



**Pre-Sampling Questionnaire (Importer)
Subsidy Investigation
Case AS0067: Hydrotreated Vegetable Oil (HVO)
originating in the United States of America**

Period of Investigation:	<input type="text" value="1 January 2024 to 31 December 2024"/>
Injury Period:	<input type="text" value="1 January 2021 to 31 December 2024"/>
Deadline for response:	<input type="text" value="1 April 2025"/>
Case Team Contact:	<input type="text" value="AS0067@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Valero Energy Ltd"/>

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 **goods** originating in the **United States of America (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 '**goods concerned**' in this pre-sampling questionnaire refers to the goods description above, regardless of the commodity code under which they are imported.



Like goods

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are **like** the goods concerned. Any reference to '**like goods**' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than **US** 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

Who should complete this form

You should complete this form if you are a **UK importer** of the goods concerned.

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

You have identified yourself as a UK importer 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 UK importers 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.

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, AS0067@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](#).



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/ and like goods please refer to the section above on [‘the scope of this investigation.’](#)

- importer of the goods concerned in the UK
- other (please give details below)

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

Click or tap here to enter text.)



Please describe your interest in this investigation:

Valero Energy Ltd is a subsidiary of Valero Energy Corporation (NYSE: VLO).

Valero Energy Corporation ("Valero"), through its subsidiaries, is an international manufacturer and marketer of transportation fuels, and a leader in the commercialisation of emerging low-carbon intensity biofuels. Valero is a Fortune 50 company based in San Antonio, Texas, and it operates 15 petroleum refineries located in the United States, Canada and the United Kingdom with a combined throughput capacity of approximately 3.2 million barrels per day and 12 ethanol plants with a combined production capacity of approximately 1.69 billion gallons per year.

Valero, through a subsidiary, owns 50% of Diamond Green Diesel Holdings LLC ("DGD"), a joint venture whose facilities in Louisiana and Texas, currently produce renewable fuels, including renewable diesel and synthetic paraffinic kerosene.

In the UK, Valero Energy Ltd owns and operates Pembroke Refinery in south west Wales, which is one of Europe's largest and most complex refineries, has ownership interests in four major pipelines, eight fuel terminals and a large aviation fuels business.

Affordable low carbon liquid fuels will be essential to meeting the UK's goal of achieving emission reduction targets by 2050.

As Valero Energy Ltd has consistently maintained with the TRA in the various biofuels investigations to date, we are interested in ensuring that trade barriers do not unnecessarily interfere with the market in order to provide the lowest cost, most efficient supply of biofuel to meet these objectives.

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	Company location (city, country)	Activities	Relationship
Associated party 1	<i>Diamond Green Diesel LLC</i>	<u>Principal Office:</u> One Valero Way San Antonio, TX 78249 <u>Port Arthur, TX Facility:</u> 2275 W Rev Dr Ransom Howard St, Port Arthur, TX 77640 <u>Norco (a/k/a St. Charles), LA Facility:</u> 14891 Airline Hwy, Norco, LA, 70079	Manufacture and marketing of renewable diesel	50% indirectly affiliated joint venture ¹

+ Add additional rows as required

¹ An affiliate of Valero and an affiliate of a US company called Darling Ingredients, Inc. jointly own Diamond Green Diesel Holdings LLC, which, through its subsidiary, Diamond Green Diesel LLC, owns a renewable diesel manufacturing plant near New Orleans, Louisiana, USA and a renewable diesel and synthetic paraffinic kerosene manufacturing plant in Port Arthur, Texas USA. Neither Valero nor Darling “control” Diamond Green Diesel Holdings LLC (or its subsidiary Diamond Green Diesel LLC) to the exclusion of the other, though an affiliate of Valero operates the Diamond Green Diesel LLC plants.



Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.
Please confirm in the final column if we are able to contact these companies.

Exporter/supplier name	Address	Contact details	Can we contact? Yes/No
<i>Diamond Green Diesel LLC</i>	One Valero Way, San Antonio, Texas 78249	[CONFIDENTIAL: personal information]	Yes

+ Add additional rows as required



Section C – Sales, imports and domestic purchases

C1 – Total company revenue

Please provide your company's total revenue and the revenue of the goods concerned: For clarity, we do not consider revenue from Renewable Transport Fuel Certificates to be within scope.

	Value in original currency USD (\$)	Value in GBP (£)	Conversion rate
Total revenue of your company during the POI	[CONFIDENTIAL: commercially sensitive data]	[CONFIDENTIAL: commercially sensitive data]	[CONFIDENTIAL: commercially sensitive data: non-confidential range: 1,0-1,5]
Total revenue of your company for the goods concerned during the POI	N/A	[CONFIDENTIAL: commercially sensitive data] ²	N/A

Indexed:

Total revenue of your company during the POI – Value in GBP (£) = 100

	Value in original currency USD (\$)	Value in GBP (£)
Total revenue of your company during the POI	[110-140]	100
Total revenue of your company for the goods concerned during the POI	N/A	[0.3-0.5]

² This includes revenue from [CONFIDENTIAL: commercially sensitive data] which was imported into the UK during Q1 & Q2 2023, but sold during the POI. The revenue from these transactions cannot be easily excluded from the 2024 data.



C2 – Your imports of the goods concerned

Please provide the total volume and value of the goods concerned **imported** by your company from the US during the POI:

[CONFIDENTIAL: commercially sensitive data. Indexed table provided for the non-confidential version. Where possible, ranges for the real data were provided]

	Volume (Metric tonnes)	Volume (Litres)	Value in original currency (X)	Value in GBP (£)	Currency conversion rate
The goods concerned imported into the UK during the POI = 100 <i>(Sum of next three rows should match volume/value of this row)</i>	100	100	100	100	[1.2-1.4]
The goods concerned imported into the UK during the POI and resold in the UK	[0-10]	[0-10]	[0-10]	[0-10]	[1.2-1.4]
The goods concerned imported into the UK during the POI and consumed by your own company	[85-100]	[85-100]	[85-100]	[85-100]	[1.2-1.4]
The goods concerned imported into the UK during the POI and exported	[0-10]	[0-10]	[0-10]	[0-10]	[1.2-1.4]



Please provide the total volume and value of the like goods **imported** by your company from **all other countries** during the POI:

[CONFIDENTIAL: commercially sensitive data. Indexed table provided for the non-confidential version]

	Volume (Metric tonnes)	Volume (Litres)	Value in original currency (X)	Value in GBP (£)	Currency conversion rate
The like goods imported into the UK during the POI = 100 <i>(Sum of next three rows should match volume/value of this row)</i>	100 ³	100	100	100	[1.2-1.4]
The like goods imported into the UK during the POI and resold in the UK	[85-100]	[85-100]	[85-100]	[85-100]	[1.2-1.4]
The like goods imported into the UK during the POI and consumed by your own company	[0-10]	[0-10]	[0-10]	[0-10]	[1.2-1.4]
The like goods imported into the UK during the POI and exported	[0-10]	[0-10]	[0-10]	[0-10]	[1.2-1.4]

³ All goods imported from the Netherlands and of US origin.



C3 – Like goods purchased from a UK producer

If you have also **purchased like goods** from a **UK producer** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.

	Volume (Metric tonnes)	Volume (Litres)	Value in original currency (X)	Value in GBP (£)	Currency conversion rate
Like goods purchased from UK producers during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	0 ⁴	0	0	0	0
Like goods purchased from UK producers during the POI and resold in the UK market	0	0	0	0	0
Like goods purchased from UK producers during the POI and consumed by your own company	0	0	0	0	0
Like goods purchased from UK producers during the POI and exported	0	0	0	0	0

⁴ There is no UK production of HVO.



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
[CONFIDENTIAL: commercially sensitive data]	

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?

Valero Energy Ltd 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 Valero Energy Ltd’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.

Valero Energy Ltd 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(100)	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.



Valero Energy Ltd 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.

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 Valero Energy Ltd'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.

Valero Energy Ltd 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).