



## Pre-Sampling Questionnaire (Exporter) Countervailing investigation Case AS0067: 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:	AS0067@traderemedies.gov.uk
Completed on behalf of:	St. Bernard Renewables 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](http://www.trade-remedies.service.gov.uk)) by **1 April 2025**.



## Table of Contents

The scope of this investigation .....	3
Instructions .....	5
Who should complete this form.....	5
Why you are being asked to complete this pre-sampling questionnaire .....	5
Deadline for response .....	5
Note about confidentiality .....	5
Section A – Activities of your company and any associated parties .....	7
A1 – Your company’s activities .....	7
A2 – Associated parties and operational links .....	8
Section B – Production and sales volumes.....	9
B1 – Production.....	9
B2 – Sales volume and value .....	10
B3 – Conversion.....	11
B4 – Commodity codes .....	12
Section C – Individual countervailing amount .....	13
Section D – Additional information .....	14
D1 – Other interested parties .....	14
D2 – Scope.....	14
D3 – Product Control Numbers.....	Error! Bookmark not defined.
D4 – Economic Interest Test .....	17
D5 – Subsidies.....	18
D6 – Anything else .....	22



## 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 the production and/or export of HVO originating in the US to the UK are being subsidised and that this subsidisation is causing injury to the UK 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 countervailing amount, if we are recommending that measures apply following this investigation. Please refer to [Section C](#) for more information on individual countervailing amount.

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, 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 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:

(Click or tap here to enter text.)

Please describe your interest in this investigation:

St. Bernard Renewables LLC (“SBR” or the “Company”) is a producer of HVO, at location in the Chalmette, Louisiana USA. *[CONFIDENTIAL]*

SBR anticipates additional sales into the UK and is seeking cooperation with the TRA and its Countervailing investigation to ensure SBR is judged entirely on the basis of the facts presented.



## 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	Chalmette Refining, L.L.C.	500 W St Bernard Hwy. Chalmette, LA 70043	Operator of Renewable Diesel refinery	Operator, a subsidiary of PBF Holding Company LLC
Associated party 2	SBR Marketing LLC	500 W St Bernard Hwy. Chalmette, LA 70043	Sales (Domestic) entity. Marketing arm of SBR used primarily in domestic sales.	Subsidiary of SBR

+ 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 <b>goods concerned</b> and like goods during the POI	80*	80*
Total production capacity of the <b>goods concerned</b> and like goods during the POI	100*	100*

*\*Index based on production capacity is 100.*

#### B1.1 - What other products does your company produce?

Please provide details of other products, including other biofuels that your company produces:

[CONFIDENTIAL]



**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 <b>manufactured</b> by your company	9*	9*	13*	13*	N/A
Total export sales of the goods concerned to the UK during the POI <b>not manufactured</b> by your company	N/A	N/A	N/A	N/A	N/A
Total domestic sales of like goods during the POI <b>manufactured</b> by your company	100*	100*	100*	100*	N/A
Total domestic sales of like goods during the POI <b>not manufactured</b> by your company	N/A	N/A	N/A	N/A	N/A

*\*Index based on domestic sales as 100.*



**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.	Measured in volume (barrels) and then converted to mass (MT) using a density of ~6.55 pounds/gallon (2024 average) for HVO	
Please provide the density at which your products, the goods concerned, are sold at.	The goods concerned in the export market were sold on a volume basis (cubic meters or barrels). Goods concerned sold in the domestic market are also sold on a volume (barrel or gallons) basis.	
Please detail the conversion rate you have used to convert mass to volume in litres.	Every MT = 2,204 pounds. 6.546 pounds = 1 gallon. Every barrel = 158.987 liters.	



## 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:

The Harmonized Tarriff Code SBR uses for US Customs when exporting is 2710.19.4590, which is reflected in SBR's sales documents. SBR believes it is equivalent to the HS code of 2710 19 42.



## Section C – Individual countervailing amount

If the TRA decides to sample overseas exporters, and you are **not** selected for this sample, you might become eligible for an individual countervailing 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 countervailing amount. Your countervailing 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 countervailing 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 countervailing 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

### 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?



### 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 <a href="#">UK RTFO categories</a> )
	2	biodiesel from feedstocks subject to incentives (double counted according to <a href="#">UK RTFO categories</a> )
	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.

SBR believes the PCN structure broadly covers the necessary categories. As the investigation progresses, SBR retains the right to return to this question should further analysis warrant.



### 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.

	<b>Company name</b>	<b>Company location (city, country)</b>	<b>Company contact information (email/telephone )</b>	<b>Relationship</b>	<b>Can we contact? Yes/No</b>
1		[CONFIDENTIAL]			



**D5 – Subsidies**

Please confirm whether your company has claimed/ received any of the following during the investigation period 1 January 2024 to 31 December 2024.

Subsidy Name	Have you received this subsidy? (Yes/No)	Who was the granting authority?	Value of subsidy per year claimed?
<b>Federal Schemes</b>			
Biodiesel Mixture Credit (otherwise referred to as the Blender’s Tax Credit BTC)	[CONFIDENTIAL]		
Clean Fuel Production Credit (otherwise referred to as the Producer’s Tax Credit (PTC))	[CONFIDENTIAL]		
Biodiesel Credit	[CONFIDENTIAL]		
Second Generation Biofuel Producer Credit	[CONFIDENTIAL]		
USDA Bioenergy Programme for Advanced Biofuels (BPAB)/Advanced Biofuels Payment Program	[CONFIDENTIAL]		



USDA Higher Blends Infrastructure Incentive Programme (HBIIP)	[CONFIDENTIAL]		
The Biomass Crop Assistance Program (BCAP)	[CONFIDENTIAL]		
Advanced Biofuel Production Grants and Loan Guarantees <i>(also formerly known as The Biorefinery Assistance Program and now known as Biorefinery, Renewable Chemical, and Biobased Product Manufacturing)</i>	[CONFIDENTIAL]		
US Environmental Protection Agency and Department of Energy joint funding for advanced biofuels	[CONFIDENTIAL]		
Alternative Fuel Infrastructure Tax Credit	[CONFIDENTIAL]		
Department of Energy Domestic Biofuel Production Funding	[CONFIDENTIAL]		
<b>State Schemes</b>			
Missouri Qualified Biodiesel Producer Incentive Fund	[CONFIDENTIAL]		
Missouri Biodiesel Producer Tax Credit	[CONFIDENTIAL]		
Texas Fuel Ethanol, Renewable Methane, Biodiesel and Renewable Diesel Production Incentive Programme	[CONFIDENTIAL]		



Biofuel Blend Tax Exemption	[CONFIDENTIAL]		
Washington State Biofuels Production Tax Exemption	[CONFIDENTIAL]		
Florida Biofuels Investment Tax Credit	[CONFIDENTIAL]		
Iowa Biodiesel Producer Tax Refund	[CONFIDENTIAL]		
Kansas Qualified Biodiesel Fuel Producer Incentive	[CONFIDENTIAL]		
Kentucky Biodiesel Production Tax Credit	[CONFIDENTIAL]		
North Dakota Biodiesel and Renewable Diesel (HVO) Blender Tax Credit	[CONFIDENTIAL]		
North Dakota Biodiesel and Renewable Diesel (HVO) Sales Equipment Tax Credit	[CONFIDENTIAL]		
North Dakota Agriculturally Derived Fuel Production Facility Loan Guarantees and North Dakota Advanced Biofuel Incentives	[CONFIDENTIAL]		
Michigan Incentive Programme for In-State Sale and Production of Biodiesel	[CONFIDENTIAL]		



North Dakota Biofuel Loan/PACE Programme	[CONFIDENTIAL]		
California Alternative Fuel and Vehicle Incentives (otherwise referred to as the Clean Transportation Programme)	[CONFIDENTIAL]		
Oregon Production Property Tax Exemption (as part of the Rural Renewable Energy Development RRED Zone)	[CONFIDENTIAL]		
Montana Biodiesel Blending (and Storage) Tax Credit	[CONFIDENTIAL]		
US - Free trade zone specific	[CONFIDENTIAL]		



## D6 – Anything else

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

SBR would like to add the below key points:

- 1) The U.S. blender's tax credit ("BTC") incentive of \$1/gal expired as of year-end 2024. The marketplace currently does not expect an extension of that credit. While the U.S. is contemplating adding a federal incentive in its place (45Z/Clean Fuel Production Credit under the Inflation Reduction Act), the potential value of the incentive, even if it comes to fruition, is expected to be notably below the BTC's \$1/gal.
- 2) [CONFIDENTIAL]
- 3) To SBR's knowledge, there is no UK HVO production, only Fatty Acid Methyl Esters ("FAME")/Biodiesel. To SBR, that is an entirely different comparison when thinking about analyzing the quality and associated economic incentives of FAME vs HVO.
- 4) [CONFIDENTIAL]

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](https://trade-remedies.service.gov.uk)).