



28 June 2024

Version Open for Consultation

**BEFORE THE TRADE REMEDY AUTHORITY
OF THE UNITED KINGDOM**

In the matter of the Anti-dumping Investigation
concerning imports of Biodiesel
originating in the People's Republic of China

No.AD0058

Comments on the Scope of Investigation (concerning SAF)

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Comments on the Scope of Investigation (concerning SAF)

I. INTRODUCTION

- [1] On 5th June 2024, the Trade Remedies Authority of the United Kingdom (“TRA”) initiated the anti-dumping investigation concerning the biodiesel originating in the People’s Republic of China by Notice of Initiation under paragraph 9(5) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act) to initiate an investigation into alleged dumping (“Notice of Initiation”).
- [2] On 14th June 2024, TRA issued the Notice of Request for Information concerning scope and invited the interested parties to propose their assessment on whether the Sustainable Aviation Fuel (“SAF”) should be included within the scope of this investigation.
- [3] On behalf of Longyan Zhuoyue New Energy Co., Ltd and Xiamen Zhuoyue Biomass Energy Co., Ltd (“Zhuoyue Group”), we hereby submit comments on the Scope of Investigation.
- [4] The Comments on the Scope of Investigation below demonstrate that SAF should be included within the scope of this investigation on the ground that 1) the definition of SAF falls within the definition of the goods subject to the investigation as described in the Notice of Initiation; 2) SAF is similar to Fatty Acid Methyl Ester (“FAME”) which is a type of the goods subject to Investigation.

II. SAF SHOULD BE INCLUDED IN THE SCOPE OF GOODS SUBJECT TO INVESTIGATION

1. The definition of SAF falls within the definition of goods subject to investigation

- [5] In the Notice of Initiation, TRA defined the product subject to investigation as follows:
- Fatty-acid mono-alkylesters or paraffinic gasoils obtained from synthesis or hydrotreatment of non-fossil origin, in pure form or as included in a blend.*



- [6] That is to say, the product subject to investigation has two characteristics: 1) Fatty-acid mono-alkylesters or paraffinic gasoils; 2) sourced from synthesis or hydrotreatment of non-fossil origin.
- [7] SAF is produced by using the hydrotreatment and deoxygenation process to create paraffinic hydrocarbon, and it is a further development from hydrogenated vegetable oil (HVO). SAF can be produced from residues or animal waste, apparently the fossil free raw materials¹.
- [8] Therefore, SAF meets the characteristics of the goods subject to investigation: paraffinic biofuels produced through hydrotreatment process and made from non-fossil origin and should be included within the scope of investigation.

2. SAF is similar to FAME

- [9] Based on the current definition of the goods subject to investigation, FAME is the predominant type of biodiesel covered by the scope of investigation. SAF is similar to the FAME and should therefore be considered as the goods subject to the investigation based on the following reasons.

2.1 FAME and SAF can be produced from the same feedstocks

- [10] SAF is a fossil free alternative to the conventional aviation fuel where the clean and renewable raw materials can be used. It is important to note that both FAME and SAF can be produced from animal and vegetable oil and other lipidic waste and residues.
- [11] FAME is mainly made from animal or vegetable oil and fats or used cooking oil through the transesterification process².
- [12] Meanwhile, as mentioned above, SAF is mainly made from the sustainable resources, known as sustainable feedstocks, such as waste oils, agricultural and forestry residues.
- [13] Therefore, FAME and SAF are all acting as the replacement to the conventional fossil fuel and can be produced from the same feedstocks, which is the key element that distinguishes the type of biofuels³.

¹ See <https://www.iata.org/en/programs/environment/sustainable-aviation-fuels/>

² See https://en.wikipedia.org/wiki/Fatty_acid_methyl_ester

³ See <https://assets.publishing.service.gov.uk/media/65ba3f6cee7d49000d984a61/rtfo-compliance-guidance.pdf>



2.2 FAME and SAF have the same use

[14] FAME and SAF, both known as the renewable liquid biofuels, which are intended for the same use. They both have a wide application as fuels in the fuel engines in the transport sector. Furthermore, they both provide a cleaner-burning alternative to petroleum diesel which effectively contributes to the carbon reduction effect in the transport sector, especially the products with the waste oil as the feedstocks.

2.3 FAME and SAF are a substitute for one another

[15] FAME and SAF are mostly a substitute for one another as their overlapping application in the fuel engines.

[16] Given the interchangeability of FAME and SAF, it is practical to include SAF in the goods subject to investigation as it may contribute to a comprehensive assessment of the biodiesel industry.

III. CONCLUSION

[17] In view of the above, Zhuoyue Group hereby presents that SAF should be included in the scope of this investigation.

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Submitted on behalf of Longyan Zhuoyue New Energy Co., Ltd. and Xiamen Zhuoyue Biomass Energy Co., Ltd,



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