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17 April 2025

Dear Sir,

**NON- CONFIDENTIAL**

**AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates Provisional Affirmative Determination and Recommendation of Guarantee**

The United Kingdom Lubricants Association Ltd (UKLA), as the representative trade sector body for the lubricants sector in this country, welcomes the opportunity to respond to the Trade Remedies Authority Provisional Affirmative Determination and Recommendation of Guarantee concerning case AD0059: Certain Engine Oils and Hydraulic Fluids from Lithuania and the United Arab Emirates.

UKLA welcomes the Trade Remedies Authority Provisional Affirmative Determination and Recommendation of Guarantee concerning case AD0059. The UKLA supports the TRA's preliminary findings that dumping of certain lubricant products has occurred in the UK market from Lithuania and the UAE which has caused injury to domestic producers and marketers.

That this injury has been significant and sustained over an extended period and has both destabilised the UK lubricants market by offering goods at below cost price compared with the home market of Lithuania and the UAE, and this has caused great hardship and suffering to UK domestic producers and marketers at a time when the general domestic and international economic circumstances have been very challenging.

However, we are concerned that Point 293 regarding the TRA underselling calculation. The result of this calculation, based on unverified and partial data, was that the TRA established that there had been price underselling of the goods concerned, but that this price underselling was significant, ranging at 69-74% for the identified goods concerned from Lithuania, and 74-89% for the identified goods concerned from the UAE.

However, the recommendations on an additional ad valorem tariff were significantly less than this and has taken no account of the margin allowing for injury of this dumping, which has been calculated at;



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Figure 21: Overseas dumping margin, injury margin, recommended guarantee Overseas exporter/producer	Dumping margin (%)	Injury margin (%)	Estimated anti-dumping amount /recommended provisional duty (ad valorem) (%)
UAB SCT Lubricants (Lithuania):	11.60%	71.62%	<b>11.60%</b>
All other Lithuanian exporters (residual dumping margin):	49.59%	74.55%	<b>49.59%</b>
SCT FZE / Chempioil (UAE):	24.95%	76.28%	<b>24.95%</b>
SCT Chemicals FZE (UAE):	24.95%	76.28%	<b>24.95%</b>
All other UAE exporters (residual dumping margin):	59.40%	84.78%	<b>59.40%</b>

UKLA understands that the process is that the lower of the two margins (injury or dumping) are taken as recommendations for the ad valorem tariff calculation. This is based on the working hypothesis that the products that are being marketed in the home market (ie UAE and Lithuania) are the same as those being offered on the UK market at prices below this level, and that the products, their claims and performance are a match to those placed on the market by domestic producers.

However, UKLA understands that from the cases investigated by our subsidiary the Verification of Lubricant Specifications (VLS) that certain lubricants marketed by Mannol have not been compliant with their own performance claims and stated technical specifications.

Therefore UKLA believes that an additional ad valorem tariff is justified in this exceptional case as certain lubricant products have been dumped onto the UK market at a price below that of the home market of Lithuania and the UAE as the TRA as determined, but that certain of these engine oil products are not compliant with their own stated performance claims and technical specification and that this has caused exceptional harm to both the UK market through destabilisation, and this has risked the reputation of the UK lubricants industry. That this additional ad valorem tariff should be levied in line with the tariff outlined under injury margin (%) calculated in the table above.

For this reason, UKLA believes that an exceptional ad valorem tariff reflecting the injury to the UK market is justified in this exceptional case.

Yours sincerely



**David J Wright**  
**Director General**  
**United Kingdom Lubricants Association Ltd**

