

---

**ECO BIOCHEMICAL TECHNOLOGY (ZHANGJIAGANG) COMPANY LIMITED  
AND ECOCERES LIMITED ("ECOCERES")**

**Anti-dumping proceeding concerning biodiesel imported into the United Kingdom  
from the People's Republic of China (AD0058)**

**Supplement to Request for exclusion of SAF from the scope of the investigation**

**Non-Confidential**

**11 July 2024**

---

1. The present supplemental submission is lodged on behalf of ECO Biochemical Technology (Zhangjiagang) Company Limited ("Eco BioTech") and its related company EcoCeres Limited ("Eco HK") (jointly referred to as "EcoCeres").
2. This supplemental submission is filed pursuant to the Trade Remedies Authority ("TRA")'s Notice of Request for Information concerning scope published on 14 June 2024 in the framework of the United Kingdom ("UK") anti-dumping investigation concerning imports of biodiesel from China and in response to certain of the comments on the investigation scope published by the TRA on the public file for AD0058 on 9 July 2024.
3. The question of what constitutes a "biodiesel" was raised in a number of the comments on the scope of the investigation. EcoCeres would like to take the occasion of this supplemental submission on the scope of the biodiesel investigation to submit that biodiesel has a very specific legal definition in the UK and neither Hydrotreated Vegetable Oil ("HVO") nor Sustainable Aviation Fuel ("SAF"), meet that definition.
4. The Hydrocarbon Oil Duties Act 1979 ("HODA") is the principal piece of legislation relating to excise duties on both hydrocarbon (mineral) oil and products that can be used in place of hydrocarbon oil such as biofuels, and gas used as a road fuel. Section 2AA of the HODA defines a "biodiesel" as:

*“diesel quality liquid fuel –*

*(a) that is produced from biomass or waste cooking oil,*

*(b) the ester content of which is not less than 96.5% by weight, and*

*(c) the sulphur content of which does not exceed 0.005% by weight or is nil.”<sup>1</sup>*

5. Put simply, SAF do not meet this legal definition of a "biodiesel" because it has no ester content, being comprised instead of pure paraffinic hydrocarbons.
6. That distinction is also apparent in the standards that apply to diesel, Fatty Acid Methyl Ester ("FAME") and HVO on the one hand and SAF on the other. Specifically, EN590 (the standard for diesel fuel) and EN15940 (the standard for paraffinic diesel fuel) describe the

---

<sup>1</sup> Section 2AA, Hydrocarbon Oil Duties Act 1979, <https://www.legislation.gov.uk/ukpga/1979/5/section/2AA>.

physical properties that all automotive diesel fuel must meet if it is to be sold in the UK and warranted by diesel engine manufacturers. SAF does not meet those requirements, therefore, it cannot be sold as diesel in the UK and its use in a diesel engine would void the engine's warranty. Rather, SAF meets the requirements of a separate standard – the American Society for Testing and Materials ("ASTM") D7566 (the standard specification for aviation turbine fuel containing synthesized hydrocarbons). This is the only globally recognized fuel standard for the qualification of SAF in the aviation industry and describes the fuel quality specifications for each qualified SAF production pathway.

7. This supplemental submission should be read alongside and in addition to the Request for exclusion of SAF from the scope of the investigation submitted by EcoCeres to the TRA on 28 June 2024.

\* \* \*