



# Registration form for interested parties and contributors

Case No.: ER0083

Expiry review

## **Biodiesel products originating in the USA and consigned from Canada**

Completed on behalf of (provide the name of your business or organisation):	<b>Valero Energy Ltd</b>
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### **Note:**

Please provide **two copies of your response to this form**: 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)).

When you have completed each form, indicate the **confidentiality** status of the document by placing an  in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- Confidential
- Non-confidential (will be made available on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	12 February 2026
Case team contact:	<a href="mailto:ER0083@traderemedies.gov.uk">ER0083@traderemedies.gov.uk</a>



## Introduction

### Registration of interest to the review

We invite interested parties and contributors to register their interest in this review by completing the relevant sections as indicated in this form and submitting the completed form using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

An interested party is either:

- a government of the foreign country or territory subject to the review;
- an overseas exporter, an overseas producer or an importer of the goods subject to the review;
- a UK producer of goods that are like the goods subject to the review; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in a review.

### Scope of the review

Goods subject to review	<p><b>Category 1 Goods (biodiesel, pure or blend, greater than 20% biodiesel content)</b></p> <p>Fatty-acid mono-alkyl esters (FAME) and/or paraffinic gasoil obtained from synthesis of non-fossil origin, commonly known as 'biodiesel'. In a pure form or in a blend containing by weight more than 20%, fatty-acid mono-alkyl esters and/or paraffinic gasoil obtained from synthesis of non-fossil origin, originating in the United States of America and consigned from Canada.</p> <p><i>AND</i></p> <p><b>Category 2 Goods (biodiesel, blend, less than 20% biodiesel content)</b></p> <p>Fatty-acid mono-alkyl esters and/or paraffinic gasoil obtained from synthesis of non-fossil origin, commonly known as 'biodiesel', in a blend containing by weight 20% or less of fatty-acid mono-alkyl esters and/or paraffinic gasoil obtained from synthesis of non-fossil origin, originating in the United States of America.</p>
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Period of investigation (POI)	1 January 2025 to 31 December 2025
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For further details, please refer to the *Notice of Initiation* on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>.

## Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by 12 February 2025 using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

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](#)<sup>1</sup> for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this review (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

## Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the review or a UK producer of

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<sup>1</sup> <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



goods that are like the goods subject to the review, we will ask you to complete a detailed questionnaire to inform this review.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.



## Section A: About your business or organisation

### A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this review, please select all of the following options that are applicable to your business or organisation. Please refer to the period of investigation (POI) defined on page 2.
  - [A1.1] During the POI, we produced the goods subject to review in the US and/or exported from Canada.  
**Note: Please complete sections A2 and B.**
  - [A1.2] During the POI, we directly exported the goods subject to review from the US or from Canada to the UK.  
**Note: Please complete sections A3 and B.**
  - [A1.3] During the POI, we indirectly exported the goods subject to review from the US or from Canada to the UK via a third party (located either in the US, Canada or a third country not subject to the review).  
**Note: Please complete sections A3 and B.**
  - [A1.4] During the POI, we imported the goods subject to review originating in the US and/or consigned from Canada to the UK.  
**Note: Please complete sections A4 and B.**
  - [A1.5] During the POI, we produced goods that are like the goods subject to review in the UK.  
**Note: Please complete sections A5 and B.**
  - [A1.6] Other.  
**Note: Please complete section B.**
2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this review in the field below.

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.



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.

Valero Energy Ltd is an importer of non-US origin FAME into the UK. As such, the outcome of the present investigation will have a direct impact on Valero Energy Ltd's operations and the market as a whole. Consequently, Valero Energy Ltd has a substantial interest in the proceedings and wishes to participate in the present case as a Contributor.

3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.

Valero Energy Ltd is an associate member of UK and Ireland Fuel Distributors Association Ltd (UKIFDA) and is also a member of Fuels Industry UK (formerly known as the UK Petroleum Industry Association, UKPIA).

## A2. Production and domestic sales of the goods subject to review

Complete this section if you indicated under **A1** that **you are a producer of the goods subject to review in the US.**

4. Please refer to the description of the goods subject to review on page 2. In the field below, describe the goods that you produce and that fall within the description.

N/A

5. Please provide your business' total production volumes and production capacity for the goods subject to review during the period of investigation (POI) in the table below.



Confidential

Non-confidential

	Metric Tonnes	Litres
Total production volume (POI)	N/A	
Total production capacity (POI)		
Conversion Rate used above:		

Consider providing these figures in ranges in your non-confidential version of this form.

6. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods subject to review during the period of investigation. 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](#).

Company name	Company location (city, country)	Activities	Relationship
N/A			

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

7. Please provide the total of your domestic sales volumes and sales values of the goods subject to review produced by your business during the POI in the table below.

	Metric Tonnes	Litres
Total domestic sales volume (blended)(POI)	N/A	
Total domestic sales value (blended)(POI) [£]		
Total domestic sales volume (all bio content) (POI)		
Total domestic sales value (all bio content) (POI) [£]		

Consider providing these figures in ranges in your non-confidential version of this form.

8. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

N/A
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9. Is your company or any of your associated parties related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods subject to review in the UK?

N/A

10. Do you produce and/or sell other goods for the UK market other than the goods concerned?

N/A

11. Did you receive benefit from the Clean Fuel Producers Tax Credit in 2025 and if so, what was the total benefit received (\$), and what was the average value (cents per US Gallon)?

N/A

12. Did you defer any benefit to a future tax year or to another unrelated party?

N/A

### A3. Direct and indirect exports of the goods subject to review

Complete this section if you indicated under **A1** that **you are an exporter of the goods subject to review from the countries subject to the review.**

13. If you are not the producer of the goods subject to review that you export to the UK, please provide details for your suppliers of the goods subject to review and indicate whether these are the producers of the goods subject to review in the table below.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)
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Confidential

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N/A			

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

14. Please provide the total of your direct and indirect export volumes and export values of the goods subject to review to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in the US or consigned from Canada or a third country, are to be considered indirect exports.

	Metric Tonnes	Litres
Total direct export volume (POI)	N/A	
Total indirect export volume (POI)		
Total direct export value (POI) [£]		
Total indirect export value (POI) [£]		

Consider providing these figures in ranges in your non-confidential version of this form.

15. If you exported the goods subject to review to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship
N/A			

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

16. Please provide details of the commodity code(s) you export the goods subject to review to the UK under in the box below.

N/A
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#### A4. UK imports of the goods subject to review



Complete this section if you indicated under **A1** that **you are an importer of the goods subject to review originating from the US and consigned from Canada.**

17. Please provide the total of your import volumes and import values of the goods subject to review originating in the US and consigned from Canada to the UK during the POI in the table below.

	Metric Tonnes	Litres
Total import volume (POI)	N/A	
Total import value (POI) [£]		
Conversion rate used:		

Consider providing these figures in ranges in your non-confidential version of this form.

18. Please provide details for your suppliers of the goods subject to review originating in the US and consigned from Canada in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship
N/A			

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

19. Please specify your purpose in importing the goods subject to review from countries subject to the review. Select **all** of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.
- We use the goods as input in our production of \_\_\_\_\_ (specify the product/s).
- We reexport the good to third countries, namely \_\_\_\_\_
- Other.

20. "If you selected "other", please specify your purpose for importing the goods subject to review from the countries subject to the review in the field below.



N/A

21. Please describe how the subject to review compare to UK produced goods that are like the subject to review in the field below.

N/A

### A5. Production and sales of goods produced in the UK that are like the subject to review.

Complete this section if you indicated under **A1** that **you are a producer in the United Kingdom of goods that are like the goods subject to review.**

22. Please describe the goods that you produce in the UK and that you consider to be like the goods subject to review.

N/A

23. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods subject to review during the POI in the table below.

	Metric Tonnes	Litres
Total production volume (POI)	N/A	
Total production capacity (POI)		

Consider providing these figures in ranges in your non-confidential version of this form.

24. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods subject to review produced by your business in the UK during the POI in the table below.



Confidential

Non-confidential

	Metric Tonnes	Litres
Total domestic sales volume (POI)	N/A	
Total domestic sales value (POI) [£]		
Total export sales volume (POI)		
Total export sales value (POI) [£]		
Conversion rate used:		

Consider providing these figures in ranges in your non-confidential version of this form.

25. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

N/A

26. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods subject to review in the UK

N/A



## Section B: Additional information

### B1. Other interested parties

27. We need contact information in order to notify potentially interested parties. Please provide contact details of any other known exporters, importers of the goods subject to review and UK producers of the goods that are like the goods subject to review in the UK in the table below.

Name	Website	email
N/A		

Add additional rows as required

28. Please provide a list of as many of the following domestic companies as possible:

- Those that produce goods that are like the goods subject to review in the UK;
- Those that are involved in the importation, distribution, or sale of goods that are like the goods subject to review from third countries;
- Those that are producer or sell raw materials used in the production goods that are like the goods subject to review in the UK
- Those that purchase the biodiesel products, including those that sell use biodiesel products in their products or services; and those that sell biodiesel products directly to consumers
- Please specify which category they belong to.

N/A

### B2. Scope

29. If you consider that the goods description subject to the measure under review should be varied, please specify the suggested changes and provide your reasons in the field below.

N/A

### B3. Product control numbers



The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods subject to review. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

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 UK and those produced in the countries subject to a review.

We have created the following draft PCN table:

Characteristic	Symbol	Description
Type	F	FAME (fatty-acid mono-alkyl esters)
	P	Paraffinic gasoil from synthesis
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	<a href="#">biodiesel from feedstocks subject to incentives (singled counted according to UK RTFO categories)</a>
	2	<a href="#">biodiesel from feedstocks subject to incentives (double counted according to UK RTFO categories)</a>
	0	other/special purpose sold without any certificate
Form	B(100)	Pure form
	B(XX)	XX equals percentage of biodiesel blended with mineral diesel (The nearest percentage rounded down to a whole number)

30. Please review the above draft PCN structure for this review and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your business.

N/A

31. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods subject to review and the goods that are like the goods subject to review in the UK



N/A

32. If you are an overseas exporter or importer of the goods subject to review or a UK producer of the goods that are like the goods subject to review in the UK, comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on

- the categorisation of product features;
- the list of products included in the “other” category and whether this prevents a fair comparison between PCNs; and
- whether you produce, or are aware of, any specialised products that fall within the definition of the goods subject to review or are like the goods subject to review in the UK which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the “goods concerned”.
- Do you export, produce or import any goods that could be categorised under more than one PCN? If so, please suggest any changes to the proposed PCN structure?

N/A

33. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods subject to review or are like the goods subject to review in the UK.

N/A

## B4. Economic Interest Test

34. If, following a review, we conclude that a measure should be imposed or extended, we conduct an Economic Interest Test (EIT) to determine whether the proposed 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 UK upstream companies (providing inputs for the manufacture of the goods that are like the subject to review) and UK customers (downstream companies buying the



goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
N/A				

Add additional rows as required]

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

### B5. Other comments

35. Please use the field below to provide additional information that you consider relevant to this review.

The U.S. Biodiesel Mixture Credit (BTC), which is the primary scheme countervailed by the measures subject to this review, was terminated with effect on 1 January 2025 and is no longer in force. Accordingly, the BTC no longer confers any benefits.

The Complainants misrepresent the Clean Fuel Production Credit (CFPC) as a "reinstatement" of the BTC. The CFPC and the BTC are very different schemes in terms of benefits, objectives, scope, eligibility criteria, and requirements.

The Complainants incorrectly claim that "CFPC provides a benefit that is identical to the previous biodiesel tax credits, namely USD 1.00 for each gallon of biodiesel produced and sold as transportation fuel". The vast majority of biodiesel previously covered under the BTC will either be ineligible for the CFPC or will qualify for a credit significantly below USD 1.00 per gallon.

The CFPC imposes significant restrictions on eligible feedstocks under the program. In addition, whereas the BTC targeted blenders, the CFPC targets producers of biofuels and bases the value of the income tax credit on the carbon intensity of the produced fuel and the feedstock used. The TRA itself has recognised that "[i]nitial information suggests that the [CFPC] will be more limited in scope than the BTC" (AS0067, Statement of Essential Facts, para. 569).

Therefore, in light of the expiration of the main subsidy scheme covered by the countervailing measure subject to this review, we hereby request that the review should be terminated without the extension of the duties.

Valero Energy Ltd reserves the right to submit additional comments at a later stage.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).



36. If you consider that the countervailing measure subject to this review should be recalculated, please provide evidence why you believe that it is necessary and appropriate to recalculate these.

The expiration of the BTC and the significant differences of the CFPC do not justify the extension of the countervailing duties through this review.

Without prejudice to the above, should the TRA decide to extend the measures, it must first assess whether the CFPC is a countervailable subsidy, whether a sufficient nexus with the BTC exists, and if so, whether and to what extent exports of the goods concerned actually benefit from it.

Any decision to extend the application of the measures based on the CFPC would require a reassessment and recalculation of the level of countervailing duties subject to this review. As explained above, the significant differences of the CFPC would have affected both the amount of any benefit and any potential injury resulting thereof.

Valero Energy Ltd reserves the right to submit additional comments at a later stage.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).