



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

Period of Investigation:	<input type="text" value="1 April 2023 – 31 March 2024"/>
Injury Period:	<input type="text" value="1 April 2020 – 31 March 2024"/>
Deadline for response:	<input type="text" value="2 July 2024"/>
Case Team Contact:	<input type="text" value="AD0059@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="REDACTED"/>

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**.



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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 codes *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 '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 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 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/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:

Please describe your interest in this investigation:

[REDACTED] UK-based importer and distributor of premium engine oils and hydraulic fluids, operating since [REDACTED]. We specialise in sourcing high-quality lubricants from reputable international manufacturers [REDACTED]

[REDACTED] Our core activities are importing, warehousing, and distributing lubricants to automotive and industrial clients [REDACTED]

We have always operated ethically, with a focus on maintaining fair pricing and supporting the integrity of the UK lubricants market. However, our business has been significantly impacted by the aggressive pricing strategies employed by certain exporters, in particular (SCT Lubricants) Mannol, whose practices have severely distorted the market.

We are participating in this investigation because we have serious concerns that the current provisional duties unfairly penalise legitimate importers like us, who have never engaged in dumping. We respectfully seek a review of the residual duties applied to UAE imports, and we are committed to cooperating fully to help ensure that the investigation results in a fair and balanced outcome for ethical UK businesses.


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	N/A	N/A	N/A	We have no associated parties involved in the production, export, or sale of the goods concerned.  operates independently as an importer and distributor only.
Associated party 2				

+ Add additional rows as required



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
Contact Details Provided from Exporter from UAE			

+ 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:

	Value in GBP (£)
Total revenue of your company during the POI	Less than 5 million
Total revenue of your company for the goods concerned during the POI	Less than 5 million



C2 – Your imports of the goods concerned

Please provide the total volume and value of the goods concerned imported by your company from Lithuania and the United Arab Emirates during the POI:

	Volume (L)	Value in GBP (£)



The goods concerned imported from Lithuania into the UK during the POI <i>(Sum of next three rows should match volume/value of this row, unless you currently have purchases from the POI in storage)</i>	N/A	N/A
The goods concerned imported from Lithuania into the UK during the POI and resold in the UK	N/A	N/A
The goods concerned imported from Lithuania into the UK during the POI and consumed by your own company	N/A	N/A
The goods concerned imported from Lithuania into the UK during the POI and exported	N/A	N/A
The goods concerned imported from the United Arab Emirates into the UK during the POI <i>(Sum of next three rows should match volume/value of this row unless you currently have purchases from the POI in storage)</i>	We don't have DATA to specify the sum of Value in Litres, only the total amount spend during the POI and the total imported from UAE	Less than 5 million
The goods concerned imported from the United Arab Emirates into the UK during the POI and resold in the UK	We don't have DATA to specify the sum of Value in Litres, only the total amount spend during the POI and the total imported from UAE	Less than 5 million
The goods concerned imported from the United Arab Emirates into the UK during the POI and consumed by your own company	0 L	£0.00
The goods concerned imported from the United Arab Emirates into the UK during the POI and exported	0 L	£0.00



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

	Volume (L)	Value in GBP (£)
The like goods imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row unless you currently have purchases from the POI in storage)</i>	0 L	£0.00
The like goods imported into the UK during the POI and resold in the UK	0 L	£0.00
The like goods imported into the UK during the POI and consumed by your own company	0 L	£0.00
The like goods imported into the UK during the POI and exported	0 L	£0.00

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 (L)	Value in GBP (£)
Like goods purchased from UK producers during the POI <i>(Sum of next three rows should match volume/value of this row unless you currently have purchases from the POI in storage)</i>	100.000- 300.000 L	Up to £500.000
Like goods purchased from UK producers during the POI and resold in the UK market	100.000- 300.000 L	Up to £700.000
Like goods purchased from UK producers during the POI and consumed by your own company	Minimum	Minimum
Like goods purchased from UK producers during the POI and exported	0 L	£0.00



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
Company 1	Information's can be provided upon request
Company 2	Information's can be provided upon request
Company 3	Information's can be provided upon request
Company 4	Information's can be provided upon request
Company 5	Information's can be provided upon request
Company 6	Information's can be provided upon request

D2 – 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.

Click or tap here to enter text.



D3 – 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.

D4 – 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.

D5 – 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. 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	Information provided with confidential statement			
2				
3				
4				



D6 – Anything else

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



We write to you not just as a business, but as a dedicated team that has spent over [REDACTED] Ltd with integrity, care, and a commitment to doing things the right way.

We were not made aware of this investigation in its early stages and had no opportunity to participate or offer input until now. As a result, we are now facing serious consequences — including the highest provisional anti-dumping duties — despite being a fully independent UK importer that has never engaged in unfair pricing or market disruption.

What feels especially unfair is that SCT Lubricants (Mannol), whose undercutting tactics and dominating the market are widely recognised as having triggered this investigation, has received a lower duty rate than we have. While we've always chosen ethical [REDACTED], priced responsibly, and complied fully with the rules, we are now being grouped with those whose actions we've consistently opposed.

[REDACTED] is a trusted supplier to respected institutions including [REDACTED] bases in the UK. We source high-quality lubricants from long-standing partners in the UAE — we do not manufacture, export, or reprice below market. Our role is simple: to import, warehouse, and distribute essential products fairly and transparently.

But the pressure caused by these provisional duties is already affecting our ability to compete. We are being forced to raise prices at a time when our customers — many of them public services — rely on us, dependable supply. Some customers may leave. Others already we have, The longer this continues, the greater the risk to our business, our people, and the customers we have services.

We urge you to take a closer look at what's really happening in the market. The reality is that certain distributors of Mannol and Fanfaro (SCT Lubricants)products are selling engine oils at prices that fall far below any reasonable cost of manufacture — sometimes as low as £255 per drum on pallet loads. These are not market efficiencies; they are deliberate, unsustainable strategies to dominate by undercutting.



This has created a distorted and unhealthy trading environment, forcing compliant importers like us to reduce margins to the point of loss just to survive. And yet, instead of support, we're facing the heaviest penalties — while the true sources of disruption walk away with minimal consequence.

We respectfully ask that the Trade Remedies Authority reconsider the duty margins applied, and recognise that not all importers are the same. There *is* a difference between those who play by the rules and those who manipulate them. We are ready to provide any documentation, insight, or evidence to support a more accurate, fair outcome.

At stake here is more than just a balance sheet — it's the future [REDACTED] honest UK business and the livelihoods of the people behind it, our staff. We hope our voice is heard, and that a fairer, more proportionate approach will be taken before irreversible harm is done.

Above all, we hope the Authority will consider aligning our duty rate more closely with that of the parties whose practices have directly contributed to the current market disruption — such as SCT Lubricants (Mannol) — rather than penalising those who have played no part in it.

With respect and hope,

[REDACTED]

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).