



Verification report – Overseas Exporter/Producer Case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates

Period of Investigation (POI):	1 April 2023 – 31 March 2024
Injury Period:	1 April 2020 – 31 March 2024
Date of report:	August 2025
Case team contact details:	AD0059@traderemedies.gov.uk
Interested Party verified:	Atlantic Grease & Lubricants FZC, United Arab Emirates

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



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Executive Summary

The Trade Remedies Authority (TRA) is conducting an anti-dumping investigation to determine whether injury is being caused to the United Kingdom (UK) due to dumping of Certain Engine Oils and Hydraulic Fluids imported into the UK from Lithuania and the United Arab Emirates (UAE).

More information about the case can be found on the public file:

[Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates - Trade Remedies Service - GOV.UK](#)

Atlantic Grease & Lubricants FZC (Atlantic), a UAE based producer/exporter of the goods concerned, returned an exporter questionnaire and annex (the questionnaire response). Atlantic produces engine oils, hydraulic fluids and other similar products. The goods under review are exported to the UK and other countries. Atlantic did not sell any like goods domestically in the UAE during the period of investigation (POI).

The TRA sought to verify the completeness, relevance and accuracy of the information submitted, and also requested additional information and supporting evidence and calculations to corroborate amendments made to the questionnaire response received:

- We conducted a remote walkthrough of Atlantic's accounting system, to gain an understanding of the accounting function and its systems and controls, to enable us to assess the level of reliance that can be placed on the data submitted.
- We conducted a remote verification exercise to evaluate the completeness, relevance and accuracy of information provided in the questionnaire response.
- We checked information provided in the questionnaire response regarding general company set-up and associations against information on the Atlantic's corporate website and other open sources, as well as its audited financial statements. We also confirmed details were consistent with company secretarial records and discussed ownership or and structure with management.
- We conducted specific testing of Product Control Numbers (PCNs) due to complexity of the PCN structure to ensure accuracy and consistency of its application and when mapping PCN parameters to internal product codes.
- We reconciled questionnaire responses with information held in Atlantic's accounting system and financial statements, to consider the completeness, relevance and accuracy of the submission.

Overall, based on the verification activity undertaken the TRA has been able confirm that the information is complete, relevant and accurate for the purposes of this Investigation.



Purpose of verification

The purpose of the TRA's verification activity is to determine whether 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 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.

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 seek assurance upon which to base our case decision. This work was undertaken remotely via MS Teams.

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 Atlantic. It details the conclusions reached regarding completeness, relevance and accuracy, and provides an overall conclusion stating the level of assurance reached.

Confidential information

Atlantic 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, Atlantic 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 Atlantic in its questionnaire response is complete, relevant and accurate.



A. Company structure and associations

What information was considered

We considered the following from the questionnaire response:

- Company details including date of incorporation, company addresses, etc.
- General company structure, ownership and management
- Associations with other companies
- Accounting compliance and auditor's opinion

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

We checked the company structure and declared associations to gain an understating of Atlantic's operations and relationships. This process enabled us to check the authenticity of the information provided.

Company details

We cross-checked information submitted by Atlantic to its audited financial statements for the period ended 31 March 2024 and to other sources, including its corporate website.

General company structure, ownership and management

We cross-checked details provided by Atlantic on its structure, ownership, and management with company secretarial documents submitted in the questionnaire response, as well as to publicly available information.

Associations with other companies

We reviewed the questionnaire response and did not identify any undeclared associated parties. We also discussed the nature of relationships with other corporate entities and found no inconsistencies when compared to our own independent research.

Accounting compliance and auditor's opinion

The statutory financial statements of Atlantic are produced in accordance with International Financial Reporting Standards (IFRS). The statutory financial statements spanning the entirety of the injury period are aligned with the POI and have been subject to independent audit. The conclusion of the auditor is that the financial statements have been presented fairly in all material respects.



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 a reasonable level of assurance that the information relating to company associations and accounting policies and practices can be treated as complete, relevant and accurate and can therefore be used by the TRA for dumping and injury assessment 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](#)):

B. Accounting Systems and Procedures

What information was considered

- Accounting systems
- Accounting policies, risks and financial statements
- Sales and customer order process
- Purchase order on raw materials

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

We conducted a remote walk-through of Atlantic’s accounting systems and procedures to ascertain the level of reliance that can be placed on the data processed by its information systems. This included systems and controls underpinning the sales costing and purchasing processes.

Accounting systems



Atlantic demonstrated the use of “PACT” enterprise resource planning (ERP) software, an application designed for small and medium-sized enterprises. This is used in conjunction with Microsoft Excel for further analysis of data. We were able to follow examples of the key functions and integrations.

Accounting policies, risks and financial statements

We reviewed the full audited financial statements for the reporting period ended 31 March 2024, which we confirmed were prepared in line with IFRS and independently audited; the accounting period aligns with the POI. We found no high-risk or high complexity areas which needed responding to via the design of additional verification procedures.

Sales and customer order process

We selected a random sales transaction to observe the procedural overview of sales order, fulfilment and settlement. Atlantic demonstrated how the sales order was placed by the relevant customer, its invoice issuing process, delivery and settlement process via a walk-through of its accounting system. In addition, we requested source documentation and other evidence and explanations to underpin our understanding of the processes.

Purchase order on raw materials

Atlantic demonstrated via a walk-through of its accounting system how the randomly selected purchase order was processed, related production departments were notified, and logistics and payments were tracked. In addition, we requested source documentation and other evidence and explanations to underpin our understanding of the processes.

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 Atlantic. This enabled us to plan and respond to 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 of the like goods and goods concerned
- Product Control Number (PCN) allocations
- Internal coding system
- Top PCNS by sales volume

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

We checked the information submitted in the questionnaire response to determine whether Atlantic had correctly assigned PCNs to goods produced, and to ensure its submission included goods within the scope of the investigation.

Goods description, PCN allocations and internal coding system

We reviewed the characteristics of PCNs in relation to the product catalogue specifications and aligned them with internal product codes. This process highlighted the inherent complexity of the PCN table, including overlapping technical specifications that allow for multiple interpretations.

We conducted testing during verification by focusing on the top 10 products by sales volume, to establish if there had been any inaccuracies concerning the mapping of internal product codes to the PCNs. We reviewed extracts from internal product catalogues and product specification sheets and discussed with technical management about any potential ambiguities. We identified one PCN which was incorrectly applied. Additionally, seven PCNs were requested to be removed from the annex data as these related primarily to gear oils, which, although similar in terms of technical specifications, are outside the scope of this investigation. Atlantic took an action to re-present the annex data and omit sales and related information concerning the out-of-scope items.

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 a reasonable level of assurance that the information presented by Atlantic in relation to the goods concerned and like goods can be treated as relevant and accurate, and can therefore be used by the TRA for dumping and injury assessment 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](#)):

D. Costs

What information was considered

- Completeness of costs data
- Transactional testing:
 - Sample of transactions
 - Cost source documents
- Cost allocation testing:
 - Raw materials and production overheads
 - Administration, selling and general (AS&G) costs
 - Domestic freight

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

Completeness of costs

Atlantic did not provide a completed Annex D4 Upward Cost Reconciliation in its questionnaire response. During verification, we checked the cost ledger on the live version of the accounting system, and it reconciled to the cost of goods sold in of the audited financial statements. We also checked the cost elements and established that the purchases of raw materials represented the majority of the cost to make and sell – consistent with our knowledge of the industry within the scope of the investigation. We were also able to isolate the movement between



opening and closing inventories by raw materials, work in progress, and finished goods, establishing that the latter was an immaterial cost to the case. We were satisfied that we had obtained complete cost to make and sell values and an appropriate level of detail and understanding to inform downwards testing procedures to consider accuracy and relevance of transactional-level data.

Transactional testing

We conducted downwards verification procedures to consider the accuracy and relevance of cost transactions listed in the questionnaire annex. Prior to the verification visit, we requested source documents for a sample of cost transactions, which was communicated to Atlantic in the form of a transaction selection. This sample of cost transactions was compared to source documentation supplied by Atlantic during the remote verification call. All selected transactions were backed up with documentation including purchase orders, invoices, delivery records, and bank payments. No material differences were identified during our testing.

Cost allocations

Raw materials and production overheads

Atlantic assigned direct costs to the sales of products based on the breakdown of sales prices of the goods concerned, net of mark-up. The underlying costs was then broken into constituent parts of raw materials. We compared the allocated raw material costs to the accounting records and initially discovered material discrepancies. Atlantic had in some instances used the largest cost values assigned to a group of sales representing individual PCNs. We requested that the data be re-presented in the form of mean averages of costs for each class of PCN, which could then be used to define a per litre cost breakdown, which would be required for dumping calculation purposes. After re-presenting the data, we are satisfied that the raw material values accurately reflected the cost. We are also satisfied that the methodology used is reasonable.

AS&G

Atlantic did not fully complete the applicable AS&G annex data entry points in its original questionnaire response. After remote verification, Atlantic re-presented AS&G costs in a manner which could be used to populate the annex. We examined the costs, considering the individual elements and their importance to the case, as well as ensuring consistency with detail presented in the notes to the audited financial statements. As the AS&G costs related to the overall business operations of selling both in and out-of-scope products, we requested that a portion of these costs be assigned to the goods concerned based on proportion of goods sold. Initially, we requested this be done on a volume basis. However, Atlantic revealed that the volume-based sales records were not easily available to them and , therefore prepared the AS&G split based on the share of sales values. Atlantic used the sales values of all goods sold to the UK rather than the goods



concerned to calculate the percentage. We compared the difference between the two sales values and found that it was immaterial. We also reviewed each of the AS&G costs for extraordinary items and found no examples. No additional data in the form of detailed cost ledgers was requested. We are satisfied with the accuracy and reasonableness of the allocations of AS&G costs to PCNs, except for the immaterial difference identified which we would recommend be adjusted for.

Domestic freight

During verification, Atlantic confirmed that it had used its own fleet to deliver all goods, including those goods concerned, to the port at its own costs. We requested a response from Atlantic to estimate domestic freight on a per litre basis. In response, Atlantic provided limited local freight documentation instead of a breakdown of appropriate freight costs requested. No domestic freight on a per litre basis was provided and we are not in a position to estimate this due to inadequate data and evidence.

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

No domestic freight on a per litre basis was provided and we are not in a position to estimate this due to inadequate data and evidence.

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

Conclusions

Except for domestic freight costs, based on the work performed we have a reasonable level of assurance that the information can be treated as relevant and accurate, and can therefore be used by the TRA for dumping and injury assessment 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](#)):

E. Sales

What information was considered



- Completeness of sales
- Transactional testing:
 - Sample of transactions
 - Cost source documents
- Price reductions

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

Completeness of sales

We checked the sales data presented in the questionnaire annex and reconciled it to the POI-aligned audited financial statements. We observed immaterial differences which were attributed to exchange rate differences occurring due to the reporting currency being UAE dirham, with the questionnaire annex data being presented in GBP. Fluctuations between the two currencies over the course of the POI meant that such observable differences were reasonable. During verification, we also checked the sales records from the accounting systems and confirmed that Atlantic had correctly identified in and out of scope products, only reporting sales values of goods concerned in its questionnaire response.

Transactional testing

We conducted downwards verification, a form of testing involving checking for accuracy and relevance of sales transactions listed in the questionnaire annex. Prior to the verification visit, we requested source documents for a sample of sales transactions, which was communicated to Atlantic in the form of a transaction selection. This sample of sales transactions was compared to source documentation supplied by Atlantic during the verification visit. All selected transactions were backed up with documentation including sales invoices, delivery documents, and bank payments. We also discussed Atlantic's discount policies as well as related policy involving insurances and other related transactions involved in exports. No material differences were identified during our testing. We have reasonable assurance that Atlantic had correctly reported the sales and price reductions in the questionnaire response.

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



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 a reasonable level of assurance that the information can be treated as relevant and accurate, and can therefore be used by the TRA for dumping and injury assessment 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](#)):

F. Fair Comparison

What information was considered

- Discounts, rebates and credits
- Transportation, insurance, handling
- Differences in physical characteristics
- Other adjustments and disclosures

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

Discounts, rebates and credits

We compared the discounts, rebates and credits reported in the questionnaire response to the source documentation, including invoices, payment, delivery and accounting records, during the sales testing, and observed no material differences. We also found no examples of non-disclosures. We are satisfied that discounts, rebates and credits have been correctly reported in the questionnaire response.

Transportation, insurance and handling

We compared the questionnaire response to supporting delivery documentation, confirming that sales to UK during the POI were conducted on Cost and Freight (CFR) basis, which means the buyer is responsible for obtaining insurance to cover the value of exported products. We further examined Atlantic's accounting



records and discussed insurance costs incurred and confirmed that Atlantic also incurs an insurance cost to protect themselves in the event of a catastrophic marine event. These insurance charges cover all the goods, including the goods concerned. During verification, we enquired with Atlantic and it maintained that it had sold the goods concerned on CFR basis despite the existence of the additional insurance charges. The reviewed documentation is consistent with this explanation.

Differences in physical characteristics

Atlantic demonstrated via its questionnaire response that it produces goods both in and out of scope of this investigation. Of those within scope of our investigation, there is no difference in physical characteristics for any of its customers. Our Goods verification section details the methods we used to test product characteristics and to determine whether PCN classifications had been applied correctly. We found no material issues.

Other adjustments and disclosures

No other adjustments were claimed by Atlantic and we found no examples of omissions as part of our verification procedures.

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 a reasonable level of assurance that the information can be treated as relevant and accurate. Therefore, can and can therefore be used by the TRA for dumping and injury assessment 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](#)):

G. Performance



What information was considered

- Profitability
- Production facilities and capacity
- Stocks

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

Our ability to verify performance-related metrics was limited due to a lack of information provided in Atlantic's questionnaire response.

Profitability

We reviewed audited financial statements for the POI, as well as the entirety of the injury period. The financial period aligns with the POI meaning that profitability documented within the audited financial statements is a relevant benchmark. This is particularly true given the integrated nature of in and out-of-scope products and similar specifications amongst the product mix. Atlantic does generate non-product revenues, but these are immaterial.

Production facilities and capacity

We reviewed disclosures made in the questionnaire response relating to capacity and production facilities, but these were limited. We were unable to fully test capacity utilisation throughout the injury period, as it was declared by Atlantic that such a data request would be disproportionate to the effort required.

Stocks

Inventories are disclosed at an appropriate level within the notes to the POI-aligned audited financial statements to determine the breakdown of the constituent parts of raw materials, work in progress and finished goods. The latter are immaterial within the content of overall costs to make and sell.

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

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

None.



Conclusions

Based on the work performed, we have a limited level of assurance that the information can be treated as relevant and accurate.

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

Conclusions

We checked company and product details, as well as ownership information provided by Atlantic, comparing it with company secretarial records and Atlantic’s audited financial statements. We reviewed PCN allocations and in and out-of-scope goods for accuracy and consistency. We also observed and reviewed accounting policies and practices.

Atlantic demonstrated how costs and sales data had been extracted and prepared in the questionnaire response from its accounting systems. A sample of cost and sales transactions were traced back to source documents with no material issues observed. We were able to reconcile cost and sales data within the questionnaire response to the audited financial statements and live accounting system.

We reviewed fair comparison, corroborating information including discounts, transportation, insurance and handling, profitability and production. We found no material errors or inconsistencies.

We are unable to reach a reasonable or limited level of assurance in relation to freight cost because of insufficient relevant cost data.

Based on the verification activity undertaken the TRA has been able to confirm that the information is complete, relevant and accurate for the purposes of this investigation, except the freight costs due to insufficient relevant cost data.



Annex 1: Meetings

Date and duration	Type of authentication	Company representatives	TRA representatives
29.7.2025 – 31.7.2025, and 6.8.2025 (7 hours)	<input checked="" type="checkbox"/> remote <input type="checkbox"/> on-site	Redacted Redacted	Redacted, Redacted, Redacted