



**Pre-Sampling Questionnaire (Exporter)
Anti-dumping investigation
Case AD0068: Hydrotreated Vegetable Oil (HVO)
originating in the United States of America**

Period of Investigation:	1 January 2024 to 31 December 2024
Injury Period:	1 January 2021 to 31 December 2024
Deadline for response:	1 April 2025
Case Team Contact:	AD0068@traderemedies.gov.uk
Completed on behalf of:	Diamond Green Diesel LLC

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete.

- Confidential
 Non-confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **1 April 2025**.



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The scope of this investigation

Goods concerned

This investigation covers hydrotreated vegetable oil (HVO) originating in the US, described as:

Biodiesel (or paraffinic diesel fuel / gasoil) obtained from synthesis or hydrotreatment of oils and fats of non-fossil origin, in pure form or as included in a blend, originating in the United States of America (US). This biodiesel is commonly known as hydrotreated (hydrogenated) vegetable oil diesel (HVO), renewable diesel or green diesel. Synthetic paraffinic kerosene (also known as sustainable aviation fuel (SAF)) is excluded from this description of biodiesel.

These goods are currently classifiable within the following commodity codes:

1516209821	1518009923	2710194429	2710194810	2710201699
1516209823	1518009929	2710194432	2710194890	3824999210
1516209829	1518009932	2710194439	2710201121	3824999213
1516209832	1518009939	2710194621	2710201123	3824999214
1516209839	2710194221	2710194629	2710201129	3824999216
1518009121	2710194223	2710194623	2710201132	3824999219
1518009123	2710194229	2710194632	2710201139	3826009011
1518009129	2710194321	2710194639	2710201621	3826009019
1518009132	2710194329	2710194721	2710201623	3826009039
1518009139	2710194339	2710194723	2710201629	
1518009511	2710194390	2710194729	2710201632	
1518009519	2710194421	2710194732	2710201639	
1518009921	2710194423	2710194739	2710201692	

These commodity codes are only given for information.

In this pre-sampling questionnaire, these goods will be referred to as the goods concerned. Any reference to the goods concerned in this pre-sampling questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.



Like goods

In addition to seeking information about your company's export sales to the UK of the goods **concerned**, this pre-sampling questionnaire will also ask about your sales of like goods in your domestic market and to third countries. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods **concerned** in all respects, or with characteristics closely resembling them.

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

For more information about this case, you may refer to the Notice of Initiation published at: [HVO originating in the United States of America - Trade Remedies Service - GOV.UK](#).



Instructions

The Trade Remedies Authority (TRA) is responsible for investigating the allegation that **HVO** originating in **the US** is being exported to the UK at prices less than their normal value and that this dumping (export price at less than normal value) is causing injury to the UK industry for these goods.

Who should complete this form

You should complete this form if you are an overseas exporter of goods concerned.

Why you are being asked to complete this pre-sampling questionnaire

You have identified yourself as an overseas exporter of the goods concerned. We are therefore seeking your cooperation in the investigation.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of overseas exporters of the goods concerned from the US complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

By submitting a completed detailed questionnaire response, you might become eligible for an individual anti-dumping amount, if we are recommending that measures apply following this investigation. Please refer to [Section C](#) for more information on individual anti-dumping amounts.

If you do not complete this pre-sampling questionnaire or the detailed questionnaire, you could be found to be non-cooperating. For more details on how this may affect you, please consult our [operational guidance on non-cooperation](#).

Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **1 April 2025**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact David Sibley, AD0068@traderemedies.gov.uk and see the TRA's guidance on extension requests for further information.



Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date.

Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-confidential” in the header.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.

Please see the TRA’s [public guidance](#) for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

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 [HVO originating in the United States of America - Trade Remedies Service - GOV.UK](#).
[HVO originating in the United States of America - Trade Remedies Service - GOV.UK](#).



Section A – Activities of your company and any associated parties

A1 – Your company’s activities

To determine your company’s role for the purpose of this investigation, please select the activity/activities of your company below. For a definition of goods concerned like goods please refer to above section [‘the scope of this investigation’](#).

- overseas exporter of the **goods concerned**
- other (please give details below)

If you have selected ‘other’, please describe the role of your company with regards to the goods concerned or the like goods:

Please describe your interest in this investigation:



Diamond Green Diesel LLC (“DGD”) (<https://www.diamondgreendiesel.com/>) is a joint venture between subsidiaries of Valero Energy Corporation and Darling Ingredients Inc. DGD is a global leader in the production of Hydrotreated Vegetable Oil (“HVO”), also referred to as Renewable Diesel (“RD”), a biomass-based diesel product that, unlike methyl ester products, is a true hydrocarbon. In addition to its original production facility based outside of New Orleans, Louisiana, USA, DGD’s new [CONFIDENTIAL: commercially sensitive information] million Metric Ton-per-year production facility near Valero’s Port Arthur, Texas, USA refinery began operations in late 2022, increasing DGD’s total production to approximately [CONFIDENTIAL: commercially sensitive information] million Metric Tons of HVO. DGD’s HVO is produced from sustainable low-carbon feedstocks, such as used cooking oil, inedible animal fats derived from processing meat fats and fuel-grade corn oil and pursuant to the BioGrace model, the greenhouse gas emissions savings for the HVO produced by DGD is over 80%.

DGD markets its HVO globally, including into the UK market, in order to provide supply necessary for the UK to meet its commitment to reduce greenhouse gas (“GHG”) emissions in the transportation fuel sector. The pure HVO market in the UK continues to grow, as HVO gains significant traction as a sustainable alternative to fossil diesel. The availability of HVO at terminal rack locations across the country also continues to rise and as the product becomes more available, demand continues to rise. DGD has helped meet this need, and its HVO is particularly attractive to UK customers, not only because the quality of the fuel itself, but also because of the robust back-office infrastructure DGD has invested in to help verify the traceability and compliance of its fuel to meet regulatory mandates. The availability of DGD’s high-quality product gives the UK market more supply and optionality in reaching their carbon reduction goals, and DGD continues to be unaware of any UK producers of pure HVO that are able to similarly meet this demand.

A2 – Associated parties and operational links

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the goods concerned or like goods during the POI. 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](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the **goods concerned** or like goods.



	Company name ¹	Company location (city, country) ²	Activities	Relationship
Associated party 1	Diamond Green Diesel Holdings LLC (Delaware)	San Antonio, Texas, USA	Holding company	Owns 100% of the membership interests in DGD
Associated party 2	Diamond Alternative Energy LLC (Delaware)	San Antonio, Texas, USA	None, other than ownership of 50% interest in Diamond Green Diesel Holdings LLC	Wholly-owned subsidiary of Valero Energy Corporation. Owns 50% of the membership interests in Diamond Green Diesel Holdings LLC
Associated party 3	Darling Green Energy LLC (Delaware)	Dallas, Texas, USA	None, other than ownership of 50% interest in Diamond Green Diesel Holdings LLC	Wholly-owned subsidiary of Darling Ingredients Inc. Owns 50% of the membership interests in Diamond Green Diesel Holdings LLC
Associated party 4	Valero Energy Corporation (Delaware) Publicly traded on the NYSE under the ticker symbol "VLO"	San Antonio, Texas, USA	Refiner and marketer of refined petroleum products with operations worldwide. No direct commercial transactions with DGD	Indirect 50% owner of Diamond Green Diesel Holdings LLC (through ownership of 100% of the membership interests of Diamond Alternative Energy LLC)
Associated party 5	Valero Marketing and Supply Company (Delaware)	San Antonio, Texas, USA	Along with many other activities unrelated to DGD, Valero Marketing and Supply	Indirectly, wholly-owned subsidiary of Valero Energy Corporation

¹ Information in parentheses indicates jurisdiction of formation.

² For companies with multiple business locations, address given is that of the primary or headquarters location.



			Company (“ VMSC ”) purchases distillers corn oil (“ DCO ”) from Valero Renewable Fuels Company, LLC and sells it on to DGD for use as a feedstock (it also sells DCO to third parties)	
Associated party 6	Valero Renewable Fuels Company, LLC (Delaware)	San Antonio, Texas, USA	Owns and operates ethanol plants in various U.S. states. No direct relationship with DGD. Manufactures ethanol in the U.S. and sells DCO (which is a byproduct of the ethanol production process) to VMSC	Wholly-owned subsidiary of Valero Energy Corporation
Associated party 7	Diamond Renewable Operations LLC (Delaware)	San Antonio, Texas, USA	Contract operator of DGD’s plants in Norco, LA and Port Arthur, TX.	An indirect wholly-owned subsidiary of Valero Energy Corporation. Has contracted with DGD to operate DGD’s plants in Norco, LA and Port Arthur, TX
Associated party 8	Valero Energy Inc. / Énergie Valero Inc. (Canada)	Montreal, Quebec, Canada	Owns a refinery and related marketing business in	Subsidiary of Valero Energy Corporation. Owns a refinery and related marketing



			eastern Canada In connection with these activities it purchases renewable diesel produced by DGD	business in eastern Canada
Associated party 9	Darling Ingredients Inc. (Delaware) Publicly traded on the NYSE under the ticker symbol "DAR"	Dallas, Texas, USA	Among other activities unrelated to DGD, it supplies U.S.-sourced feedstocks to DGD (but not exclusively)	Indirect 50% owner of Diamond Green Diesel Holdings LLC (through ownership of 100% of the membership interests of Darling Green Energy LLC)
Associated party 10	Best Commodity Trade BV (Netherlands)	Son en Breugel, North Brabant, Netherlands	Among other activities unrelated to DGD, it supplies Europe-sourced feedstocks to DGD	Indirect wholly-owned subsidiary of DAR
Associated party 11	Araguaia Indústria de Óleos e Proteínas S/A (Brazil)	Xinguara, Pará, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 50% owned by DAR
Associated party 12	Agroindustrial São Francisco Ltda. (Brazil)	Dourados, Mato Grosso do Sul, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 100% owned by DAR
Associated party 13	Faros Indústria de Farinha de Ossos Ltda. (Brazil)	Cruzeiro do Sul, Rio Grande do Sul, Brazil	Among other activities unrelated to DGD, it supplies	Member of the FASA Group Indirectly 100% owned by DAR



			Brazil-sourced feedstocks to DGD	
Associated party 14	Ossotuba Ind. E Comércio de Óleos e Proteínas Ltda. (Brazil)	Tubarão, Santa Caratina, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 100% owned by DAR
Associated party 15	Pacífico Indústria e Comercio de Óleos e Proteínas Ltda. (Brazil)	Cacoal, Rondônia, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 47.5% owned by DAR
Associated party 16	FASA Comercial Exportadora Ltda. (Brazil)	Cruzeiro do Sul, Rio Grande do Sul, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 100% owned by DAR
Associated party 17	Rio Verde Indústria de Gorduras e Proteínas Ltda. (Brazil)	Itaúba, Mato Grosso, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 70% owned by DAR
Associated party 18	Santa Rita Indústria de Óleos e Proteínas Ltda. (Brazil)	Jaraguari, Mato Grosso so Sul, Brazil	Among other activities unrelated to DGD, it supplies Brazil-sourced feedstocks to DGD	Member of the FASA Group Indirectly 100% owned by DAR

+ Add additional rows as required



Section B – Production and sales volumes

B1 – Production

Please fill in your company's total production volume and capacity for the goods concerned and like goods in the table below.

	Volume (Metric tonnes)	Volume (Litres)
Overall production of the goods concerned and like goods during the POI = 100	100	100
Total production capacity of the goods concerned and like goods during the POI	[90-110]	[90-110]



B2 – Sales volume and value

Please provide the total sales volumes and sales price values in the table below.

	Volume (Metric tonnes)	Volume (Litres)	Value in original currency (X)	Value in GBP (£)	Currency conversion rate
Total export sales of the goods concerned to the UK during the POI manufactured by your company	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 150,000-250,000]	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 200,000,000-300,000,000]	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 250,000,000-350,000,000]	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 200,000,000-300,000,000]	[1.2-1.4]
Total export sales of the goods concerned to the UK during the POI not manufactured by your company	0	0	0	0	0
Total domestic sales of like goods during the POI manufactured by your company	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 2,000,000-2,500,000]	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 2,500,000,000-3,500,000,000]	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 2,500,000,000-3,500,000,000]	[CONFIDENTIAL: commercially sensitive data. Non-confidential range: 2,000,000-3,000,000]	[1.2-1.4]
Total domestic sales of like goods during the POI not manufactured by your company	0	0	0	0	0



B3 – Conversion

Please fill in whether your company primarily uses metric tonnes to measure its production volume and if not, then please describe your conversion method.

Conversions		
Does your company primarily use metric tonnes to measure its production volume?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If not, then please describe your conversion method to metric tonnes.	Gallons x 42 = Barrels x 6.28981077 = Metric Cubes * 0.78 (standard HVO conversion) = Metric Tonnes	
Please provide the density at which your products, the goods concerned, are sold at.	Domestic Sales are conducted in \$/Gallons UK sales are conducted in \$/MT or converted to \$/M3 using 0.78 conversion	
Please detail the conversion rate you have used to convert mass to volume in litres.	Metric Tonnes * 0.78 =Metric Cubes * 1000 = Litres	



B4 – Commodity codes

Please provide details of the commodity code(s) (e.g. HS code/UKGT code) you export the goods concerned to the UK under in the box below:

DGD does not import the goods concerned into the UK. In 2024,
[CONFIDENTIAL: commercially sensitive information].



Section C – Individual anti-dumping

If the TRA decides to sample overseas exporters, and you are **not** selected for this sample, you might become eligible for an individual anti-dumping amount if you complete a detailed questionnaire. Please indicate whether you would complete this questionnaire below:

Yes

No

If you do **not** choose to complete a detailed questionnaire, you will not be eligible for an individual anti-dumping amount. Your anti-dumping amount will be determined based on the amounts imposed on the overseas exporters in the sample.

Please note:

If we recommend that a trade remedy measure applies following this investigation, and you have requested an individual anti-dumping amount, please note that you will be required to supply the necessary information within the given timeframe for us to calculate this for you.

The TRA must accept an overseas exporter's request for an individual anti-dumping amount and calculate an individual amount, providing that:

- the information required is complete and submitted on time; and
- the number of requests for individual calculations does not unduly burden the investigation and risk delaying its conclusion.



Section D – Additional information

D1 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below.

Organisation name	Website
N/A	

D2 – Scope

Do you agree with the scope of the investigation as outlined on page 3

- Yes
- No

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

Diamond Green Diesel LLC strongly objects to the scope of investigations as presented by the Applicants. HVO and FAME are not “like products”. HVO is chemically very different and these differences mean it is handled fundamentally differently in the marketplace. These differences were exacerbated in recent years, as HVO continued to gain significant traction as a distinct commodity on the UK market due to its unparalleled quality and greenhouse gas emissions reduction properties.

To Diamond Green Diesel LLC’s knowledge there are no producers of HVO in the UK. As there is no UK production of HVO, the Applicants who represent only the UK FAME industry, do not have a standing to initiate the investigations. Therefore, the UK market is completely dependent on imports of HVO. UK domestic production is unable to satisfy the RTFO targets, necessitating imports of HVO. Imposing measures on imports of HVO from the US would not be in the interest of the UK consumers.

Diamond Green Diesel LLC will share further comments on the product scope of the case concerned as a separate submission.



D3 – 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.

We have created a draft PCN table and enclose this here for you now.

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 UK RTFO categories)
	2	biodiesel from feedstocks subject to incentives (double counted according to UK RTFO categories)
	0	other/special purpose sold without any certificate
Form	R(99.9)	Pure form
	B(XX)	XX equals percentage of biodiesel blended with mineral diesel (The nearest percentage rounded down to a whole number)



Please review the draft PCN structure for this investigation shown in the table above. Please include any comments on the PCN structure in the box provided.

Diamond Green Diesel LLC understands that FAME is not included in the scope of investigation and the “goods concerned” are HVO / green diesel / renewable diesel. We therefore expect the revised PCN table will reflect this accordingly and FAME will be excluded.

In addition, Diamond Green Diesel LLC notes that “pure” HVO contains 0.1% ultra-low-sulfur diesel (“**ULSD**”). The volume of ULSD is quantified on sales to the UK such that the customers only generate RTFCs on the 100% renewable content. Therefore, “Pure form” should be represented by R(99.9) instead of R(100).

D4 – Economic Interest Test

It is a requirement of the investigation to conduct an Economic Interest Test (EIT). The aim of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Company contact information (email/telephone)	Relationship	Can we contact? Yes/No
[CONFIDENTIAL: commercially sensitive data relating to the company’s customers that is not publicly available]				



D5 – Anything else

Please use the box below to provide information about anything else you consider relevant to this investigation

To Diamond Green Diesel LLC's knowledge there are no producers of HVO in the UK. As there is no UK production of HVO, the Applicants who represent only the UK FAME industry, do not have a standing to initiate the investigations. Therefore, the UK market is completely dependent on imports of HVO. UK domestic production is unable to satisfy the RTFO targets, necessitating imports of HVO. Imposing measures on imports of HVO from the US would not be in the interest of the UK consumers.

Diamond Green Diesel LLC will share further comments on the product scope of the case concerned as a separate submission.

Now you have reached the end of this questionnaire please ensure that you have prepared a confidential and non-confidential version and indicated the status of each within the header. The non-confidential version should redact personal contact information, names, signatures, and exact sales quotes. Redacted figures should be replaced with a range where possible. Please return both versions to the TRA using the Trade Remedies Service (trade-remedies.service.gov.uk).