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Our Ref  
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Trade Remedies Authority  
Premier House  
60 Caversham Road  
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RG1 7EB  
United Kingdom

Brussels, 22 April 2025

Dear Sirs

**Anti-Dumping Investigation**

**Case No – AD0068**

**Subsidy Investigation Case No – AS0067**

**Hydrotreated Vegetable Oil (“HVO”) originating in the United States of America (“US”)**

**Response to Notification of Sample – St Bernard Renewables LLC**

We hereby submit a response on behalf of our client, St. Bernard Renewables LLC, to the proposed sampling in the two investigations at the head of this letter.

Our client notes that three US exporters of HVO replied to the Pre-Sampling Questionnaire (PSQ) for the anti-dumping investigation and two US exporters replied to the PSQ for the subsidy investigation. Our client further notes that three United Kingdom (UK) companies support the applications:

- Greenergy Fuels Limited
- Argent Energy Limited
- Olleco

In its note of 11th April, the Trade Remedies Authority (TRA), proposes to sample two UK companies, whilst intending not to sample the US exporters. Our client questions this approach and does not understand why all three UK companies were not selected, thus removing the need for them to be sampled.

By selecting all three UK companies, the TRA will be able to maximise its analysis of as much of the UK market as possible. It will also remove any differential treatment of parties in the sampling exercise, thereby eliminating any possibility of discrimination between UK and US companies. We, therefore,

invite the TRA to include Olleco in the list of UK companies which are “expected to provide adequate responses to questionnaires and allow the TRA to verify the data provided”.

So far as sampling of importers is concerned, our client does not know how many of these companies replied to the PSQ so cannot comment on the TRA’s proposal and reserves the right to further comment as the investigation continues.

To conclude, our client asks the TRA to apply the same methodology to the sampling of UK companies as it has to the sampling of US exporters, and by extension to the sampling of UK importers. By so doing, the TRA will remove any actual or potential discrimination between these parties. It will also provide the TRA with fuller information upon which to base its findings in the investigations.

Depending upon the final decision taken by the TRA on sampling, our client reserves its right to return to this matter at a later date.

Finally, we wish to confirm that this letter in no way accepts that the UK companies which support the application can be considered as UK producers of HVO. We will address this issue in subsequent submissions to the TRA.

Yours faithfully



John Grayston (\*)  
Member – Grayston & Company

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