



**Pre-Sampling Questionnaire (Producer)
Anti-dumping investigation
Case AD0059: Certain engine oils and hydraulic
fluids exported from Lithuania and the United Arab
Emirates**

Period of Investigation:	1 April 2023 – 31 March 2024
Injury Period:	1 April 2020 – 31 March 2024
Deadline for response:	2 July 2024
Case Team Contact:	AD0059@traderemedies.gov.uk
Completed on behalf of:	Certs Energy UK Limited

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 **2 July 2024**.



Table of Contents

The scope of this investigation	4
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, sales and imports.....	9
B1 – Production	9
B2 – Sales volume and value	9
B3 – Imports and Sales	10
Section C – Additional information	11
C1 – Other interested parties.....	11
C2 – Particular Market Situation	11
C3 – Scope.....	11
C4 – Product Control Numbers.....	12
C5 – Economic Interest Test	14
C6 – Anything else.....	14



The scope of this investigation

Goods concerned

This investigation covers certain engine oils and hydraulic fluids exported from Lithuania and the United Arab Emirates, described as:

- Certain engine oils and hydraulic fluids. This includes passenger car motor oils, heavy duty commercial vehicle oils and hydraulic oils, grades: 5W-30, 5W-40, 0W-16, 0W-20, 0W-30, 10W-40, 10W-30, 20W-50, S40, S50, 15W-40, ISO32, ISO46, ISO68, HV32, HV46 and HV68.

These engine oils and hydraulic fluids are currently classifiable within the following commodity code(s) *ex 27101981 and ex 27101983*. 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

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 Lithuania or the United Arab Emirates 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: <https://www.trade-remedies.service.gov.uk/public/case/AD0059/>



Instructions

Who should complete this form

You should complete this form if you are a UK producer of the like goods in the investigation.

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

You have identified yourself as a UK producer of the like goods. 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 producers 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 2 July 2024. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact the case team, AD0059@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: <https://www.trade-remedies.service.gov.uk/public/case/AD0059/>



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 or like goods please refer to above section on ‘the scope of this investigation’.

- producer of the like goods in the UK
- other (please give details below)

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

Click or tap here to enter text.

Please describe your interest in this investigation:

Certas Energy UK own HyperDrive Lubricants which is a producer of ‘like goods’ based in the UK and have seen a negative impact both on business but also a wider industry for the reason this investigation has been raised.



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 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 with associated parties could include production, domestic sales, export sales, and/or further processing of the like goods.

	Company name	Company location (city, country)	Activities	Relationship
Associated party 1	<i>Certas Energy UK Limited</i>	Warrington, UK	Domestic Sales	Parent Company
Associated party 2	<i>HyperDrive Lubricants</i>	Redditch, UK	Producer	Producer

+ Add additional rows as required



Section B – Production, sales and imports

B1 – Production

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

	Volume (Litres - L)
Overall production of the like goods during the POI	<u>1,000,000 – 3,000,000</u>
Total production capacity of the like goods during the POI	<u>3,000,000 - 6,000,000</u>

B2 – Sales volume and value

Please provide your UK sales data for the like goods produced in the UK by your company.

	Volume (L)	Value in GBP (£)
UK sales of the like goods produced in the UK during the POI	1,000,000 – 3,000,000	£1,500,000 - £4,000,000



B3 – Imports and Sales

If your company has also imported the goods concerned from Lithuania and the United Arab Emirates or like goods from any other country and sold them in the UK during the POI, provide your sales data for these imported goods concerned/like goods.

	Volume (L)	Value in GBP (£)
Imports of the goods concerned from Lithuania during the POI	0	0
Imports of the goods concerned from the United Arab Emirates during the POI	0	0
Imports of the like goods from countries other than Lithuania or the United Arab Emirates during the POI	0	0
UK sales of the goods concerned, imported from Lithuania during the POI	0	0
UK sales of the goods concerned, imported from the United Arab Emirates during the POI	0	0
UK sales of the like goods, imported from countries other than Lithuania or the United Arab Emirates during the POI	0	0



Section C – Additional information

C1 – 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
Shell Lubricants UK	www.shell.co.uk
Castrol UK	www.castrol.com
Kuwait Oils	www.Q8oils.com

C2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the exporting country or territory, please provide details in the box below. This can include examples such as:

- Prices are artificially low;
- There is significant barter trade (e.g. goods exchanged for other goods);
- Prices reflect non-commercial factors; or
- Anything else.

Our understanding is that the United Arab Emirates do not currently have in place any trade sanctions on Russian base oil and due to other sanctions in place this has then meant base oils being sold into Lubricant manufacturers in the UAE cheaper than the global base oil prices.

Based on pricing intel we have seen in the UK marketplace on 'like goods' linked to this investigation that they are being sold cheaper in the UK following freight into the country compared to finished prices being sold locally in the UAE. We can provide UAE finished goods prices that we have seen vs. a comparison to sell prices in the UK on request.



C3 – 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?

Click or tap here to enter text.

C4 – 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.



Cat 1	Code (grade)	Cat 2	Code (AECA oil sequences)	Cat 3	Code (container type)
01	Oil grade 5W30	E4	Heavy duty E4	1	Plastic bottle
02	Oil grade 5W40	E7	Heavy duty E7	2	Plastic pail
03	Oil grade 0W16	E8	Heavy duty E8	3	Plastic barrel
04	Oil grade 0W20	E1	Heavy duty E11	4	Steel drum
05	Oil grade 0W30	A3	Light duty petrol A3	5	Intermediate bulk container
06	Oil grade 10W40	A5	Light duty petrol A5	6	Other – plastic
07	Oil grade 10W30	A7	Light duty petrol A7	7	Other – steel
08	Oil grade 20W50	B4	Light duty diesel B4	8	Other – Mixed plastic and steel
09	Oil grade S40	B5	Light duty diesel B5	9	Other – Other materials
10	Oil grade S50	B7	Light duty diesel B7	0	No container
11	Oil grade 15W40	C2	Light duty both C2		
12	Oil grade ISO32	C3	Light duty both C3		
13	Oil grade ISO46	C4	Light duty both C4		
14	Oil grade ISO68	C5	Light duty both C5		
15	Oil grade HV32	C6	Light duty both C6		
16	Oil grade HV46	C7	Light duty both C7		
17	Oil grade HV68	X0	No AECA spec / Not applicable		
00	Oil grade other				

Example: 0W30 C2 engine oil in a plastic barrel would be: 05C23

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.

Click or tap here to enter text.

C5 – 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). We would like to use any contact details you provide to get in touch with these companies, although there is no obligation on you to provide this information.

	Company name	Company location (city, country)	Company contact information (email/telephone)	Relationship
1	Supplier	Liverpool, UK		Base Oil Supplier
2	Supplier	Wickford, UK		Additive Supplier
3	Supplier	Bury, UK		Base Oil Supplier
4	Customer	Swindon, UK		Customer
5	Customer	Tewkesbury, UK		Customer

C6 – Anything else

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



Now you have reached the end of this questionnaire please ensure that you have

Click or tap here to enter text.

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).