



Verification report – Importer
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:	1 May 2025
Case team contact details:	AD0059@traderemedies.gov.uk
Interested Party verified:	Lubriage Ltd

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.

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](#)

Lubriage Ltd (Lubriage), an importer of the goods concerned, returned a domestic importer's questionnaire and annex. Following TRA's analysis, we sought clarification on certain parts of this submission. This resulted in further work being undertaken to complete the data set requested in order to inform the investigation. This included changes to import data and clarifications about freight costs.

Lubriage is a medium-sized business that imports engine oils and hydraulic fluids and then subsequently sells the goods on.

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

- We conducted a walkthrough of Lubriage's accounting system, to gain an understanding of the accounting function and its systems and controls, in order for us to assess the level of reliance that can be placed on the data provided to inform case decisions.
- We conducted an on-site verification exercise to evaluate the completeness, relevance and accuracy of information provided in the questionnaire and annex response.
- We had a site tour of the company's premises to gain an appreciation of its storage facilities and processes.



- We checked information provided in the questionnaire response regarding general company set-up and associations against information on Lubriage's corporate website, audited financial statements and company secretarial records including Companies House for consistency. We also discussed any proposed ownership or re-structure plans with management.
- We conducted detailed testing of PCNs due to complexity of the PCN structure to ensure accuracy and consistency of the application and mapping of the PCN parameters to internal product codes.
- We reconciled questionnaire responses with information held in Lubriage's accounting system and financial statements, to consider the completeness, relevance and accuracy of the submission.

Based on the verification activity undertaken, the TRA has a reasonable level of assurance on the completeness, relevance and accuracy of the information provided by Lubriage 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 or likely to cause injury to the UK industry. This will form the basis for establishing appropriate measures where necessary, and to assess whether these measures are in the UK's economic interest.

We carried out verification activities remotely and 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 Lubriage. It details the conclusions reached regarding completeness, relevance and accuracy, and provides an overall conclusion stating the level of assurance reached.

Confidential information

Lubriage 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, the company 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 Lubriage in its questionnaire response is complete, relevant, and accurate.

A. Company structure and associations

What information was considered

- 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 company structure and associations to gain a thorough understating of the company's operations and relationships. This process enabled us to identify any discrepancies and check the authenticity of the information provided.

Company Details

The TRA cross-checked information submitted by Lubriage to its most recent audited financial statements from Companies House, as well as other sources, including its corporate website.

General company structure, ownership management

We cross-checked details provided by the company on its structure, ownership and management with documents submitted to the case. We confirmed relationships, including directorships, and shareholders provided in submitted information, was accurate. We also conducted research procedures in order to determine if there were any relationships that had been undisclosed. During our research we noted a director/owner of Lubriage also



owned shares and was appointed director for a customer [Redacted: Customer name], during a portion (40 days) of the period of investigation (POI). Although not material, the sales transactions for this period may be treated as not being made at arm's length for the purposes of case decision-making.

Associations with other companies

The associated companies listed in the questionnaire have been reviewed, and the agreement types specified in the provided contracts appear to be accurate.

Accounting compliance and auditor's opinion

Unaudited financial statements covering the POI were submitted by the company. The December 2023 financial statements obtained from Companies House have since been audited and have been prepared in compliance with the provisions of FRS 102, Section 1A 'The Financial Reporting Standards applicable in the UK and the Republic of Ireland'. There are however some issues which have prevented the auditor from issuing an unqualified opinion.

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 complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments 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 policies, significant risks and accounts
- IT Applications
- Sales and customer order process
- Purchase order and invoice approval process

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's accounting systems to ascertain the level of reliance that can be placed on the data processed by its information systems for case decision-making.

Accounting policies, significant risks, and accounts

The company's financial statements are prepared in accordance with UK GAAP and the Companies Act 2006, following FRS102.

IT applications

The company's financial accounting system is [Redacted: Details of company accounting system(s)]. [Redacted: Details of company accounting system(s)] supports management accounting by providing essential data for internal decision-making with some manual interventions to ensure accuracy and completeness.

Sales and customer order process

A demonstration of the sales and customer order process was provided, and upon request the company was able to retrieve a selected sales transaction from its systems.

Purchase order and invoice approval process



An on-screen demonstration of the purchase order process and works order flow was provided. Upon request, the company was able to retrieve a selected purchase transaction from its systems.

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 the company, which 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
<ul style="list-style-type: none"> • Goods description and comparability to the like goods • Product Control Number (PCN) allocations • Internal coding system
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i>
How the information was checked
<p>We checked goods information to determine that Lubriage has correctly assigned PCNs to all the like goods it imports.</p> <p>Goods description, PCN allocations and internal coding system</p> <p>Lubriage have created PCNs based on the first three PCN elements, Oil grade, ACEA oil sequences and OEM performance. They have not added a code for the pack type, instead each product has the different pack types listed.</p> <p>We reviewed the characteristics of PCNs in relation to the product catalogue specifications and aligned them with the internal product codes. This process highlighted the inherent complexity of the PCN table, including overlapping technical specifications that allow for multiple interpretations.</p> <p>Some PCNs were correctly assigned, but others were not. Some had two ACEA oil sequences recorded, which is consistent with our findings (of multiple interpretations). Sales transactions were reviewed, revealing one sale with an inaccurate PCN assigned to it.</p>
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i>
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 complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments 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. Imports and forward orders

What information was considered

Completeness testing:

- relevance and completeness of the import transactions to the like goods
- Aligning the company's financial accounts to the POI
- Reviewing the total import volumes and values

Transactional testing:

- Sample of transactions
- Import source documents
- Freight charges

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 testing

The TRA carried out upwards verification, which involves comparing data submitted in the questionnaire responses to the total import costs reported in Lubriage's financial statements.

During in-person verification, it was discovered that part of the transaction-by-transaction dataset had been accidentally duplicated, and another part had been omitted. These errors were due to human error at the data population stage. These errors have since been corrected, and a new annex has been submitted. The revised data has been reviewed and provides a comprehensive breakdown of every import transaction.

Initially, during the desktop research phase of the investigation, which predated the in-person verification visit, we were unable to reconcile financial statement data (comprising of trial balance extracts for the POI) to the annex data. Consequently, additional procedures were planned and executed during in-person verification. This led to a



resubmission of data, a revision of the upwards reconciliation, and an extension of the sampled downwards cost testing to reflect the changes in the dataset.

We reviewed the total import volumes and values of like goods during the POI and compared them to the financial account detail. The imports were reconciled with an immaterial difference, which can reasonably be attributed to exchange rate fluctuations.

Transactional testing

The TRA conducted downwards verification, which involves comparing transactional data to source documentation on a sample basis. This testing enables cost data submitted in the questionnaire response to be checked for accuracy and relevance. Prior to the verification visit, the TRA requested source documents be provided for a sample of cost transactions, the “transaction selection”.

The transaction selection was initially selected from Lubriage’s submitted questionnaire annex. Lubriage supplied documentation for all selected transactions, including invoices and bank payments. Where discrepancies were identified, reasonable explanations were provided. In addition, documentation confirmed freight charges have been correctly presented in the annex data. Due to our in-person findings, we were required to expand our transaction selection. All requested documentation were forthcoming and only immaterial issues were identified.

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 complete, relevant, and accurate and can therefore be used



by the TRA for dumping and injury assessments 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 testing:

- Sales reconciliation
- Completeness of data

Transactional testing:

- Transaction-by-transaction domestic sales
- Sale source documentation
- Freight charges

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 testing

The TRA conducted upwards verification to ascertain the completeness of the sales figures provided in the questionnaire response.

Due to the accounting system used by Lubriage, they have been able to provide us with an executive summary of its accounts aligned to the POI. We were able to match up annex data with financial documents supplied with only a trivial difference observed.

Transactional testing

A sample of sales transactions was selected from Lubriage's submitted questionnaire annex. Lubriage supplied documentation for all selected transactions, including invoices, delivery notes, and bank payments.

No material discrepancies were found during our testing. We found no inconsistencies between discounts provided on invoices and discount policies disclosed on the annex data. Negative sales values were confirmed as returns of goods. Although some discrepancies were noted in some credit notes, the annex data showed corresponding



negative and positive entries for these. All transactions were correctly listed [Redacted: Details of transport arrangements] from an Incoterms perspective.

During our in-person verification visit, and as an extension to the work covered during the review of freight charges in the sales transaction testing, we queried domestic transportation charges disclosed on Lubriage’s questionnaire submission. Based on our understanding of the entity these disclosures appeared incorrect. We re-calculated these, acknowledging that there had been a data entry error, confusing USD and GBP currencies. A correction was subsequently made to these values by virtue of written confirmation (in response to our closing verification visit meeting actions).

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 complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments.

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
<ul style="list-style-type: none"> • The downstream industry • Employment figures
<p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i></p>
How the information was checked
<p>The downstream industry</p> <p>Customers and suppliers have been checked and confirmed in transactions testing.</p> <p>Employment figures</p> <p>Lubriage’s employment figures were reviewed. They have generally increased during the Injury Period, which has been linked to the growth of the business. Employee numbers are consistent with disclosures made to the audited financial statements.</p> <p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i></p>
Exceptions/Findings/Adjustments
<p>None.</p> <p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i></p>
Conclusions
<p>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 dumping and injury assessments and for any other purpose within the investigation.</p>



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

Conclusions

We examined the company's structure, associations, details and accounting compliance, to understand Lubriage's operations and relationships. We confirmed the accuracy and relevance of the submitted information.

We reviewed Lubriage's accounting policies and applications, sales and customer order processes, and purchase order and invoice approval processes through an on-screen demonstration, which provided us with a basic understanding of the accounting system and processes.

We assessed the goods description, comparability to like goods, PCN allocations, and internal coding system by reviewing the characteristics of PCNs in relation to the product catalogue specifications and aligning them with internal product specifications. Some PCNs were correctly assigned, while others were not.

For imports, we conducted a completeness check by evaluating the relevance of import transactions to like goods, aligning the company's financial accounts to the POI, and reviewing total import volumes and values. Errors found were subsequently revised, and a new annex was resubmitted. Our completeness testing found no material differences.

We also performed transaction testing by sampling import transactions and compared these to source documentation. We also considered the accuracy and relevance of freight charges. Our testing found no material differences, but we revised the estimated per litre cost of domestic freight based on our testing results and re-calculations.

We conducted a completeness check of sales through sales reconciliation, matching annex data with financial documents supplied. We observed only a trivial difference



between the data sets. A sample of sales transactions was selected from Lubriage's submitted questionnaire annex. Lubriage supplied documentation for all selected transactions and payments, with no material discrepancies found.

Where evidence was provided, we confirmed its relevance and accuracy for analysis in relation to the Economic Interest Test. Customers and suppliers were checked and confirmed during transactional-level testing. Lubriage's employment figures increased during the Injury Period and were consistent with disclosures made in the audited financial statements.

Lubriage 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
28 November 2024 (90 minutes)	<input checked="" type="checkbox"/> remote <input type="checkbox"/> on-site	[Redacted: Personal information, 2 individuals]	[Redacted: Personal information, 2 individuals]
11-12 December 2024 (2-days)	<input type="checkbox"/> remote <input checked="" type="checkbox"/> on-site	[Redacted: Personal information, 2 individuals]	[Redacted: Personal information, 3 individuals]