

Subsidy Transition Review Questionnaire (UK Producer) Transition Review of Countervailing Measures.

Case TS0065: Biodiesel originating in Indonesia

Period of Investigation (POI):	<input type="text" value="1 October 2023 to 30 September 2024"/>
Injury period:	<input type="text" value="1 October 2020 to 30 September 2024"/>
Deadline for response:	<input type="text" value="19 March 2025"/>
Contact details:	<input type="text" value="TS0065@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Argent Energy"/>

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

Non-Confidential

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **19 March 2025**.

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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

This transition review will consider whether the importation of biodiesel originating in Indonesia and injury to the UK Industry would.

Why should I take part?

We are asking domestic producers of biodiesel to complete this questionnaire to inform our review of whether the current countervailing measure should be maintained, varied, or revoked.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by **19 March 2025**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you are completing the questionnaire, please contact the Case Team at TS0065@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you will not be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annexes, and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided in the annex. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).

- Unless otherwise stated, ‘year’ or ‘calendar year’ refers to the period 1 January – 31 December and ‘quarter’ refers to the associated three-month periods (e.g., 1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations, and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of recoverable tax unless otherwise stated.
- Please refer to the case number, **TS0065**, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential (e.g., the data is commercially sensitive).
- Provide the source for all information or data you don’t own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46

of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019* and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods subject to review.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

- If any of your subsidiaries or associated companies are also a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully
- the Case Team will contact you if further information is required
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification.

In some circumstances verification visits may be conducted remotely.

Please indicate any dates when you would be unable to host a verification visit.

None

Appendix reference:

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this review

Goods subject to review

This review covers biodiesel originating from Indonesia, described as:

Fatty-acid mono-alkyl esters or paraffinic gasoils obtained from synthesis or hydro-treatment, of non-fossil origin, in pure form or as included in a blend.

A [public notice](#) regarding the description of the goods was published on the public file on 20 December 2024.

These goods are currently classifiable within the following commodity codes:

1516 20 98 21	1518 00 99 32	2710 19 47 39	3824 99 92 15
1516 20 98 22	1518 00 99 39	2710 20 11 21	3824 99 92 16
1516 20 98 23	2710 19 43 21	2710 20 11 22	3824 99 92 19
1516 20 98 29	2710 19 43 22	2710 20 11 23	3826 00 10 20
1516 20 98 31	2710 19 43 23	2710 20 11 29	3826 00 10 21
1516 20 98 32	2710 19 43 29	2710 20 11 31	3826 00 10 22
1516 20 98 39	2710 19 43 31	2710 20 11 32	3826 00 10 29
1518 00 91 21	2710 19 43 32	2710 20 11 39	3826 00 10 50
1518 00 91 22	2710 19 43 39	2710 20 16 21	3826 00 10 51
1518 00 91 23	2710 19 46 21	2710 20 16 22	3826 00 10 52
1518 00 91 29	2710 19 46 22	2710 20 16 23	3826 00 10 59
1518 00 91 31	2710 19 46 23	2710 20 16 29	3826 00 10 89
1518 00 91 32	2710 19 46 29	2710 20 16 31	3826 00 10 90
1518 00 91 39	2710 19 46 31	2710 20 16 32	3826 00 10 91
1518 00 95 10	2710 19 46 32	2710 20 16 39	3826 00 10 99
1518 00 95 11	2710 19 46 39	2710 20 16 91	3826 00 90 11
1518 00 95 19	2710 19 47 21	2710 20 16 92	3826 00 90 12
1518 00 99 21	2710 19 47 22	2710 20 16 99	3826 00 90 13
1518 00 99 22	2710 19 47 23	3824 99 92 10	3826 00 90 19
1518 00 99 23	2710 19 47 29	3824 99 92 11	3826 00 90 31
1518 00 99 29	2710 19 47 31	3824 99 92 13	3826 00 90 32
1518 00 99 31	2710 19 47 32	3824 99 92 14	3826 00 90 39

These commodity codes are given for information only.

In this questionnaire, these goods will be referred to as **‘the goods subject to review’**. Any reference to ‘goods subject to review’ in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This questionnaire asks for information about your company's production and sales of goods which are **like** the goods subject to review. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than Indonesia which are like the goods subject to review in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above.

The PCN table is set out in the box below.

Characteristic	Symbol	Description
Type	F	FAME (fatty-acid mono-alkyl esters)
	P	Hydrotreated vegetable oil (HVO) / Paraffinic Diesel Fuel / Gasoil
Cold Filter Plugging Point (CFPP) in degrees centigrade to nearest degree	1	Higher than +9
	2	Higher than or equal to 0 but lower than or equal to +9
	3	Lower than 0 but higher than or equal to -9
	4	Lower than -9 but higher than or equal to -40
	5	Lower than -40
Feedstock	1	biodiesel from feedstocks subject to incentives (singled counted according to <u>UK RTFO categories</u>)
	2	biodiesel from feedstocks subject to incentives (double counted according to <u>UK RTFO categories</u>)
	0	other/special purpose sold without any certificate
Form	R(100)	Pure form
	B(XX)	XX equals percentage of biodiesel blended with mineral diesel (The nearest percentage rounded down to a whole number)

Under this PCN structure, biodiesel assigned PCN P12B30 would be a product that corresponds with the following:

- Hydrotreated vegetable oil (HVO) / Paraffinic Diesel Fuel / Gasoil
- A Cold Filter Plugging Point (CFPP) higher than +9 degrees centigrade
- Biodiesel from feedstocks subject to incentives (double counted according to UK RTFO categories)
- A 30 percent blend rate

1. Do you agree with the scope of this review?

Yes

If you have answered no to the above question, please explain why.

NA	
	Appendix reference:

Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

None	
	Appendix reference:

Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:

- categorisation of features;
- number of products included under the end range thickness categories, which may prevent a fair comparison; and
- specialised products which may unduly influence the comparison.

Suitable	
	Appendix reference:

Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods subject to review and the like goods.

None	
	Appendix reference:

SECTION A: Company structure and operations

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	Argent Energy Holdings Limited
Legal structure (e.g., limited company, sole trader, partnership etc):	Limited company
Year of establishment:	2013
Other operating names:	NA
Company registration number:	08562451
Place of registration:	London
Name (point of contact):	Confidential
Position:	Confidential
Address:	Alford House, Lloyd Drive, Cheshire Oaks Business Park, Ellesmere Port
Telephone No:	Confidential
Email:	Confidential
Website:	https://www.argentenergy.com/

2. If you have appointed an external party to act on your behalf in this review, please provide their details and attach a letter confirming the TRA should contact them directly:

Name:	NA
Address:	NA
Telephone No.:	NA
Email:	NA
Confirm they have signed authority to act (Yes/No):	NA
Appendix reference:	

A2 About your company

1. Describe the role of your company in the UK market for the like goods (e.g., producer, producer/exporter, producer/importer or producer/distributor).

Argent Energy is a producer of biodiesel from waste fats and oils. Argent built their English plant in 2016 in Stanlow, Ellesmere Port. The Stanlow plant operates as the legal entity Argent Energy Ltd. Argent Energy Holdings is the parent company of both operations as well as Argent's biodiesel production facility in Amsterdam, Argent Energy Netherlands

Argent Energy is a biodiesel (FAME) producer, using only wastes and residues as feedstocks. Argent supplies the domestic market and is also an exporter when market conditions dictate. Argent does not import biodiesel.

Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
		None

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

EA. Licence from Environment Agency in England to operate the biodiesel plant at Stanlow. No restrictions.

REACH. Registration of products to permit selling into the EU and UK. No restrictions.

Appendix reference:

4. List all international production standards (BS / EN etc) your company currently conforms to, for the like good.

BS EN14214

Appendix reference:

5. Please describe all the other products (not including the like goods) produced or sold by your company in the UK.

As part of the biodiesel process we produce two by-products and one distillation residue stream which is sold into the market.

By-products are crude glycerine with a low percentage glycerine (about 50% concentration) which is sold mainly to the biogas industry and a fertiliser raw material, which are salts combined with potassium residuals that can be used as a fertiliser feedstock.

The distillation residue is a residue of heavy fraction (and low grade) biodiesel which is accumulated at the bottom of the distillation column. It is a crude residue that needs further filtering/cleaning to make useable as a heating oil or if it is clean enough as a marine fuel.

Appendix reference:

5. State whether your company is a member of any representative organisations (e.g., trade bodies, associations, Chambers of Commerce). If so, provide a copy of the relevant documentation.

Renewable Transport Fuels Association, UK. (RTFA)
European Biodiesel Board (EBB)
European Waste-to-Advanced Biodiesel Association (EWABA)

Appendix reference:

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g., companies) are associated where they meet the definition of 'Related Persons' in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the like goods for domestic and export markets.

See appendix.
The biodiesel plant in Scotland under the legal entity Argent Energy (UK) Ltd is no longer operational.

Appendix reference: A3.1

2. Please provide a written summary and a diagram/flow chart, if available, of your production process for the like goods that you produce in the UK. Clearly indicate the different production stages carried out by your company.

See appendix.

Appendix reference: A3.2a and b

3. Please complete **Annex 1 – Associated companies** for your company’s worldwide corporate structure and affiliations.

A4 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or Indonesia.

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies
None			

+Add additional rows as required.

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or Indonesia.

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
None			

+Add additional rows as required.

A5 Operational links with other companies or persons

1. Please complete the table below if your company has established long term agreements or relationships with any company/companies located in the UK,

Indonesia or in third countries for the production (e.g., sub-contracting), supply and sale of the goods subject to review or the like goods, or other licensing, technical patent or compensatory agreements. Please provide the relevant contract for each agreement listed.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
None			

A6 Accounting practices

1. Give the address where your company's accounting records are kept and can be verified by the TRA. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
Argent Energy, Aldford House, Lloyd Drive, Cheshire Oaks Business Park, Ellesmere Port, England CH65 9HQ	Financial

2. Please give the financial year convention your company uses for its accounts (e.g., 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last four financial years, please describe these changes.

1 January – 31 December	Appendix reference:
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3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your annual reports, including the financial statements and audit report covering the injury period.

See appendix	Appendix reference: A6.3
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4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period 1 October 2020 to 30 September 2024.

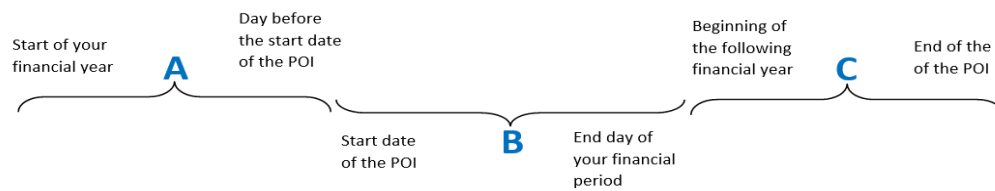
N/A

Appendix reference:

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI **1 October 2023 to 30 September 2024**. If your financial year is fully aligned with the POI, this is all that is required.

Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:

- A. the trial balance which starts from the beginning of your financial year and ends on **30 September 2023**.
- B. the trial balance which starts from **1 October 2023** to the end of your financial year; and
- C. the trial balance which starts from the beginning of your following financial year and ends on **30 September 2024**.



See appendix

Appendix reference: [A6.5](#)

6. For your company and any associated parties involved in the production, marketing or sales of the like goods or the goods subject to review, please attach copies of relevant management reports (e.g., profit and loss statement) for the profit centre that includes the like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

See appendix

Appendix reference: [A6.3](#)

7. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for your most recently completed financial year.

N/A – group consolidation not performed

Appendix reference:

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g., costing, debtors, creditors) and other sales or production systems integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:
- your company's chart of accounts
 - your company's cost centres

All products within this service are Software as a Service and all are maintained and supported by the vendor. The service is on the latest version of software and is upgraded every quarter, in line with the agreed SaaS Policy. The products in use cover Financial Management processes and include General Ledger, Accounts Payable, Accounts Receivable, Cash Management, Fixed Assets and Tax. Supply Chain and Manufacturing products are also in use, such as Procurement, Inventory Management and Order Management.

Appendix reference: A6.8

9. Have you changed your financial policies during the injury period? If so, please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes on the like goods.

No

Appendix reference:

SECTION B: About your goods

B1 Understanding your like goods

The goods subject to review are defined in '[the scope of this review](#)'.

1. Please complete **Annex 2 – Product comparison**, If your company manufactures a range of like goods, list this information for each individual make and model in the range.
2. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

The only aspect that causes distinguishable price differences in our FAME product is the sustainability characteristics. Argent's FAME is waste-based whereas most Indonesian is not.

Appendix reference:

3. Indicate in the box below any physical, commercial or functional differences between your products and the goods subject to review. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

Other than the grade differential specified in question A6.3 there are no other commercial price variations.

Appendix reference:

4. Please provide details of your like goods regarding their production processes, interchangeability, raw materials used, degree of model differentiation channels of distribution and sale, pricing and other relevant characteristics.

The FAME Argent produces is all from wastes and residues, uses the same production process and is distributed through the same channels. It is all produced to the same standard, EN14214.

Appendix reference:

B2 Understanding the UK market

1. Please explain the end use of the goods subject to review and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

In the UK the goods concerned are used as a road transport fuel and is blended with a fossil diesel. Fuel stations in the UK offer a diesel product which has up to 7% FAME blended into the diesel. This product is also called B7. The fuel distributor however has the option to blend between 0-7% FAME into their fuel mix.

FAME has two alternative applications, namely as a heating oil (for industrial use) or as a marine fuel, both markets are not really well developed in the UK with a lack of government policy to incentivise these market using FAME as a low carbon fuel option.

Of the FAME sold by Argent, in the UK market, 90% is sold as a road transport fuel with the remainder mainly sold as a heating oil (for industrial use).

Appendix reference:

2. Provide a general description of the nature of competition within the overall UK market for the goods subject to review and the like goods.

The demand for biodiesel stems from the Renewable Transport Fuel Obligation (RTFO) set by the department of transport (DFT) which was introduced in 2008. RTFO applies to fuel suppliers who own fossil fuel and/or renewable fuels at the point it becomes liable for duty ("duty point"). The percentage of the obligation that a fuel supplier has to use renewable fuel is set by the DFT and changes per year. The percentage obligation in 2024 is 13.563%. Biodiesel is the most common renewable fuels that is used to meet this obligation. Based on RTFO's data biodiesel 1.5 million tons was supplied to the market in the UK in 2020 of a total pool of 2.5 million tons of renewable fuels. The supply for biodiesel compounds of domestically produced biodiesel and imported biodiesel both from Europe and outside Europe (China was the main source of imported biodiesel to the UK in 2023). There are only a few domestic producers of which Argent, Olleco and Greenergy are the largest producers.

Appendix reference:

3. How price-sensitive is demand for the goods subject to review and like good? In other words, to what extent will the overall demand for biodiesel change in response to changes in price?

Demand of biodiesel is solely driven the obligation. If more fossil diesel is consumed then the demand for biodiesel is likely to go up to match the obligation. The only alternative to buying and blending physical biodiesel is to buy RTFC tickets to comply with the obligation, however these tickets are only generated by the use of renewable fuels. Therefore there is a direct link between the price of a renewable fuel (e.g. biodiesel) and the RTFC ticket price. The price for biodiesel is determined by normal supply/demand dynamics for biodiesel. In other words, if cheap biodiesel was imported into the UK market, the overall price for biodiesel drops as a result. Important to note is that EU member states have a similar obligation system and therefore the supply of biodiesel in the UK is directly linked to the EU. In other words, if cheap biodiesel enters the UK market but this same origin of biodiesel is not allowed to go to the EU market, then the UK produced biodiesel is forced out of the UK to the European market instead.

Appendix reference:

4. Do consumers buy from the cheapest producer, or are there other factors that influence their decision such as quality and service?

There are a few factors that buyers would consider but mainly they will consider price. Other factors are quality (cloud point, sulphur levels, percentage of saturated monoglycerides), sustainability credentials, logistics cost and reputation of the producer.

Appendix reference:

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in prices?

Feasibility of increasing production is negligible without significant investment. Production can be slowed, or stopped completely but with impacts on employment accordingly.

Appendix reference:

6. Provide a general description of the trends and drivers of demand within the UK market for the goods subject to review and the like goods, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

As discussed under answer B2.3 the overall diesel demand in combination with the obligation are driving demand patterns in the UK. In addition renewable fuels from other sources (e.g. biogas, electricity, sustainable aviation fuel) are added to the total pool of renewable fuels and are therefore correlated with each other. For instance, more biogas sold in the UK would impact the demand on biodiesel (albeit limited) and vice versa. Considering that the biogas production in the UK is also

quite significant it is important to look at the renewable fuel industry as a whole and not just biodiesel on its own.

Appendix reference:

7. What are the major distribution and marketing channels within the UK market for the goods subject to review and the like goods?

Pure biodiesel is blended with fossil diesel via a diesel producer, diesel distributors and traders. Biodiesel is blended up to 7% (B7) with regular diesel and sold at fuel stations. In addition there are some distributors that produce a high blend diesel in the market (10%, 15%, 20%, 30% or even 100% biodiesel) however volume wise this is relatively small. These high blends are sold to trucking and coach companies with their own fuel deposits.

Appendix reference:

8. Who are the general users/consumers/customers within the UK market for the goods subject to review and the like goods?

Refineries, distributors, traders for pure biodiesel and truck and coach companies for high blend fuels. There is a small market for biodiesel into the heating (for industrial use) and as a marine fuel.

Appendix reference:

9. Do the goods subject to review and like goods compete directly with one another?

Yes

Appendix reference:

10. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods subject to review and the like goods.

There are no tax incentives for biodiesel production in the UK. The incentive mechanism in the UK is in the form of a sales obligation on fuel suppliers – the RTFO – that effectively creates the market but does not provide any direct support for production. The RTFO is not unlimited as it sets targets over time and is effectively capped by the incorporation of a 'buy-out' mechanism for fuel suppliers. Indonesia supports biodiesel production through favourable tax differentials and subsidies.

Appendix reference:

11. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods subject to review and the like goods.

No particular developments in biodiesel production affecting FAME production in UK or outside UK. The technology remains fundamentally the same with some relatively small improvements in pre-treatment, and general efficiencies in the biodiesel process. Outside the UK, we understand [CONFIDENTIAL].

Appendix reference:

12. Are there any goods which could be substituted for the goods subject to review and the like goods?

No

Appendix reference:

13. Provide a comment on any other factors which influence the market for the like goods and goods subject to review (e.g., seasonality).

Seasonality has negligible impact on Indonesian biodiesel that has similar seasonal characteristics to UK waste and residue biodiesel.

Appendix reference:

SECTION C: Costs and production

C1 Cost to make and sell

1. Please complete **Annex 3 – Cost to make and sell** for your total goods and for your total like goods.
2. If your company is vertically integrated or some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

N/A

Appendix reference:

3. Please state the cost allocation method for each cost type listed in **Annex 3 – Cost to make and sell**.

Direct costs and by products are applied using bill of materials, using actual production volumes, costs and usages. Manufacturing overheads, and SG&A costs are taken from ERP income statements

Appendix reference:

C2 Cost reconciliation

1. Please complete **Annex 4 – Cost reconciliation**: please only fill in the white cells and include reference to the source documents of the inserted data.

C3 Production process

1. Please provide a written summary and a diagram/flow of your production process clearly indicating the different production stages for your like goods carried out by your company.

See appendix (same as question A3.2)

Appendix reference: A3.2a and b

- Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

All parts of production take place in the UK.
 The steps of the process are mutually dependent in order to produce an on-spec biodiesel that can achieve its full value potential.
 The process is [CONFIDENTIAL].

Appendix reference:

- Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Argent Energy Ltd	3 Oil Sites Road, Ellesmere Port, Cheshire CH65 4BF

Appendix reference:

+Add additional rows as required

C4 Raw material (RM) and major input purchases

- Please complete **Annex 5 – Raw materials and input purchases**, detailing by supplier, purchases, which account for more than 5% of total cost to make and sell (or if energy more than 1%), used in the production of the like goods during the POI by your company.
- Please provide an invoice and any supporting documents for two of your suppliers stated within **Annex 5 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

Please answer here

Appendix reference:

C5 Purchases of like goods and/or goods subject to review

- Complete **Annex 6 – Purchases of like goods** and/or goods subject to review This should include information relating to your company's total annual purchases of the

like goods and/or goods subject to review over the injury period. All figures should be reported net of recoverable tax. Please list for each year, every country you have purchased from in a separate row.

2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods subject to review.

N/A

Appendix reference:

SECTION D: Sales

D1 – Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales**
 - These should include all your domestic sales and returns of the like goods for the POI. Include the like goods you have produced, purchased and resold and/or goods subject to review that you have purchased and resold.
 - Please report returns as negative (-) sales figures.
 - Please ensure that you correctly categorise each sale by commodity code.
 - For invoices that consist of multiple commodity codes, the same invoice number should be referenced against each transaction.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

D2 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 8 – Sales reconciliation**
2. Additionally, please complete the sales forecast table in **Annex 8 – Sales reconciliation** providing quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like goods and of all other goods you produce on the UK market for the next five years.

D3 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the like goods for **1 October 2023 to 30 September 2024**.

The most accurate price lists for the like goods are published by Argus. The appendix includes daily price settlements for 2 products:

- UCOME (CFPP 0 degrees and sulphur max 10ppm)
- TME (CFPP 11 degrees and sulphur max 12ppm)

The price assessments are based on an European delivery basis and not the UK. However both markets have a significant correlation and the European price levels are used as a reference price.

Appendix reference:

2. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
- Explain the terms and conditions that must be met for any price reduction.
 - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.

N/A

3. Please provide details of your distribution network for like goods if you have one.

N/A

Appendix reference:

4. Do your sales usually include delivery in the price? If so, please explain how you calculate delivery costs and prices?

This depends on how the goods are being sold. If the goods are sold on a delivered basis (e.g. DAP or CIF) logistics are included and if sold on an ex-works plant or port basis (EXW or FOB) logistics cost are not included. In Argent's case we can sell our goods on both basis and add the logistics cost to the price.

Appendix reference:

5. Does delivery price vary between customers? If so, then please explain what these differences may relate to.

Yes and this depends on 2 things: mode of transport used to deliver the goods and the distance between our plant and the delivery destination. Both trucking and shipping (bulk or containers) are the most common modes of transport.

Appendix reference:

6. Attach sales contracts for the top five customers by volume in **Annex 7 – T by T domestic sales** that you have sold like goods to in the period of investigation.

Our [CONFIDENTIAL]. A copy of one of the commercial recaps (deal) is included in the attachments. This recap is representative of all commercial (spot) agreements with this customer.

In addition we have attached [CONFIDENTIAL] contracts for our high blended fuel sales.

[CONFIDENTIAL]

All other sales are on a spot basis only.

Appendix reference: [D3.6](#)

7. Select examples of domestic sales of like goods to two different customers included in **Annex 7 – T by T domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

[CONFIDENTIAL] customer. This is a straight forward sales transaction [CONFIDENTIAL].

Appendix reference: [D3.7](#)

D4 Captive use

1. For products classified for internal use in **Annex 2 – Product comparison** please specify how these goods were used

N/A

Appendix reference:

2. Please comment on whether your internal use of the like good would be affected if the existing countervailing measure on the goods subject to review no longer applied? Please attach evidence to support your answer where possible.

N/A

Appendix reference:

SECTION E: Injury to your company

1. Would your company suffer from injury if the existing countervailing measure on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. If your company is already suffering injury, would the nature or source of the injury change if the measures were to no longer apply?

Yes we would suffer injury if the existing measure no longer applied. Goods subject to review would enter the UK market at increased competition and discounted prices. Europe has applied countervailing duties on Indonesian FAME and heavily restricts imports of Indonesian FAME through trade defence measures. The UK would become a market for these goods if the existing countervailing measure in UK no longer applied. .

The minimum injury is between \$55/t-\$65/t for additional transport cost between UK and EU if all of the remaining UK's local biodiesel production is forced out of the UK. Our production capacity in the UK is 95,000tpa, having had to close one plant (55,000 tpa) already last year due to the high level of injury. The injury is felt even greater however in the lowering of demand and downward pressure on pricing if subsidised Indonesian FAME was to be allowed into UK without defence measures. In addition we would see a lower European market price as a result of large biodiesel shipments from Indonesia entering into the UK.

Appendix reference:

2. How would your costs to make and sell change if the existing countervailing measure on the goods subject to review no longer applied, what measures would your company have to take to remain competitive. If possible, please provide annual estimates (e.g., projections or forecasts) for the next five years for any changes and use the text box below to explain the methods used to calculate these estimates.

With the consequent reduction in sales price for finished product, our ability to compete when purchasing feedstocks would be reduced further, particularly [CONFIDENTIAL]. Ultimately, if UK manufacturing became too tight, we would have to consider [CONFIDENTIAL].

Appendix reference:

- O
3. Please complete **Annex 9 - Injury**. This should be completed in reference to your UK production of the like goods for the injury period.

4. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods.

Apportioned based on volumes

Appendix reference:

5. Please explain how you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.

Any volatility will be to balance contract positions vs. margins, so no abnormally high variances

Appendix reference:

6. Please explain how you estimated your percentage of market share for the like goods.

Potentially we could have a max market share of [CONFIDENTIAL] if all our production was sold in the UK market. Currently the market share would be closer to [CONFIDENTIAL] is sold into the UK market. In 2023 the total volume of biodiesel ME (methyl ester) was 1414kt (Renewable Transport Fuel Obligation (RTFO) statistics - GOV.UK). The total biofuels market (including ethanol and HVO) was 3.7MT.

Appendix reference:

7. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations.

Plants run at capacity, after any planned/unplanned downtime

Appendix reference:

8. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Argent's actual performance variances have been caused by [CONFIDENTIAL]. Showing the forecast vs budget in the injury period is not therefore not seen as relevant.

However, if countervailing duties for Indonesian biodiesel were no longer applied, we believe it would have a negative impact on our financial performance as there is a competing source of biodiesel in the UK market that is offered at competitive price

levels. As the EU does have countervailing duties in place for Indonesian biodiesel we expect that a consequence of removing countervailing duties in the UK would result in lower domestic sales for Argent and therefore higher export volumes to the EU.

Appendix reference:

9. Please explain how you set your wages, and the causes of any significant variations.

Wages are market benchmarked against chemical industry related industries and not directly linked to variations.

Appendix reference:

10. Please explain whether any of the indicators listed in **Annex 9 – Injury** would be affected if the existing countervailing measure on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 9 Injury** to provide estimates for the next five years (e.g., projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

We expect that Indonesian biodiesel would replace UK produced biodiesel. This is partly because the EU still has countervailing duties in place and Indonesian biodiesel would be sold in the UK market and therefore would push UK biodiesel to the EU market. In that scenario we expect Argent's production volumes would probably be sustained with a shift of domestic sales more towards export sales, but with a negative impact on the turnover values and profitability. The extent of the imports and the injury however could dictate that Argent considers closing its remaining plant in the UK, leading to a loss of 95kt/annum of waste-based biodiesel. Indonesia is one of the world's largest biodiesel producers and could reasonably quickly redirect their biodiesel to the UK market which could cause a (further) disbalance in the supply & demand balance in the UK.

Appendix reference:

11. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

The profitability of [CONFIDENTIAL] however the market spreads (delta between feedstock price and the biodiesel price) has deteriorated as a result of an oversupplied market. This [CONFIDENTIAL] are the main causes for Argent's difficult

circumstances. In 2024 Argent has decided to close one of the facilities (Motherwell Scotland) [CONFIDENTIAL].
The level of profit would be negatively impacted.

Appendix reference:

12. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this. Would your sales price for your like goods be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

The current price is based on a two components. [CONFIDENTIAL]. As more biodiesel comes to the market it would push the premium down. If the new biodiesel supply came only to the UK (and not EU) it would have a disproportioned impact on the UK specifically, which would force Argent's biodiesel to the EU markets at additional logistics costs.

Appendix reference:

13. Complete **Annex 10 – Investments and Return on Investments**

- For each investment category, indicate the amount of investment (apportioned where applicable) and explain what the investment is for.
- Where possible, add columns in **Annex – 10 Investments and Return on Investments** to provide estimates (e.g. projections or forecasts) for future years assuming the measure is retained.
- For the investments you have made during the injury period, please also provide the depreciation incurred company-wide and for the like goods.

Please answer here

Appendix reference:

14. Please provide details of your typical source(s) of finance (e.g., loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

[CONFIDENTIAL]

Appendix reference:

15. Please describe any changes in your company's level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence e.g., funding proposals, loan approvals or other relevant financial documents.

[CONFIDENTIAL]

Appendix reference:

16. Please explain whether your company's ability to make investments and/or ability to raise capital would be affected in the next five years if the existing countervailing measure on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g., company investment plans, etc) and if you have provided estimates explain how you calculated them.

Argent's ability to make investments in the UK are [CONFIDENTIAL].

Appendix reference:

17. Please complete **Annex 11– Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation? Would your forward sales contracts be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

None

Appendix reference:

18. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged subsidisation of the goods subject to review. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at subsidised prices
- contraction in demand or changes in patterns of consumption
- restrictive trade practices of, and competition between, third country and UK producers
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

Would the cause(s) or degree of injury change if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Significant injury is being suffered in UK. As a result, Argent announced the closure of its 55kt plant in Motherwell (Scotland) in March 2024. [CONFIDENTIAL].

The UK market is a net importer of biodiesel and you would expect that all of UK's biodiesel production would find its way to the domestic market, however during the POI [CONFIDENTIAL] overall costs of Argent's biodiesel.

The main external cause of injury is the impact of unfair trade. If the countervailing duties on Indonesian FAME imports were to be removed and the expected consequential downturn in the market resulted, the level of injury we would suffer would further increase to the extent that UK manufacturing of biodiesel may become unviable.

Appendix reference:

19. Would there be any other effects on your industry and/or company if the existing countervailing measure on the goods subject to review no longer applied? Please substantiate your claims with evidence.

We would anticipate that the [CONFIDENTIAL] remaining facility by an increase of imports that are unfairly subsidised.

Appendix reference:

SECTION F: Subsidies

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

F1 General

The programmes being reviewed are listed in the table below. Please use this section of the questionnaire to provide any information you have on the programmes listed. You can also provide information on any other subsidy programmes that you believe relate to the production and/or sale of the goods subject to review.

Subsidy programmes

No.	Subsidy	Subsidy type
1	Government support to the biodiesel industry through grants via the Oil Palm Plantation Fund (OPPF).	Direct transfer of funds
2	Government support to the biodiesel industry through the provision of Crude Palm Oil for less than adequate remuneration.	Provision of goods or services for less than adequate remuneration
3	Government support to the biodiesel industry through the exemption of import duties on machinery imported into bonded zones	Government revenue foregone or not collected

F2 Subsidies

1. Please complete **Annex 13 – Subsidies** providing as much information for each of the subsidies listed as possible. Please substantiate with any evidence if possible

Add additional lines for any further subsidy you would like the TRA to consider into the relevant tables depending on the type of subsidy it is (i.e., grants, loans etc).

2. Please provide any further information on subsidies that you feel is relevant to the investigation.

None
Appendix reference:

SECTION G: Economic Interest Test

The Economic Interest Test helps the TRA assess the economic impact of a measure compared to what would happen if it the measure was not in place. There are six factors which the TRA must consider as part of the Economic Interest Test:

- i) The injury caused by the importation of the subsidised goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA considers relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

G1 Background

1. Please provide the names, legal addresses and telephone numbers of the following domestic companies:
 - Those that produce biodiesel in the UK;
 - Those that are involved in the importation, distribution, or sale of biodiesel from third countries.

Biodiesel producers:

- Greenergy
- Olleco
- Argent Energy

Importers include:

- Valero
- Essar
- P66
- Petroineos
- Prax
- Shell
- BP
- Exxon
- Greenergy
- Kolmar
- Cargill

Appendix reference:

2. Please provide an overview of your upstream supply chain for biodiesel (e.g., producers of raw materials). Where possible, please describe the number, location and size of UK producers at each stage.

[CONFIDENTIAL]

Appendix reference:

3. Please provide an overview of your downstream supply chain. Please indicate who the consumers of biodiesel are, which industry and level of trade they relate to and whether they are companies or private individuals.

Biodiesel can be sold to any trader or distributor of fuel in UK who will blend biodiesel with fossil diesel in order to meet the RTFO obligation. Petrol station in particular as the most common use of distribution of diesel in the UK. The top 10 petrol stations are:

- Esso
- BP
- Shell
- Texaco
- Certas
- Tesco
- Unbranded
- Morrisons
- Asda
- Sainsbury

<https://www.statista.com/statistics/312047/petrol-station-sites-by-brand-in-the-united-kingdom-uk/>

Appendix reference:

G2 Your company

4. Please complete **Annex E1 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company’s UK sites or facilities.
5. How would these employment figures be affected if the existing countervailing measure was no longer to apply? Please support your claims with evidence.

Either the employment would be minimally affected, should the impact of withdrawing the existing measure be less than anticipated, or [CONFIDENTIAL].

Appendix reference:

6. How would your domestic sales of biodiesel be affected if the existing countervailing measure was no longer to apply? Please support your claims with evidence.

We anticipate the pricing of UK biodiesel would be affected such that [CONFIDENTIAL] EU.

Appendix reference:

7. How significant is the production of biodiesel relative to your company's entire UK production?

Completely

Appendix reference:

G3 Potential impacts of a measure

8. Please describe how you would expect a decrease in the import prices of biodiesel to affect each of the following. Where possible, please support your claims with evidence.

- Domestic prices of biodiesel in the UK.

Decrease accordingly

Appendix reference:

- Total UK production of biodiesel.

Reduce certainly. The extent of the reduction would be subject to the outlook UK producers take on the decreasing attractiveness of UK biofuel manufacturing. [CONFIDENTIAL].

Appendix reference:

- Total imports of biodiesel from Indonesia and other third countries to the UK.

Imports of Indonesian biodiesel would likely be maximised to achieve the cap on crop-based but also would [CONFIDENTIAL] putting downward pressure on EU prices. Indonesian production of biodiesel has continued to increase year on year and was 9 million tonnes in 2022. Imports into the EU and UK in 2018, prior to EU and UK countervailing duties, was just under 1 million tonnes. This level reduced to under 100,000 after the duties were applied, demonstrating a high level of effectiveness.

Appendix reference:

- Total exports of biodiesel from the UK.

If production levels remained the same we anticipate a loss of the duties would have to lead to an increase in exports. Should the injury be more, biodiesel production in the UK would decline with a corresponding decline in exports.

Appendix reference:

9. Do you know of any related industries that would be affected if the existing countervailing measure was no longer to apply?

Please consider in particular:

- Upstream industries – those who produce inputs (such as raw materials) needed for the production of biodiesel.

UK rendering industry. The UK has a number of companies that render animal fats which in turn can be used as a raw material for biodiesel. These companies will be harmed by a loss of the duties as it would affect the buying power of Argent Energy, at best, and could lead to the loss of a hugely significant outlet in the UK should our remaining plant have to close. Argent is the only biodiesel manufacturer in the UK utilising this waste stream. The [CONFIDENTIAL] raw material.

Appendix reference:

- Downstream industries – those who purchase biodiesel;

Biodiesel can be sold to any trader or distributor of fuel in UK who will blend biodiesel with fossil diesel in order to meet the RTFO obligation. Petrol station in particular as the most common use of distribution of diesel in the UK. The top 10 petrol stations are:

- Esso
- BP
- Shell
- Texaco
- Certas
- Tesco
- Unbranded
- Morrisons
- Asda
- Sainsbury

UK: petrol station sites by brand 2022 | Statista

Appendix reference:

- Industries for complimentary goods – those which would typically be bought alongside biodiesel (such as ink being bought with printers)

None

Appendix reference:

- Industries for substitute goods – those which might be bought instead of biodiesel (such as margarine instead of butter).

None

Appendix reference:

10. To what extent would you expect any changes in prices of biodiesel to be passed onto final consumers?

We would not expect a significant change in prices to be passed onto the final consumer as the final consumer buys a product with max 7% biodiesel blended in. If at oil companies passed on any savings they would be lost in the overall price changes of the fossil element.

Appendix reference:

11. Would your plans for investment or expansion in the UK over the next five years be affected if the existing countervailing measure was no longer to apply? Please support your claims with evidence.

Yes. [CONFIDENTIAL].

Appendix reference:

12. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

Please provide any relevant information about whether any of these groups or any other particular group might be disproportionately affected if the existing countervailing measure was to no longer apply.

Not aware of any

Appendix reference:

13. How would the number or range of suppliers in the biodiesel market be affected if the existing countervailing measure was to no longer apply? Please provide an explanation.

The UK producers could well consider a reduction in production facilities and thereby a reduction in the number of suppliers. With only 3 producers, the loss of only one would reduce the number of UK suppliers by a third.

Appendix reference:

14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the biodiesel market be affected if the existing countervailing measure was to no longer apply? Please provide an explanation.

It would not be affected in general. However, the sustainability characteristics of Indonesian biodiesel are [CONFIDENTIAL].

Appendix reference:

15. How would the cost of switching between suppliers in the biodiesel market be affected if the existing countervailing measure was to no longer apply? Please provide an explanation.

It would not.

Appendix reference:

16. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if the existing countervailing measure was to no longer apply? Please provide an explanation.

It would remain non-existent

Appendix reference:

17. How would the choices of biodiesel available to consumers be affected if the existing countervailing measure was to no longer apply? Please provide an explanation.

Consumers would be unaware of a switch from UK made biodiesel to Indonesian.

Appendix reference:

18. How would the ability of downstream businesses or consumers to make informed decisions be affected if the existing countervailing measure was to no longer apply? Please provide an explanation.

Not much, apart from [CONFIDENTIAL].

Appendix reference:

19. Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

No

Appendix reference:

SECTION H: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	✓
Section B – About your goods	✓
Section C – Costs and production	✓
Section D - Sales	✓
Section E – Injury to your company	✓
Section F – Subsidies	✓
Section G – Economic Interest	✓

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
A3.1	AE Organogram
A3.2a	Process description
A3.2b	Process Flow
A6.3	AE (UK) Ltd Stats
A6.3	AE Ltd Stats
A6.5	Trial Balances
A6.8	AE CoA
D3.6	CONFIDENTIAL

D3.6	CONFIDENTIAL
D3.6	CONFIDENTIAL
D3.7	CONFIDENTIAL

+Add additional rows as required