



Statement of Essential Facts

INVESTIGATION No. AD0058

Dumping investigation into biodiesel imported into the United Kingdom
originating from the People's Republic of China

22 August 2025



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Section A: Introduction

A1. Investigation

1. This investigation relates to biodiesel imported into the United Kingdom (UK) originating from the People's Republic of China (PRC). A full description of the goods that this investigation relates to can be found in [Section D: The goods concerned and the like goods.](#)
2. This section briefly summarises the legal framework for this Statement of Essential Facts (SEF) and the Trade Remedies Authority (TRA)'s main findings. The background to and details of the investigation are explained fully in the subsequent sections.
3. This SEF sets out a summary of the facts considered by the TRA during the investigation, those facts that have formed the basis of the TRA's intended final determination and the anti-dumping measure that the TRA intends to recommend to the Secretary of State for Business and Trade (Secretary of State).
4. It should be read in conjunction with other public documents available for this case, which are available on the [public file.](#)
5. This SEF also informs parties who have supplied information, how the TRA has considered and used information provided. The SEF provides details of the analysis forming the basis of the intended determination and allows interested parties to make submissions in response.
6. Interested parties, contributors and any other person who has supplied information to the TRA are invited to make submissions within 30 calendar days of the publication date of this SEF, i.e., before 23:59 hours (BST) on 22 September 2025, as per regulation 62(2) of The Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (S.I. 2019/450) (as amended) (the Regulations).
7. Any submissions received after this date may not be accepted by the TRA if to do so would significantly impede the progress of this investigation. If the TRA rejects information for any reason, it will publish the reasons for rejection in the Final Determination.



8. Registered interested parties to the case can make submissions on the Trade Remedies Service online platform (TRS). These submissions must be accompanied by a non-confidential version of the submission for the public file. Parties that are not registered on TRS may send submissions by email to AD0058@traderemedies.gov.uk. These submissions must also be accompanied by a non-confidential version for the public file.
9. In exceptional circumstances it may not be possible to summarise confidential information. If this is the case, interested parties must provide a 'statement of reasons' setting out the reasons why the TRA should treat the information as confidential and why summarisation of the information is not possible, as defined under regulation 45(6)(b) of the Regulations.
10. For further information about the TRA's investigations, please see its [public guidance](#).
11. Within this publication, there are instances where Argus Media is identified as a source of the data which the Trade Remedies Authority (TRA) has aggregated and republished under licence from Argus. This data has not been prepared specifically for the TRA nor with any knowledge of any of the materials into which the TRA is incorporating it. Argus makes no warranties, express or implied, as to the accuracy, adequacy, timeliness, or completeness of its data or the TRA's presentation of that data, or its fitness for any particular purpose. Argus shall not be liable for any loss or damage arising from any party's reliance or use of such data and disclaims any and all liability related to or arising out of use of the data to the fullest extent permissible by law.

A2. Legal framework

12. This SEF is made pursuant to regulation 62 of the Regulations. It includes:
 - the recommendation that the TRA intends to make;
 - a summary of the facts considered during the investigation;
 - those facts referred to in the summary that formed the basis of the intended recommendation;



- details of how we have used the information supplied by interested parties in making the intended final recommendation;
- details of the analysis forming the basis of the intended final recommendation.

A3. Period of investigation and injury period

13. The period of investigation (POI) is 1 April 2023 to 31 March 2024.
14. To assess injury, the TRA has examined the period from 1 April 2020 to 31 March 2024 as the injury period.

A4. Unit of Measurement

15. The product is a liquid and is referenced by a variety of metrics in the marketplace. Units are metric tonnes (mt) defined as 1,000kg and litres (ltr) as measurement for volume. The UK industry commonly uses both Great British Pounds (GBP) and United States Dollars (USD) as currency. In order to compare the trends, all volume units have been converted to mt, and unit pricing to GBP/mt.



Section B: Summary and findings

B1. Dumping

16. In accordance with paragraph 1(1) and 8(1)(a) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act) the TRA has examined whether dumping of the goods concerned has occurred.
17. The TRA has concluded that the relevant goods (as identified in [Section D](#) and defined in paragraph 17(2) of Schedule 4 of the Act) are being dumped into the UK from the PRC.

B2. Injury

18. In accordance with paragraphs 5 and 8(1)(b) of Schedule 4 to the Act, the TRA has examined whether the dumping of the relevant goods has caused or is causing injury to a UK industry in the like goods.
19. The TRA has concluded that the UK industry has suffered injury and that the dumped goods from the PRC have caused injury to the UK industry.

B3. Economic Interest Test

20. The TRA has considered the evidence before it and the following factors set out under paragraph 25 of Schedule 4 to the Act:
 - the injury to UK industry in the like goods caused by dumping of the relevant goods and the benefits to that UK industry in removing that injury;
 - the economic significance of affected industries and consumers in the UK;
 - the likely impact on affected industries and consumers in the UK;
 - the likely impact on particular geographic areas, or particular groups, in the UK;
 - the likely consequences for the competitive environment, and for the structure of markets for like goods, in the UK; and
 - such other matters as the TRA considered relevant.



21. The TRA has concluded that the application of the anti-dumping measure it intends to recommend to the Secretary of State meets the Economic Interest Test (EIT) (see [Section I. Economic Interest Test](#)).

B4. Intended final determination and recommended measure

22. In accordance with regulation 62(1) of the Regulations, before making a final affirmative determination for the purpose of paragraph 11(5) of Schedule 4 to the Act, the TRA must publish a SEF that sets out the intended final determination, a summary of the facts considered during the investigation, and a summary of those facts that formed the basis of the intended final determination.

23. The TRA intends to make a final affirmative determination on imports of the relevant goods originating from the PRC. The detailed description of the relevant goods is given in [Section D: The Goods Concerned](#).

24. The TRA has determined that the relevant goods have been or are being dumped in the UK and that the dumping of these goods has caused injury to UK industry in those goods. The TRA has determined that the application of the anti-dumping measure it intends to recommend to the Secretary of State meets the EIT.

25. The TRA intends to recommend that the Secretary of State impose an ad-valorem duty for a period of five years on the relevant goods that are the subject of the final affirmative determination.

26. The rates of anti-dumping duty that the TRA intends to recommend are set out in Table 1.

Table 1: Intended final anti-dumping duty		
Country	PRC exporter	Duty amount (%)
PRC	The Zhuoyue Group	15.68%
PRC	Non-sampled cooperating exporters (see Annex A)	15.68%
PRC	All other exporters (residual amount)	54.64%



Section C: Background

C1. Initiation

27. On 26 March 2024, the TRA received an [application](#) lodged by the Renewable Transport Fuel Association (RTFA) alleging that biodiesel imported into the UK, originating from the PRC, has been or is being dumped and that the dumping is causing injury to the UK industry in the goods.
28. The TRA was satisfied that the application contained sufficient evidence of dumping and resulting injury to justify the initiation of the investigation, and that the requirements referred to in paragraph 9 of Schedule 4 to the Act and regulation 51 of the [Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019](#) (the Regulations) were met.
29. The investigation was initiated by the TRA on 5 June 2024, and the original [notice of initiation](#) (NOI) was published on that date.
30. The Secretary of State, the foreign government of the PRC and some other known interested parties and contributors were notified and invited to register on the [Trade Remedies Service](#) to participate in the investigation. On 14 May 2025, the TRA also invited additional known interested parties and contributors to register to the case. One new party registered, who confirmed that they did not export the goods concerned during the POI.

C2. Conduct of the investigation

C2.1 Participation in the investigation

31. The following interested parties and contributors registered to this investigation:

UK Producers:

- Argent Energy (UK) Limited (Argent)
- Olleco
- Greenergy Fuels Limited (registered as an importer) (Greenergy)



Overseas Exporters:

- Changzhou City Jintan District Weige Biological Technology Co., Ltd. (Weige Biological Technology)
- Eco Biochemical Technology (Zhangjiagang) Company Limited and EcoCeres Limited (EcoCeres) Hebei Jingu Plasticizer Co., Ltd and Hebei Jingu Recycling Resources Development Co., Ltd (Jingu Group)
- Longyan Zhuoyue New Energy Co., Ltd (Longyan Zhuoyue)
- Xiamen Zhuoyue Biomass Energy Co., Ltd (Xiamen Zhuoyue)
- Zhejiang Jiaao Enprotech Stock Co., LTD (Jiaao Group)

Overseas producers:

- Haixin Energy Technology International Pte. Ltd (Haixin Energy)

Importers:

- Phillips 66 Limited
- Shell Trading Rotterdam BV
- Greenergy Fuels Limited (Greenergy)

UK trade bodies:

- Renewable Transport Fuel Association (the applicant) (RTFA)

Third-country Producers:

- Anonymous third country producer

Foreign Governments

- Ministry of Commerce, PRC (MOFCOM)
- Government of Malaysia (GOM)

Contributors:

- ESL Fuels Limited



- Foodchain And Biomass Renewables Association (UK) Limited (Fabra)
- Gasrec Ltd
- International Consolidated Airlines Group, S.A.
- Kolmar Group AG
- UK & Ireland Fuel Distributors Association Limited
- Valero Energy Ltd
- Vivergo Fuels Limited

32. The relevant non-confidential submissions made to this investigation by each of the participants are available on the [public file](#) and a list of the main submissions made are outlined in [Annex B: Summary of submissions on the public file received from interested parties and contributors.](#)

C2.1.1 UK Producers

33. Three of the largest producers of biodiesel in the UK registered an interest in the investigation: Argent, Olleco, and Greenergy.

34. Argent and Olleco submitted full producer questionnaires.

35. As Greenergy is both a UK producer of biodiesel and also an importer of biodiesel from the PRC, Greenergy did not register as a producer, but instead registered as an importer of the goods concerned and submitted a full importer questionnaire. Pursuant to Regulation 29(2)(a) of the Regulations, the TRA disregarded Greenergy from the definition of the UK industry for this investigation as they are an importer of the goods concerned.

C2.1.2 Overseas Exporters

36. Longyan Zhuoyue and Xiamen Zhuoyue registered separately to the case but outlined in their relevant pre-sampling questionnaires that they were associated parties, meeting the definition of “related persons” in Regulation 128 of the [Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#). For the purposes of this investigation, it was



decided both Zhuoyue companies would be collapsed into the 'Zhuoyue Group' with any subsequent tariff rate covering the overall Zhuoyue Group.

37. Due to the number of responses to the pre-sampling questionnaire received during the registration period, with respect to Regulations 56 and 57 of the Regulations, the TRA limited its examination of overseas exporters.
38. The TRA published a [notice of proposed sample](#) on 27 August 2024 which was based on the largest number of exports from the PRC that the TRA could reasonably investigate.
39. The overseas exporters selected to be within the sample were:
 - Zhuoyue Group (Longyan Zhuoyue and Xiamen Zhuoyue)
 - Jiaao Group (Zhejiang EastRiver Energy S&T Co., Ltd, Zhejiang Jiaao Enproenergy Co., Ltd., Jiaao International Trading (SINGAPORE) PTE.LTD. and Zhejiang Jiasui Import & Export Co., Ltd.)
40. No comments relating to the proposed sample were received and the [final sample](#), which included the exporters listed in the proposed sample above, was published to the public file on 4 September 2024.
41. On 20 September 2024, the Jiaao Group confirmed that they no longer wished to cooperate in the investigation.
42. A full questionnaire submission was received from the Zhuoyue Group.

C2.1.3 Importers

43. Due to the number of responses received to the pre-sampling questionnaire during the registration period, with respect to Regulations 56 and 57 of the Regulations, the TRA also limited its examination of importers. The [notice of proposed sample](#) published on 27 August 2024 also outlined the sampling of importers based on the largest number of exports from the PRC to the UK that the TRA could reasonably investigate.
44. The importers selected to be within the sample were:
 - Greenergy



45. No comments were received on the proposed sample and the [final sample](#), consisting of Greenergy, was published on 4 September 2024.
46. We received a full questionnaire response from Greenergy.
47. Greenergy is a UK producer of the like goods and an importer of the goods concerned. Pursuant to Regulation 29(2)(a) of the Regulations, the TRA disregarded Greenergy from the definition of the UK industry for this investigation as they are an importer of the goods concerned.

C2.1.4 UK Trade Bodies

48. The RTFA was the applicant of the investigation and a non-confidential version of the application can be viewed on the [public file](#).

C2.1.5 Third-country producers

49. Following an initial assessment that a particular market situation (PMS) may exist in the biodiesel industry in the PRC, the TRA published a note to the public file outlining its proposal to use Malaysia as a representative third country should it be required (for further information see [Section C2.3](#)). In response to the selection of Malaysia as a representative third country, a company, wishing to remain anonymous, submitted a Third Country Producer (TCP) pre-sampling questionnaire.
50. The TRA granted anonymity to this TCP, who subsequently submitted a full questionnaire.

C2.1.6 Foreign Governments

51. MOFCOM registered its interest in the investigation on behalf of the government of the PRC.
52. The GOM registered its interest in the investigation, following the TRA's proposal to use Malaysia as a representative third country.

C2.1.7 Contributors

53. The contributors listed in paragraph 30 registered an interest to the case however no questionnaire submissions were received.



C2.1.8 Non-cooperation

54. The following parties were deemed to be [non-cooperative](#):

- Jiaao Group
- MOFCOM

C2.2 Scope

55. On 13 June 2024, it was brought to the attention of the TRA that the goods description published in the original [NOI](#) could be considered to include Sustainable Aviation Fuel (SAF).
56. Under Regulation 41(3)(a) of the Regulations, the TRA may revise the scope of a dumping investigation so as to amend the description of the goods concerned where it has provided interested parties and contributors with reasons for the proposed revision and has given them an opportunity to comment.
57. On 14 June 2024, the TRA published a [Request for Information \(RFI\)](#) to the public file inviting interested parties and contributors to provide their views and supporting evidence on the scope of the investigation.
58. The TRA received submissions from 11 parties, which were considered during the assessment of scope. The submissions can be viewed on the [public file](#). The TRA also held discussions with HMRC, the British Standards Institute (BSI) and the Department for Transport (DfT) to gain further insight into the SAF and biodiesel industries, products and fuel mandates.
59. On 14 August 2024 the TRA published its [proposal](#) to revise the scope of the investigation to remove SAF from the goods description. Interested parties were invited to provide comments by 21 August 2024.
60. Having considered all submissions from interested parties and contributors on the product scope, on 23 August 2024, the TRA published a [note to public file](#) outlining its final decision to exclude SAF from the scope of the investigation, and an amended [NOI](#).
61. The amended NOI set out the revised description of the goods as:



“Fatty-acid mono-alkylesters or paraffinic gasoils obtained from synthesis or hydrotreatment of non-fossil origin in pure form or as included in a blend, excluding sustainable aviation fuel, in pure form or as included in a blend.”

62. In accordance with regulation 41(5) of the Regulations, the TRA’s assessment was that:

- it is likely the TRA would have initiated its investigation with the revised scope had the information been available in the application;
- the revision did not cause any prejudice to the interests of any interested party or contributor;
- the revision did not prevent the TRA from proceeding with the investigation expeditiously.

C2.3 Appropriate representative third country

63. Where it is determined that a PMS exists and the effect of the PMS on the domestic sales price in the exporting country prevents a proper comparison between that and the export price, the comparable price is not considered appropriate to use for the purpose of determining normal value.

64. In such circumstances, the TRA may determine the normal value by determining the costs of production plus a reasonable amount for administrative, selling, and general costs (AS&G) and profit. Adjustments may be made to these figures using data from an appropriate, representative third country. The TRA may also use data from an appropriate representative third country as part of its examination of whether a PMS exists.

65. The TRA received an allegation that a PMS may exist in the biodiesel industry in the PRC. Details of the allegation can be found in the [application](#).

66. Following its assessment of initial claims regarding the presence of a PMS, the TRA considered an appropriate benchmark country that could be used if it was determined that a PMS existed in the biodiesel industry in the PRC that prevented a proper comparison between the domestic and export prices of the goods.



67. In its application, the Applicant proposed that Brazil would be an appropriate representative third country for the purposes of benchmarking. The TRA asked parties registering to the case to comment within their PSQ whether they agreed with the applicant's proposal of Brazil.
68. The TRA received a number of comments in the PSQs on the appropriateness of Brazil as an appropriate third country. The PSQ responses can be seen on the [public file](#).
69. [EcoCeres](#) commented that Brazil was an inappropriate third country as imports of biodiesel require a licence from the country's oil regulator, the Agência Nacional do Petróleo, Gás Natural e Biocombustíveis (ANP), to access the market. These licences are only granted in "exceptional circumstances" and solely for specific uses (e.g., for the buyer's own consumption or for experimental uses). EcoCeres commented that this import restriction means that any data to be used from Brazil would be inherently distorted. EcoCeres commented that other distortive measures exist in Brazil, including biodiesel price intervention.
70. We found evidence that minimum contracting goals are in place for biodiesel producers, according to ANP Resolution No. 857/2021, and that imports of biodiesel into Brazil are restricted under the ANP. However, we do not consider interventions relating to the biodiesel selling price to necessarily discount a country from being a suitable representative third country. The PMS assessment into biodiesel is principally looking at the input costs into making the product, and whether the cost of these inputs are affected in the PRC. Haixin Energy commented that Brazilian producers benefit from state tax exemptions, such as Imposto de Circulação de Mercadorias e Serviços (ICMS) reductions and federal credit programs (e.g., RenovaBio), which Haixin Energy claims lower reported production costs.
71. A number of potential countries were proposed in the PSQ responses including Brazil, Malaysia, the Netherlands, Indonesia, Singapore, South Korea and Taiwan.
72. The TRA compared each country to the PRC using a number of economic indicators, including GDP per capita, life expectancy, literacy rate, manufacturing value added, as well as the human development index.



73. Further consideration was given to the known availability and reliability of data from each of these countries, levels of production of biodiesel, and whether any existing trade remedy measures are in place relating to the like goods.
74. On the 27 September 2024, the TRA published a [note to public file](#) indicating that it had provisionally selected Malaysia as an appropriate representative third country, should it be required.
75. Malaysia was identified as suitably comparable to the PRC on the basis of economic indicators. Malaysia was found to have a market for used cooking oil (UCO) which is the main raw material used to produce biodiesel in the PRC.
76. Interested parties were given a period of ten calendar days to provide comments on the proposed selection of benchmark country.
77. The TRA received comments from the RTFA (the Applicant) only. Their comments were published to [the public file](#) on 18 October 2024.
78. The Applicant commented that Brazil would be the most appropriate country, as:
 - it is more economically comparable to the PRC than Malaysia;
 - it has a higher volume of biodiesel production than Malaysia;
 - Brazilian biodiesel producers have readily available public data for the TRA to use, and;
 - an Automatic Pricing Mechanism (APM) exists in the Malaysian domestic market, influencing biodiesel selling prices.
79. The TRA considered these comments and determined that the APM is an immaterial factor given that we are principally interested in the cost inputs to construct normal value. Having assessed the formula used to calculate the APM we do not consider it to affect cost inputs.
80. Following the window for interested parties to comment on the proposed benchmark country selection, and having reviewed submissions, the TRA determined that Malaysia was an appropriate representative third country, on the basis of the factors set out above.



C3. Verification of data

81. The TRA undertook verification activities to assess the completeness, relevance, and accuracy of the information provided by the cooperating interested parties.

82. The TRA has had regard to the information supplied by interested parties as that information:

- complied with the applicable statutory requirements as per Regulation 47 and the [TRA's public guidance](#);
 - was verifiable;
 - could be used by the TRA without undue difficulty; and
 - was supplied within an applicable time limit and in a form that the TRA requested.
 - where relevant, has been supplied to it in a form that it has requested.

83. Details of the in-person verification visits, and links to the associated verification reports are set out in the table below.

Table 2: Verification		
Company	Verification visit	Verification report
Argent	25 - 28 November 2024	Verification report
Olleco	13 - 16 January 2025	Verification report
Greenenergy	9 - 10 December 2024	Verification report
Xiamen Zhuoyue	11 - 14 February 2025	Verification report
Longyan Zhuoyue	17 - 21 February 2025	Verification report
Anonymous Malaysian TCP	27 February 2025	Verification report

84. Secondary source information was used in accordance with Regulation 47. This secondary information was treated with special circumspection and, where practicable, verified using independent sources. This included, but was not limited to, official import statistics and data pertaining to relevant markets.



C4. Registration of imports

85. On 9 May 2024, the applicant requested the TRA make a recommendation to the Secretary of State to require HMRC to register imports of biodiesel originating from the PRC. The reason given was to allow for possible duties to be collected from as early a date as possible, due to a continuing trend of increasing imports of dumped biodiesel from the PRC.
86. The applicant considered that the dumping was likely to continue. The applicant also stated there was a possibility that traders would import and stockpile the product in anticipation of potential UK measures.
87. Pursuant to paragraph 29 of Schedule 4 to the Act, the Secretary of State published [Trade Remedies notice 2024/12](#) on 17 October 2024, effective from 18 October 2024. This notice gave effect to the SoS's decision to accept the TRA's recommendation to require HMRC to register the importation of biodiesel originating from the PRC.



Section D: The goods concerned and the like goods

D1. Goods concerned

88. The TRA refers to the goods it investigates as the ‘goods concerned’ as per regulation 2 of the Regulations.

89. The updated [NOI](#) published on 23 August 2024 describes the goods concerned as:

“Fatty-acid mono-alkylesters or paraffinic gasoils obtained from synthesis or hydrotreatment of non-fossil origin in pure form or as included in a blend, excluding sustainable aviation fuel, in pure form or as included in a blend.”

90. The UK Global Tariff commodity codes under which the goods concerned may be imported into the UK have been updated since the publication of the amended NOI on 23 August 2024. Below is an updated list under which the goods concerned are imported into the UK:

1516209821	1516209829	1516209833	1518009121
1518009129	1518009133	1518009521	1518009921
1518009929	1518009933	2710194221	2710194229
2710194290	2710194421	2710194429	2710194433
2710194621	2710194629	2710194633	2710194721
2710194729	2710194733	2710201121	2710201129
2710201133	2710201621	2710201629	2710201633
2710201693	2710201910	2710201990	3824999210
3824999214	3824999217	3826001020	3826001029
3826001050	3826001059	3826001089	3826001099
3826009011	3826009019	3826009033	



D2. Like goods

91. In accordance with paragraph 7 of Schedule 4 to the Act, the TRA refers to ‘like goods’ as those which are like the goods concerned in all respects or, if there are no such goods, goods which, although not alike in all respects, have characteristics closely resembling those of the goods in question.
92. The like goods are fatty-acid mono-alkylesters (FAME) and hydrotreated vegetable oil (HVO). The UK currently only produces FAME.

D3. Comments on goods concerned and like goods

93. The TRA received a submission from Valero Energy Ltd on 4 March 2025. This submission expressed the view that HVO and FAME are distinct products, and that the TRA should assess these products separately in its analysis. Haixin Energy also made comments in their PSQ response expressing the view that HVO should be excluded from the scope of this investigation. The TRA maintains its earlier determination from TD0004 and TS0005 that HVO and FAME are comparable products.

D4. Product control numbers

94. The TRA uses product control numbers (PCNs) to define and group different types of products that fall within the goods description above ([Section D1](#)).
95. PCNs are created on the basis of the main physical characteristics differentiating the types of products, providing that those characteristics have an impact on price.
96. The PCN structure used in this investigation can be seen in the table 3 below:

Table 3: PCN structure		
Characteristic	Symbol	Description
Type	F	FAME (fatty-acid mono-alkyl esters)
	P	Paraffinic gasoils
Cold Filter Plugging Point (CFPP) in degrees	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



centigrade to nearest degree	4	Lower than -9 but higher than or equal to -40
	5	Lower than -40
Feedstock	1	biodiesel from feedstocks subject to incentives (single counted as according to the RTFO categories)
	2	biodiesel from feedstocks subject to incentives (double counted as according to the RTFO categories)
	3	biodiesel from feedstock other than food and feed crops and not subject to incentives as according to the RTFO
	0	other/special purpose sold without any certificate as according to the RTFO
Form	P(100)	Included in a blend with mineral fuel Pure form
	B(XX)	Included in a blend with mineral fuel

97. The PCN structure was provided to interested parties and contributors for comment in the registration forms and pre-sampling questionnaires following initiation of the investigation.
98. No comments concerning the PCN structure were received from parties during the registration period. The PCN structure therefore remained unchanged. For reference only, feedstock designation within the PCN structure was updated with a link to the relevant RTFO categories (shown above).
99. Following publication of questionnaires, the TRA received a written request from Argent requesting an amendment to identifier codes within the PCN structure. In accordance with Regulation 48, the TRA considered the request and determined that it was not appropriate to amend the PCN structure as this would have the potential to impact the timeline of the investigation.

D5. PCN analysis

100. The TRA's calculations of dumping and injury margins are performed at a PCN level to ensure an accurate comparison of the sub-categories of goods.
101. For dumping margin calculations, the TRA compares the PCNs produced and sold by overseas exporters in their domestic market with the PCNs produced and exported by these overseas exporters to the UK.



102. For injury margin calculations, PCN-by-PCN calculations were possible for PCNs that were both sold in the UK as domestically produced like goods and exported from the PRC to the UK as the relevant goods.
103. In order to obtain a sufficient PCN match across all sampled parties, the TRA collapsed its PCN structure to remove the cold filter plugging point (CFPP).
104. The CFPP is the lowest temperature, expressed in degrees Celsius (°C), at which a given volume of fuel still passes through a standardized filtration device in a specified time when cooled under certain conditions.
105. The fatty-acid composition of biodiesel can vary significantly as a result of the feedstock used, and this affects the properties of the fuel, including the point at which it will gel and freeze.¹ The CFPP of biodiesel therefore depends on the feedstock used to produce it.
106. As the PCN structure accounts for category of feedstock, we do not consider the difference in CFPP material in conducting a PCN comparison.
107. The TRA considers that the PCNs used in its calculations are sufficiently representative to proceed with this methodology.

¹ Various: [2023 Biodiesel Analytics.pdf](#); [The market for biodiesel production](#); [Cold Flow Treatment: FAME, HVO & Diesel Blends | Biodiesel Magazine](#)



Section E: The UK industry and market

E1. UK industry

108. In accordance with paragraph 6(1) of Schedule 4 to the Act, the UK industry is defined as:

- a) all the producers in the UK of like goods, or
- b) those of them whose collective output of like goods constitutes a major proportion of the total production in the UK of those goods

109. Information provided in the application was used to determine the UK industry.

110. The three largest biodiesel producers in the UK are Greenergy, Argent and Olleco. Greenergy is also an importer of the goods concerned and exports the majority of what it produces domestically. In accordance with regulation 29(2) of the Regulations, we have disregarded Greenergy as a UK producer for the purpose of defining UK industry in this investigation on the basis that it is an importer of the goods concerned.

111. The TRA therefore identified that during the injury period the UK industry was composed of two UK producers, Argent and Olleco.

112. Some data from Greenergy, as a UK producer of the like goods, was used for the purposes of the EIT ([Section I](#)). Where their data was included within the analysis, this has been made clear.

113. The TRA is aware of some very small UK producers, who were contacted prior to initiation. None of these parties registered an interest as producers.

E2. UK market

E2.1. Overview

114. In the UK biodiesel market, the purchase of biodiesel is subject to UK government incentives through the Renewable Transport Fuel Obligation (RTFO) framework. Most

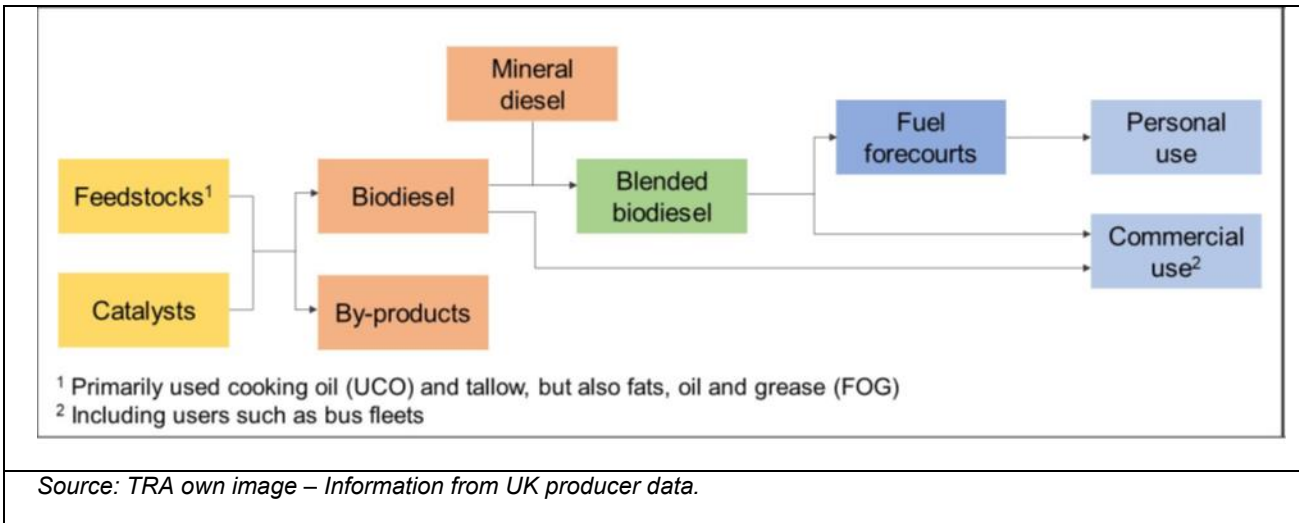


biodiesel is blended at specific blend rates with mineral diesel (diesel) and used in road transport.

E2.2. Production process

115. Fatty-acid mono-alkyl ester (FAME) is produced via transesterification, whereby fatty acids react with alcohol, often methanol, in the presence of a catalyst to produce biodiesel. The UK industry only produces biodiesel through transesterification at present, using waste-origin feedstock as the main raw material and fatty acid component. The main waste-origin feedstock used in the UK is UCO, but the UK also uses tallow category 1 and 2, acid oils contaminated with sulphur, mill-effluent residue, fats and greases from wastewater systems among others. Some feedstock that is considered more polluted requires a pre-treatment process.
116. Hydrotreated Vegetable Oil (HVO) – paraffinic gasoil in the goods description – is considered a like good in all respects for the purposes of this investigation. HVO is produced via hydrocracking or hydrogenation of fatty acids. Both processes treat molecules using hydrogen to produce renewable diesel fuel. Biodiesel is not, at present, produced via the hydrotreatment of vegetable oil in the UK.
117. The following diagram (Image 1) provides an overview of the UK biodiesel industry from upstream businesses (feedstock suppliers) to consumers (final end-users).

Image 1: UK's biodiesel industry supply chain overview



E2.3. Market size and structure

118. In respect of consumption, the Department for Transport (DfT) publishes data on total UK consumption of biodiesel that is gathered as part of its RTFO scheme. According to this data, total UK consumption of biodiesel during the POI was 1,701,016.60metric tonnes.

119. Biodiesel is often sold via traders, who either sell it domestically or export it. It is possible to claim Renewable Transport Fuel Certificates (RTFC) from the UK government once biodiesel is sold to the end user and the RTFCs themselves have commercial value.

E2.4. Trends

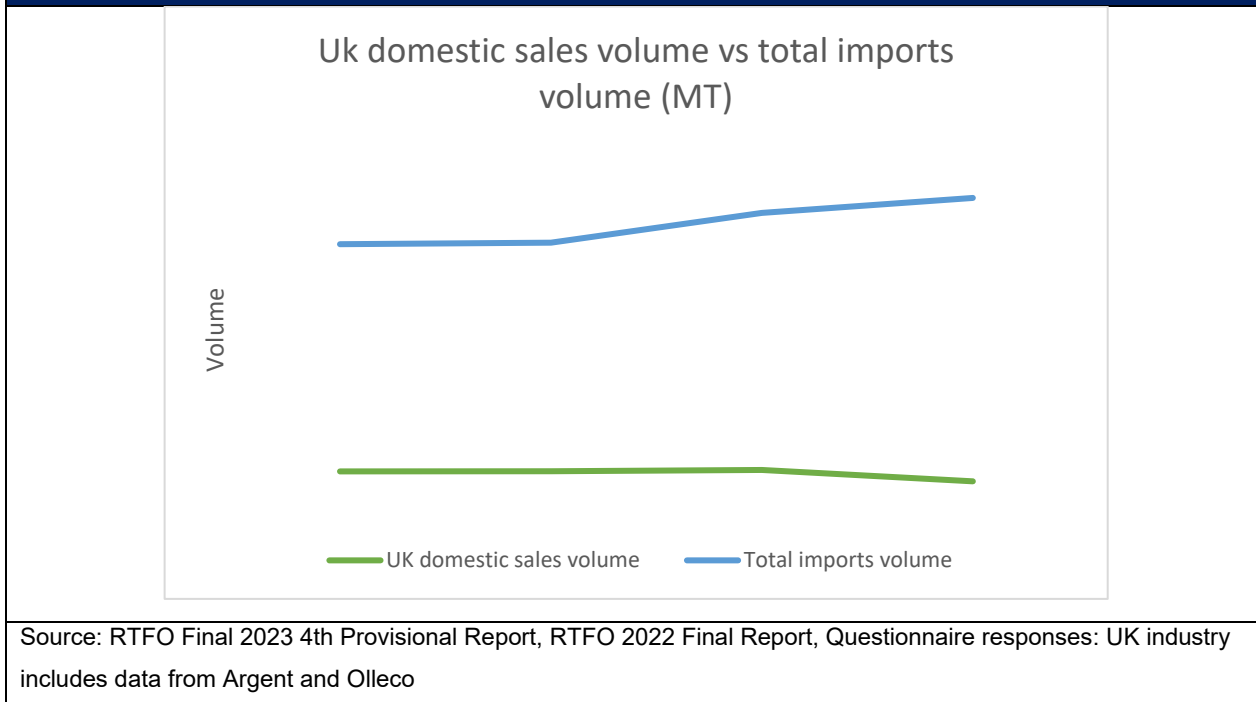
Table 4: UK consumption and domestic sales				
	Year 1	Year 2	Year 3	POI
UK consumption (mt) (Indexed)	100	96	129	124
UK industry* domestic sales (mt) (indexed)	100	100	104	73
UK industry domestic market share % (indexed)	100	105	80	59
Total imports (indexed)	100	95	133	131

Source: RTFO Final 2023 4th Provisional Report, RTFO 2022 Final Report, Questionnaire responses.
*Includes data from Argent and Olleco, which are the two companies defined as the UK industry for the purposes of this investigation.



120. The UK industry share of the UK biodiesel market was stable over year 1 and year 2 of the injury period before dropping in year 3 and the POI, while overall imports increased by 31% from year one to the POI. Biodiesel imports made up almost the entirety of total UK consumption during the POI at 92%, see image 2.

Image 2: UK industry domestic sales vs total imports



E2.5. Competition in the market

121. Biodiesel produced in the UK competes directly with biodiesel imported from other countries. HMRC Overseas Trade in Goods Statistics (OTS) indicates that there were significant imports from the PRC during the injury period and POI.



Section F: Dumping

118. In accordance with paragraph 1(1) of Schedule 4 to the Act, goods are 'dumped' in the UK when those goods are imported into the UK and their export price is less than their normal value.

119. The TRA has assessed whether the goods concerned are being dumped in accordance with paragraphs 1(1) and 8(1)(a) of Schedule 4 to the Act.

120. Paragraph 1(2) of Schedule 4 to the Act defines the 'normal value' of goods as:

- the comparable price, in the ordinary course of trade, for like goods when destined for consumption in the exporting foreign country or territory, or
- such other price or value as may be determined in accordance with provision made by regulations for specified cases where it is not appropriate to use the price in paragraph (a)

121. The dumping margin is the difference between the export price and the normal value of the goods being dumped, described as a percentage of the export price at a level of the cost of insurance and freight (CIF).

122. The TRA has calculated dumping margins in accordance with paragraph 2 of Schedule 4 to the Act and regulation 6(2) of the Regulations. Calculating the dumping margin involved the following stages:

- calculating the normal value of the goods concerned;
- determining the export price;
- ensuring a fair comparison between the normal value and the export price;

F1. Exporting country analysis

123. During the POI, exports of the goods concerned from the PRC accounted for 80%-90% of all imports into the UK (based on pure biodiesel sales). This range was sourced from confidential HMRC raw customs declaration data.



124. The TRA established that the PRC had 62 biodiesel production plants in 2023, 48 FAME plants and 14 HVO plants.² These had a total production capacity of 6.5 billion litres, although production was approximately 3.76 billion litres. Of this, 2.85 billion litres (2,508,803 mt) was FAME, and 910 million litres (709,828 mt) was HVO.
125. Of this total production approximately 2.8 billion litres (2,384,588 mt) were exported. This was made up of 2 billion litres (1,760,563 mt) of FAME and 800,000 litres (624,025 mt) of HVO.
126. Imports into the PRC were estimated at 50 million litres (44,014 mt), making the PRC a net exporter of biodiesel.

F2. Normal value

127. In accordance with regulation 6(1) of the Regulations, Part 2 of the Regulations applies where the TRA is required to determine whether goods have been or are being dumped into the UK in accordance with paragraph 1 of Schedule 4 to the Act. To make such a determination the TRA must determine the normal value of the goods concerned in accordance with regulation 6(2)(a) of the Regulations.
128. In accordance with regulation 7(1) of the Regulations, the TRA must use the comparable price to determine the normal value unless it is not appropriate to use that price.
129. Regulation 7(2) of the Regulations sets out the circumstances in which it is not appropriate to use the comparable price to determine the normal value of the goods concerned. This includes where, because of a particular market situation or the low volume of sales in the domestic market of the exporting country or territory, such sales do not permit a proper comparison between the like goods destined for consumption in the exporting country or territory and the goods concerned, in accordance with regulation 7(2)(b) of the Regulations.

² [Report: China's biobased diesel production to fall in 2024 | Biodiesel Magazine](#)



130. Regulation 7(4) of the Regulations sets out that for the purposes of paragraph 7(2)(b) a PMS includes situations where prices are artificially low, there is significant barter trade, or prices reflect non-commercial factors.

131. The Applicant made the following allegations of a PMS in the biodiesel industry in the PRC:

- The market in the PRC is served by enterprises that operate under the ownership, control or policy supervision or guidance of authorities in the PRC;
- State presence in firms allows the State to interfere with respect to prices and costs;
- Public policies or measures discriminate in favour of domestic suppliers or otherwise influence free market forces;
- The lack, discriminatory application, or inadequate enforcement of bankruptcy, corporate, or property laws;
- Distorted wage costs;
- Access to finance granted by institutions that implement public policy objectives or otherwise not acting independently of the State.

132. The TRA investigated the allegations to determine whether the overseas exporters' prices are artificially low or reflect non-commercial factors and cause a PMS in the biodiesel market in the PRC, to the extent that they do not permit a proper comparison. The TRA's detailed assessment of each specific allegation can be seen in [Section F2.1 PMS Assessment](#).

133. Following these assessments, the TRA concluded that a PMS exists in the domestic market for biodiesel in the PRC, and that the price of biodiesel reflects non-commercial factors as a result of government influence and control.

134. The TRA considered whether the PMS in the biodiesel market prevents a proper comparison between the like goods in the PRC and the goods concerned.

135. The TRA found that conditions of competition in the PRC and the UK are materially different.



136. The process for biodiesel production in the UK and biodiesel production in the PRC are similar in terms of the manufacturing process and inputs. The main inputs for FAME biodiesel are the primary feedstocks, energy and methanol. The UK does not produce HVO biodiesel.
137. The UK and the PRC have different market conditions. The differing conditions are demonstrated through import and export levels. The UK market is a net importer and there is a high level of import penetration given that the market share of the UK biodiesel industry averaged 11% during the injury period. There is a large amount of international competition in the UK market as a result.
138. In the UK, where biodiesel inputs and energy costs are not distorted and there are high volumes of imports from third countries, competitive pricing exists at a higher level than the PRC. This is evidenced by the UK producers' costs of production, and average import prices from third countries.
139. In contrast, the PRC imported approximately 50 million litres (equivalent to 44,014 mt) of biodiesel in 2024³, compared to estimated biodiesel consumption of 830 million litres in the same year. The PRC imports reflect only 6% of domestic consumption. This demonstrates that the PRC is a significantly closed market when compared to the UK.
140. The Government of China's (GOC)'s industrial strategy and economic plans in the PRC have led to excess biodiesel production capacity. According to the United States Department for Agriculture, PRC consumption rose by 20% in 2024 to 792,000 mt during which time the PRC's production capacity was reported to be 4.6 million mt per year. This excess capacity in the PRC is likely to grow further following the European Commission's (EC) imposition of definitive anti-dumping measures on biodiesel imports⁴.
141. According to a MySteel report from April 2024, over 90% of the PRC's biodiesel was exported to Europe due to the higher prices offered⁵. In addition, stable domestic

³ [China: Biofuels Annual | USDA Foreign Agricultural Service](#)

⁴ [EU imposes anti-dumping duties targeting cheap Chinese biodiesel imports](#)

⁵ [China Accelerates Biodiesel Promotion, Especially B24 Marine Biofuel | Mysteel](#)



prices in the PRC for feedstocks such as UCO mean profit margins for biodiesel producers are reported as limited.

142. The openness of the UK market is further demonstrated by the domestic blend mandates for diesel fuel⁶. These mandates create demand for biodiesel.

143. When competing internationally, the reduced costs (see [F2.1 Particular Market Situation](#)) incurred by PRC producers, particularly in the key areas of energy, feedstock and methanol, allow them to gain market share abroad in markets where competitors do not benefit from artificially low costs. All PRC biodiesel producers have access to the same reduced costs, and the same consequential advantage, but UK domestic producers do not. This low-cost of biodiesel inputs such as methanol, feedstock and energy mean that PRC producers can:

- Increase profit margins and compete within the range of the price levels of UK producers and third country imports, and/or;
- Undercut the level of competitive pricing in the UK, so that they are not competing on a level playing field with UK producers and third country imports.

144. Sales at a domestic and export level in the PRC are not equal, and there are low levels of sales in the domestic market of the like goods, and a significant level of those sales are not in the ordinary course of trade. The biodiesel market in the PRC is not mandated to the same extent as the UK market and does not therefore create the same level of demand as the UK. Whilst some cities in the PRC have 5% blend mandates this is not a national mandate. With significant levels of biodiesel production in the PRC, but low demand, there is a low level of competitive pricing in the PRC when compared to other markets such as the UK or Europe.

145. Sales in the PRC domestic market are affected by prices and inputs that reflect non-commercial factors or are artificially low and are under different market conditions to sales in the UK market, which is an open market.

146. The TRA found that:

⁶ [The RTFO: an essential guide - GOV.UK](#)



- These distorted input costs means that there is a lower level of competitive pricing in the PRC than the UK.
- The relationship between price and cost is materially different in both markets, and therefore the relative effect on domestic price and export price is materially different.
- Although the PRC benefits legitimately from economies of scale and integration, if these input costs were not distorted, a higher level of competitive pricing would exist in the PRC, resulting in a higher normal value.

147. The TRA concludes that the existence of PMS with the quantitative and qualitative factors described above, prevents a proper comparison between the domestic price and export price.

148. Where it is not appropriate to use the comparable price the TRA must determine the normal value of the goods in accordance with regulation 8 of the Regulations.

149. The TRA calculated the normal value of the relevant goods by determining the costs of production plus a reasonable amount for administrative, selling and general (AS&G) costs and for profits in accordance with regulation 8(1)(a) of the Regulations. Full details are outlined in [Section F2.2 Constructed normal value](#).

F2.1. Particular market situation

150. To address the allegations of PMS raised by the RTFA in its application, questions relating to PMS were included in the PSQs. The PSQ responses can be seen on the [public file](#). Questions relating to PMS were also included in questionnaires issued to overseas exporters in the PRC. Longyan Zhuoyue and Xiamen Zhuoyue both responded to the allegations in their questionnaire response which can be seen on the [public file](#). The TRA also invited MOFCOM to respond to the allegations however no questionnaire response was received.

F2.1.1 Preliminary PMS assessment

151. The PRC has been the subject of many trade remedies investigations conducted by other investigating authorities wherein PMS assessments have been conducted.



Recently, the EC published an updated report on [Significant Distortions in the Economy of the PRC for the Purpose of Trade Defence Investigations](#), which documents findings of market distortions in the PRC in multiple areas and was used by the EC when conducting a PMS assessment in the recent EU biodiesel investigation EU 2025/261.

152. The TRA has previously completed two affirmative PMS assessments against the PRC: anti-dumping investigation AD0021 concerning optical fibre cables (OFC), and anti-dumping investigation AD0012 concerning aluminium extrusions.

153. As this current investigation also concerns the PRC, findings from the TRA's previous investigations are relevant for carrying out the preliminary assessment of PMS. We have considered these findings where applicable in connection with the Applicant's allegations and further research conducted by the TRA into the biodiesel industry specifically. This is set out by factor below.

F2.1.2 State Ownership and control

154. The Applicant claims that the market in the PRC is served by enterprises operating under the ownership or control of the State. The Applicant noted that the economy is more complex than "private" and "state-owned", and that often privately owned companies have close links to the State.

155. In the PRC large domestic SOEs are called central SOEs and are supervised by the State-owned Assets Supervision and Administration Commission (SASAC). The SASAC was established in 2003 to fund and regulate non-financial SOEs. Central SOEs under the SASAC exist in key strategic industries, such as energy, telecommunications and petrochemicals.

156. One of the largest centrally owned SOEs in the PRC is the State Grid Corporation of China, which is the largest utility company in the world. It ranked third in the Fortune Global 500 in 2024 (a global ranking of companies based on revenue).⁷

157. Two other centrally owned SOEs in the PRC rank in the top ten of the Fortune Global 500; Sinopec Group and China National Petroleum Corporation.⁸ Sinopec Group is

⁷ [State Grid Corporation of China \(sgcc.com.cn\)](http://sgcc.com.cn)

⁸ [Three Chinese companies make top 10 on 2024 Fortune Global 500 list - Chinadaily.com.cn](https://chinadaily.com.cn)



the largest oil and petrochemical products supplier and the second largest oil and gas producer in PRC, as well as the largest refining company and the second largest chemical company in the world. Its total number of gas stations ranks second in the world.⁹ The China National Petroleum Corporation (CNPC) is the PRC's largest oil and gas producer and supplier.¹⁰

158. This is of relevance as fuel suppliers are the main buyers of biodiesel, with sales rarely made directly to end users. Given the size of the SOEs that supply fuel, they are able to set demand and as a consequence price.
159. SOEs are an important part of the economy in the PRC. The presence of SOEs does not necessarily indicate the presence of a market distortion if they adhere to high standards of corporate governance and contribute to fair and competitive markets. However, in the PRC, conditions tend to favour SOEs.
160. In the 2024 report on “Quantifying the role of state enterprises in industrial subsidies”¹¹ the Organisation for Economic Co-operation and Development (OECD) found that SOEs in the PRC are larger recipients of subsidies than other PRC-based companies.
161. The OECD found that SOEs are also providers of subsidies themselves. A prominent case is that of below-market borrowings, which usually involves state banks on the provider side, as well as other SOEs on the recipient side. The OECD found that below-market borrowings are particularly prevalent for PRC based firms with over 10% government ownership.
162. State ownership of banking assets is significant in the PRC, where the proportion of government shares in the top ten financial institutions by market capitalisation exceeded 39% in 2021. This contrasts with the extent of government ownership in the top ten financial institutions of other major economies. Except for Korea (16.6%) and Japan (5.4%), the top ten financial institutions of other major economies were on average less than 5% government-owned, and for some, entirely private.¹¹

⁹ [About Sinopec Group | China Sinopec](#)

¹⁰ [CNPC at a Glance](#)

¹¹ [Quantifying the role of state enterprises in industrial subsidies | OECD Trade Policy Papers | OECD iLibrary \(oecd-ilibrary.org\)](#)



163. Despite SOEs in the PRC receiving subsidies and regulatory advantages, research has found that their financial performance has been below the average of privately owned enterprises, and less productive.
164. China Briefing reports that, as of June 2018, the average return on assets among SOEs was 3.9%, compared with 9.9% for private firms.¹² Return on assets is an indicator of how profitable a company is relative to its total assets. If an SOE has received financial support from the government and its profitability is high, it may mean that the support has been well-utilised.
165. The Centre for Strategic and International Studies¹³ found that in 2020, PRC companies' average profit margin and return on assets were 4.5% and 1.9% respectively. In 2022, companies in the PRC performed similarly, but most companies in other countries improved their margins significantly. This left companies in the PRC with the lowest average profit margin and return on assets among all those countries having more than ten companies on the Fortune 500 2022 list.
166. These findings indicate that SOEs may be pursuing industrial policy rather than ensuring their own profitability or financial sustainability.
167. Steps have been taken towards reform of SOEs, with consolidation of large SOEs, and merging, selling or closing small inefficient SOEs. The state-sector in the PRC has declined, and the private sector has grown considerably. However, as commented by the Applicant, in the PRC the line between the State and private sector is more complex than state owned or privately owned.
168. SOEs are typically structured as large, partially privatised enterprise groups. At the top of each enterprise group is a group company that is typically wholly owned by SASAC or a local SASAC or government body. Below the group company there can be as many as 100 to 200 subsidiary entities, including publicly listed firms, joint venture firms, finance companies, and research institutes. Each of these subsidiary entities may in turn have additional subsidiaries or hold shares in other such subsidiary entities.¹⁴

¹² [China's SOE Reforms: Assessing Their Impact on the Market \(china-briefing.com\)](https://china-briefing.com)

¹³ [Fortune Favors the State-Owned: Three Years of Chinese Dominance on the Global 500 List | Trustee China Hand | CSIS](https://www.trusteechina.com)

¹⁴ [Missing Link: Corporate Governance in China's State Sector – Rhodium Group \(rhg.com\)](https://rhodiumgroup.com)



169. A 2023 study by Stanford's Center on China's Economy and Institutions (CCEI) found that as of 2019, 78% of the PRC's largest 1,000 private owners have equity ties with a branch of central or local government or a firm owned by central or local government.¹⁵
170. Approximately 65% of these 1,000 private owners are directly connected to state owners, meaning both the State owner and private owner have at least a 10% equity stake in the same joint venture. The other 13% are "indirectly connected" to the State through a joint venture with a separate private owner that itself has equity ties with a state owner.
171. A recent study by the CCEI in 2024¹⁶ found that the companies closer to central and provincial governments in the ownership hierarchy tend to have higher growth rates in assets, while firms more remotely owned by governments tend to have higher profitability and efficiency.
172. Compared to private companies, companies with state ownership tend to have lower borrowing costs on average. Firms with mixed ownership also enjoy similar favourable borrowing terms from state-owned banks as 100% state-owned enterprises.
173. The findings by CCEI indicate that mixed state and private ownership, especially indirect government ownership, combine the advantages of government support and the efficiency of private firms.
174. The Applicant claims that two biodiesel producers (Beijing Sanju Environmental Protection and New Materials Co and Beijing Haixin Technology Co. Ltd) are linked to the GOC. Beijing Haixin Technology Co. Ltd was the third largest biodiesel producer in the PRC in 2023, according to production capacity.¹⁷
175. We have examined the link between the GOC and biodiesel producers in the PRC and found evidence that Beijing Haixin Technology Co Ltd is linked to the GOC through a state-owned investment group, and is a shareholder of Beijing Sanju Environmental Protection

¹⁵ [The Rise of the State-Connected Private Sector in China | FSI \(stanford.edu\)](#)

¹⁶ [Reassessing the Role of State Ownership in China's Economy | FSI \(stanford.edu\)](#)

¹⁷ [China: largest biodiesel producers 2023 | Statista](#)



176. On its website Beijing Haixin Energy Technology Co Ltd (Haixin) states “*Incorporated in 1997 and listed on the Shenzhen Stock Exchange (stock code: 300072), Beijing Haixin Energy Technology Co., Ltd. (Haixin for short) is a holding listed company under Beijing Haidian State-owned Assets Investment Group Co., Ltd. (Haidian Investment Group).*”¹⁸
177. It goes on to state “*Being committed to blazing new trails, Haixin has grown into an innovation entity... It has constantly expanded its main businesses: bioenergy, catalytic purification (environmental materials), featured chemicals and engineering services, innovatively developed its proprietary techniques, processes, equipment and products for the industry, and aggressively enhanced their application in various sectors and across the world, effectively responding to developmental needs in the new era and fully demonstrating its strength and quality as a Chinese state-owned enterprise in a new global landscape.*”
178. According to the 2022 annual report of Haixin (submitted by the Applicant¹⁹), it lists state-owned Beijing Haixinzhi Low Carbon Technology Development and Beijing Haidian District State-owned Assets Investment Management Co., Ltd, as a majority stakeholder with 35.22 % of the company’s shares. It also holds a majority 20% share in Beijing Sanju Environmental Protection.
179. We have found evidence that state ownership or control is present in the PRC, and that SOEs benefit from links to the state. State ownership or control exists in private companies through government equity, and these close hierarchical ties to the State confers benefits.
180. Direct state ownership or control is particularly prevalent in finance and energy markets that input into the production of biodiesel, and the oil and petrochemical industry, who are buyers of biodiesel.
181. We determine that the above evidence regarding State ownership and control reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

¹⁸ [Beijing Haixin Energy Technology Co., Ltd. \(hxnc.com\)](https://www.hxnc.com)

¹⁹ [TRA Investigations - Trade Remedies Service - GOV.UK](#) (Appendix E-7)



F2.1.3 Policy supervision or guidance

182. The Applicant claims that the market in the PRC is served by enterprises operating under State policy supervision or guidance. It provided evidence of policy supervision and guidance to biodiesel producers, including the Strategic Action Plan for Energy Development (2014-2020), the 14th Five-Year-Plan (2021-2025) for Renewable Energy Development.

183. We have examined policy supervision and guidance relevant to the biodiesel industry in the paragraphs below.

184. In 2009 the National People’s Congress in the PRC released the Renewable Energy Act in which the GOC “*encourages the production and utilization of bioliquid fuels*” with bio-liquid referring to “*liquid fuels such as methanol, ethanol and biodiesel...*”²⁰

185. The Renewable Energy Act sets out that:

- “*Petroleum marketing enterprises shall, in accordance with the provisions of the energy department of the State Council or the provincial-level people's government, include bio-liquid fuels that meet national standards into their fuel sales systems.*”
- “*Financial institutions may provide preferential loans with financial discounts for renewable energy development and utilization projects that are listed in the National Renewable Energy Industry Development Guidance Catalogue and meet the credit requirement.*”
- “*The State shall give preferential tax treatment to projects included in the Catalogue for the Guidance of the Development of the Renewable Energy Industry. The specific measures shall be formulated by the State Council.*”

186. In 2014 the National Energy Administration (NEA) in the PRC released the “Biodiesel Industry Development Policy” (the biodiesel policy).²¹ The biodiesel policy provides

²⁰ [中华人民共和国可再生能源法---国家能源局 \(nea.gov.cn\)](#) (in Mandarin)

²¹ [政府信息公开目录---国家能源局---国家能源局关于印发《生物柴油产业发展政策》的通知 国能科技\[2014\]511号 \(nea.gov.cn\)](#) (In Mandarin)



guidelines on development of the industry, government supervision, raw materials, technological innovation and industrial specification.

187. The biodiesel policy sets out that:

- *“The energy department of the State Council shall, in accordance with the needs of industrial development, formulate, revise and be responsible for organizing and implementing biodiesel industry development policies and special plans...”*
- *“Regions or provinces that plan to develop the biodiesel industry and promote the use of biodiesel blended fuels shall prepare a regional biodiesel industry development plan based on relevant national development plans and industrial policies...”*
- *“The biodiesel industry development plans in each region shall be submitted to the energy administrative department of the State Council in accordance with regulations...”*

188. This indicates that whilst provinces and regions are encouraged to develop their own biodiesel development policies to develop biodiesel, the GOC will maintain overall control.

189. The biodiesel policy calls for biodiesel producers to focus on utilising waste oils and fats, as well as investing in the construction of relevant waste systems. It calls on “waste oil supply units” to sell to biodiesel producers, in order to guarantee raw material supply:

- *“According to local conditions, [focus] on the utilization of waste oils and fats...and gradually establish a sustainable raw material supply guarantee system...”*
- *“Establish a waste oil recycling and supply system in conjunction with the pilot work on resource utilization and harmless treatment of kitchen waste...Encourage waste oil supply units to actively sell waste oil to biodiesel production enterprises”*



- *“Encourage biodiesel production enterprises to invest in the construction of waste oil purchase systems and [support] raw material bases to develop integrated upstream and downstream development. Encourage the development of special machinery for collection, storage and transportation, and support the establishment of a standardized raw material collection, storage, transportation and supply guarantee system for energy crop.”*

190. The biodiesel policy sets out the government support that biodiesel producers will receive, such as tax policy support and financial subsidies. It encourages regions to develop their own local supporting policies.

191. The biodiesel policy also sets out that financial subsidies will be provided for energy forestry (a form of forestry in which a fast-growing species of tree or woody shrub is grown specifically to produce biomass or biofuel).

- *“The State has formulated and introduced clear and long-term support policies in terms of price, taxation, finance, and investment. Relevant regions should in principle introduce relevant local supporting policies”.*
- *“Biodiesel will be provided with tax policy support in accordance with national regulations. Biodiesel whose proportion of waste oil and fat in raw materials meets the prescribed requirements will enjoy comprehensive resource utilization products and other relevant value-added tax and consumption tax preferential tax policies....”.*
- *“Financial subsidies for the construction of supporting oil energy forest bases for biodiesel production enterprises (projects), including improved seed breeding, afforestation, and tending, shall be handled in accordance with relevant regulations. Financial institutions and commercial banks support the development and construction of energy forests in accordance with relevant regulations on forest insurance and other financial support for forestry development”.*
- *“Actively utilize central infrastructure investment and provide investment subsidies to qualified biodiesel projects. Projects producing more than*



100,000 tons of biodiesel per year will be subsidized according to the high limit as appropriate...".

192. In 2016 the National Energy Administration (NEA) published the 13th Five Year Plan for Biomass Energy Development.²² The plan is relevant as biomass can be converted directly into liquid fuels, called biofuels, which includes biodiesel. It includes plans to:

- *"Accelerate the application of biodiesel in the field of transportation. Upgrade the biodiesel project to improve product quality and meet the needs of transportation fuel quality. Establish and improve the standard system for biodiesel products. Carry out market closure promotion demonstrations to promote the application of biodiesel in the transportation field".*
- *"The central and local government to improve the system of policies and measures to support the utilisation of biomass energy."*
- *"Actively support private capital to enter the biomass energy field. Guide local governments to introduce measures to support other biomass power generation methods beyond existing policies."*
- *"By 2020, new investment in the biomass energy industry will be approximately 196 billion yuan And the new investment in bioliquid fuel is about 18 billion yuan."*

193. These plans continued to be relevant during the injury period of this investigation. In August 2021 the NEA published a statement on biodiesel policy.²³ It clarifies that:

- *"The State actively supports the development of the biodiesel industry. The Renewable Energy Law clearly stipulates that oil marketing enterprises shall incorporate bioliquid fuels that meet national standards into their fuel sales system. In 2014, the "Biodiesel Industry Development Policy" clarified the requirements of industrial specifications from the aspects of raw materials, layout and supervision. In 2016, the "13th Five-Year Plan for Biomass Energy Development" proposed to*

²² [Notice of the National Energy Administration on Printing and Distributing the "13th Five-Year Plan for Biomass Energy Development" Departmental Government Affairs Chinese Government Network \(www.gov.cn\)](#) (In Mandarin)

²³ [Advice on biodiesel policy --- the National Energy Administration \(nea.gov.cn\)](#) (In Mandarin)



improve the standard system of biodiesel products and promote the application of biodiesel in the field of transportation.”

- *“The State also implements a consumption tax exemption and a 70% value-added tax refund policy for biodiesel that meets national standards. In addition, Shanghai has introduced strong financial price supporting policies and has achieved positive results in the pilot promotion of biodiesel.”*
- *“In the next step, we will work with relevant departments to continue to guide pilot cities to promote biodiesel, strengthen the construction and supervision of the collection, storage and transportation system of “waste oil”, prevent “waste oil” from returning to the table and polluting the environment, stabilize the supply of raw materials for biodiesel enterprises, and promote the high-quality development of the industry.”*

194. Since this statement, biodiesel has been the focus of further policies calling for the promotion of biodiesel, as well as research and development and use of advanced technology.

195. The “Notice on Printing and Distributing the Action Plan for Carbon Peaking Before 2030” was published in 2021 by the State Council.²⁴ It states that *“We will keep oil consumption within a reasonable range, gradually adjust the scale of gasoline consumption, vigorously promote alternatives like advanced liquid biofuels and sustainable aviation fuels in substitution for traditional fuel oils and make end-user fuelled by oil more efficient.”*

196. The 14th Five Year Plan (145YP) for the Development of Renewable Energy²⁵ was released in 2022 by nine departments, including the Ministry of Science and Technology and the National Development and Reform Commission (NDRC). It includes plans to *“Support the R&D, promotion and use of advanced technology and equipment in the fields of biodiesel and bio-aviation kerosene”* and states that *‘We will continue to promote the commercial application of clean liquid fuels such as fuel*

²⁴ [\[ACTION PLAN FOR CARBON DIOXIDE PEAKING BEFORE 2030\]](#) -National Development and Reform Commission (NDRC) People's Republic of China

²⁵ [\[Notice on Printing and Distributing the "14th Five-Year Plan" Renewable Energy Development Plan \(Fagai Energy \[2021\] No. 1445\)\]](#) - National Development and Reform Commission (ndrc.gov.cn) (In Mandarin)



ethanol and biodiesel and expand the large-scale substitution of gasoline and diesel in heavy-duty road transportation, aviation and shipping on the basis of scientific research on power and safety performance.”

197. The 145YP for the Development of the Bioeconomy²⁶ was released in 2022 by the NDRC. It includes plans to *“Actively develop bioenergy. Carry out the research and development and cultivation of new biomass energy technologies, promote the integrated development of biofuels and biochemicals, and establish biomass combustion blending standards. Carry out pilot projects for the promotion of biodiesel in areas where conditions permit...”*
198. The “Implementation Plan for Science and Technology to Support Carbon Peak and Carbon Neutrality” (2022-2030) was released in 2022 by nine departments, including the Ministry of Science and Technology and the NDRC.²⁷ The plan includes *“R&D and promotion of biofuel preparation technologies such as bio-aviation kerosene, biodiesel, cellulosic ethanol, bio-natural gas, biomass pyrolysis, etc., research and development of biomass-based materials and high value-added chemical preparation technologies, and key technologies for efficient combustion of biomass fuels with low calorific value.”*
199. In October 2023 the NDRC and other departments published the “Guiding Opinions of Promoting the Green Innovation and High-Quality Development of the Oil Refining Industry Development and Reform Energy.”²⁸ Addressed to *“all provinces, autonomous regions, municipalities directly under the Central Government and cities specifically designated in the State plan”* it calls to *“Actively and orderly develop biomass liquid fuels such as biodiesel ... with waste oil as the main raw material.”*
200. These national goals are pursued by the private industry. The Applicant noted that on its website, Longyan Zhuoyue New Energy Co Ltd.²⁹ states that:
- *“The company uses waste oil to produce biodiesel, which can not only solve the problem of safe recycling of waste oil for the upstream, but also provide*

²⁶ [关于印发《“十四五”生物经济发展规划》的通知\(发改高技〔2021〕1850号\)](#) -国家发展和改革委员会 ([ndrc.gov.cn](#)) (In Mandarin)

²⁷ [Notice of the Ministry of Science and Technology and Other Nine Departments on Printing and Distributing the Implementation Plan for Science and Technology to Support Carbon Peak and Carbon Neutrality \(2022-2030\) - People's Republic of China Ministry of Science and Technology \(\[most.gov.cn\]\(#\)\)](#) (In Mandarin)

²⁸ https://www.nea.gov.cn/2023-10/25/c_1310747157.htm (In Mandarin)

²⁹ [Industrial Policy Longyan Excellence New Energy Co., Ltd \(\[zyxny.com\]\(#\)\)](#) (In Mandarin)



environmentally friendly and safe renewable resources for the downstream, which has multiple environmental and social effects, and is an industry that the country needs to vigorously develop. The State is involved in the "12th Five-Year Plan" and "13th Five-Year Plan", with a long time span and intensive policy planning."

201. The company also lists a range of past and current government policies and the content that relates to the company's business. It states that it has undertaken a large amount of government projects³⁰;

- *"The company has established scientific research platforms such as provincial enterprise technology centers, key laboratories and engineering technology centers, and has successively undertaken biodiesel application technology research and development projects and demonstration projects such as "National Key New Product Plan", "National Torch Plan", "National Tenth Five-Year Science and Technology Research Plan", "Eleventh Five-Year Science and Technology Support Plan", and "Twelfth Five-Year Science and Technology Research Plan", and has achieved a large number of scientific and technological achievements. The company is a circular economy demonstration enterprise in Fujian Province, an innovative demonstration enterprise in Fujian Province, and a backbone enterprise in strategic emerging industries in Fujian Province."*

202. On its website³¹ Haixin states that:

- *"With the strong support from the Party Committee, the Government and the SASAC of Haidian District, and Haidian Investment Group, Haixin has committed to serving major national strategic needs, actively promoting the achievement of carbon peaking and carbon neutrality goals and implementing the new national energy security strategy."*

203. We have determined that State policy supervision and guidance is prevalent in the biodiesel industry. Support of a domestic biodiesel market also appears to be pursued at a provincial level (as discussed under [Section F2.1.6 Shanghai and pilot demonstrations](#)) stemming from the overarching national policy.

³⁰ [Company Profile Longyan Excellence New Energy Co., Ltd \(zyxny.com\)](#) (In Mandarin)

³¹ [Beijing Haixin Energy Technology Co., Ltd. \(hxnk.com\)](#) (In Mandarin)



204. We determine that the above evidence regarding policy supervision and guidance reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.4 State Influence

205. The Applicant claims that State presence in firms does not only concern state-owned enterprises but also private companies, and that the GOC has presence in biodiesel companies.

206. Since 2017 the GOC has established boards of directors in SOEs to replicate structures of other commercial entities, but it also requires all SOEs to institutionalise the role of the Communist Party of China (CCP) committees into their articles of association and give the party oversight of all strategic decisions. As a result, boards of directors still lack de facto authority to manage SOE operations.³²

207. A report by the Rhodium Group, an independent research provider, found that Senior SOE executives are typically also government officials. This incentivizes them to pursue state goals from industrial policy to social stability. The State continues to appoint, assess, promote SOE leaders (such as board chairmen, Party secretaries, and general managers or presidents) who in turn select the leadership of listed subsidiaries.

208. Joint managerial and Party appointments, in which a single individual serves as both board chairman and Party secretary, are now a policy priority and widespread at the group company level (a company's top administrative layer, which controls all subsidiaries below it and has no commercial function). Significant overlap between the membership of boards and Party committees is also common.

209. State presence in firms does not only concern SOEs, but also private companies where party organisations exist.

210. According to MacroPolo think tank, the share of private companies with party organisations increased from 4% in 1993 to 48.3% in 2018.³³ The presence of party organisations is common in bigger companies. MacroPolo reports that party

³² [State-Owned Enterprise Policy Reform — The China Dashboard Winter 2021 — Asia Society Policy Institute and Rhodium Group](#)

³³ [Party Committees See Rising Prevalence in Private Sector \(macropolo.org\)](#)



organisations were present in 92.4% of the PRC's top 500 private companies in 2019. This could increase further, as these committees are mandatory for listed companies.

211. As set out by the Applicant, there is evidence of overlaps between managerial positions and CCP membership / CCP functions in companies involved in biodiesel production in the PRC. This includes:

- Employees listed in Haixin's 2022 annual report³⁴ as members of the CCP:
 - Zhou Congwen, general manager of the company from March 2023, and director of the company from April 2023;
 - Zuo Shiyang, independent director of the company;
 - Ma Fang, employee representative supervisor of the company
 - Wu Yongtao, deputy general manager of the company
 - Zhao Wentao, executive deputy general manager from April 2022
 - Yu Dongming, deputy general manager
 - Kong Deliang, deputy general manager
- Li Lin, general manager of Sanju Environmental Protection³⁵;
- Jian Shen, chairman and general manager at Zhejiang Jiaao Enprotech Stock Co., Ltd. and a Member at the Chinese People's Political Consultative Conference of Zhejiang³⁶.

212. This demonstrates that the GOC is in a position where they can exercise influence over state-owned and private companies.

213. Applications of this influence are outlined below. We determine that the evidence regarding State influence reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

³⁴ [TRA Investigations - Trade Remedies Service - GOV.UK](#) (Appendix E-7)

³⁵ [Haiguotou's "role model" is one of the three environmental protection Li Lin: overcoming the world's problems and leading the bioenergy technology](#)

³⁶ [Jian Shen: Positions, Relations and Network - MarketScreener](#)



F2.1.5 Public policies or measures discriminating in favour of domestic suppliers or otherwise influencing free market forces

214. The Applicant claims that the GOC introduced a VAT refund policy which gives biodiesel producers a 70% VAT rebate if biodiesel is made from waste animal and vegetable oils. It also claims that biodiesel producers in the PRC benefit from a 90% discount on taxable income from relevant products.

215. The 2022 edition of the Catalogue of comprehensive use products and services benefitting from preferential VAT rates, includes biodiesel raw materials with a tax refund rate of 70%. This preferential VAT rate is available to all biodiesel producers in the PRC.³⁷

216. Biodiesel is also exempted from consumption tax when it meets the following conditions:

- The proportion of waste animal oil and vegetable oil in production raw materials is not less than 70%.
- The pure biodiesel produced complies with the national “Diesel Engine Fuel Blended Biodiesel (BD100) standard”.

217. All biodiesel producers in the PRC are able to benefit from a 90% discount on the taxable income originating from biodiesel if the resources specified in the Catalogue of Enterprise Income Tax Incentives are used as the main raw materials.

218. A number of biodiesel producers, including the participating overseas exporter, also benefit from a corporate income tax reduction. The standard corporate income tax rate in the PRC is 25%.³⁸ This is also sometimes referred to as the Enterprise Income Tax. Enterprise Income Tax Incentives exist to support and encourage development of business in certain sectors or areas.

219. Pursuant to the Law of the PRC on Enterprise Income Tax and the Implementing Rules for the Law of the PRC on Enterprise Income Tax, major high and new

³⁷ [国家税务总局 \(In Mandarin\)/ The production of biodiesel and industrial-grade blended oil from waste animal and vegetable oil as raw materials shall be subject to a 70% refund of value-added tax](#) State Administration of Taxation

³⁸ [standard corporate income tax rate](#)



technology enterprises supported by the State may have their enterprise income taxes reduced to 15%.³⁹

220. Biodiesel producers that list themselves as high-tech enterprises, therefore benefitting from the reduction in enterprise income tax include:⁴⁰

- Hebei Longhai bio-energy Co. Ltd⁴¹
- Haixin⁴²
- Tangshan Jinlihai Biodiesel Co. Ltd⁴³
- Longyan Excellence New Energy Co., Ltd⁴⁴
- Jingzhou Dadi Biotechnology⁴⁵

221. The certification allows high-tech enterprises to carry forward losses for up to 10 years, allowing them to offset future taxable income and reduce their overall tax liability.⁴⁶

222. High-tech enterprises are also able to access other preferential policies. RSM Stone Forest (a consultancy firm) reports that a "High-tech Enterprise Certification Certificate" and related approval documents, make it easier for enterprises to access funding and financial support for research and development (R&D).

223. RMS Stone Forest reports that in Shanghai specifically, enterprises that are successfully identified as high-tech enterprises can obtain capital subsidies of up to 2 million RMB.

224. On its website, the Shanghai Municipal Government states that "*High-tech enterprises are also able to benefit from funding incentives, financing opportunities, priority access to office and industrial land, preferential treatment in government procurement, and accelerated depreciation of fixed assets.*"⁴⁷

³⁹ [Measures for the Administration of High-tech Enterprise Accreditation \(beijing.gov.cn\)](http://beijing.gov.cn)

⁴⁰ [China: largest biodiesel producers 2023 | Statista](https://www.statista.com)

⁴¹ [Hebei Longhai bio-energy Co., Ltd. \(longhai-bioenergy.cn\)](http://longhai-bioenergy.cn)

⁴² [Beijing Haixin Energy Technology Co., Ltd. \(hxnk.com\)](http://hxnk.com)

⁴³ [Tangshan Jinlihai Biodiesel Co., Ltd](http://www.tangshan-jinlihai.com)

⁴⁴ [Longyan Zhuoyue New Energy Co. Ltd Company Introduction \(zyzny.com\)](http://zyzny.com)

⁴⁵ [Company Profile-Jingzhou Dadi Bioengineering Co., Ltd. | biodiesel | fatty acid methyl ester \(dady.com.cn\)](http://dady.com.cn)

⁴⁶ [Tax Incentives in China for High and New-Technology Enterprises \(HNTE\) | Article 15 Sept 2023 – HSBC Business Go](https://www.hsbc.com)

⁴⁷ [What benefits are available to accredited high-tech enterprises? A Comprehensive Guide to High-Tech Enterprise Accreditation \(shanghai.gov.cn\)](http://shanghai.gov.cn)



225. In March 2023, the Ministry of Finance and the State Administration of Taxation announced that the super deduction for R&D expenses would become a long-term policy from March 2023, meaning that 100 percent of R&D expenses could be deducted from the taxable income amount for high-tech enterprises.⁴⁸
226. R&D is important to the biofuels industry. Areas of R&D include advancements in feedstock development and utilisation, and exploration of approaches to utilising waste and non-food biomass resources. This is crucial to making biofuels sustainable and scalable. Improving conversion technologies and process efficiencies is also crucial to enable biofuel companies to be cost-effective and energy efficient.
227. The TRA found that biodiesel producers benefit from a 70% VAT rebate, exemption from consumption tax, and a 90% discount on the taxable income originating from biodiesel subject to certain conditions.
228. In addition, biodiesel producers certified as high-tech enterprises benefit from numerous preferential policies such as a reduction in enterprise income tax, capital subsidies and tax deductions on R&D expenses.
229. We determine that the above evidence regarding public policies and measures reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.6 Shanghai and pilot demonstrations

230. The Applicant claims that there has never been a nationwide blend mandate for biodiesel, and that Shanghai is the only local authority with a biodiesel mandate. It claims that Shanghai put in place measures to support the promotion and application of biodiesel made from UCO, and that only biodiesel producers in the PRC who can obtain UCO under a closed loop management system are entitled to benefit from the Shanghai mandate.
231. Whilst the participating overseas exporter in the investigation is not located in the province of Shanghai, these claims are relevant, as they are operating in a domestic market that is subject to government intervention, price setting and subsidies.

⁴⁸ [Tax Incentives in China for High and New-Technology Enterprises \(HNTE\) | Article – 15 Sept 2023 - HSBC Business Go](#)



232. Shanghai produces more than 30,000 tonnes of discarded cooking oil each year. There are 18 recycling companies in the city that refine the UCO for production of B5 biodiesel. In 2013 and 2018, the city issued management guidelines to encourage recycling, transportation and processing of UCO.
233. Shanghai required that recycling enterprises purchase UCO at a price of no less than 3,600 RMB per tonne. In addition, it also provides a subsidy up to 0.24 RMB per litre of B5 biodiesel for oil companies.⁴⁹
234. There are over 300 gas stations in Shanghai supplying this fuel, with Sinopec running approximately 240 of them.⁵⁰
235. An article by the NRDC states that “*Sinopec Shanghai Branch participated in the promotion and application of biodiesel made from kitchen waste oil in Shanghai, blending BD100 biodiesel into B5 biodiesel (including 5% BD100 biodiesel, and the remaining 95% is 0# diesel), which was promoted and applied in its subordinate gas stations.*”⁵¹
236. The scale of centralised procurement in Shanghai (through the centrally owned SOE Sinopec) demonstrates that through buying power, the GOC influences the sale of biodiesel.
237. Across the PRC state-owned oil companies own 90% of gas stations, therefore holding significant power over whether or not to encourage biodiesel use in road transport or other uses domestically.
238. In the PRC biodiesel is primarily used in marine fuel and to fuel electrical power generation and farm equipment.
239. COSCO Shipping Corporation Limited (COSCO Shipping) is an SOE headquartered in Shanghai. It is the merged entity of China Ocean Shipping (Group) Company

⁴⁹ [Shanghai steps up use of biodiesel converted from recycled gutter oil - People's Daily Online](#)

⁵⁰ [China to expand biodiesel use domestically amid EU anti-dumping probe | Mysteel](#)

⁵¹ [\[Shanghai actively promotes the resource utilization of kitchen waste and strives to improve the garbage classification system\] - National Development and Reform Commission \(ndrc.gov.cn\)](#) (In Mandarin)



(COSCO) and China Shipping (Group) Company (China Shipping).⁵² In 2024 COSCO Shipping reported completing the largest biofuel refuelling order in the PRC.⁵³

240. In 2022, Sinopec Fuel Oil and China Marine Bunker (PetroChina) Co. (Chimbusco), both engaged in a biodiesel pilot program, with marine fuel bunkering volumes of 19.79 million and 17.79 million tonnes, respectively.⁵⁴
241. In 2024 the participating overseas exporter Longyan Zhuoyue signed a strategic cooperation agreement with Sinopec CNOOC Marine Fuel Supply. On its website it states that “The two sides said that the signing of this strategic cooperation agreement will play a positive role in the promotion and application of biodiesel in the field of marine fuel oil in China. The teams of both parties will promote the implementation of substantive cooperation projects as soon as possible and make more contributions to the development of the green energy and carbon reduction industry.”⁵⁵
242. In September 2023, the NEA held a meeting on pilot programs for biodiesel promotion and application in Shanghai.⁵⁶ The meeting was arranged to learn from Shanghai’s experience and practices, share information, analyse the development of the country’s biodiesel industry, and study and deploy next steps.
243. The meeting emphasised that the PRC encourages the development and promotion of the biodiesel industry, highlighting that pilot projects are important measures for accelerating the construction of a waste recycling system and accelerating the green transformation of development methods.
244. The meeting requested that, *“in order to support the demonstration and leading role of pilot work, relevant localities should strengthen organisational leadership, collaborate with multiple parties to form a joint task force, and incorporate the promotion and application of biodiesel into the overall planning of promoting carbon peak, carbon neutrality and ensuring food safety in the region.”*

⁵² [Group Profile](#)

⁵³ [The COSCO SHIPPING Lines Vessel “XIN YA ZHOU” Completed the Largest Biofuel Oil Refueling Order for Vessel in China](#)

⁵⁴ [China Accelerates Biodiesel Promotion, Especially B24 Marine Biofuel | Mysteel](#)

⁵⁵ [Excellence New Energy and Sinopec China Shipping Gas Supply signed a strategic cooperation agreement Longyan Excellence New Energy Co., Ltd \(zyxny.com\)](#) (In Mandarin)

⁵⁶ [The National Energy Administration organized an on-site meeting for the promotion and application of biodiesel pilot work --- the National Energy Administration \(nea.gov.cn\)](#) (In Mandarin)



245. More than 90 people attended the meeting, including relevant provincial and municipal development and reform commissions, energy bureaus, relevant units in Shanghai, PetroChina, Sinopec, as well as relevant biodiesel production companies and industry associations.

246. Following the meeting, the NEA issued the “Notice on Organising Pilot Demonstrations for the Promotion and Application of Biodiesel”⁵⁷ (the Notice). The Notice asked governments at all levels, enterprises, and other entities to apply for pilot demonstrations in respective regions.

247. The Notice states that:

- *“eligible pilot demonstration projects will be given priority to be included in mid- and long-term loan projects in the manufacturing industry for support, and it will actively promote the establishment of biodiesel carbon emission reduction methodologies and promote the inclusion of biodiesel in the national certified voluntary emission reductions (CCER)”;*
- *“At the same time, the NEA will work with relevant departments to coordinate existing funds and support research on qualified pilot demonstration projects”;*
- *“...all regions will increase the protection of land and sea factors for pilot demonstration projects, optimize the project approval process, study and provide financial support, and create good conditions for pilot demonstration areas and project construction.”*

248. In April 2024, the NEA announced biodiesel pilot projects for promoting its use domestically. The pilot project aims to expand domestic biodiesel application scenarios and establish replicable policy systems to gradually form demonstration and scale up effects.

249. Out of the 22 approved projects, 19 are led by local governments and only three by enterprises. All three enterprises included in this pilot program (Chimbusco, Sinopec Fuel Oil Co. and Shandong High-Speed Group) are state owned.

⁵⁷ [Notice of the National Energy Administration on Organizing and Carrying out Pilot Demonstration of Biodiesel Promotion and Application \[2023\] No. 80 - National Energy Administration website \(nea.gov.cn\)](#) (In Mandarin)



250. This demonstrates that the GOC are in a position where they can favour domestic suppliers through pilot demonstrations, local governments and SOEs.

251. We determine that the evidence outlined above regarding Shanghai and pilot demonstrations reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.7 Raw Material costs

252. Based on the allegations outlined in the Application and the TRA's conclusions in previous investigations, we have chosen to examine the key raw materials used in the production process for biodiesel. In previous investigations the TRA found evidence that raw material costs in the PRC reflected non-commercial factors. Evidence was found through five-year plans, policy, and guidance documents.

Feedstock

253. Kitchen waste, or waste oil (also referred to as "gutter oil") is used as the main feedstock for biodiesel in the PRC. Our understanding is that this includes UCO, food waste oil, soap stock and brown grease.

254. UCO has also been encouraged as an export, with a 100 percent refund of its 13 percent export tax in place during the POI. We have considered what this means for the production of biodiesel in the PRC.

255. The GOC has implemented numerous policies and measures relevant to the management and collection of UCO and kitchen waste.

256. In 2010 the General Office of the State Council issued the "Opinions on Strengthening the Remediation of Waste Oil and Management of Kitchen Waste" requiring all localities to establish a system "*to increase the management of kitchen waste and remediation of gutter oil*".⁵⁸

257. In 2010 the NDRC, the Ministry of Finance and the Ministry of Housing and Urban-Rural Development launched pilot projects for "*resource utilisation and harmless*

⁵⁸ [\[Letter on the reply to the proposals No. 1045 \(No. 049 of urban and rural construction\) and No. 2334 \(No. 140 of resources and environment\) of the fifth meeting of the 12th National Committee of the Chinese People's Political Consultative Conference\]-National Development and Reform Commission \(ndrc.gov.cn\)](#) (Mandarin)



treatment of kitchen waste". These pilot projects were expected to process and utilise "more than 6.9 million tons of kitchen waste every year" and produce "more than 600,000 tons of industrial oil such as biodiesel".⁵⁸

258. In 2013, the State Council issued the "Circular Economy Development Strategy and Near-term Action Plan" to make strategic planning and specific work arrangements to promote the resource utilization of kitchen waste.⁵⁸

259. In 2015, five batches of 100 pilot cities were identified by the NDRC. The NDRC reports that "*In the implementation stage, the pilot cities adopted the method of combining dredging and blocking.... they used kitchen waste to produce biogas, industrial oil, biodiesel, bio-organic fertilizer and other resource products.*"⁵⁹

260. The NDRC provided suggestions on financial support policies on the collection of kitchen waste⁵⁹:

- a. "*First, at the national level: in order to increase the guidance of pilot cities, guide social capital to invest in the field of kitchen waste resource utilization and harmless treatment, and give full play to the decisive role of the market. Our committee and the Ministry of Finance have formulated the "Notice on Printing and Distributing the Implementation Plan of Special Funds for the Development of Circular Economy to Support the Construction of Pilot Cities for the Resource Utilization and Harmless Treatment of Kitchen Waste" (Fa Gai Ban Huan Zi [2011] No. 1111), and arranged special funds for the development of circular economy to support the collection and transportation system, resource utilization projects and capacity building of kitchen waste in 100 pilot cities.*"
- b. "*The second is the local level: pilot cities generally arrange financial funds to give subsidies ranging from 100 to 300 yuan per ton of kitchen waste collection, transportation and treatment. Some pilot cities have explored charging for the discharge of kitchen waste by catering enterprises, and specially used for the collection, transportation and treatment of kitchen waste, and established a long-term operation mechanism for charging subsidies.*"

⁵⁹ [\[Reply to Proposal No. 3467 \(Medical and Sports No. 362\) of the Third Session of the Twelfth National Committee of the Chinese People's Political Consultative Conference\] - National Development and Reform Commission \(ndrc.gov.cn\)](#) (In Mandarin)



261. In 2017, the NDRC and relevant departments formulated the "Circular Development Leading Action" plan, which made overall arrangements for the recycling and disposal of kitchen waste in the PRC during the "13th Five-Year Plan" period, and proposed *"that by 2020, the resource treatment rate of urban kitchen waste will increase by 10% compared with 2015."*
262. In 2017 the General Office of the State Council identified the management of kitchen waste, as a key part of food safety for the 13th Five Year Plan (135YP) period (2016-20).⁶⁰ Companies making use of the resource were encouraged to expand operations, with tax breaks to support research into technology and the roll-out of systems for utilisation.
263. In 2020 the NDRC reported on the success of some of these pilot cities. Regarding Linyi City, Shandong Province the NDRC reports that *"The Linyi Municipal Government has signed a franchise agreement and a collection and transportation agreement for the harmless disposal of kitchen waste with a third-party professional enterprise. The financial sector has given corresponding subsidies for the collection, transportation and disposal of kitchen waste, and promoted the in-depth development of kitchen waste resource utilization and harmless treatment."*
264. It reports that *"Through the centralized co-construction of treatment facilities, the "Linyi model" of centralized and joint disposal of a variety of solid wastes has been explored, which can comprehensively treat and dispose of 1 million tons of domestic waste, 100,000 tons of kitchen waste, 30,000 tons of sick and dead livestock and poultry, and 100,000 tons of sludge per year... the natural gas purification center and biodiesel production center in the park process the biogas and crude grease produced by the kitchen, sick and dead livestock and poultry projects into high-quality natural gas and biodiesel respectively, realizing the co-construction and sharing of facilities."*⁶¹
265. All biodiesel producers in the PRC are able to benefit from low-cost feedstock in the PRC, due to local government policies promoting a "closed loop system" in which food waste feeds directly into the production of biodiesel. Whether or not a biodiesel

⁶⁰ [Opinions of the General Office of the State Council on Strengthening the Remediation of Gutter Oil and the Management of Kitchen Waste \(www.gov.cn\)](#) (In Mandarin)

⁶¹ [\[Linyi City, Shandong Province Solidly Promotes the Resource Utilization and Harmless Treatment of Kitchen Waste\]-National Development and Reform Commission \(ndrc.gov.cn\)](#) (In Mandarin)



producer in the PRC is part of a closed loop system, the domestic price is affected by the policies that exist.

266. We determine that the evidence outlined above regarding feedstocks reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

Methanol

267. Methanol in the PRC is supplied from domestic production and primarily derived from coal. As of 2023, 75% of the PRC's total methanol production capacity was for coal-made methanol, and 13% for coke-oven gas made methanol (which is formed by heating coal).⁶²

268. The coal power sector in the PRC has been a large beneficiary in the form of below-market loans for expanding capacity,⁶³ as well as other support measures, including price setting of the transportation of coal.⁶⁴ Additionally, export restrictions on coal exist, such as export licenses as highlighted in the PRC WTO notification in 2022 on quantitative restrictions.⁶⁵

269. The OECD produces and maintains an online Inventory of Support Measures for Fossil Fuels, which systematically identifies, documents and estimates the fiscal cost of individual policy measures which encourage the production or consumption of fossil fuels.⁶⁶ The OECD found that the coal industry in the PRC received significant support from the State between 2010 and 2022.

270. Reuters⁶⁷ reports that with effect from 1 January 2024, which covers part of the period of investigation, coal producers will be able to recover around 30% of their capital costs between 2024 and 2025. This payment will take the form of a tariff paid to coal-fired power producers by the grid company. The capacity payments will be calculated based on fixed costs of 330 RMB per kilowatt per year for coal plants.

⁶² [Here's Why China is Betting Big on Methanol \(ief.org\)](#) and [1708572242138826-1708572242152386.pdf \(czce.com.cn\)](#)

⁶³ [OECD TRADE POLICY PAPER N°2XX \(oecd-ilibrary.org\)](#)⁶⁴ [s458_e.pdf \(wto.org\)](#)

⁶⁴ [s458_e.pdf \(wto.org\)](#)

⁶⁵ [s458_e.pdf \(wto.org\)](#)

⁶⁶ [OECD Inventory of Support Measures for Fossil Fuels 2023 | OECD](#)

⁶⁷ [China to guarantee payments to coal power producers based on capacity | Reuters](#)



271. The evidence demonstrates that the coal market in the PRC is subject to non-commercial factors, such as below-market loans, the price setting of transportation of coal, export restrictions and government subsidies.
272. As well as being the world's largest producer of coal, the PRC is also the world's largest importer of coal. According to the WTO Trade Policy Review 2024, imports accounted for 7.7% of coal supply in the PRC in 2021. As imports of coal into the PRC make up less than 10% of total coal supply, we consider that imports are unlikely to counter the effects of the non-commercial factors described above.⁶⁸
273. As methanol is primarily produced by coal, we consider that as a consequence the cost of methanol reflects non-commercial factors. This is relevant to biodiesel, as methanol is an input into the production of FAME biodiesel.
274. We therefore determine that the evidence outlined above regarding methanol reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.8 Energy costs

275. The TRA has historically found that electricity transmission and distribution in the PRC are subject to price controls by the State.
276. The Applicant claims that state control exists in the energy sector in the PRC, which discriminates in favour of the biodiesel industry in the PRC.
277. In 2022 coal accounted for 61% of energy supply in the PRC.⁶⁹ As set out under [Section F2.1.7 Raw Materials](#), the coal power sector in the PRC has been a large beneficiary in the form of below-market loans for expanding capacity, as well as other support measures, including price setting of the transportation of coal, and export restrictions.
278. The benefits transferred to the energy market therefore effects not only the cost to generate the power but the overall cost to the user. Electricity costs for the end user is

⁶⁸ [s458 e.pdf\(wto.org\)](#)

⁶⁹ [China - Countries & Regions - IEA](#)



the sum of the generation price, the transmission and distribution prices (and government funds and special charges).

279. Generation prices (also known as on-grid prices) are what grid companies pay to power generation companies when purchasing their electricity. They are decided by provincial price bureaus under the guidance of the NDRC. Electricity transmission and distribution is subject to price controls by the Central Government.
280. There are three grid companies. Distribution of electricity is largely managed by the two SOE grid companies, the State Grid Cooperation of China and the China Southern Power Grid.
281. Power generators include those owned by central authorities (the big five), regional power generators (usually owned by provincial governments) and to a much smaller extent foreign companies.
282. The 2023 OECD report “Measuring distortions in international markets: Below-market energy inputs⁷⁰” found that below-market energy in certain economies (e.g. the PRC) is not widespread but rather specific to certain companies, sectors, or regions.
283. The 2023 OECD report “Government support in industrial sectors, a synthesis report⁷¹” found that in relation to the PRC, “It is especially problematic for trade in the context of industries for which energy constitutes an essential input, such as aluminium smelting, steel, cement, fertilisers, and chemicals.”
284. We have found there is evidence that the energy market in the PRC reflects non-commercial factors, through the price of inputs (coal) and price setting or price controls for the generation, transmission and distribution of electricity. We consider that the effect of energy at below-market prices will be higher than other sectors, as a key input in the cost of production of biodiesel.
285. We therefore determine that the evidence outlined above regarding energy reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

⁷⁰ [Measuring distortions in international markets: Below-market energy inputs](#)

⁷¹ [Government support in industrial sectors, a synthesis report](#)



F2.1.9 The lack, discriminatory application, or inadequate enforcement of bankruptcy, corporate, or property laws

286. The Applicant claims that the State intervenes in the bankruptcy reorganization of listed companies, which prevents the implementation of any bankruptcy law. It claims that the People's Court is subordinated to the GOC, which must give prior approval for the court to decide on whether to accept or reject the applications of listed companies in practice.
287. Under the Enterprise Bankruptcy Law of the PRC 2007⁷², a debtor firm or creditors can file a bankruptcy petition if the debtor firm's balance sheet is insufficient to repay debt when due. According to the Peterson Institute for International Economics (PIIE) in practice, however, bankruptcy of loss-making enterprises, especially state-owned enterprises, was rare prior to the deleveraging campaign.⁷³
288. The PIIE found that at the end of 2015, over 62,000 state-owned firms, were incurring RMB1.3 trillion in losses. However, only 3,683 bankruptcy cases, filed by companies of different ownership forms, were accepted by the PRC's legal system in 2015, in which 2,352 were adjudicated, including 366 reorganisations.
289. Whilst we do not have evidence of bankruptcy relating to biodiesel companies specifically in the PRC, the finding is of relevance to SOEs which exist in key strategic sectors to the biodiesel industry in the PRC as outlined in [Section F2.1.2 State Ownership and control](#). Therefore, the benefits derived from a lack of enforcement of bankruptcy amongst SOE's in the PRC can impact the biodiesel industry.
290. We therefore determine that the evidence outlined above regarding bankruptcy reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.10 Land costs

291. The Applicant claims that the land market in the PRC reflects non-commercial factors.

⁷² [中国人大网](#)

⁷³ [China Is Only Nibbling at the Problem of "Zombie" State-Owned Enterprises | PIIE](#)



292. Land Administration Law of the PRC states that all urban land in the PRC is owned by the state (“state-owned land”), and the suburban and country areas are either owned by the state or rural collectives (“collective land”)⁷⁴.

293. The process is (or can be) dictated by the local government’s economic and industrial planning. Article 5 of the “Order of the Ministry of Land and Resources of the People's Republic of China”⁷⁵ states that the expectation is that land allocation will reflect non-market factors:

- *“The land and resources administrative department of the people's government of the city or county shall, in accordance with the economic and social development plan, industrial policy, overall land use plan, annual land use plan, urban planning and land market conditions, formulate an annual plan for the assignment of state-owned construction land use rights, and report it to the same level.”*

294. Favourable land treatment is in place for industries listed in the PRC’s Catalogue of Encouraged Industries for Foreign Investment. Land can be preferentially supplied for encouraged foreign-invested projects with intensive land use; and the minimum price of land transfer can be set at 70% of the national minimum price for industrial land in the specific locations where the transfer occurs.⁷⁶

295. The latest “Catalogue of Encouraged Industries for Foreign Investment”⁷⁷ was released in October 2022 and came into force on 1 January 2023. This catalogue includes two sub-sections, a national catalogue and a regional catalogue. In this catalogue “Bio-liquid fuels (fuel ethanol, biodiesel) using non-food plants such as cassava, jatropha and rubber seeds as raw materials” is listed as an encouraged industry in the Guangxi Autonomous Region, Yunnan Province and Anhui Province.

⁷⁴ [Land Administration Law of the PRC](#)

⁷⁵ http://www.gov.cn/flfg/2007-10/09/content_771205.htm

⁷⁶ [China's Encouraged Catalogue Updated for 2023: Key Points for Investors \(china-briefing.com\)](#)

⁷⁷ [【关于发布《鼓励外商投资产业目录（2022年版）》的令 2022年第52号】-国家发展和改革委员会 \(ndrc.gov.cn\) \(In Mandarin\)](#)



296. In addition, favourable land treatment is also in place for those biodiesel producers with High-Tech Enterprise status. Shanghai reports that companies with High-Tech Enterprise status are granted “priority access to office and industrial land.”⁷⁸

297. We therefore determine that the evidence outlined above regarding land-use costs reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F.2.1.11 Labour costs

298. The Applicant claims that wage costs are distorted in the biodiesel industry, as a system of market-based wages cannot fully develop in the PRC.

299. The TRA has historically found that there are labour cost distortions as a result of a PMS in the PRC due to laws around unionisation and household registration (the hukou system). The TRA found that despite reforms of the hukou system in 2020, the same structure still applies and restricted movement for rural workers artificially creates a pool of underprivileged labourers who are willing to work for less than their urban counterparts.

300. The Applicant claims that a system of market-based wages cannot fully develop in the PRC, and that this also applies to the biodiesel industry, which is equally subject to government intervention.

301. The current household registration (hukou) system was formally introduced in the PRC in 1958. It categorises each PRC citizen as either an agricultural (rural) hukou holder or a non-agricultural (urban) hukou holder. The hukou was hereditary so children whose parents held a rural hukou would also have a rural hukou even if they are born in a city.

302. Having a two-tier system of citizenship where certain workers can only reside in the wealthier urban areas on a temporary basis conditional on them working, creates a pool of cheap labour, since the only alternative to accepting such wages would be a return to the deprived rural areas.

⁷⁸ [What benefits are available to accredited high-tech enterprises? A Comprehensive Guide to High-Tech Enterprise Accreditation](#)



303. China Labour Bulletin reports that smaller cities in inland areas have opened up, providing employment opportunities closer to home, while major cities such as Beijing, Shanghai, Guangzhou and Shenzhen, have imposed even greater restrictions on migrant workers and their families.
304. The Trade Union Law of the PRC (enacted in 1992 and revised three times in 2001, 2009 and 2021) sets out that “any worker who derives their principal income from a company, professional unit, institution, or social organization is legally entitled to participate in and organize labour unions, regardless of their ethnicity, race, gender, occupation, religion, or educational level.”
305. Whilst all workers in the PRC have the right to form or join a trade union, that right is limited as all enterprise unions must be affiliated with the one legally mandated body, the All-China Federation of Trade Unions (ACFTU). The ACFTU is a government body that answers directly to the Central Committee of the CCP.
306. Article 33 of the CCP constitution states that unions within non-public sector entities shall be controlled by CCP organisations in order to implement government policy⁷⁹:
- *Primary-level Party organizations in non-public sector entities shall implement the Party’s principles and policies, guide and oversee their enterprises’ observance of state laws and regulations, exercise leadership over trade unions, Communist Youth League organizations, and other people’s group organizations, promote unity and cohesion among workers and office staff, safeguard the legitimate rights and interests of all parties, and promote the healthy development of their enterprises.*
307. Although the right to strike was removed from the Constitution of the PRC in 1982, there is no legal prohibition on workers taking strike action. China Labour Bulletin’s Strike Map shows strikes by date, location and industry. Whilst strike action does occur, workers cannot organise or negotiate outside the official structure.
308. The biodiesel industry does not exist outside of this structure. The biodiesel industry benefits from these labour cost distortions stemming from the hukou system and the

⁷⁹ http://www.xinhuanet.com/english/download/Constitution_of_the_Communist_Party_of_China.pdf



ability for workers to organise or negotiate wages, in both the costs of production of biodiesel, as well as the costs of key inputs into the production of biodiesel.

309. We therefore determine that the evidence outlined above regarding labour costs reflects non-commercial factors and constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.12 Finance costs

310. The TRA has historically found evidence of distortive practices, including the issuing of bonds and loans according to government industrial strategy rather than market forces, the setting or influencing of interest rates by the government via state-owned banks and the influencing of interest rates by other distortive practices, e.g. the predominance of SOEs.

311. The Applicant claims that the biodiesel industry benefits from the GOC intervention in the financial system, and that biodiesel producers in the PRC have access to financing granted by institutions that implement public policy objectives and do not act independently of the State.

312. Banks in the PRC are overseen by the People's Bank of China (PBoC), the central bank responsible for regulating financial institutions and implementing monetary policies. It has authority over the PRC banking system to protect the country's financial stability.

313. The banking system in the PRC is characterised not only by its high degree of state ownership, but also by the intricate ties that PRC banks (regardless of ownership) maintain with various levels of government.

314. Central authorities, as well as provincial and local governments have been found to frequently intervene in the lending decisions of commercial banks, often using bank lending as a policy tool to achieve pre-set industrial targets.

315. In the report "Quantifying the role of state enterprises in industrial subsidies" the OECD examined the annual reports of banks in the PRC that participated in the study. The OECD found that the banks responded to and participated in the implementation of national policies, including Made in China 2025, the Belt and Road Initiative, strategic



emerging industries and Going Global. The OECD also found that some banks signed strategic co-operation agreements with the Ministry of Industry and Information Technology (MIIT) or the NDRC.⁸⁰

316. The General Rules on Loans 1996 gives local authorities the legal right to support preferential loans for preferred industries. Article 15 states that “[i]n accordance with the State’s policy, relevant departments may subsidize interests on loans, with a view to promoting the growth of certain industries and economic development in some areas.”⁸¹
317. This indicates that banking institutions in the PRC are key in implementing the governments industrial strategy.
318. The TRA found that banks in the PRC are encouraged to support the biodiesel industry. The 2009 Renewable Energy Act sets out that: “*Financial institutions may provide preferential loans with financial discounts for renewable energy development and utilization projects...*”
319. The 2014 Biodiesel Policy states that “*Financial institutions and commercial banks support the development and construction of energy forests in accordance with relevant regulations on forest insurance and other financial support for forestry development.*”
320. The 2016 13th Five Year Plan for Biomass states that the GoC “*Actively support[s] private capital to enter the biomass energy field.*”
321. We therefore determine that the evidence outlined above regarding finance costs reflects non-commercial factors constitutes a particular market situation in the biodiesel industry of the PRC.

F2.1.13 Conclusion on the existence of a PMS

322. Based on the evidence provided by the Applicant, as well as case-specific research, the TRA considers there to be sufficient evidence to conclude that a PMS exists in the PRC for the biodiesel industry on the basis that the market reflects non-commercial

⁸⁰ [Pdf \(oecd.org\)](http://www.oecd.org)

⁸¹ <http://www.lehmanlaw.com/resource-centre/laws-and-regulations/banking/general-rules-on-loans-1996.html>



factors. The TRA used comparator values to assess whether input costs or prices are artificially low in the PRC and concluded that the costs of energy, feedstock, methanol, finance and labour are artificially low and will have a material impact on the domestic sales price of the goods in the PRC.

F2.2. Constructed normal value

323. During verification the TRA established that Xiamen Zhuoyue's domestic sales included a number of experimental sales to a single customer. These experimental sales incurred additional costs. Along with low volumes purchased, this led to a higher per unit domestic sales price.
324. The TRA considered that these domestic sales were not representative of the typical domestic sales of Xiamen Zhuoyue. In addition, these domestic sales were not made in sufficient volumes to permit a proper comparison between the like goods destined for consumption in the exporting country or territory and the goods concerned in accordance with regulation 7(2)(b) of the Regulations.
325. In addition, the TRA has determined that it is not appropriate to use the comparable price of the like goods in the PRC to calculate the normal value, in accordance with regulation 7(2)(b) of the Regulations. Consequently, the TRA has used an alternative method to calculate the normal value.
326. The TRA has constructed the normal value of the goods in accordance with regulation 8(1)(a) of the Regulations, by determining the costs of production plus a reasonable amount for administrative, selling and general costs and for profits.
327. We have determined the normal value for the goods concerned based on the facts of the case before us. In accordance with regulation 13 of the Regulations, where there are government interventions or other market distortions, we may adjust any cost or profit elements where we consider they are unrepresentative because they do not reasonably reflect what they would be in their domestic market if the costs and profits were substantially determined by market forces.
328. Therefore, the alternative method used to construct normal value is based on the sampled exporters' costs of production, adjusted to account for artificially low raw



material, labour, finance and energy costs, plus the sampled exporters' administrative, selling and general costs plus a reasonable level of profit.

F2.2.1 Costs of production

329. Where the TRA determines the costs of production for the purposes of regulation 8(1)(a) of the Regulations, it will do so in accordance with regulation 11 of the Regulations.

330. Regulation 11(2) of the Regulations sets out that where regulation 11(3) of the Regulations applies, the TRA will normally calculate the costs of production of the like goods on the basis of records kept by the overseas exporter.

331. This applies where the records of the overseas exporter of the goods:

- a) are in accordance with generally accepted accounting principles of the exporting country or territory; and
- b) reasonably reflect the costs associated with the production and sale of the like goods in the exporting country or territory.

332. The TRA determines that the cooperating exporters meet both the above conditions based on the pre-verification walkthroughs conducted in December 2024 and the in-person verification activities conducted in February 2025 with Longyan Zhuoyue and Xiamen Zhuoyue.

333. However, the our PMS assessment revealed that costs in the PRC are not substantially determined by market forces.. As such, the TRA made adjustments to the overseas exporters costs of production. For further information see [Section F2.3 PMS adjustments](#).

F2.2.2 Administrative, selling, and general costs

334. Where the TRA determines a reasonable amount for administrative, selling, and general (AS&G) costs for the purposes of regulation 8(1)(a) of the Regulations, it will do so in accordance with regulation 12 of the Regulations.

335. Regulation 12(2) of the Regulations sets out that, subject to regulation 12(3) of the Regulations, the TRA must determine reasonable amounts for the AS&G costs on the



basis of the actual data pertaining to the production and sales by the overseas exporter of the like goods, in the ordinary course of trade, in the domestic market of the exporting country or territory.

336. In conducting the ordinary course of trade tests, the TRA considered raw material cost trends throughout the POI. Analysis of the monthly per unit feedstock costs submitted by both Longyan Zhuoyue and Xiamen Zhuoyue demonstrated that 100% of the monthly costs fall within 3 standard deviations of the mean monthly costs for the POI, which shows that there are not significant fluctuations in feedstock costs. Therefore, we determined it is appropriate that the ordinary course of trade tests are considered on an annual basis.
337. In accordance with regulation 9 of the Regulations the TRA considered the sampled exporter's domestic sales and determined that for Longyan Zhuoyue, its sales passed the ordinary course of trade tests.
338. The TRA determined that for Xiamen Zhuoyue, its sales did not pass the ordinary course of trade tests.
339. However, when comparing the actual ex-works per unit AS&G costs for Longyan Zhuoyue and Xiamen Zhuoyue, we determined that the difference is immaterial.
340. We have therefore determined AS&G costs for the Zhuoyue Group using the actual amounts incurred and realised in accordance with regulation 12(2) of the Regulations.
341. During verification the TRA established that the interest income reported in the Zhuoyue Group's AS&G data, relates to a level of cash reserves built up over time and held in foreign currency.
342. As the interest income does not relate to the cost to make and sell of the goods for the purposes of the investigation, we have removed the interest income from the AS&G costs, as per regulation 12(3)(c) of the Regulations.
343. The Zhuoyue Group made comments on the TRA's treatment of the interest expense in response to their [verification report](#).
344. The Zhuoyue Group state that "Interest revenue should be included as a reduction of costs, because it is directly tied to the company's sales and production activities. Given



the substantial volume of US dollar receipts for export sales and the relatively high interest rates on USD deposits, the company generates significant interest revenue. Due to the large scale of sales, the relatively long production and sales cycle, and the considerable quantity and value of raw material purchases, it is necessary for the company to maintain a substantial level of working capital to ensure smooth operations. Ultimately, this interest revenue is used for the procurement of raw materials.”

345. The TRA acknowledges the Zhuoyue Groups comments. The comments made by the Zhuoyue Group are points that the TRA considered during verification. The TRA’s findings in respect to interest expenses have not changed as a result of the Zhuoyue Group’s comments.
346. We then made further adjustments to the AS&G costs in accordance with regulation 12(4) of the Regulations. For information see [Section F2.3 PMS adjustments](#).

F2.2.3 Reasonable level of profits

347. Where the TRA determines a reasonable amount for profits for the purposes of regulation 8(1)(a) of the Regulations, it will do so in accordance with regulation 12 of the Regulations.
348. Regulation 12(2) of the Regulations sets out that, subject to regulation 12(3) of the Regulations, the TRA must determine a reasonable amount for profits on the basis of the actual data pertaining to the production and sales by the overseas exporter of the like goods, in the ordinary course of trade, in the domestic market of the exporting country or territory.
349. In accordance with regulation 9 of the Regulations the TRA considered the sampled exporter’s domestic sales and whether they can be considered to be made in the ordinary course of trade. We determined that for Longyan Zhuoyue, its sales passed the ordinary course of trade tests in accordance with regulations 9(1)(a) and (b) of the Regulations. The TRA determined that for Xiamen Zhuoyue, its sales did not pass the ordinary course of trade tests.



350. The TRA analysed the Zhuoyue Group's profit levels over the injury period. The TRA did not consider differences in average profit levels over the injury period to be materially different between Longyan Zhuoyue and Xiamen Zhuoyue.
351. However, the TRA did consider the profit levels during the POI for both Longyan Zhuoyue and Xiamen Zhuoyue to be a significant outlier compared to profit levels in previous years and not a representative margin.
352. The TRA therefore calculated a reasonable level of profit using the average of the profit rate for the injury period, excluding the POI as another reasonable method as per Regulation 12(3)(c).

F2.3. PMS adjustments

353. In accordance with regulations 11(6) and 12(4) of the Regulations, the TRA may make adjustments to costs of production or administrative, selling, and general (AS&G) costs in accordance with regulation 13 of the Regulations.
354. As detailed in [Section F2.1.13](#), the following costs in respect of the production and sale of the like goods in the PRC were found to be artificially low. These costs require adjustments to determine what the exporters' costs would be in the market in the PRC, if costs were substantially determined by market forces:
- energy (electricity);
 - energy (coal);
 - UCO;
 - food waste, soap stock, brown grease;
 - finance;
 - methanol; and
 - direct labour

355. The TRA determined certain costs were either; not applicable to the Zhuoyue Group, not artificially low in comparison to the Malaysian benchmark, or immaterial to the cost of biodiesel to warrant an adjustment. These costs are;



- energy (gas);
- land use costs;
- in-direct labour; and
- export contingent loans.

As set out in Section C2.3 Malaysia was chosen as an appropriate third country in accordance with regulation 13(4)(a) and 13(4)(5).

356. The Malaysian third country benchmark was used rather than benchmark costs from the PRC as the TRA determined that the distortions in the PRC's domestic industry of biodiesel are so far reaching that we are unable to find undistorted benchmarks in the PRC.

Energy (Electricity)

357. During verification the TRA established that the energy costs reported by the Zhuoyue Group were inclusive of VAT, and these costs were updated during verification to exclude VAT.

358. The TRA compared the Zhuoyue Group's per unit costs of electricity with per unit electricity costs of the anonymous Malaysian TCP.

359. The TRA increased the Zhuoyue Group's electricity costs in line with the benchmark to reasonably reflect the cost in the market of the PRC if such prices were substantially determined by free market forces, in accordance with regulation 13(2) of the Regulations.

Energy (coal)

360. The TRA could not establish a benchmark for coal using the anonymous Malaysian TCP, as they did not use coal as an energy source during the POI.

361. The TRA established an international benchmark for the cost of coal using data from Global Trade Tracker (GTT) under HS code 27 01 11. This is in accordance with regulation 13(4)(b) of the Regulations.



362. Longyan's Zhuoyue's coal costs have been increased in line with the benchmark to reasonably reflect the cost in the market of the PRC if such prices were substantially determined by free market forces, in accordance with regulation 13(2) of the Regulations.

363. This adjustment was not applicable to Xiamen Zhuoyue as they did not purchased coal during the POI.

Energy (gas)

364. The TRA compared the Zhuoyue Group gas costs with the gas costs reported by the anonymous Malaysian TCP. We found that the Zhuoyue Group gas costs during the POI were not artificially low in comparison to the benchmark.

Energy (biofuel)

365. The TRA considered adjusting for the reported cost of biofuel by Longyan Zhuoyue during the POI. However, as the reported cost of biofuel represented less than 2% of the total energy cost of Longyan Zhuoyue, we determined the cost of biofuel to be immaterial to warrant an adjustment.

UCO raw material

366. The TRA established a UCO benchmark using verified data from the anonymous Malaysian TCP. The benchmark was calculated as a weighted average of a sample of the TCP's Malaysian origin purchase invoices of UCO during the POI.

367. The Zhuoyue Group's UCO costs have been increased in line with the Malaysian benchmark to reasonably reflect the cost in the PRC market if such prices were substantially determined by market forces, in accordance with regulation 13(2) of the Regulations.

Foodwaste, soap stock and brown grease raw material

368. The TRA calculated a food waste, soap stock and brown grease Malaysian benchmark using GTT data for HS codes 38 23 19 11, 38 23 19 19, 38 23 19 90 for total trades during the POI.



369. The equivalent data from GTT during the POI for the above HS codes were not available for the PRC.
370. In lieu of the equivalent data being available from GTT, data for the applicable 6-digit HS code 38 23 19 from GTT was used instead to reduce the Malaysian GTT benchmark cost, by the cost differential between the food waste, soap stock and brown grease costs of the PRC exporters and the PRC GTT benchmark.
371. The Zhuoyue Group's UCO costs have been increased in line with the Malaysian benchmark to reasonably reflect the cost in the PRC market if such prices were substantially determined by market forces, in accordance with regulation 13(2) of the Regulations.

Methanol raw material

372. The Zhuoyue Group's methanol raw material costs were compared on a per unit basis to Methanol costs during the POI reported on a per unit basis by an anonymous Malaysian TCP.
373. The methanol costs of both Zhuoyue Group exporters were increased in line with the Malaysian TCP methanol costs to reasonably reflect the cost in the PRC market if such prices were substantially determined by market forces, in accordance with regulation 13(2) of the Regulations.

Finance costs

374. The TRA compared the average interest rates for loan finance reported by Longyan Zhuoyue to the average interest rates for loan finance reported by the anonymous Malaysian TCP.
375. The finance costs of Longyan Zhuoyue were increased in line with the Malaysian TCP finance costs to reasonably reflect the cost in the PRC market if such prices were substantially determined by market forces, in accordance with regulation 13(2) of the Regulations.
376. This adjustment was not applicable to Xiamen Zhuoyue.

Export contingent loans



377. During verification the TRA established that the Zhuoyue Group had no export contingent loans during the POI, therefore no adjustment was required

Land costs

378. The TRA compared the Zhuoyue Group’s land use right costs, against the anonymous Malaysian TCP’s land use right costs during the POI. The comparison was conducted on a cost per metre squared basis.

379. The TRA found that the Zhuoyue Group’s land use right costs did not appear to be artificially low in comparison to the benchmark, therefore an adjustment was not required.

Labour costs

380. The TRA compared the Zhuoyue Group’s direct and indirect labour costs to the direct and indirect labour costs reported by the anonymous Malaysian TCP.

381. Labour costs were compared on a 52-week basis and included staff related expenses such as bonuses and uniforms as well as salary and wage costs and were compared on a direct and indirect basis.

382. The direct labour costs of the Zhuoyue Group were increased in line with the Malaysian TCP direct labour costs to reasonably reflect the cost in the PRC market if such prices were substantially determined by market forces, in accordance with regulation 13(2) of the Regulations.

383. The TRA found that the indirect labour costs were either immaterial to warrant an adjustment or not artificially low in comparison to the benchmark.

Summary of PMS adjustments

384. Table 5 shows the non-confidential ranges that each cost for the Zhuoyue Group has been increased by to calculate their dumping margin.

Table 5: PMS adjustments	
Cost	PMS adjustment (%) (range)
Energy (electricity)	25% - 40%



Energy (coal)	1% - 6%
Energy (gas)	Not applicable
Finance	95% - 125%
Direct labour	40% - 80%
Indirect labour	Not applicable
UCO	1% - 15%
Food waste, soap stock, brown grease	1% - 15%
Methanol	1% - 10%
Land-use rights	Not applicable
Export contingent loans	Not applicable

F3. Export price

385. In accordance with regulation 15(1) of the Regulations, the export price is the price the goods concerned are sold for, or the agreed price at which they are to be sold, to either an importer in the UK or a third party outside of the UK for export to the UK.

386. The TRA found that the Zhuoyue Group export sales were all made to an independent party in the UK. We therefore used the export sales submitted by the Zhuoyue Group for the export price in accordance with regulation 15(1)(a) of the Regulations.

F4. Fair comparison

387. In accordance with regulation 16(2) of the Regulations the TRA may make adjustments for any differences which affect price comparability including differences relating to:

- conditions and terms of sale
- taxation
- levels of trade
- quantities
- physical characteristics.



388. The TRA considered whether a fair comparison adjustment was needed to account for the quality of the biodiesel exported to the UK in comparison to the goods sold domestically in the PRC in accordance with regulation 16(2) of the Regulations.
389. During verification the TRA established that the lower quality biodiesel sold by the Zhuoyue Group in the domestic market was in fact, biofuel oil, a by-product of biodiesel, and not considered a like good.
390. During verification the by-product was re-allocated and is no longer included as a like good. Therefore, an adjustment for differences in quality is not required
391. As constructed normal value and export price were calculated on an ex-works basis, the TRA considered that no other adjustments were needed to allow for a fair comparison.

F5. Dumping margin

392. In accordance with regulation 17(1)(a) of the Regulations, the TRA compared a weighted average normal value with a weighted average export price for prices for all comparable export transactions to calculate the dumping margin for Longyan Zhuoyue and Xiamen Zhuoyue. A weighted average of the two exporters was used to create the Zhuoyue Group's individual rate.
393. The dumping margin is calculated as the dumping amount as a percentage of the CIF value.
394. During verification the TRA established that the Zhuoyue Group had calculated the CIF value of its export sales to the UK on the basis of insurance and freight from the PRC to the Amsterdam-Rotterdam-Antwerp (ARA) area.
395. The TRA calculated an average freight cost per metric tonne from the ARA to the UK using a sample of freight invoices over the POI.
396. The additional freight cost between ARA and the UK has been added to the CIF export value provided by the Zhuoyue Group, so that it accurately reflects the CIF value from the PRC to the UK.



397. Where the TRA has limited its examination of overseas exporters in accordance with regulation 56 or 57 of the Regulations, it must determine an anti-dumping amount for non-sampled overseas exporters.
398. In accordance with regulation 37(3) of the Regulations, the dumping amount for cooperating non-sampled overseas exporters is calculated as the weighted average of the amounts determined for the overseas exporters in the sample. As the Jiaao Group was marked non-cooperative due to failure to provide a full questionnaire, the weighted average will be identical to the Zhuoyue Group's individual rate.
399. For all other PRC exporters, the TRA established a residual amount in accordance with regulation 38 of the Regulations. This has been determined by using the highest constructed normal value within the two underlying Zhuoyue Group calculations and the lowest export price based on HMRC PRC import data. The lowest export price was taken from the applicable commodity codes that represent at least a 20% share of the total import volumes examined.
400. The dumping margins are shown in table 6 below:

Table 6: Dumping margins		
Country	PRC exporter	Dumping margin (%)
PRC	The Zhuoyue Group	15.68%
PRC	Non-sampled cooperating exporters (see Annex A)	15.68%
PRC	All other exporters (residual amount)	54.64%



Section G: Injury

401. Injury is the term used when there is evidence of a UK industry being harmed by dumped goods. Paragraph 5 of Schedule 4 to the Act defines 'injury' to a UK industry in particular goods as:

- material injury, or the threat of material injury, to the industry, or
- material retardation of the establishment of the industry.

402. In accordance with regulation 27(2) of the Regulations, as the TRA has determined that goods have been or are being dumped into the UK, it must determine whether:

- a UK industry has suffered or is suffering injury in accordance with regulation 30 of the Regulations (determination of injury); and
- the dumped goods have caused or are causing that injury to that UK industry.

403. To determine whether a UK industry is suffering or has suffered injury, in line with regulation 30 of the Regulations, the TRA has examined three factors:

- a) the volume of the dumped goods during the injury period;
- b) the effect of the dumped goods on prices of the like goods in the UK during the injury period;
- c) the consequent impact of the dumped goods on UK industry during the injury period;
- d) the TRA has not considered any other factors to be relevant.

404. In line with regulation 35 of the Regulations, the TRA examined whether any known factors other than the dumped goods (other known factors) have caused or are causing injury to a UK industry. The TRA identified and considered the following factors:

- The volume and prices of imports that are not dumped into the UK;



- The volume and prices of imports that are dumped into the UK from other countries;
- contraction in demand or changes in the pattern of consumption of the like goods in the UK;
- trade restrictive practices of and competition between the overseas exporters and the UK industry;
- cost inflation.

G1. Injury Analysis

405. To conduct the injury analysis, the TRA has used the information relating to the UK industry that was supplied in the questionnaire responses.

406. Sales of biodiesel constitute Argent's primary operations, and the sale of relevant biodiesel by-products is contingent on the production of biodiesel. As such, Argent is particularly vulnerable to negative effects on its biodiesel sales as they do not sell any products entirely removed from its biodiesel operations.

407. Whilst biodiesel production is a major revenue stream for Olleco, the company conducts business operations separate from biodiesel production, and as such is more resilient to negative effects on injury factors.

408. Olleco supplies a range of cooking oils to the UK hospitality sector and organises the collection of used cooking oils, fats and food waste. Specifically, feedstock produced from Olleco's used cooking oil processing plant is sold to their biodiesel processing plant as a raw material.

409. As Olleco operates on an integrated business model, it is able to make private commercial decisions which may understate the level of injury that is being caused to the UK industry. The TRA has taken this into consideration when calculating its injury margins, as set out in [Section G4. Injury Margin](#).

410. Secondary sources of information were also used in accordance with the Regulations, treated with special circumspection, and where practicable verified using other independent sources.



411. These sources were Argus Media, import statistics by HMRC, and official Renewable Transport Fuel Obligation (RTFO) statistics, published by DfT.
412. Overseas Trade in Goods Statistics (OTS) import data published by HMRC, is at an 8-digit commodity code level. It is based on country of dispatch, which refers to the country where the last commercial transaction took place. This is not necessarily the country of origin/manufacture or the last country from which the goods were shipped to the UK. The OTS import data may also contain goods under the 8-digit commodity level that are not in scope of the investigation. For these reasons we did not use the publicly available OTS import data at 8-digit commodity code level.
413. In order to provide a more accurate assessment on imports, the TRA obtained raw customs declaration data from HMRC. This confidential data is provided at the ten-digit commodity code level and is based on the country of origin. This data has been used for the purposes of assessing volume and value of imports.
414. RTFO statistics are published quarterly. The quarterly tables are updated as new data comes in throughout the year, ending with a final annual report. The most recent final report published is [Renewable fuel statistics 2023: Final report](#). This data has been used for the purposes of assessing UK consumption and market share.
415. It should be noted that whilst the OTS import data has undergone a cleaning process and is considered an official statistic, the HMRC raw customs declaration data is not, and may be subject to some errors or omissions.
416. The raw customs declaration data has been used for the purposes of assessing volume and value of imports. This analysis has been conducted on the basis of all in-scope commodity codes. As the TRA is unable to separate the diesel component under the in-scope commodity codes, this may have inflated the data trends. The TRA has therefore also conducted the import volume and value analysis solely on goods under commodity code 3826 (pure biodiesel) for comparison.
417. [RTFO statistics](#) are based on fuel volumes, carbon and sustainability information and renewable transport fuel credits reported by suppliers under the RTFO. These statistics are [official statistics](#) and comply with the standards in the [Code of Practice for Statistics](#).



418. The TRA found that import data is significantly higher than consumption data during the period of investigation, and a level of caution should be used when assessing this data.
419. As set out above, the TRA is unable to separate the diesel component under the in-scope commodity codes, and this is likely to have inflated the import volume data. For comparison the TRA has also conducted imports analysis solely on goods under commodity code 3826 (pure biodiesel).
420. In addition, there are differences in data sources between RTFO and HMRC.
421. RTFO records fuels based on how renewable they are, and HMRC uses commodity codes. Calendar month and quarterly duty payments can be recorded against different supply periods under the RTFO and by HMRC. Adjustments in duty payments can also be recorded in different periods by RTFO and HMRC.
422. The TRA determined that it is likely that:
- Not all biodiesel that was imported into the UK was consumed in the UK. It has not been possible for the TRA to quantify the extent to which this is the case.
 - There may be changes to the provisional RTFO statistics for 2024 when the final report for 2024 is published.

423. However, the TRA remains satisfied that the data represents the best facts available.

G1.1. Volume of the dumped goods

424. In accordance with regulation 31 of the Regulations, when determining whether the UK industry has suffered or is suffering injury, the TRA has considered whether there has been a significant increase in the dumped goods entering the UK during the injury period either in absolute terms (the volume of dumped goods being imported into the UK market) or relative to domestic production or consumption.

G1.1.1. Volume of dumped goods in absolute terms

425. Assessing the volume of dumped goods in absolute terms, gives an indication of the rate at which imports of these goods increased or decreased during the injury period.



426. As set out under [Section G1 Injury Analysis](#) the TRA is unable to separate the diesel component present in some of the commodity codes for the goods concerned, and it is likely that this has inflated the import volumes (the driver of PRC imports under commodity codes 2710 includes a minimum of 70% mineral diesel). This raw data may therefore give a distorted view of the market. To account for this, the TRA conducted the analysis using goods under commodity code 3826 (pure biodiesel) (see Table 8) in addition to analysis using all the commodity codes (see Table 7).

427. The following table shows how the import volumes of dumped goods (all commodity codes which includes an element of diesel) originating from the PRC increased throughout the injury period. The increases in import volumes are compared with the increase in total volume of imports of biodiesel into the UK.

Table 7: Increase in import volume (mt) of biodiesel originating from the PRC and increase in total import volume, all in-scope commodity codes April 2020 to March 2024

	Year one	Year two	Year three	POI
Total imports into the UK (mt) (Indexed)	100	1,521	1,791	2,487
Imports into the UK from the PRC (mt) (Indexed)	100	2,823	3,610	5,474
Share of imports from the PRC out of total imports into the UK (%) Indexed	100	186	202	220

Source: Confidential HMRC raw customs declaration data

428. Table 7 shows that total import volumes of biodiesel into the UK increased significantly year on year during the injury period. Imports from the PRC increased beyond the rate of total imports to the UK from all other countries.

429. Table 8 shows that import volumes of pure biodiesel from the PRC into the UK increased significantly over the injury period.



Table 8: Increase in import volume of biodiesel originating from the PRC and increase in total import volume, goods under 10-digit commodity codes 3826, April 2020 to March 2024

	Year one	Year two	Year three	POI
Total imports into the UK (mt) Indexed	100	682	677	579
Imports into the UK from the PRC (mt) Indexed	100	860	1,137	1,170
Share of imports from the PRC out of total imports into the UK (%) Indexed	100	120	160	192

Source: HMRC confidential raw customs declaration data

430. The TRA notes that year one of the injury period coincides with the COVID-19 pandemic, during which imports were significantly disrupted. It could be that this has inflated the import volume trends in the following years.

431. In order to assess if this is the case, the TRA examined the volume of imports from the PRC prior to 2020. The TRA found that there were no or minimal imports of biodiesel from the PRC between April 2017 to April 2020, and that the effect of the COVID-19 pandemic did not inflate the import volume trends seen in Table 7. The data in Table 9 also shows that total imports into the UK prior to April 2020 were minimal.

Table 9: Import volume (mt) of biodiesel originating from the PRC and total import volume, April 2017 to March 2021

	April 2017 to March 2018	April 2018 to March 2019	March 2019 to April 2020
Imports into the UK from the PRC (mt)	0	0	0
Total Imports into the UK (mt) (Range)	0	150 – 300	0

Source: Confidential HMRC raw customs declaration data



432. We consider that import volumes from the PRC in absolute terms have increased significantly over the injury period, alongside their rising percentage share of total imports.

G1.1.2. Volume of dumped goods relative to domestic production

433. Assessing import volumes in relative terms gives an indication of the rate at which imports of these goods increased or decreased during the injury period when compared to the UK domestic production of the like goods.

434. The following table shows the import volumes of biodiesel from the PRC throughout the injury period in comparison to UK industry domestic production of the like goods during the same period.

Table 10: Import volume (mt) of biodiesel originating from the PRC and total UK industry production volumes, all in-scope commodity codes, April 2020 to March 2024

	Year one	Year two	Year three	POI
Imports into the UK from the PRC (mt) (Indexed)	100	2,823	3,610	5,474
UK industry domestic production (mt) (Indexed)	100	98	100	93
PRC imports relative to UK industry domestic production (%)	28%	802%	1,001%	1,636%

Source: Confidential questionnaire responses and HMRC raw customs declaration data

435. Table 11 demonstrates the position further when considering the same analysis using goods under commodity code 3826 (pure biodiesel).

Table 11: Import volume (mt) of biodiesel originating from the PRC and total UK industry production volumes, goods under 10-digit commodity codes 3826, April 2020 to March 2024



	Year one	Year two	Year three	POI
Imports into the UK from the PRC (indexed)	100	860	1,137	1,170
UK industry domestic production (mt) (indexed)	100	98	100	93
PRC imports relative to UK industry domestic production (%)	28%	244%	315%	350%

436. During verification visits, the TRA established that the most efficient running of a biodiesel plant is at maximum capacity. The UK industry aims to produce at maximum capacity. UK producers may be able to marginally increase capacity where efficiencies are made. UK production decreased in year two of the injury period and the POI.

437. Total imports of pure biodiesel from the PRC relative to UK domestic production significantly increased during the injury period from 28% to 350%.

G1.1.3. Volume of dumped goods relative to domestic consumption

438. As set out in [Section G1 Injury Analysis](#), UK consumption was calculated using RTFO statistics.

Table 12: Relative change in the total import volume (mt) of biodiesel originating from the PRC in relation to UK consumption, all in-scope commodity codes, April 2020 to March 2024

	Year one	Year two	Year three	POI
Imports into the UK from the PRC (mt) (Indexed)	100	2,823	3,610	5,474
UK consumption (mt) (Indexed)	100	96	129	124
PRC imports relative to UK consumption (%)	5%	150%	142%	225%



Source: Confidential questionnaire responses and HMRC data

439. As set out in [Section G1 Injury Analysis](#), there is some caution to be applied when comparing the import volume to domestic consumption, as the TRA is unable to separate the diesel component from the in-scope commodity codes.

440. Additionally, different sources are used in the statistics, and not all imports may be consumed in the UK.

441. Analysis for goods under in-scope commodity codes 3826 (pure biodiesel) is shown in table 13 below.

Table 13: Relative change in the total import volume (mt) of biodiesel originating from the PRC in relation to UK consumption, goods under 10-digit commodity codes 3826, April 2020 to March 2024

	Year one	Year two	Year three	POI
Imports into the UK from the PRC (mt) (Indexed)	100	860	1,137	1,170
UK consumption (mt) (Indexed)	100	96	129	124
PRC imports relative to UK consumption (%)	5%	46%	45%	48%

Source: Questionnaire responses and HMRC data

442. PRC imports of biodiesel increased significantly beyond the rate of increase of UK consumption of biodiesel. Table 13 demonstrates that imports of pure biodiesel increased from 5% of total UK consumption to 48% of total UK consumption.

G1.2. Effect of dumped goods on prices

443. In accordance with regulation 32 of the Regulations, to assess the effect of the dumped goods on prices of the like goods in the UK during the injury period, the TRA has considered whether:



- there has been significant price undercutting by the dumped goods as compared with the price of the like goods produced in the UK; or
- the dumped goods have depressed or suppressed domestic prices of the like goods produced in the UK to a significant degree.

G1.2.1. Price undercutting

444. Price undercutting is where the imported goods are consistently priced lower than the like goods in the UK.

445. An undercutting margin is calculated by comparing the landed price of the goods concerned, and the average domestic sales price of the like goods (ex-factory). The undercutting margin (%) reflects the extent to which landed prices of the imported goods concerned were lower than the UK sales prices of the like goods during the POI. The landed price comprises of the cost, insurance, and freight (CIF) import price of the goods concerned, customs duties, and relevant post-importation costs (such as customs clearance fees and handling costs).

446. The TRA assessed price undercutting for the entirety of the injury period based on the total imports originating from the PRC. We compared the import values from the PRC obtained from raw customs declaration data from HMRC against the average UK industry sales value per tonne.

447. We compared this average import value per tonne against the UK industry’s average sales price per tonne. This assessment includes all commodity codes within the scope of the investigation. This assessment is set out in the table below:

Table 14: Undercutting analysis per tonne for UK industry and imports originating from the PRC, all in-scope commodity codes, April 2020 to March 2024

	Year one	Year two	Year three	POI
Undercutting margin (%)	-23%	26%	15%	32%

Source: Confidential questionnaire responses and HMRC raw customs declaration data



448. Table 14 shows that there was no undercutting in year one of the injury period.

However, the UK industry suffered from significant undercutting from year two of the injury period, which coincides with the significant increase of imports from the PRC as shown in Table 12.

449. Table 15 below, shows the in-scope commodity codes 3826 (pure biodiesel).

Table 15: Undercutting analysis per tonne for UK industry and imports originating from the PRC, goods under 10-digit commodity codes 3826, April 2020 to March 2024

	Year one	Year two	Year three	POI
Undercutting margin (%)	-23%	-28%	-17%	13%

Source: Questionnaire responses and HMRC raw customs declaration data

450. Table 15 shows that in years one to three of the injury period there was no undercutting. However, during the POI, the UK industry suffered from significant undercutting.

451. The TRA calculated an undercutting margin for the participating sampled overseas exporter, for the POI.

452. The landed price of the goods concerned was calculated using the sampled overseas exporter's CIF import price of the goods concerned. The CIF price was converted from RMB to GBP using HMRC's average exchange rate for the month that the sale was made.⁸²

453. The TRA is aware that during the POI an inward processing relief (IPR) was in place, that suspended the 6.5% duty that would normally be due at import of biodiesel. In order to understand whether customs duty should be applied to the landed price, the TRA held conversations with HMRC. The TRA was also able to confirm its understanding with Greenergy during its verification visit. The IPR enabled biodiesel that was imported, processed and then released on the domestic market, to be

⁸² [\[Withdrawn\] Exchange rates from HMRC in CSV and XML format - GOV.UK](#)



discharged from the 6.5% customs duty in favour of paying the customs duty liable on the processed blended product, which for diesel was 0%.

454. The IPR applied to importers that held authorisation from HMRC. Authorised holders could choose to pay duty on the basis of either the imported goods or the processed goods. It is the TRA's understanding that the importers of biodiesel over the POI held IPR authorisation.
455. It is the TRA's understanding that the majority of biodiesel that was imported was blended, and authorised holders chose to pay on the basis of the processed products at the time of release, a 0% duty and 20% VAT. The duty rate was confirmed using the [UK integrated tariff tool](#) for the POI. As customs duty was suspended on imports of biodiesel, the TRA did not add customs duty to the landed price.
456. For the sampled overseas exporter, the TRA found an average undercutting margin of -0.41% during the POI. Although this suggests there was not undercutting, this information should be considered in totality with the other price effects analysis.
457. When considering the overall import data for all in-scope commodity codes, and goods under commodity codes 3826 (pure biodiesel), we found evidence of significant undercutting during the POI.
458. As set out under [Section G1. Injury Analysis](#), HMRC 8-digit commodity code level data, is based on country of dispatch, which refers to the country where the last commercial transaction took place. When comparing this data against HMRC 10-digit commodity code level data, which captures the country of origin/manufacture, it is clear that a significant number of PRC origin biodiesel is being imported into the UK through the Netherlands.
459. The data provided by the sampled overseas exporter does not take into account any imports into the UK that have come from the Netherlands. We therefore consider Table 14 and Table 15 to be a more accurate representation of the undercutting faced by the UK industry, as it captures all imports from the country of origin.



G1.2.2. Price depression

460. Price depression occurs when the UK industry is forced to reduce its domestic sales prices to compete against lower priced dumped goods.

461. The TRA compared the average domestic price of the UK industry like goods to the average import price of the goods concerned originating from the PRC to establish whether there was price depression during the injury period.

Table 16: Price depression, April 2020 to March 2024

	Year one	Year two	Year three	POI
Average import price per metric tonne from the PRC (GBP) (indexed) (all in-scope commodity codes)	100	78	116	88
Average import price per metric tonne from the PRC (GBP) (indexed) (goods under commodity codes 3826)	100	136	159	111
Average UK industry domestic sales price per metric tonne (GBP) (indexed)	100	130	166	158

Source: Questionnaire responses and HMRC raw customs declaration data

462. Table 16 shows that the UK industry’s average sales price increased over the entire injury period. The increase in sales price does not correspond with the UK industry’s level of profits achieved during the same period and could instead indicate that a higher biodiesel price existed in response to higher feedstock costs. The UK industry has informed us that whilst feedstock costs were relatively stable during the POI, there have been fluctuations in the prior years.

463. It has been noted that UK industry did increase its sales prices over the injury period, which could suggest there was no evidence of price depression.



464. The UK industry’s average sales price decreased by 8% points from year three of the injury period to the POI. The average import price from the PRC based on all in-scope commodity codes decreased by 28% points during that same period.

465. The average import price originating from the PRC based on goods under commodity code 3826 (pure biodiesel) increased by 11% over the injury period.

466. Given the overall increase in the UK industry’s sales price over the injury period, the TRA concluded this is not representative of significant price depression.

G1.2.3. Price suppression

467. Price suppression occurs where lower priced imports of the goods concerned prevent, to a significant degree, the UK industry from increasing its domestic sales prices to a level that would otherwise have occurred.

468. To assess whether there was any evidence of price suppression, the TRA examined changes to domestic sales prices and changes to the cost of production for the like goods produced in the UK during the injury period.

Table 17 Price suppression, April 2020 to March 2024

	Year one	Year two	Year three	POI
Average UK industry domestic sales price per mt (GBP) (indexed)	100	130	166	158
Average UK industry costs of production per mt (GBP) (indexed)	100	121	146	133

Source: Confidential questionnaire responses and HMRC raw customs declaration data

Note: Average costs of production is made up of average annual costs of production and average annual output value. We consider this to be a reasonable reflection of UK industry costs of production over the injury period, as differences between costs of production and output value are negligible.

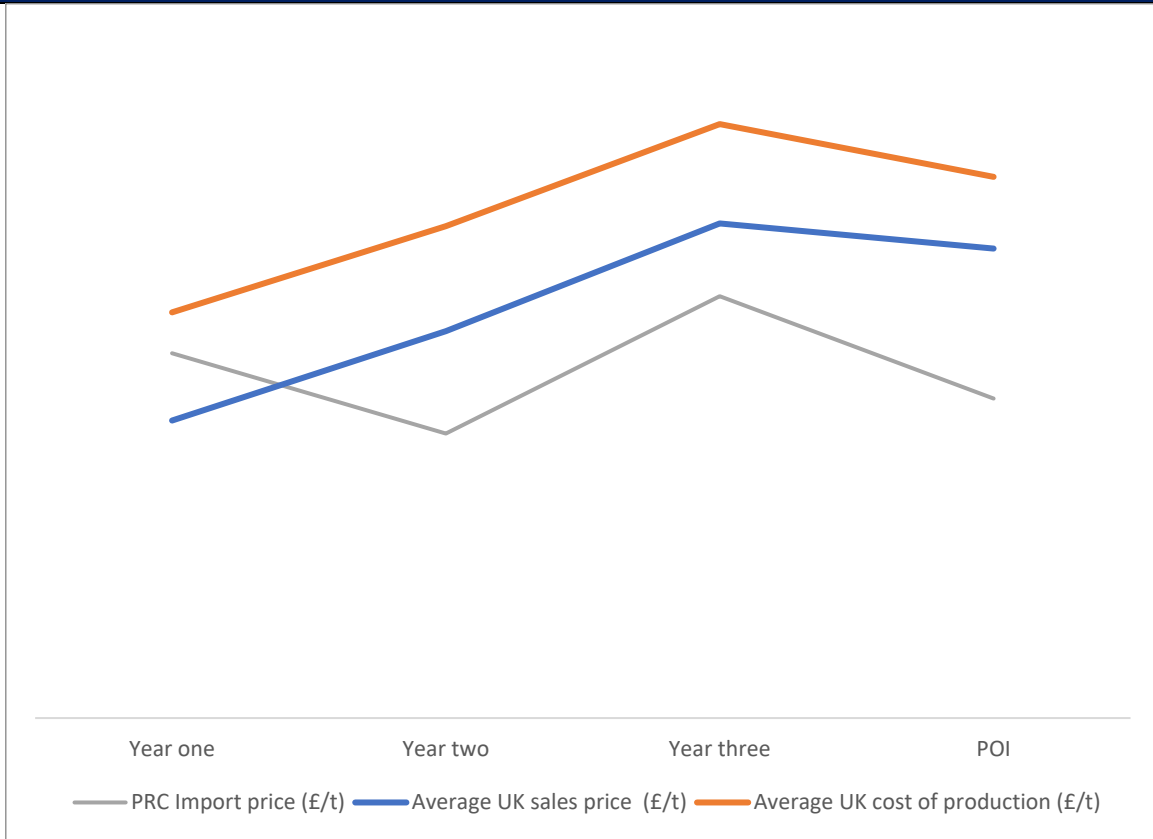
469. Table 17 shows the average sales price increased beyond the rate of increase of the average costs of production.

470. However, it should be noted that for each year of the injury period, the UK industry’s average sales price was below their costs of production, and that they were operating at a loss. As shown in the image below, over the injury period, the UK industry was



unable to increase its sales price beyond its costs of production. This is an indication of price suppression.

Image 3: UK industry average sales price, average PRC import price and average UK industry costs of production per metric tonne April 2020 to March 2024



Source: Confidential questionnaire responses, HMRC raw customs declaration data

G1.2.4. Conclusion on the effect of dumped goods on price effects

471. The TRA determined that in the POI there had not been undercutting by the sampled overseas exporter when comparing the dumped imports of the goods concerned with the price of the like goods produced in the UK.

472. However, the TRA found significant undercutting when comparing the average import price over the injury period with the average price of the like goods in the UK. We consider this assessment to be representative of the undercutting faced by the UK industry, due to the significant volumes of imports originating from the PRC.



473. Significant undercutting was evident from year two of the injury period for all in scope commodity codes, with an undercutting margin of 32% during the POI on all in-scope commodity codes, and 13% on goods solely under commodity code 3826 (pure biodiesel).
474. The TRA identified that the average UK industry sales price increased over the injury period. Whilst this could indicate that there was not price depression, this has been considered alongside other evidence. Whilst the UK industry's sales prices increased the UK industry was still unable to achieve a profit during the same period.
475. The average UK industry sales price decreased by 8% points from Year 3 to the POI. However given the overall increase in sales price over the injury period, the TRA concluded this is not representative of significant price depression.
476. The TRA obtained evidence of significant price suppression and determined that this was caused by the considerably lower priced imports from the PRC.
477. Throughout the injury period, UK industry was selling its like goods at a loss while the average PRC import price continued to be significantly below that of the UK industry's domestic sales price from year two of the injury period.

G1.3. Impact of dumped goods on UK industry during the injury period

478. In considering, for the purpose of regulation 30(2)(c), the impact of the dumped goods on the UK industry, the TRA must take into account all relevant economic factors and indices having a bearing on the UK industry including:
- actual and potential decline in sales, profits, output, market share, productivity, return on investments, and utilisation of capacity;
 - factors affecting domestic prices of the like goods;
 - the magnitude of the margin of dumping;
 - actual and potential negative effects on cash flow, inventories, employment, wages, growth, the ability to raise capital or investments.



G1.3.1. Sales

479. The TRA assessed the change in the volume and value of the UK industry’s sales during the injury period.

480. The following table shows how the UK industry’s domestic sales developed throughout the injury period.

Table 18: UK Industry’s domestic sales (per metric tonne), April 2020 to March 2024				
	Year one	Year two	Year three	POI
Domestic sales volumes (mt) (indexed)	100	100	104	73
Domestic sales value (GBP) (indexed)	100	131	173	115
Average domestic sales price (GBP) (indexed)	100	130	166	158
<i>Source: Confidential questionnaire responses</i>				

481. In the UK, demand for biodiesel is driven by DfT’s RTFO. The RTFO is a UK Government policy for reducing greenhouse gas emissions from road transport in the UK.

482. Under the RTFO, suppliers of relevant transport fuel in the UK must be able to show that a percentage of the fuel they supply comes from renewable and sustainable sources. RTFO biodiesel blending targets increased from 9.75% in 2020 to [13.56% in 2024](#).

483. As the UK is a net importer of biodiesel, it is expected that domestic sales volumes increase in line with consumption, but UK industry sales declined during the POI as demonstrated in Table 18.

484. It is also likely that the decline in domestic sales is being understated. Year one of the injury period coincides with the COVID-19 pandemic. Whilst one UK producer was able to remain open and operating, one UK producer had long periods of factory shutdowns. This means that the figures in Year one are not representative, and the



indexed figures in year two through to the POI, are likely to be impacted. This does not affect the export sales data, as UK producers only exported in minimal quantities prior to COVID-19.

485. The TRA assessed the significance of export sales of biodiesel by the UK industry. The following table shows the volumes and values of export sales of biodiesel throughout the injury period.

Table 19: Export sales by the UK Industry, April 2020 to March 2024				
	Year one	Year two	Year three	POI
Total export sales volumes (mt) (indexed)	100	117	137	192
Total export sales value (GBP) (indexed)	100	123	152	102
Average export sales price per metric tonne (GBP) (Indexed)	100	105	111	53
Exports as a % of total sales volume (mt)	21%	24%	26%	41%
<i>Source: Questionnaire responses</i>				

486. Export sales increased by volume overall during the injury period, and the export sales value and average export sales price decreased. Exports as a percentage of total sales increased by 20% throughout the injury period for the UK industry.

487. The UK industry informed us that they have had to export to Europe as a result of uncompetitive price levels in the UK at an additional cost per tonne for transport.

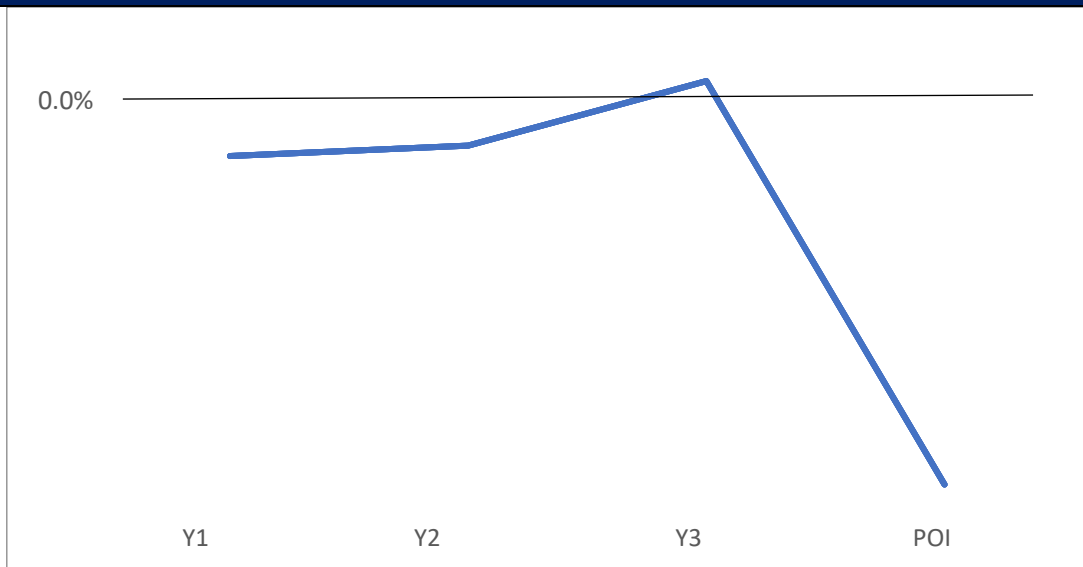
488. Although export sales increased over the injury period, there is no evidence to suggest that the increase was at the expense of domestic sales, due to an increased focus on export markets. Instead, it would appear that domestic sales were impacted by price pressure, as described under [Section G1.2.3 Price Suppression](#).



G1.3.2. Profits

489. The TRA assessed changes in profitability of the UK industry during the injury period. The following image shows how the UK industry’s net operating profit after tax developed throughout the injury period.

Image 4: UK industry Net operating profit after tax (NOPAT) (%) April 2020 to March 2024



Source: Confidential questionnaire responses

490. The data shows that the UK industry as a whole was operating at a loss in every year of the injury period, apart from year three. The data shows that profits significantly declined during the POI.

491. This trend is in line with what the TRA would expect to see based on its findings that the UK industry was selling its like goods on the UK market below costs of production.

G1.3.3. Market share

492. The TRA assessed the changes in the market share by volume of the UK industry during the injury period.

Table 20: Evolution of UK industry’s market share March 2020 to April 2024

	Year one	Year two	Year three	POI



UK industry domestic market share (%) (indexed)	100	105	80	59
Imports from PRC market share in UK (%) (indexed)	100	2,947	2,794	4,425
<i>Source: RTFO statistics, Confidential HMRC raw customs declaration data and questionnaire responses</i>				

493. During the injury period the UK industry lost market share overall, by 41%.

494. As explained in [Section G1. Injury Analysis](#), it is likely that not all biodiesel that was imported was consumed, but it is not possible for the TRA to quantify the extent to which this is the case. Therefore, the assessment of market share for imports of biodiesel from the PRC should be treated with a level of caution.

495. Even when taking into consideration the issues with comparing the data sets, imports from the PRC rose significantly above the level of demand in the UK according to RTFO statistics on consumption.

G1.3.4. Outputs (production) and production capacity utilisation

496. The TRA assessed the changes in the production output, capacity and capacity utilisation of the UK industry during the injury period.

497. Output is measured by the volume of like goods (metric tonnes) produced by the UK industry during the injury period. Production capacity is a measure of the maximum biodiesel that can be produced over a respective period.

498. Production capacity utilisation illustrates how much of the UK industry's capacity is being used over a set period to produce biodiesel.

499. Production capacity can be measured by the nameplate capacity, or the actual capacity, which is based on the expected output after efficiencies are made in production. The data shown in Table 21 relates to actual capacity, and takes into consideration planned maintenance shutdowns.



Table 21: Indexed production capacity, output and capacity utilisation March 2020 to April 2024

	Year one	Year two	Year three	POI
Total Production capacity (mt) (indexed)	100	94	95	90
Total production (mt) (indexed)	100	98	100	93
Total production capacity utilisation (%) (indexed)	100	105	106	103

Source: Confidential questionnaire responses

500. The UK industry generally aims to produce to maximum capacity, in order to keep overheads as low as possible. Therefore, as efficiencies are made and capacity increases, so will production volumes.

501. Table 21 shows that production capacity decreased over the injury period. This is likely due to private commercial decisions to shutdown plants, which the TRA understands can occur when it is not commercially viable to produce biodiesel, when comparing the biodiesel sales price to the costs of feedstock.

502. Whilst outside of the injury period, the TRA notes that Argent closed its biodiesel plant in Motherwell, Scotland in May 2024. This will lead to an additional capacity loss of approximately 55,000 metric tonnes of biodiesel per year.⁸³

G1.3.5. Growth

503. The TRA assessed the changes in the growth of the UK industry during the injury period.

Table 22: Growth of the UK industry, March 2020 to April 2024

	Year one	Year two	Year three	POI
UK consumption (mt) (indexed)	100	96	129	124

⁸³ [TRA Investigations - Trade Remedies Service - GOV.UK](https://www.gov.uk/government/consultations/tra-investigations)



UK domestic production (mt) (indexed)	100	98	100	93
Employment for domestically sold like goods (indexed)	100	97	100	103
<i>Source: Confidential questionnaire responses, RTFO statistics</i>				

504. Over the entirety of the injury period UK consumption increased by 24%. This trend is in line with what the TRA would expect, given the increase in blending obligations under the RTFO. Over the same period UK domestic production decreased by 7%. Employment remained relatively stable and increased by 3% during the POI.

G1.3.6. Factors affecting domestic prices of the like goods

505. Biodiesel is a commodity, with the price set by international market conditions based on supply and demand.

506. One of the main drivers in price is the cost of the raw material: feedstock. The cost of feedstock and the price of biodiesel has historically been closely related; as the cost of feedstock fluctuates so does the price of biodiesel.

507. Feedstock can be divided into two categories - waste feedstock and non-waste feedstock. Examples of waste feedstock includes UCO, animal fats (tallow) and food waste.

508. Other than an increase in year two, the cost of feedstock remained relatively stable over the injury period and the POI; however, the price of biodiesel did not correlate as expected. Instead, the price of biodiesel decreased as a result of an oversupply of imports of biodiesel.

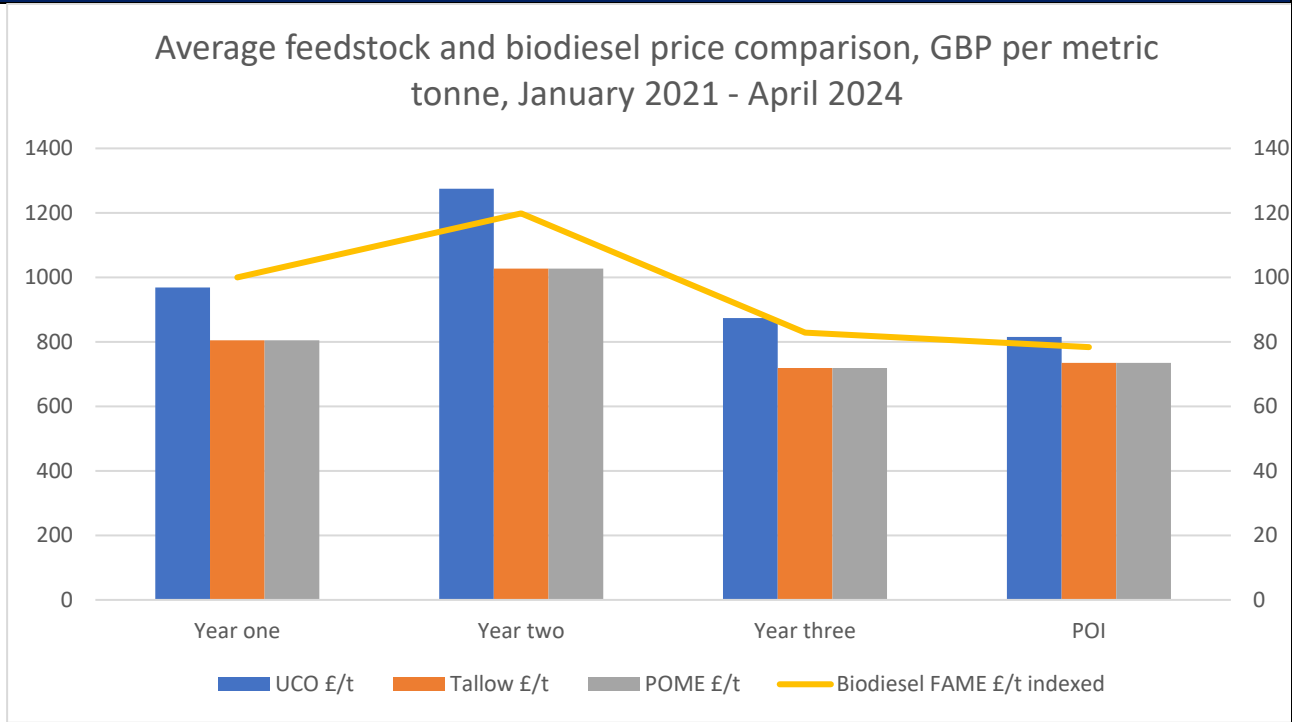
509. The TRA used data from Argus to calculate a monthly average Amsterdam Rotterdam Antwerp (ARA) price of UCO, tallow (categories 1 and 2) and palm oil mill effluent. These are the main categories of feedstocks used to produce biodiesel in the UK.

510. We have compared the monthly average ARA feedstock prices against the ARA price of biodiesel FAME. Image 5 shows the results.



511. We consider the ARA prices to be reflective of the UK industry prices. Contracts to import biodiesel negotiated by UK importers, as confirmed by Greenergy, base their pricing on the relevant ARA price, and then factor in the additional transport costs.

Image 5: ARA average feedstock and biodiesel price comparison January 2021 to April 2024



Source, Argus

Note: Data prior to January 2021 is not available to the TRA

512. The price of feedstock decreased from year one to year three of the injury period; however, this was not sufficient to compensate for the decrease in sales price for the same period, and the effect of this can be seen in the UK industry’s profits.

G1.3.7. The magnitude of the margin of dumping

513. In the dumping assessment we calculated a dumping margin of 15.68% for the sampled overseas exporter and non-sampled overseas exporters. We calculated a residual margin of 54.64%. The TRA is satisfied that this is significant and cannot be considered to be negligible given the volume and the prices of the relevant goods.



G1.3.8. Employment and productivity

514. The TRA assessed the changes in the employment and productivity of the UK industry during the injury period.

515. Employment trends were assessed by analysing how the number of employees for the like goods have changed throughout the injury period. Productivity is measured by establishing the output (the number of like goods produced) per employee during the injury period.

516. The following table shows the UK industry’s employment and productivity throughout the injury period:

Table 23: UK industry employment and productivity, April 2020 to March 2024				
	Year one	Year two	Year three	POI
Number of employees for the like goods (indexed)	100	97	100	103
Average productivity (indexed)	100	101	100	91
<i>Source: Confidential questionnaire responses</i>				

517. The employment information shows that the number of employees decreased in year two of the injury period and increased during the POI. However, the number of employees will decrease significantly following the POI, as Argent has stopped production at its biodiesel plant in Motherwell, Scotland, reportedly leading to the loss of 75 jobs.⁸⁴ Argent entered consultation during the POI with the facility closing in May 2024.

518. Over the injury period productivity declined, with a 9% fall from 2020 to 2024.

G1.3.9. Wages

519. The TRA assessed the changes in the level of wages paid by the UK industry during the injury period.

⁸⁴ [Biodiesel plant closure would be 'devastating' for Lanarkshire - BBC News](#)



520. Wages were assessed by analysing the trends in the wage levels of employees engaged in the production of the like goods over the injury period. The following table shows the mean wage of the UK industry over the injury period:

Table 24: UK industry wages for employees involved in the like goods, April 2020 to March 2024				
	Year one	Year two	Year three	POI
Hourly mean wage for FTE engaged in activities related to the like goods (indexed)	100	102	118	122
Hourly national living wage in the UK (indexed)	100	102	109	119

Source: Confidential questionnaire responses and [National Minimum Wage and National Living Wage rates - GOV.UK](#)

521. The UK industry have informed us that it uses industry benchmarking to set wages, as they have to compete against a number of similar roles.

522. The year-on-year increases to the hourly mean wage were above the increases to the minimum wage in the UK throughout the injury period. The mean wage of UK industry employees remained higher than the amount the UK industry was legally required to provide when compared to the minimum wage.

523. What the data on wages does not show us is several factors which could be indicative of injury including;

- High turnover of staff, and difficulty recruiting reflecting that wages may not be competitive;
- Either the inability to provide bonuses or that bonuses have reduced significantly;
- Internal restructuring to limit headcount.

524. However, it has not been possible for the TRA to quantify or verify these factors.



G1.3.10. Investments and cashflow

525. The TRA assessed the changes in the level of investments, the return on these investments (ROI) and UK industry's cash flow for the domestically sold like goods during the injury period.

526. Table 25 shows how investments developed over the injury period.

Table 25: Investments, April 2020 to March 2024

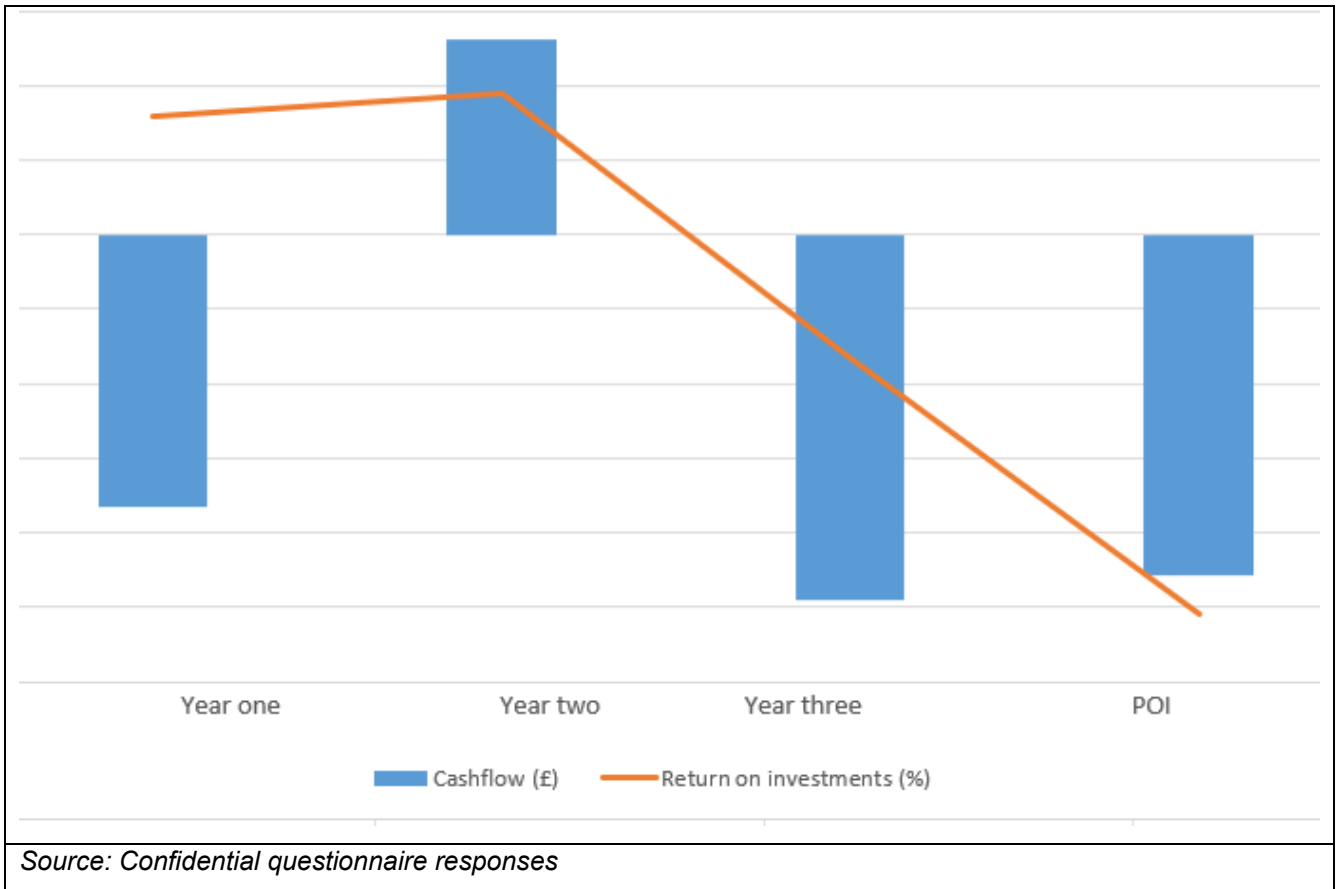
	Year one	Year two	Year three	POI
Index	100	52	66	52

Source: Confidential questionnaire responses

527. Investments decreased by 48% over the injury period. The UK industry has informed us that investments over the injury period have been in relation to the maintenance of existing infrastructure, and that there have been no new investments in relation to expansion.

528. Image 6 shows how the UK industry's ROI and cashflow developed over the period.

Image 6: Return on investments and cashflow, April 2020 to March 2024



529. ROI measures business performance and earnings arising from investments. Cash flows give us an overview of a business’s capability to invest, maintain operations and grow. A decline in these factors may indicate the UK industry has suffered or is suffering injury.

530. Aside from a marginal increase in year two of the injury period, the UK industry’s ROI and cash flow was negative.

G1.3.11. Inventory

531. The TRA has assessed changes to the stock volumes over the injury period.

Table 26: Stock volumes, April 2020 to March 2024

	Year one	Year two	Year three	POI
Index	100	108	128	168

Source: Confidential questionnaire responses



532. The UK industry has stated that stocks were not abnormally high during the injury period. However, the overall figures for UK industry demonstrate a significant increase in level of stock of 68% over the injury period, which indicates that the UK industry is losing sales.

G1.3.12. Conclusion on economic factors

533. The TRA has holistically assessed all economic factors. The UK industry trends show that there has been a decline in sales volume, production capacity, production output, market share, net operating profits, return on investments and cash flow and inventory. The TRA consider that these trends indicate that the UK industry has suffered and is suffering injury.

G1.4. Other factors considered relevant

534. In accordance with regulation 30(2)(d) of the Regulations, in order to determine whether a UK industry has suffered injury, the TRA must consider any other factors it considers relevant. The TRA has not identified any additional factors that it considers relevant for this injury analysis.

G2. Causation and non-attribution

535. The TRA assessed whether causation could be established considering timely coincidence between:

- The changes observed with regards to import volumes when compared to the changes observed with regards to UK production and UK consumption;
- the changes observed with regards to import volumes when compared to the changes observed to UK sales prices;
- the changes observed with regards to import volumes when compared to the changes observed to the economic factors.

536. The TRA found that the PRC increased its share of total imports into the UK from the 30% range to the 80% range during the injury period. The level of UK consumption did not increase at the same rate of imports from the PRC, and during the same period UK production decreased. We consider that causation can be established.



537. The TRA found that whilst the average UK industry sales price increased overall, the UK industry was unable to increase their sales price beyond the costs of production. This coincides with a decrease in the average import price from the PRC of 12%, and an increase in import volumes from the PRC of over 100%. We consider that causation can be established.

538. The TRA found that the UK industry's domestic sales volume decreased by 27%, production capacity decreased by 10%, production output decreased by 7%, investments decreased by 48% and market share decreased by 41% over the injury period. Net operating profit after tax, return on investments and cashflow were largely negative over the injury period. Imports from the PRC (of commodity code 3826) relative to UK domestic production significantly increased during the injury period from 28% to 350%. We consider that causation can be established.

539. In accordance with regulation 35 of the Regulations, injury caused by other known factors must not be attributed to dumped imports of the goods concerned. The TRA considered whether any other known factors, other than the dumped goods, caused or are causing injury to the UK industry. In doing so, the TRA considered:

- Volume and the prices of third country imports
- Contraction in demand or changes in the pattern of consumption of the like goods in the UK
- Inflation
- Feedstock availability.

G2.1. Volume and prices of third country imports

540. The TRA examined volumes and prices of imports originating from third countries to determine whether these had caused injury to the UK industry.

541. The following tables show how UK imports of biodiesel have developed throughout the injury period.

Table 27: Import volumes of biodiesel by country (as a % of total countries) (indexed to PRC in year 1), April 2020 to March 2024



	Year one	Year two	Year three	POI
PRC	100	189	208	225
European Union	178	75	53	33
Malaysia	0	12	11	8
All other countries	0	0	7	11

Source: Confidential HMRC raw customs declaration data

542. In year one of the injury period, the largest volume of biodiesel imports into the UK came from the EU. The volume of imports from the EU decreased over the injury period, while volumes of imports from the PRC increased.

543. The average price per metric tonne for the top exporting countries can be seen in the table below.

Table 28: Average price per metric tonne for the top exporting countries, April 2020 to March 2024

Country	Year one	Year two	Year three	POI
Belgium (Indexed)	100	73	179	91
PRC (Indexed)	100	78	116	88
France (Indexed)	100	117	94	117
Germany (Indexed)	100	109	160	129
Malaysia (Indexed)	-	-	-	-
Netherlands (Indexed)	100	113	215	132
Spain (Indexed)	100	147	203	142

Source: Confidential HMRC raw customs declaration data

544. The average PRC import price was consistently lower than the other major importing countries over the injury period.

545. The average PRC import price declined by 12% over the entirety of the injury period. The average import price from all other countries apart from Belgium and Malaysia increased over the same period.



546. We have been unable to compare indices for Malaysia as there were no imports during year one of the injury period. However, the volume of imports as shown in Table 27, from year two, is insignificant in comparison to the level of imports from the PRC.

547. Argent has stated on its website that a contributing factor to the weakened environment for UK biodiesel is “*renewable diesel from the USA, that competes with UK biodiesel. This has resulted in an increase of imports of subsidised US-made product of nearly half a million tonnes.*”⁸⁵

548. HVO (also known as renewable diesel) from the USA increased its share of total imports into the UK from 0% to 4% in the injury period. The TRA accepts that there may be injury to UK industry as a result of US imports of HVO into the UK, however the increase of US product does not break the causal link of injury from PRC originating goods, where imports rose from approximately 30% to approximately 80% of total imports of biodiesel into the UK over the injury period.

549. We do not consider third country imports to break the causal link between the goods concerned and the material injury suffered by UK industry.

G2.2. Contraction in demand or changes in the pattern of consumption of the like goods in the UK

550. The RTFO scheme places an obligation on suppliers of road transport fuels totalling 450,000 litres or more to demonstrate that a proportion of the fuel they supply comes from renewable sources (blending obligation). Suppliers may meet their obligation by redeeming Renewable Transport Fuel Certificates (RTFCs) or by paying a fixed sum for each litre of fuel for which they wish to 'buy-out' of their obligation.

551. The blending obligation is calculated as a percentage of fossil and renewable fuel supplied. The blending obligation under the RTFO increased over the POI and injury period from 8.50% in 2019 to 13.08% in 2023. The blending target is set to increase further to 17.68% by 2032.

⁸⁵ [Argent Energy proposes to end production at its biodiesel plant in Scotland | Argent Energy](#)



552. Whilst transport fuel demand may be decreasing overall due to a steady replacement of diesel vehicles with petrol-hybrids and electric, the blending obligation of biodiesel in vehicles is increasing, so a sustained demand for biodiesel will continue to exist.

553. The TRA does not consider contraction in demand or changes in the pattern of consumption of the like goods to break the causal link between the goods concerned and the material injury suffered by UK industry.

G2.3. Inflation

554. Between September 2022 and March 2023, the UK experienced seven months of double-digit inflation, which peaked at 11.1% in October 2022.

555. High inflation in the UK and worldwide has been caused by a number of economic factors, such as:

- supply chain disruptions during the COVID-19 pandemic, followed by a sudden increase in demand as restrictions eased;
- Russia's invasion of Ukraine; leading to an unprecedented surge in energy prices
- Employee shortages following the COVID-19 pandemic, driving up wages.

556. High levels of inflation impact the affordability of consumer goods. The higher the rate of inflation, the higher the costs of car ownership, particularly in relation to fuel consumption. However, as biodiesel demand stems primarily from government mandates, the UK industry is less impacted by inflationary pressure.

557. Inflationary costs for labour, utility prices and chemical prices, are relatively insignificant to the costs of production for biodiesel. Biodiesel production is not labour intensive, and utility prices and chemical prices are insignificant in comparison to the feedstock costs, which represent approximately 70-80% of the total cost of production.

558. We do not consider inflationary costs to break the causal link between the goods concerned and the material injury suffered by UK industry.



G2.4. Availability of feedstocks

559. Waste feedstocks used in the production of biodiesel are in high demand as they offer lower greenhouse gas emissions. The RTFO framework incentivises the use of waste-based feedstocks.
560. Examples of waste feedstock includes UCO, animal fats (tallow) and food waste. The UK has limited collection potential, yet 92% of biodiesel was produced using waste feedstocks in 2023.⁸⁶ Waste feedstocks do not compete with food crops but do compete with other industries. In addition, global growth in renewable diesel production is putting pressure on feedstock markets.
561. The International Energy Agency reports that feedstock demand is approaching the supply limits of the most-used wastes and residues.⁸⁷ The European Federation for Transport & Environment (the European federation of green transport non-government organisations) report that countries in Europe consumed close to eight times higher than the collected volumes estimates in 2023 and four times the continent's maximum potential, with demand growing much faster than domestic supply.⁸⁸
562. With crop feedstock competing with food crops and waste feedstock in high demand, new technologies for biodiesel production need to begin at scale to expand the range of available waste feedstocks, and this would require significant investment. Without this investment, the UK industry must rely on imports from the heavily competitive and changeable waste-feedstock market for its main raw material.
563. The UK has been unable to import category 1 tallow from the EU, due to EU export regulation restrictions following the UK's withdrawal from the EU. Argent cites the UK's inability to import category 1 tallow as a contributing factor to the weakened environment for UK biodiesel.
564. However, tallow is not the only feedstock used by the UK industry and the growing demand for feedstock is not specific to the UK industry. The waste feedstock market is changeable and influenced by many factors. We do not consider feedstock availability

⁸⁶ [Renewable fuel statistics 2023: final report - GOV.UK](#)

⁸⁷ [Is the biofuel industry approaching a feedstock crunch? – Analysis - IEA](#)

⁸⁸ [UCO \(Unknown Cooking Oil\): High hopes on... | Transport & Environment \(transportenvironment.org\)](#)



to break the causal link between the goods concerned and the material injury suffered by UK industry.

G3. Conclusion

565. The TRA has holistically assessed all the evidence provided by the parties registered to the case. It has concluded that the UK industry has suffered injury during the injury period which is caused by the dumped goods.

566. The TRA determined that there has been a significant increase in import volumes from the PRC during the injury period, and that there had been a significant increase in the dumped imports relative to UK production and UK consumption during that same period.

567. Whilst the UK industry suffered from price depression from year three of the injury period to the POI, there is not an indication of significant price depression over the injury period.

568. The TRA determined that the UK industry has suffered from significant price undercutting and significant price suppression.

569. The TRA assessed the trends of economic factors throughout the injury period and determined that the following factors indicate that UK industry has suffered injury:

- Sales volumes: the UK industry's domestic sales volumes decreased by 27% over the injury period. As discussed under [Section G1.3.1 Sales](#), it is likely that this figure is understated, due to one UK producer experiencing factory shutdowns during year one of the injury period.
- At the same time, export sales volumes increased by 92%, representing almost half of UK industry's total sales volume during the POI. This is despite the fact that UK consumption is growing, and that there are additional costs associated with export sales, at a time when the UK industry is suffering from losses.
- Sales values: whilst the UK industry's domestic sales value, and average domestic sales price per unit increased over the injury period, UK industry



profits declined, and the UK industry was unable to raise their sales price over the costs of production.

- Profits: The UK industry suffered losses on sales of its domestically sold like goods over the injury period, most significantly during the POI, when the average PRC import price decreased by 12%.
- Growth and market share: The UK industry did not grow its market share despite increased UK consumption of 24% over the injury period. Over the same period the UK lost market share of 41%. At the end of the POI Argent entered into consultations to close its Motherwell plant, which subsequently closed in May 2024.
- Investments, ROI and cashflow: The UK industry's investments decreased by 48% over the injury period. There have been no new investments in relation to expansion over the injury period. The UK industry's ROI and cash flow was largely negative over the injury period.
- Production: Production output decreased by 7% over the injury period and will decrease further over the next financial year due to the closure of Argent's Motherwell site. Production capacity decreased by 10% over the injury period, and we consider that this is due to private commercial decisions made by the UK industry to close production when it is not sustainable to produce biodiesel, in relation to the sales price and costs of feedstock.
- Inventory: Stock levels increased by 68% during the injury period, indicating that the UK industry is losing sales.

570. The TRA assessed that the following factors could not be used to determine whether or not injury was being caused:

- Employment and wages: Employment figures have remained stable over the injury period. Wages are benchmarked and have increased over the injury period. Whilst there are qualitative factors that could indicate injury (as explained in [Section G1.3.9 Wages](#)), the TRA was not able to verify or quantify the impact of these.



571. The TRA considered whether injury to the UK industry was caused by any other known factors.

572. The TRA is satisfied that the identified volume trends and the associated price effects of the imports of the relevant goods shows timing that corresponds with negative changes in economic factors for UK industry, which establishes causation.

573. Despite increased UK consumption, UK industry has lost market share during the injury period, and this has led to an increase of export sales. The TRA is satisfied this was as a direct result of the pricing levels of the dumped goods. Imports of the relevant goods from the PRC have not only captured market share from UK industry but during the injury period also increased its share of all imports into the UK.

G4. Injury margin

574. The TRA is required under regulation 36 of the Regulations to determine an injury margin.

575. The injury margin is the extent to which the UK industry is being injured. The default method is to base the injury margin for each exporter on its underselling margin. This is calculated by comparing a benchmark UK price (the target price) with the import price (the landed price) for each PCN.

G4.1. Target price

576. The target price is the price at which a UK producer would expect to sell its like goods in the absence of dumped goods.

577. The target price has been calculated using the UK industry cost of production for the goods, administrative, selling and general (AS&G) costs, and a normal rate of profit of 20%.

578. Olleco operates a UCO processing business that sells UCO to its biodiesel processing plant. In order to accurately calculate a target price for the UK industry that fully reflects the injury identified in this assessment, the TRA has adjusted Olleco's feedstock costs to a market rate. The TRA calculated a market rate using Olleco's UCO business's verified UCO sales to independent buyers on the UK market.



G4.2. Determination of the normal rate of profit

579. The UK industry informed the TRA that it would expect a normal rate of profit of 20% in the absence of injury. This is based on the cost to make and sell, and the required value to enable the UK industry to continue to invest in the business and provide sufficient returns on investments. This corresponds to 120% of the total costs of production.

580. Olleco demonstrated how the normal rate of profit was calculated during the in-person verification visit in January 2025, and the TRA is satisfied that 20% is a reasonable and normal rate of profit, given that it is a capital-intensive industry.

G4.3. Landed price

581. The landed price is the price of the dumped goods when they arrive at the UK port. It equates to the CIF (Cost, Insurance and Freight) import price, plus any customs duties and relevant post-importation costs.

582. As explained in [Section G1.2.1 Price undercutting](#), the TRA did not add customs duties to the landed price, due to the IPR that was in place.

583. As the target price is at an ex-works level, and does not include VAT, VAT has not been included when determining the landed price.

G4.4. Underselling amount

584. The TRA calculated an underselling amount, by comparing the UK target price to the Zhuoyue Group landed price. The total amount of underselling is expressed as a percentage of the total CIF import value of the goods concerned. This method was used to calculate an injury margin for the Zhuoyue Group and non-sampled cooperating exporters.

585. The TRA has made an upwards adjustment to the CIF value to add the cost of ocean freight from the ARA area to the UK.



G4.5. Residual margin

586. The TRA calculated a residual injury margin for overseas exporters where it has not determined an individual dumping amount, and the exporter is not a non-sampled overseas exporter within the meaning of regulation 37 of the Regulations. The residual margin was calculated using the lowest landed price on a transactional level, and the highest target price on a transactional level.

G4.6. Injury margins

587. The injury margins are shown in the table below. The sampled cooperating exporter, Zhuoyue Group will receive their own individual rate. Non-sampled cooperating exporters will receive the non-sampled rate (those that completed a PSQ but were not sampled). Non-cooperating exporters from the PRC will receive the residual rate.

Table 29: Injury margins		
Country	PRC exporter	Injury margin (%)
PRC	The Zhuoyue Group	64.6%
PRC	Non-sampled cooperating exporters (see Annex A)	64.6%
PRC	All other exporters (residual amount)	66.5%



Section H: Lesser Duty Rule and form of intended measure

H1. Lesser Duty Rule

588. The TRA calculated anti-dumping amounts and injury margins for the Zhuoyue Group and for all other overseas exporters. In accordance with paragraph 18(6) of Schedule 4 to the Act, and regulation 36 of the Regulations, the recommended import duty should be set at a level that does not exceed the anti-dumping amount, in relation to the goods as determined by the TRA as part of its final affirmative determination, or the amount which the TRA is satisfied would be adequate to remove the injury to the UK industry in the goods if that amount is less than the anti-dumping amount.

589. Table 30 provides the comparison of the dumping and injury margins, and the implementation of the lesser duty rule to arrive at an estimated anti-dumping amount that is the lesser amount.

Table 30: Anti-dumping amount			
PRC exporter	Dumping margin	Injury margin	Anti-dumping amount / Amount of guarantee
The Zhuoyue Group	15.68%	64.6%	15.68%
Non-sampled cooperating exporters (see Annex A)	15.68%	64.6%	15.68%
All other exporters (residual amount)	54.64%	66.5%	54.64%

H1.2. Forms of Measure

590. The TRA has considered a number of options in respect of a proposed measure on biodiesel. We consider that there is no reason to deviate from the form of an ad-valorem duty, and this is the most appropriate form of measure. The ad-valorem duty will be applied at the rates outlined in Table 30.



Section I: Economic interest test

I1. Introduction

591. The aim of the Economic Interest Test (EIT) is to determine whether applying an anti-dumping amount on the goods concerned, imported from the PRC is in the wider economic interest of the UK. This test is presumed to be met unless we are satisfied that the application of the remedy is not in the economic interest of the UK.

592. In accordance with paragraph 25 of Schedule 4 to the Act, the EIT is met in relation to the application of an anti-dumping remedy if the application of the remedy is in the economic interest of the United Kingdom.

593. In line with paragraph 25 of Schedule 4 to the Act, the TRA has taken account of the following in conducting the EIT:

- the injury caused by dumping of the goods to a UK industry in the like goods and the benefits to that UK market in removing that injury;
- the economic significance of affected industries and consumers in the UK;
- the likely impact on affected industries and consumers in the UK;
- the likely impact on particular geographic areas, or particular groups, in the UK;
- the likely consequences for the competitive environment, and for the structure of markets for like goods, in the UK; and
- such other matters as the TRA considers relevant.

I1.1. Supply Chain

594. An overview of the supply chain including upstream activities, UK producers, importers and retailers, and downstream businesses is provided in [Section E: The UK industry and market](#).



11.2. Evidence Base

595. In addition to the questionnaires, the TRA also conducted a survey for upstream and downstream businesses to help us understand the likely economic impacts on affected industries and consumers in the United Kingdom, if a trade remedy measure is imposed. We were not able to publish the business survey results due to our confidentiality requirements.

596. We have supplemented these with evidence from our background research and collated additional information from other data sources. These included reputable market data providers such as Dun & Bradstreet and Argus Media. We also used UK government data such as the RTFO annual publication on renewable fuel statistics by DfT and HMRC import data. The TRA also conducted research relating to parties that did not participate in the investigation.

597. The sections that follow assess each of the factors of the EIT in turn.

12. Injury caused by the dumping of the goods and the benefits to UK industry in removing injury

598. The TRA found that the UK industry has been suffering material injury from the dumped goods from PRC.

599. The injury assessment concluded that there would be further injury to the domestic industry were a measure not imposed. See [G3. Conclusion](#) for further details.

600. The EIT explores the expected benefits to UK producers and the impact on the rest of the UK supply chain from implementing a measure.

13. The economic significance of affected industries and consumers in the UK

601. We have identified the following groups across the UK biodiesel supply chain as potentially being affected by the implementation of a measure:



- Upstream businesses: waste disposal businesses or suppliers of input material in the form of used cooking oil (UCO), tallow or other food waste such as fats, oils and greases (FOG).
- UK producers: of biodiesel - mainly FAME.
- Importers and retailers: of biodiesel and biodiesel blends/associated goods, typically purchased with the intent to blend with diesel to produce biodiesel blends.
- Downstream businesses: fleet operators who purchase biodiesel for direct use in compatible vehicles across all sectors.
- Consumers: final end-users of biodiesel products.

602. We have attributed all known businesses to one of these groups based on their principal activity to avoid double counting. Many blending companies function primarily as importers and retailers. As the UK is a net importer of biodiesel, there is a reliance on imported goods to meet domestic demand. This includes imports of biodiesel and biodiesel blends produced abroad. Due to this reliance on imports to meet domestic demand, the significance that UK-produced biodiesel has on related industries across the biodiesel supply chain is limited.

14.1. Upstream businesses

603. From questionnaire responses, we identified 53 UK businesses that sell the raw materials required to produce biodiesel. As we did not receive a producer questionnaire from Greenergy, we are unaware of upstream businesses supplying them with raw materials for their domestic production. Upstream businesses for Olleco were largely vertically integrated. We sampled six upstream businesses with a minimum of 4% of transactions by volume with domestic producer Argent. This captures 59% of the upstream market that is known to us. This sample omits smaller businesses and those that may be potentially less relevant for analysis, such as businesses with no known basis in the UK. We removed vertically integrated companies from the upstream business sample to avoid double counting with our producer analysis. Of the businesses in the sample, we do not have evidence that suggests they are significantly vulnerable to negative economic shocks.



604. As sales to biodiesel producers represented 1% of turnover on average, we conclude that biodiesel is **Somewhat Important** to upstream businesses. As several upstream businesses are primarily involved with collection and disposal of waste products, we consider the resulting UCO, tallow, and FOG a byproduct which is not essential to operating the business.

14.2. UK Producers

605. Through research and submitted evidence, we have identified three primary UK producers of biodiesel. We are aware of some very small UK producers, who we contacted prior to initiation. The smaller producers were not included in the sample. Notably we have received producer questionnaires from two producers Argent and Olleco. Greenergy, the third producer, is the largest by market share. However, they only submitted an importer questionnaire response. Biodiesel is a primary good produced by all sampled UK producers, and as such we concluded the product to be **Very Important** for producers. Further, we assess that the UK producers are likely significantly vulnerable to negative economic shocks. We reach this conclusion primarily through financial data obtained through data aggregators, such as Dun & Bradstreet, as well as through assessment of submissions from businesses, and an announcement of biodiesel facility closure in Motherwell.

14.3. Importers and Retailers

606. We received limited engagement from importers and retailers. We identified 1,084 importers of biodiesel or similar goods over the POI. The large number found is because HMRC Overseas Trade in Goods Statistics (OTS), whilst covering the goods in scope of this review, are also wide ranging enough to include goods that are out of scope of this review. The goods imported under the relevant commodity codes included goods with descriptions not matching our understanding of biodiesel.

607. There is uncertainty that the full list of importers initially shown through research are active and importing biodiesel. We believe this explains the large count of importers when compared to other market segments. As a result, we qualitatively assessed only businesses we considered the most significant importers of biodiesel using desk research and Dun & Bradstreet figures. We were not able to assess these businesses'



use of biodiesel, so we selected only high-profile blending companies that we could reasonably assume use biodiesel to a significant degree. While these importers are likely not representative of all businesses importing biodiesel, we lack the ability to select a more precise sample due to the limitations of the commodity codes for identifying biodiesel imports as outlined above.

608. The importers remaining in our sample are large blending companies. This means that they sell fuel for consumer use, distributed through petrol stations, and their turnover is likely represented by fuels other than biodiesel as biodiesel is a small component in most common blends. Common blends include B5 and B7, which are composed of 5% and 7% biodiesel, respectively. We have seen no evidence that the final price of consumer fuels materially reflects movement in the price of biodiesel. Although it is an obligation for blending companies to incorporate some amount of biodiesel in their final products, the core business model of an importer or retailer is not principally based on biodiesel. We concluded UK biodiesel is **Not Important** for importers and retailers.

I4.4. Downstream Businesses

609. We received limited engagement from downstream industries. We obtained information regarding relevant downstream businesses through producer questionnaires. Biodiesel purchases from known producers represented 9% of turnover on average for downstream businesses. As fuelling costs for fleet operators or biodiesel sales of fuel forecourts not associated with UK producers are unknown to us, we cannot get a complete picture of the effect of biodiesel on the cost of fuel for all fleet operators. We concluded UK biodiesel is **Somewhat Important** to downstream businesses.

I4.5. Consumers

610. Our desk research and analysis has shown biodiesel is not an end-consumer product. Biodiesel is typically sold to downstream businesses that use it in their operations such as an input cost like fuel for their transport fleet. Consumers typically do not purchase biodiesel.



14.6. Summary

611. Table 31 summarises our economic significance analysis for segments of the biodiesel supply chain. We were unable to calculate specific figures due to data limitations, leading to smaller samples in upstream, importer and retailer businesses.

Table 31: Economic significance of affected industries				
	Upstream businesses	UK producers	Importers and Retailers	Downstream businesses
Total known businesses	53	3	Up to 1000	50
Total selected	6	3	15	5
Estimated importance of UK biodiesel to this group	Somewhat Important	Very Important	Not Important	Somewhat Important
Total employment of selected businesses	414 ¹	2,110	Over 3,000 ²	14,295 ³
Total GVA of selected businesses (£m)	29 ¹	4.8	Over 7,000 ²	768 ³
Total turnover of selected businesses (£m)	716 ¹	534	Over 100,000 ²	8,052 ³
Average EBITDA margin for selected businesses (%)	4%	-5%	16%	6% ³
Vulnerability to negative economic impacts	Inconclusive - Low vulnerability	High Vulnerability ⁴	Low Vulnerability ⁵	Low vulnerability
<i>Sources: Questionnaire responses, Companies House and Dun & Bradstreet</i>				

Methodology: The importance of biodiesel to each of the groups was estimated using readily available information and research using market data aggregators. For available businesses in the sample, GVA was estimated by summing operating profits, employment costs, depreciation and amortisation. Average EBITDA margin was estimated by dividing the sum of operating profit, depreciation and amortisation by turnover. The assessment of vulnerability to negative economic impacts was made, in part, by looking at financial data, with gross profits being the measure of financial wellbeing used. Supplementary information was used where data was absent to determine vulnerability and the estimated importance of UK biodiesel to selected industries.



¹As we cannot determine the metrics for vertically integrated businesses or businesses not reported to us we cannot include the businesses upstream of Olleco and Greenergy.

²Sampled importers and Retailers are not a representative sample of the sector due to lack of data provided covering the market section, figures represent 15 high profile importers selected to capture a proportion of the importer market section in our analysis.

³Sampled downstream businesses include all known downstream businesses provided in producer questionnaires and supplementary submissions. As Greenergy did not submit a producer questionnaire we cannot produce a sample that fully captures businesses downstream of Greenergy.

⁴We reach this conclusion in part through communications from businesses, evidence of facility closures, and evidence provided about UK competition with similar goods not produced in the UK, such as HVO.

⁵As we cannot sample importers granularly, we can only consider prominent actors in this market segment. Prominent actors may represent businesses that are significantly less vulnerable than the population, but that cannot be determined via our sample.

15. Likely impact on affected industries and consumers

612. In this section, we assess the overall impact that the proposed measure might have on the affected groups identified – domestic producers, importers/retailers and downstream businesses. We do this by looking at how prices and quantities of goods in the supply chain might change (i) if proposed measure is not imposed, and (ii) if it were imposed. The likely impact of the measure is within the range of these two future states. We assessed a range of scenarios due to the uncertainty around the effects of the measure.

15.1 Evidence and key assumptions

613. Costs, prices and sales of Biodiesel for UK producers are sourced from questionnaire responses. Greenergy did not submit a producer questionnaire. We estimated their domestic sales using available UK market data and insights received through stakeholder engagement.

614. Our estimates of the price elasticity of demand (PED) for biodiesel (between 0 and -0.5) come from the assumption that biodiesel is an inelastic good. The lower elasticity assumption (0) indicates that levels of consumption of biodiesel cannot change in response to price, where the higher figure of the two (-0.5) still represents a highly inelastic product, but a small change to quantity consumed based on a change in



price. This assumption is based on a qualitative assessment of the demand for biodiesel due to environmental regulatory obligations.

615. We assumed that a high proportion of the duty is passed onto market segments downstream of production (between 75% and 100%). We cannot measure the impacts of a measure on specific market segments (fuel providers and logistics companies) as we lack downstream engagement.

616. We assumed that producer marginal costs (costs for each additional metric tonne of biodiesel produced) are equivalent to their variable costs. We assumed raw materials were a variable cost while labour, maintenance, energy, and other capital costs were largely fixed. For Greenergy, we estimated a general UK marginal cost using a weighted average of marginal costs of other producers.

15.2. Expected impacts if measure is not implemented

617. We considered two scenarios to represent no-measure states.

Scenario B1: No measure implemented. All UK producers remain in the market.

618. Scenario B1 represents an outcome where no measure is implemented, and all UK producers continue operating. This scenario is considered to account for the possibility of Greenergy, Argent, and Olleco remaining in the domestic market. We have seen evidence of these producers exporting more of their domestic production because of PRC imports pushing down the domestic price.

Scenario B2: No measure implemented. Argent and Olleco exit the market. Imports and Greenergy gain market share.

619. Scenario B2 represents an outcome where no measure is implemented, and Argent and Olleco both exit the market. The market share represented by these producers is distributed to Greenergy, third-country producers, and PRC producers proportionally to their present-day market shares. The result of this market exit is a reduction in the weighted market average price and an increase in biodiesel consumed under the higher price elasticity assumption (-0.5). The magnitude of changes to price and



quantity are limited by the market share of Argent and Olleco, which is significantly smaller than the market share of imports and Greenergy combined.

15.3. Estimated impacts if the measure is implemented

620. We considered three scenarios representing the range of possible impacts from a measure. It is unlikely that any of these scenarios represents the exact impact of the proposed measure, but the likely impacts are very likely to fall somewhere between them.

Scenario A1: All biodiesel prices remain the same as present day values. PRC producers exit the market, UK producers and third-country producers gain market share proportionately.

621. We assume that a measure would result in PRC biodiesel producers exiting the market. While it is possible a measure would only result in partial market exit (reduced PRC biodiesel imports), the scenario outlines the maximum possible impacts that could result from PRC market exit. UK and third-country producers capitalise on outstanding demand by increasing quantity of biodiesel supplied but keep prices at current levels to remain competitive. PRC produced biodiesel represents the majority of biodiesel supplied to the UK market. Their market exit results in an increase in average domestic prices and a small decrease in biodiesel demanded under the higher price elasticity assumption (-0.5).

Scenario A2: All UK producers increase prices by the level of the measure, PRC producers exit the market and third-country producers gain market share.

622. We received evidence to indicate that UK producers are limited in their ability to increase the quantity of biodiesel produced due to operating close to full capacity – except Greenergy. Under this scenario, UK producers capitalise on outstanding demand resulting from PRC producer market exit by increasing prices, where most third-country producers keep prices at current levels. Third-country producers would be able to capitalise through increased sales. These producers may increase prices alongside the increase in their market share, but this potential increase cannot be estimated with data available. We do not have evidence to precisely indicate how



market share may be distributed given differences in prices between UK domestic and third-country biodiesel. The PRC market exit results in an increase in domestic prices and a decrease in biodiesel consumed under higher price elasticity assumptions (-0.5), where the quantity of biodiesel purchased slightly adapts to changes in price.

Scenario A3: All biodiesel prices increase by the level of the measure and PRC producers retain market share.

623. Under this scenario, most biodiesel PRC producers are still able to compete and retain their market share in the presence of the proposed measure. Although we acknowledge that, a measure may result in partial market exit for PRC producers, this scenario is included to capture the upper bound of impacts to downstream market segments. Partial PRC market exit cannot be estimated with the data available. Domestic prices increase alongside a decrease in biodiesel consumed under high price elasticity assumptions (-0.5). Downstream consumers can adjust consumption habits based on changes in price, though these changes in quantity are likely small given the inelastic nature of the product.

15.4. Estimated welfare impacts of a measure on affected UK producers and downstream market segments

624. We estimated welfare impacts for each scenario by looking at the change in producer and downstream market segment surplus, including downstream businesses and importers/retailers. The effects to which downstream market segments affect consumer prices is not possible to be quantified with present data. Downstream business surplus is the welfare a downstream market segment gets from buying a product. Downstream market segments include all fuel providers and users of biodiesel. We did not receive sufficient downstream or importer/retailer company engagement to differentiate between impacts based on market segment. We have not received evidence that could be used to measure the impacts on end-consumers of biodiesel or goods and services where biodiesel is used. End-consumer impacts are accounted for within our downstream business surplus calculations for downstream market welfare. Producer surplus is the welfare a producer gets from selling a product.



625. Surplus was estimated using the following formulas:

$$\text{Producer Surplus} = (\text{Price per unit} - \text{Marginal Cost}) * \text{Quantity sold}$$

$$\Delta \text{Downstream Surplus} = \frac{Q_{\text{tariff}} + Q_{\text{no_tariff}}}{2} * (P_{\text{no_tariff}}^C - P_{\text{tariff}}^C)$$

Where:

Q_{tariff} is the quantity of biodiesel consumed with a duty

$Q_{\text{no_tariff}}$ is the quantity of biodiesel consumed without a duty

$P_{\text{no_tariff}}^C$ is the average price of biodiesel without a duty

P_{tariff}^C is the average price of biodiesel with a duty

626. Table 32 below shows the welfare impacts for each of the modelled scenarios and includes both the lower cooperating duty, 15.61%, and higher residual duty rate, 54.64%.

Table 32: Estimated change in welfare⁸⁹

Welfare impact of imposing a measure, in comparison to scenario B1:

If the level of measure is the cooperating rate

	Change in UK producer surplus (to B1)	Change in downstream consumer surplus (to B1)	Total change in surplus (to B1)
Units	£m	£m	£m

⁸⁹ PED = price elasticity of demand, assumed value is -0.5 (small change in quantity sold following changes in price, inelastic) for high scenarios and 0 (no change in quantity sold following changes in prices, highly inelastic) for low scenarios.

PT = tariff cost pass through to consumers, assumed value is 100% for high scenarios and 75% for low scenarios

The average value should not be treated as a central estimate. It serves to indicate whether the majority of scenarios are closer to the top or bottom of the range.

In scenario B1 'Total change in surplus' is calculated as a change against current values. For all other scenarios, 'Total change in surplus' is calculated as change to scenario B2. This is done as B2 represents the likely outcome of the decision not to implement a measure.

Max, Min, and Average are calculated in respect to scenarios where the measure is implemented (A1-A3).



Max	36.2	-243.3	-221.3
Min	14.8	-177.4	-147
Average	21.5	-196.8	-175.4

If the level of the measure is the residual rate

	Change in UK producer surplus (to B1)	Change in downstream consumer surplus (to B1)	Total change in surplus (to B1)
<i>Units</i>	<i>£m</i>	<i>£m</i>	<i>£m</i>
Max	80.4	-886.4	-805.9
Min	33.2	-180.2	-147
Average	54.9	-424	-369

Welfare impact of imposing a measure, in comparison to scenario B2:

If the level of the measure is the cooperating rate

	Change in UK producer surplus (to B2)	Change in downstream consumer surplus (to B2)	Total change in surplus (to B2)
<i>Units</i>	<i>£m</i>	<i>£m</i>	<i>£m</i>
Max	42.5	-253.2	-224.7
Min	21.1	-187.2	-150.5
Average	27.8	-206.6	-178.8

If the level of the measure is the residual rate

	Change in UK producer surplus (to B2)	Change in downstream consumer surplus (to B2)	Total change in surplus (to B2)
<i>Units</i>	<i>£m</i>	<i>£m</i>	<i>£m</i>
Max	86.8	-896.2	-809.4
Min	39.6	-190	-150.5
Average	61.3	-433.8	-372.5



15.4.1. UK producers

627. As compared to having no measure in place, we estimate that implementing the measure could provide UK producers with welfare benefits of between £33.2m and £86.8m per year when calculated with the residual rate, and £14.8m and £42.5m per year when calculated with the cooperating rate. The lowest impacts are seen in scenario A1, where competition from third-country producers prevents UK producers from increasing prices. The highest impacts are seen in scenario A3 where PRC producers can continue to compete resulting in all prices increased by the level of the measure. Evidence received through stakeholder engagement and questionnaire responses indicates scenarios A1 and A3 are more likely. A2 is considered less likely because Argent and Olleco may be able to shift some of their exports into domestic UK sales due to the potential to increase prices because of a measure.

15.4.2. Downstream market segments, including downstream businesses and importers/retailers

628. Downstream market segments are subject to higher impacts across all scenarios with a greater range between maximum and minimum estimates. If the measure were to be implemented, we estimate that downstream market segments could face welfare costs between £180.2m and £896.2m per year at the residual rate and £177.4m to £253.2m per year at the cooperating rate. The impacts of a measure disproportionately impact downstream market segments as PRC imports represent the majority of UK biodiesel supply for domestic consumption. The inelastic nature of downstream businesses' demand mean they must purchase similar quantities despite changes in price. We do not have evidence to be able to estimate the individual impacts on each of the downstream market segments separately.

15.4.3. Overall welfare impacts

629. Overall, implementing a measure is very likely to lead to a significant overall welfare loss of between £147m to £809.4m per year when calculated using the residual rate, and £147m to £224.7m per year when calculated using the cooperating rate. The average welfare impact across all scenarios is a cost of between £369m and £372.5m



per year when calculated using the residual rate, and £175.4m and £178.8m per year when calculated using the cooperating rate. The highest benefits for UK producers do not occur in the scenarios with the highest costs to downstream market segments. Scenario A3, where the PRC can maintain market share, represents the least proportionate welfare impacts overall.

16. The likely impact of the measure on particular geographic areas, and particular groups

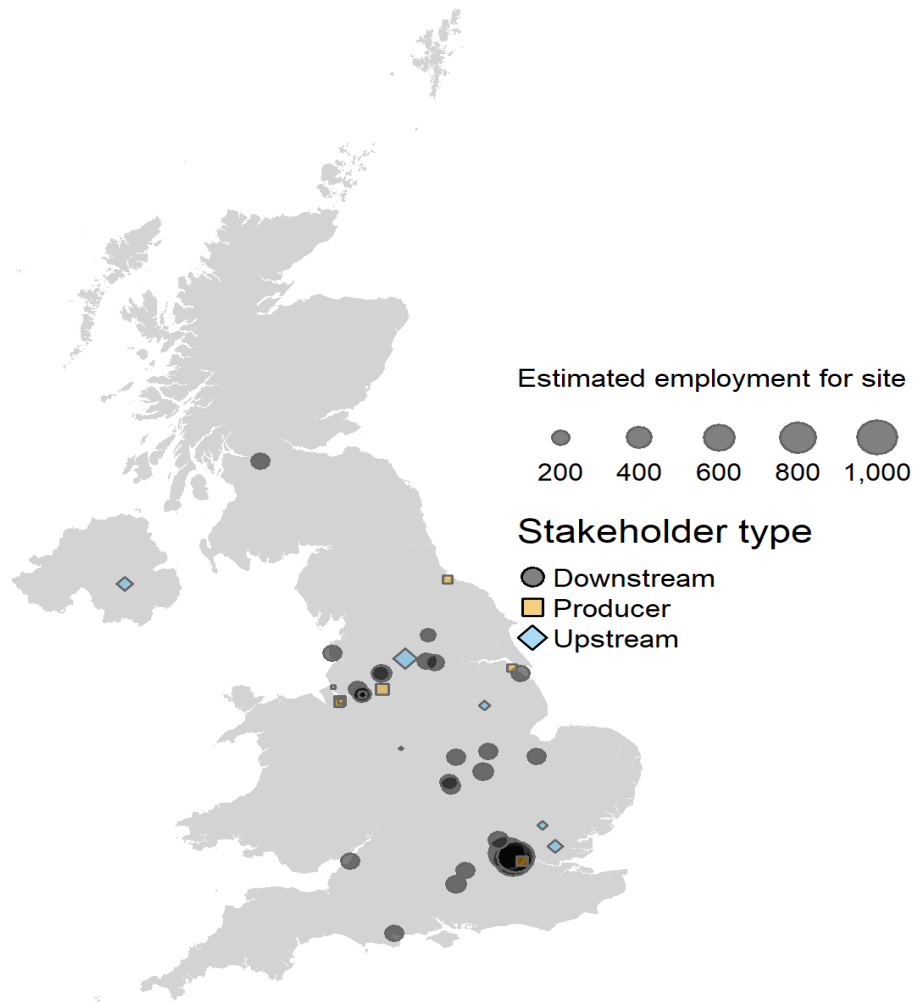
630. This section examines how the impacts of a measure are likely to be geographically distributed and whether any particular groups might be disproportionately affected. This geographic analysis considers the three groups to which biodiesel was deemed to be at least a somewhat important product: UK producers of biodiesel, upstream businesses, and downstream businesses.

16.1. Likely impact on particular areas

631. We considered the geographic areas where the UK producers, upstream businesses, and downstream businesses are located. We have assessed geographic impacts using employment and indicators of deprivation at a Travel to Work Area (TTWA) level for Great Britain, and Local Government District (LGD) level in Northern Ireland.

632. The data used for the geographic significance analysis were sourced through questionnaire responses, Dun & Bradstreet business directory, ONS estimates of working age population by TTWA, and Census 2021 estimates of working age population by LGD in Northern Ireland. We assessed the geographic significance by exploring the employment of affected industries as a proportion of employment in each TTWA / LGD.

Image 7: Map showing the UK locations of known upstream businesses, UK producers, and downstream businesses in Biodiesel supply chain



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633. In our analysis, where employment is less than 1% of the working age population within a TTWA / LGD, we considered this to indicate that there is no likelihood of a disproportionate negative geographic impact. We did not find any areas where the estimated employment from the affected groups constituted more than 1% of the working age population of the TTWAs / LGDs they are located. The main TTWA of Liverpool, Chester, Immingham and Teesside all had proportions of the working population employed below 0.1%.



16.2. Likely impact on particular groups

627. The TRA considered the likely impact on particular groups including those with protected characteristics as defined by the [Equality Act 2010](#).

628. No evidence was provided regarding potential impacts on any particular groups, either as workers or consumers. There is no evidence to suggest that there will be disproportionate impacts on particular groups.

629. We therefore conclude that a measure or no measure is unlikely to have any significant impact on groups with protected characteristics or other groups.

17. The likely consequences for the competitive environment and for the structure of markets for goods in the UK

630. The assessment of the likely consequences for the competitive environment and structure of the UK market considers four factors:

- the impact on the number or range of suppliers;
- the impact on the ability of suppliers to compete;
- the impact on the incentives to compete vigorously; and
- the impact on the choices and information available to consumers.

631. We expect changes to the competitive environment and to the structure of the UK's biodiesel market with and without a measure. The main reasons for this are:

- **The impact on the number or range of suppliers** – PRC is the largest exporter of biodiesel to the UK a measure is likely to lead to a significant drop in the range of biodiesel suppliers from PRC. We have seen evidence of this following the recent measures in the EU on PRC biodiesel where these exports increased in markets such as Japan and Australia.⁹⁰ Where no measure is imposed there is the potential for the number and range of suppliers to change. The injury assessment shows UK producers are experiencing injury and likely to exit the UK market without a measure.

⁹⁰ Argus Media Webinar - HVO in Focus: Pricing, market trends and outlook.



- **The impact on the ability of suppliers to compete** – There is evidence without a measure that domestic producers' ability to compete in the UK market could be affected, as they already are unable to compete. A measure would improve the ability of UK and third country producers to compete in the UK biodiesel market. PRC producers' ability to compete in the UK is likely to be affected differently depending on the level of the measure applied (cooperating or residual rates) and on their current profit margins.
- **The impact on incentives to compete vigorously, and impact on choices and information available to consumers** – We do not have any evidence of a measure impacting suppliers' incentives to compete vigorously or on a measure impacting the choices and information available to consumers.

18. Other factors the TRA considers relevant

632. Trends in the UK car market show reductions in the overall demand for diesel. There is a continued move away from diesel cars to alternative fuel vehicles. We found no diesel specific projections in the UK over the next five-year period but were able to estimate a 3% year-on-year reduction.⁹¹ However, this reduction in demand for biodiesel will be countered by the increase in the mandated fuel mix in the RTFO. This is set to rise from 13.55% in 2025 to 16.3% in 2030.⁹² We are not able to estimate what the net change in biodiesel demand will be as a result, but we consider this to be negligible.

633. In May 2025, Greenergy announced the temporary closure of their Immingham biodiesel plant, citing challenges currently facing the UK biofuels producers, but we understand that they would be able to restart production within a week should they need to. Evidence from the POI suggests that Greenergy as a whole is not highly vulnerable to PRC imports, but recent evidence suggests their domestic production may be more vulnerable. Without further information at this stage, we cannot verify whether this is the result of PRC imports, trends within Greenergy, or greater macro-economic trends. We do not consider that the conclusions from our welfare impacts

⁹¹ [Road To Net Zero Suggests Bearish Outlook on UK Fuel Consumption](#)

⁹² [RTFO statutory review and future of the scheme - GOV.UK](#)



analysis will be significantly affected by Greenergy's closure because the scenarios considered already include a wide range of possibilities and that the closure is temporary with Greenergy being able to restart production.

634. RTFO regulations provide the option for firms to buy out of their obligation, rather than supplying at the necessary fuel blend or redeeming credits. In 2022 and 2023 suppliers bought out of 10.4% and 15.3%, respectively, of their obligation. The TRA could not quantify the impact of buy outs on biodiesel demand over the next 5 years and we have no evidence to suggest this will change from current proportions.⁹³ Depending on the price increases following a measure this could increase the use of buy outs by downstream businesses.
635. We have evidence that PRC producers have reduced their biodiesel exports to the EU and increased sales to markets such as Japan and Australia.⁹⁴ Where no measures are placed in the UK, potentially more PRC exports could be diverted to the UK and negatively impact the domestic industry.
636. There is evidence from the European Biodiesel Association (EBA) that EU producers have excess production capacity of 4.9m metric tonnes (likely including the mass of the non-biodiesel portion of blends). Some of this could be exported to the UK market if a measure is implemented leading to the complete exit of PRC producers, provided there is sufficient capacity to also satisfy domestic demand in the EU following current EU measures against the PRC. We do not have conclusive evidence to indicate, however, that EU suppliers would definitely be able to fill the gap in the UK market left after PRC suppliers' exit. In addition, a short-term reduction in supply of biodiesel that results from PRC suppliers' exit could result in a shock to prices, with UK biodiesel prices increasing more than outlined in our assessment of likely impacts.
637. The UK biofuel sector is still growing. In the event UK biodiesel producers fail or exit the market where no measure is implemented, this could potentially reduce investor confidence in the sector. The sector already requires investment to increase current production capacity levels to meet UK demand.

⁹³ [Renewable Transport Fuel Obligation Annual Report 2023](#)

⁹⁴ Argus Media webinar - HVO in Focus: Pricing, market trends and outlook.



19. Conclusions

638. In accordance with paragraph 25 of Schedule 4 to the Act, the EIT is met in relation to the requirement of a measure if the application of the measure is in the economic interest of the UK. This test is presumed to be met unless the TRA is satisfied that the application of the measure is not in the economic interest of the UK.
639. We determined that the UK industry has been suffering injury due to the dumped goods from the PRC. The injury assessment concluded that there would be further injury were a measure not recommended.
640. The economic significance section assessed different groups that make up the UK biodiesel supply chain. Our assessment concluded biodiesel is very important for producers, somewhat important for upstream and downstream businesses. We found it not important for importers and retailers. We concluded biodiesel is not a consumer product and this group was excluded from our assessment.
641. In the impacts section we found evidence that the impacts of a measure would likely disproportionately impact downstream market segments negatively. We found this for both the cooperating rate and the residual rates across all scenarios considered. This would result in a significant net welfare cost to the UK economy. Despite welfare benefits for producers from a measure these gains were substantially lower than the losses to downstream market segments.
642. We concluded that a measure or no measure is not expected to have any disproportional geographical impacts due to sites of producers, upstream, and downstream businesses not being significant employers in their TTWAs. There was no evidence of likely impacts on particular groups with protected characteristics or other groups.
643. In the competition section, we expect changes to the competitive environment or structure of the UK's biodiesel market from a measure and no measure. There is likely an impact on the number and range of suppliers to the UK following a measure with at least some PRC producers likely exiting the market. Where no measure is imposed, potentially UK producers are likely to exit the market. There are likely impacts on some PRC producers' ability to compete with a measure. Without a measure there are likely



impacts on UK producers' ability to continue to compete as they are already unable to compete.

644. We found evidence of other relevant factors to consider. These included: consumer trends for renewable fuel vehicle types, biodiesel fuel mix mandates, businesses' use of buy outs such as credits, impacts of EU biodiesel trade remedies against PRC, EU producers' excess capacity and investor confidence in the biofuel sector industry. All these factors had different impacts on the UK biodiesel market.

645. We have identified the following key positive impacts of imposing a measure:

- UK domestic producers will benefit given the material injury they currently experience from PRC imports. We have estimated a welfare gain to producers of £14.8m to £86.8m per annum.
- Domestic producers would be incentivised due to higher domestic prices to produce more biodiesel and divert their current export sales of the product to the UK market. This could protect the existing jobs in the sector and boost local economic activity through additional investment from investors for the surrounding areas where producers are located. Diverting exports to the UK market with prices held constant does not raise the total welfare of UK producers, though a measure's price-increasing effects could make the UK a more desirable market for UK producers, resulting in a welfare gain further capitalised on through the diversion of exports back to the UK market. As producers are gaining welfare via the exports presently, this gain in total welfare would be significant, though not as large as expanded production.

646. The following are the key negative impacts of imposing a measure:

- We estimate an overall welfare cost to the UK of between £147m and £809m per annum.
- Downstream market segments which include fuel providers, fleet operators, blending companies and end-consumers are likely to be disproportionately impacted from a measure. These welfare costs range from £177m to £896m per annum. The RTFO regulatory requirements and our assumption the product is



highly inelastic mean that this part of the supply chain will have to bear these additional costs. There is potential for this cost to be passed on to end-users.

- The low market shares of domestic producers mean that if PRC producers, as the largest supplier, exit the UK market then this could create price shocks as third-country producers need to meet the large outstanding demand for biodiesel in the UK. While it is unlikely that the demand for biodiesel in the UK would be unmet, the strain caused to third-country producers may be significant enough to cause price effects outside of what is outlined in the impacts assessment.

647. Overall, while we recognise that there are valid arguments for both positive and negative impacts that are likely to result from a measure, based on the evidence and noting the presumption in favour of anti-dumping measures being in the economic interest of the UK, we do not consider that the negative impacts are sufficiently disproportionate to the benefits to overturn this presumption. Having considered the evidence submitted by the relevant parties and all the factors listed in the legislation, we conclude that the EIT is met for the proposed measure.



Section J: Intended final recommendation

648. The TRA intends to make a final affirmative determination on imports of the relevant goods originating from the PRC that fall under commodity codes:

1516209821	1516209829	1516209833	1518009121
1518009129	1518009133	1518009521	1518009921
1518009929	1518009933	2710194221	2710194229
2710194290	2710194421	2710194429	2710194433
2710194621	2710194629	2710194633	2710194721
2710194729	2710194733	2710201121	2710201129
2710201133	2710201621	2710201629	2710201633
2710201693	2710201910	2710201990	3824999210
3824999214	3824999217	3826001020	3826001029
3826001050	3826001059	3826001089	3826001099
3826009011	3826009019	3826009033	

649. As set out in [Section D: The goods concerned and the like goods](#), the relevant goods are:

“Fatty-acid mono-alkylesters or paraffinic gasoils obtained from synthesis or hydrotreatment of non-fossil origin in pure form or as included in a blend, excluding sustainable aviation fuel, in pure form or as included in a blend.”

650. The TRA has determined that the relevant goods that are the subject of the intended final affirmative determination, have been or are being dumped into the UK, and the dumped goods have caused or are causing injury to the UK industry in those goods.

651. The TRA intends to recommend that the Secretary of State impose an ad-valorem duty for a period of five years on the relevant goods subject to the final affirmative determination.

Table 33: Anti-dumping duty (%)



Country	PRC exporter	Anti-dumping duty (%)
PRC	The Zhuoyue Group	15.68%
PRC	Non-sampled cooperating exporters (see Annex A)	15.68%
PRC	All other exporters (residual amount)	54.64%



Annex A: Interested Party List

Table 34: Sampled cooperating interested party list

	Interested party name	Status
1.	Argent	UK producer
2.	Olleco	UK producer
3.	Longyan Zhuoyue	PRC exporter
4.	Xiamen Zhuoyue	PRC exporter
5.	Greenergy	Importer
6.	Anonymous third country producer	Overseas producer

Table 35: Non-sampled cooperating interested party list

	Interested party name	Status
1.	Weige Biological Technology	PRC exporter
2.	EcoCeres	PRC exporter
3.	Jingu Group	PRC exporter
4.	Haixin Energy Technology International Pte. Ltd	PRC exporter

Table 36: Non-cooperative interested party list

	Interested party name	Status
1.	Jiaao Group	PRC exporter
2.	MOFCOM	Foreign government



Annex B: Summary of submissions on the public file received from interested parties and contributors

652. Table 37 lists the information submitted to the TRA by interested parties and contributors to date.

	Interested party	Type of information received	Status
1.	Argent	Pre-sampling questionnaire Questionnaire	UK producer
2.	Olleco	Pre-sampling questionnaire Questionnaire	UK producer
3.	Weige Biological Technology	Pre-sampling questionnaire	PRC exporter
4.	EcoCeres	Comments on product scope Pre-sampling questionnaire Comments on scope revision	PRC exporter
5.	Jingu Group	Pre-sampling questionnaire	PRC exporter
6.	Longyan Zhuoyue	Comments on the product scope Pre-sampling questionnaire Questionnaire	PRC exporter
7.	Xiamen Zhuoyue	Pre-sampling questionnaire Questionnaire	PRC exporter
8.	Jiaao Group	Comments on the product scope Pre-sampling questionnaire	PRC exporter
9.	Haixin Energy Technology International Pte. Ltd	Pre-sampling questionnaire	PRC overseas producer
10.	Phillips 66 Limited	Comments on the product scope Pre-sampling questionnaire Supplemental submission on product scope	Importer
11.	Shell Trading Rotterdam BV	Pre-sampling questionnaire	Importer



12.	Greenergy	Pre-sampling questionnaire Questionnaire	Importer
13.	RTFA	Application Comments on the product scope Supplemental submission on product scope Comments on existence of PMS and proposed representative country	UK trade body
14.	Anonymous third country producer	Pre-sampling questionnaire Questionnaire	Overseas producer
15.	MOFCOM	Registration of interest	Foreign government
16.	GOM	Registration of interest	Foreign government
17.	ESL Fuels Limited	Registration of interest	Contributor
18.	Fabra	Registration of interest Comments on product scope	Contributor
19.	Gasrec Ltd	Registration of interest	Contributor
20.	International Consolidated Airlines Group, S.A.	Registration of interest	Contributor
21.	Kolmar Group AG	Registration of interest	Contributor
22.	UK & Ireland Fuel Distributors Association Ltd	Registration of interest	Contributor
23.	Valero Energy Ltd	Registration of interest	Contributor
24.	Vivergo Fuels Ltd	Registration of interest	Contributor