



Pre-Sampling Questionnaire (Exporter)

Transition Review of countervailing measures

Case TS0044: Biodiesel originating in Argentina

Period of Investigation:	1 October 2022 – 30 September 2023
Injury Period:	1 October 2019 – 30 September 2023
Deadline for response:	23 October 2023
Case Team Contact:	TS0044@traderemedies.gov.uk
Completed on behalf of:	BUNGE ARGENTINA S.A.

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 **23 October 2023**.



Table of Contents

The scope of this review	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	6
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	10
B4 – Commodity codes	11
B5 – Hydrotreated Vegetable Oil (HVO) Production	12
Section C – Individual countervailing amount	14
Section D – Additional information	15
D1 – Other interested parties	15
D2 – Scope	15
D3 – Product Control Numbers	16
D4 – Economic Interest Test	16
D5 – Anything else	17



The scope of this review

Goods subject to review

This review covers biodiesel exported from Argentina, 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.

This biodiesel is currently classifiable within the following commodity code(s):

15 16 20 98 21	27 10 19 43 21	27 10 20 11 29	38 26 00 10 29
15 16 20 98 29	27 10 19 43 29	27 10 20 11 30*	38 26 00 10 50
15 16 20 98 30*	27 10 19 43 30*	27 10 20 16 21	38 26 00 10 59
15 18 00 91 21	27 10 19 46 21	27 10 20 16 29	38 26 00 10 89
15 18 00 91 29	27 10 19 46 29	27 10 20 16 30*	38 26 00 10 99
15 18 00 91 30*	27 10 19 46 30*	27 10 20 16 90*	38 26 00 90 11
15 18 00 95 10	27 10 19 47 21	38 24 99 92 10	38 26 00 90 19
15 18 00 99 21	27 10 19 47 29	38 24 99 92 12	38 26 00 90 30*
15 18 00 99 29	27 10 19 47 30*	38 24 99 92 20	
15 18 00 99 30	27 10 20 11 21	38 26 00 10 20	

* The commodity codes that are listed above **in italics** have been replaced by new commodity codes. The code changes do not alter the description of the goods subject to review. The transfer date of these changes was 18 August 2023 and are detailed below:

Commodity Code	Replaced by Commodity Codes
15 16 20 98 30 <i>replaced by</i>	15 16 20 91 31; 15 16 20 98 32 and 15 16 20 98 39
15 18 00 91 30 <i>replaced by</i>	15 18 00 91 31; 15 18 00 91 32 and 15 18 00 91 39
27 10 19 43 30 <i>replaced by</i>	27 10 19 43 31; 27 10 19 43 32 and 27 10 19 43 39
27 10 19 46 30 <i>replaced by</i>	27 10 19 46 31; 27 10 19 46 32 and 27 10 19 46 39
27 10 19 47 30 <i>replaced by</i>	27 10 19 47 31; 27 10 19 47 32 and 27 10 19 47 39
27 10 20 11 30 <i>replaced by</i>	27 10 20 11 31; 27 10 20 11 32 and 27 10 20 11 39
27 10 20 16 30 <i>replaced by</i>	27 10 20 16 31; 27 10 20 16 32 and 27 10 20 16 39
27 10 20 16 90 <i>replaced by</i>	27 10 20 16 91; 27 10 20 16 92 and 27 10 20 16 99
38 26 00 90 30 <i>replaced by</i>	38 26 00 90 31; 38 26 00 90 32 and 38 26 00 90 39

These commodity codes are only given for information.



In this pre-sampling questionnaire, these goods will be referred to as 'goods subject to review'. Any reference to goods subject to review 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 subject to review, 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 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 goods subject to review or like goods.

For more information about this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/case/TS0044/



Instructions

The Trade Remedies Authority (TRA) will be carrying out a transition review of the EU trade remedy measure which will consider whether the production and/or export of biodiesel from Argentina to the UK is being subsidised and whether this subsidisation is likely to cause injury to the UK industry for these goods if the countervailing amount no longer applied.

Who should complete this form

You should complete this form if you are an **overseas exporter** of the goods subject to review.

If you are not an **overseas exporter**, please complete either the relevant Pre-Sampling Questionnaire or the Other Interested Party and Contributor Registration Form if you have information that you wish to be considered during the investigation.

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

We are seeking your cooperation as an overseas exporter of the goods subject to review to inform our review of whether the current countervailing measure should be maintained, varied or revoked.

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 subject to review from Argentina 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 be eligible for an individual countervailing amount, if we recommend that measures continue following this review. Please refer to [Section C](#) for more information on individual countervailing amounts.

If you do not complete this pre-sampling questionnaire or the detailed questionnaire, you may be deemed non co-operative. 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 **23 October 2023**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact TS0044@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 www.trade-remedies.service.gov.uk/public/case/TS0044



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 review, please select the activity/activities of your company below. For a definition of the goods subject to review please refer to above section [the scope of this review](#).

overseas exporter of the goods subject to review

other (please give details below)

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

N/A

Please describe your interest in this review:

BUNGE ARGENTINA S.A. is an exporting producer of the goods subject to review.



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 subject to review 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 subject to review or like goods.

Table below includes commercially sensitive information not susceptible for a meaningful summary.

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]
Associated Party 2	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]

+ 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 subject to review and like goods in the table below.

Table below includes commercially sensitive information not susceptible for a meaningful summary.

	Volume (Metric tonnes)	Volume (litres)
Overall production of the goods subject to review and like goods during the POI	[SENSITIVE]	[SENSITIVE]
Total production capacity of the goods subject to review and like goods during the POI	[SENSITIVE]	[SENSITIVE]

B2 – Sales volume and value

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

Table below includes commercially sensitive information not susceptible for a meaningful summary.



	Volume (Metric tonnes)	Volume (litres)	Value in original currency (USD/MT)	Value in GBP (£)	Conversion rate
Total export sales of the goods subject to review to the UK during the POI manufactured by your company	N/A	N/A	N/A	N/A	N/A
Total export sales of the goods subject to review to the UK during the POI not manufactured by your company	N/A	N/A	N/A	N/A	N/A
Total domestic sales of like goods during the POI manufactured by your company	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]	[SENSITIVE]
Total domestic sales of like goods during the POI not manufactured by your company*	N/A	N/A	N/A	N/A	N/A



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.

Does your company primarily use metric tonnes to measure its production volume?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
If not, then please describe your conversion method to metric tonnes.	N/A		

B4 – Commodity codes

Please provide details of the commodity code(s) under which you export the goods subject to review to the UK during the Injury Period in the box below:

N/A



B5 – Hydrotreated Vegetable Oil (HVO) Production

Please provide details of your HVO production, including sale and production volumes if applicable:

N/A

	Volume (Metric tonnes)	Volume (litres)	Value in original currency (X)	Value in GBP (£)	Conversion rate
Overall production of HVO during the POI	N/A	N/A	N/A	N/A	N/A
Total production capacity of HVO during the POI	N/A	N/A	N/A	N/A	N/A
Total export sales of HVO to the UK during the POI manufactured by your company	N/A	N/A	N/A	N/A	N/A
Total export sales of HVO to the UK during the POI not manufactured by your company	N/A	N/A	N/A	N/A	N/A
Total domestic sales of HVO during the POI manufactured by your company	N/A	N/A	N/A	N/A	N/A
Total domestic sales of HVO during the POI not manufactured by your company	N/A	N/A	N/A	N/A	N/A



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 continues following this review, and you have requested an individual countervailing amount, 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 review 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	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?

N/A



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.

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

Characteristic	Symbol	Description
Cold Filter Plugging Point (CFPP)	P	Positive value + temperature rounded to nearest degree
	N	Negative value + temperature rounded to nearest degree
Type	1	Regular RED (renewable energy directive) certified biodiesel
	2	Eligible for double-counting
	0	Other/special purpose sold without any certificate
Form	P100	Pure form (100)
	B(XX)	Included in a blend (blend rate)

Under this PCN structure, biodiesel assigned PCN P1B30 would be a product that corresponds with the following:

- A positive Cold Filter Plugging Point (CFPP)
- Regular RED certified biodiesel
- A 30 percent blend rate

D4 – Economic Interest Test

It is a requirement of the review 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, please provide 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 Y/N
1	N/A	N/A	N/A	N/A	N/A
2	N/A	N/A	N/A	N/A	N/A
3	N/A	N/A	N/A	N/A	N/A
4	N/A	N/A	N/A	N/A	N/A

D5 – Anything else

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

N/A

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).