**Case TD0004 - Transition review of anti-dumping measures applying to biodiesel originating in the United States of America and consigned from Canada**

**Case TS0005 Transition review of countervailing duties applying to biodiesel originating in the United States of America and consigned from Canada**

**Response to recommendations and statement of essential facts from United Kingdon and Ireland Fuel Distributors Association (UKIFDA)**

We support the announcement made on 15th December in which the Trade Remedies Authority (TRA) recommended the removal of measures on imports of HVO from the U.S.

UKIFDA is the trade body which represents the liquid fuel distributors in the UK. Currently our c100 members distribute liquid fuels to over 1.7m homes and 250,000 businesses. Today most of these liquid fuels are fossil based and a significant proportion used for heating purposes. The industry currently directly employs 10,000 people.

A large proportion of our customers are located in rural locations, in homes and premises which are both detached and built before 1919. These characteristics limit the decarbonisation options open to them. As a result, we have embarked on a strategy to help our customers transition to lower carbon fuels and are currently running a UK wide demonstration project with a target to convert 200 homes and premises. This demonstration project is principally aimed at looking at the logistical elements of distributing HVO which offers a c90% reduction in carbon against the counterfactual and builds on a smaller trial in 2020 which concluded there were no technical issues with swapping kerosene with HVO at a domestic home level.

We support the conclusions of the TRA for the following reasons:

1. HVO is currently not produced in the UK and therefore the country is reliant upon imports.
2. HVO can be used in markets that currently cannot be served by FAME including the home heating market
3. HVO and FAME are not alike:
   1. The manufacturing processes are very different
   2. HVO has better energy density
   3. HVO has a much lower cold filter plugging point and also safe in warmer conditions
   4. HVO has a much higher storage life and is less susceptible to degradation and less susceptible to water absorption
   5. HVO has a significantly higher price than FAME and so is not likely to be used as a substitute

The way to decarbonise oil heated homes will need a mix of technologies and HVO must be available in adequate volumes to help those homes that cannot use other technologies.

Given the potential carbon reduction we could create in the UK it seems to make little sense to be creating an economic block on the very fuel that can make it happen, particularly as the arguments put forward for introducing the measures in the first place either no longer apply or are not relevant to the UK after its withdrawal from the European Union.

As far as the UK is concerned, there seems to be significant symmetry in terms of HVO and kerosene – both can be used for heating fuel, both need to be imported as we have a shortfall indigenously and both have important economic benefits, so it makes little sense to treat them differently.

For all of the above we support the removal of the measures on HVO.

Yours sincerely

Ken Cronin

**Ken Cronin**

**Chief Executive**

