted – sensitive personal data	Redacted – sensitive personal data Redacted – sensitive personal data Redacted – sensitive personal data