



22 September 2025

Non-Confidential Version

**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 Statement of Essential Facts

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Interested party:

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Comments on the Statement of Essential Facts

1. INTRODUCTION

- [1] On behalf of Longyan Zhuoyue New Energy Co., Ltd (“Longyan Zhuoyue”) and Xiamen Zhuoyue Biomass Energy Co., Ltd (“Xiamen Zhuoyue”) (hereinafter, the two companies are referred to as “Zhuoyue Group”), we hereby submit the Comments on the Statement of Essential Facts, which was published on 22 August 2025 (hereafter the “SEF”).
- [2] These Comments address the specific issues relating to the calculation on the individual dumping margin for Zhuoyue Group.

2. COMMENTS ON THE PROFIT RATES

- [3] According to paragraph 352 of the SEF, the TRA “*calculated a reasonable level of profit by applying the average profit rate for the injury period, excluding the period of investigation, as an alternative reasonable method in accordance with Regulation 12(3)(c).*” The related calculations are contained in the **[redacted – commercially sensitive information]** section of the confidential version of calculation worksheets.
- [4] Zhuoyue Group would like to comment on the following two issues.

i. The Profit rates for the period of investigation should be considered

- [5] Zhuoyue Group emphasizes that in actual business operations, the profit rate is difficult to remain absolutely stable. Under normal operating conditions, there will be a certain degree of fluctuation - either higher or lower - which is a common and expected phenomenon. Therefore, it is not appropriate for the TRA to simply conclude that “*the profit levels during the POI for both Longyan Zhuoyue and Xiamen Zhuoyue to be not a representative margin*” solely on the basis of “*a significant outlier compared to profit levels in previous years*”.



- [6] Zhuoyue believes that during the same period, there is an inherent correlation among the company's revenue, costs, AS&G expenses, and profits. That is to say, during the same period, a company's revenue, costs, AS&G and profit should be analyzed comprehensively rather than in isolation. If, during the period of investigation, revenue, costs, and AS&G expenses are all taken into account while the corresponding profit is excluded, such an approach is not appropriate.
- [7] Zhuoyue Group respectfully requests the TRA to consider the profit rates for the period of investigation in the calculation of the normal value.
- [8] **[redacted – commercially sensitive information]**.
- ii. Profit rates should be calculated using the weighted average method rather than the simple average method*
- [9] If the TRA still decides to use the profit rates for the injury period, excluding the period of investigation, to calculate an average profit rate, Zhuoyue Group claims that this average profit rate should be calculated using the weighted average method rather than the simple average method.
- [10] Zhuoyue Group has noticed that the average profit rate is calculated using the simple average method, which is **[redacted – commercially sensitive information]**.
- [11] Zhuoyue Group notes that the average profit rate should instead be calculated using the weighted average method—specifically, **[redacted – commercially sensitive information]**. This approach is more appropriate because **[redacted – commercially sensitive information]**. Under such circumstances, the weighted average method provides a more accurate reflection of the overall actual profitability of the enterprises and is therefore more reasonable.
- [12] Please refer to **Exhibit 1** **[redacted – commercially sensitive information]** for the revised profit calculation.

3. AN ADDITIONAL INSURANCE COST BETWEEN ARA AND THE UK SHOULD BE ADDED TO THE CIF EXPORT VALUE



- [13] According to paragraph 395 of the SEF, the TRA “*calculated an average freight cost per metric tonne from the ARA to the UK using a sample of freight invoices over the POP*” and “*The additional freight cost between ARA and the UK has been added to the CIF export value provided by the Zhuoyue Group, so that it accurately reflects the CIF value from the PRC to the UK.*”
- [14] Zhuoyue Group claims that, on the basis of the TRA-adjusted level, an additional insurance cost between the PRC and the UK should be added to the CIF export value, in order to more accurately reflect the CIF value from the PRC to the UK.
- [15] Please refer to **Exhibit 2** [redacted – commercially sensitive information] for the revised CIF value calculation.

4. COMMENTS ON THE ADJUSTMENTS TO FINANCIAL EXPENSES

i. [redacted – commercially sensitive information] should be included in the AS&G costs

- [16] Zhuoyue Group noticed that, in the construction of normal value, “Financial Expenses - Exchange Gains or Losses” were not included in the AS&G costs. Both Longyan Zhuoyue and Xiamen Zhuoyue reported [redacted – commercially sensitive information].
- [17] Zhuoyue Group claims that [redacted – commercially sensitive information] are directly related to the cost to make and sell of the goods for the purposes of the investigation, and therefore should be included in the AS&G costs.

ii. Interest income should not be removed from the AS&G costs

- [18] Zhuoyue Group would like to reiterate its position regarding interest revenue and expresses appreciation to the TRA for acknowledging and considering its submissions. Zhuoyue Group emphasizes that the interest revenue is used for the procurement of raw materials for the goods concerned, and is therefore related to the cost to make and sell of the goods concerned. As such, it should not be excluded from the AS&G costs.



5. MORE INFORMATION REGARDING THE BENCHMARKS SHOULD BE DISCLOSED

[19] Zhuoyue Group has compiled the cost categories adjusted by the TRA and the benchmarks used for the adjustments based on the SEF.

[redacted – commercially sensitive information]

[20] Zhuoyue Group would like to draw the TRA's attention to the fact that, based on the current SEF and publicly available information, Zhuoyue Group is unable to access further information regarding these benchmarks and therefore cannot adequately assess their appropriateness or provide meaningful comments.

[21] Zhuoyue Group has noted that the relevant benchmarks fall into two main categories: one derived from detailed data of GTT, and the other sourced from an anonymous Malaysian TCP. With respect to the former, Zhuoyue Group understands that the underlying detailed data should be made disclosable; with respect to the latter, relevant data should be disclosed in the form of a range, and the processing requirements for such ranges should be consistent with the data treatment practices required by the TRA in the public version of the questionnaire responses.

[22] To enable all interested parties to gain a more comprehensive understanding of the benchmarks and to exercise their right to comment thereon, Zhuoyue Group respectfully requests the TRA to disclose additional information regarding the benchmarks.

6. CONCLUSIONS

[23] Zhuoyue Group hereby presents these Comments to express its views on the SEF. In summary in these regards, Zhuoyue Group concludes that:

- The Profit rates for the period of investigation should be considered. **[redacted – commercially sensitive information]**.
- If the profit rates for the injury period, excluding the period of investigation, are still used to calculate an average profit rate, such an average should be calculated using the weighted average method rather than the simple average method.



- An additional insurance cost between ARA and the UK should be added to the CIF export value.
- [redacted – commercially sensitive information] should be included in the AS&G costs.
- Interest income should not be removed from the AS&G costs.
- More information regarding the benchmarks should be disclosed.

[24] Zhuoyue Group respectfully requests the TRA to take into account the aforementioned comments.

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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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