



***JURIDICAL ANALYSIS OF THE EUROPEAN UNION'S
ANTI-DUMPING MEASURES ON BIODIESEL IMPORTS
FROM INDONESIA: A CASE STUDY OF WORLD TRADE
ORGANIZATION (WTO) DISPUTE SETTLEMENT BODY
DECISION NO. DS480***

Safiya Dwi Aprilia

University of Mataram

E-mail : safiyaapr84@gmail.com

Diva Pitaloka

University of Mataram

E-mail : diva.pitaloka@gmail.com

Abstract

This study provides a juridical analysis of the anti-dumping duties imposed by the European Union on biodiesel imports from Indonesia, focusing on the case study of World Trade Organization (WTO) Dispute Settlement Body (DSB) Decision No. DS480. The research questions addressed in this study are: what legal measures can Indonesia take to implement the DSB decision, and how can the implementation of such decision protect the national biodiesel industry from unfair trade practices? This study employs a qualitative normative juridical method, using official WTO documents, international agreements, and relevant regulations as primary legal materials. The findings show that the WTO Panel ruled that the European Union's anti-dumping measures were inconsistent with the Anti-Dumping Agreement and the General Agreement on Tariffs and Trade 1994, particularly in relation to the determination of production costs, the calculation of dumping margins, and the evidence of injury to the domestic industry. This decision requires the European Union to adjust its measures in accordance with the applicable principles of international trade law and strengthens Indonesia's position in multilateral forums.

Keywords: Anti-Dumping; Dispute Settlement Body; World Trade Organization.

A. INTRODUCTION

Free trade among countries has long been an important part of global economic development. The transformation of the international trade system, which has increasingly moved toward liberalization and the openness of global markets, has been supported by technological advancement and international legal frameworks governing trade relations between states. One of the main legal instruments regulating international trade is the General Agreement on Tariffs and Trade (GATT), which later developed into the World Trade Organization (WTO).

The WTO was established as the successor organization to GATT in order to create a fairer, more open, and more stable trading system, supported by an effective dispute settlement mechanism among its member states. The establishment of the World Trade Organization (WTO) as an international organization did not merely bring about

changes in the structure of world trade governance, but also affirmed the WTO's status as an international entity possessing legal personality and the capacity to exercise rights and fulfill obligations under international law.¹

Based on its role under international agreements, the World Trade Organization (WTO) serves as a facilitator for the implementation and operation of agreed multilateral trade agreements, acts as a forum for trade negotiations, and administers the dispute settlement mechanism among its member states. The WTO dispute settlement system consists of three main bodies or mechanisms, namely the Dispute Settlement Body (DSB), the Appellate Body, and arbitration.²

The Dispute Settlement Body (DSB) essentially functions as the General Council when acting in its capacity to handle disputes between WTO members. The DSB has the authority to establish dispute settlement panels, refer matters to arbitration, adopt panel reports, Appellate Body reports, and arbitration reports, as well as monitor the implementation of recommendations and rulings contained in those reports. The DSB may also suspend concessions in cases of non-compliance with the recommendations and rulings that have been adopted.³

Since it began operating in 1995, the DSB has handled a total of 635 disputes.⁴ Indonesia joined and became a member of the world trade organization by ratifying Law Number 7 of 1994 concerning the Ratification of the Agreement Establishing the World Trade Organization (WTO). As a WTO member, Indonesia has been involved in several disputes that have reached the panel settlement stage. Based on data from the WTO website, Indonesia has acted as a complainant in 15 cases, as a respondent in 15 cases, and as a third party in 52 cases.⁵

Indonesia's membership in the World Trade Organization (WTO) provides broader access to international markets. This has encouraged changes in the domestic trade sector to improve the competitiveness of national products in the global market. As a country actively engaged in export and import activities, Indonesia's participation in international trade does not always run smoothly, as Indonesia frequently faces various trade barriers, including allegations of dumping practices by importing countries. This has led to trade competition, particularly with the European Union, which has on several occasions imposed anti-dumping duties on products originating from Indonesia.

Dumping is a practice in which a product is sold in the international market at a price lower than its selling price in the domestic market, or even below the cost of production. To address dumping practices, an anti-dumping measure

1 Muh. Risnain, Erlies Septiana Nurbani, Diva Pitaloka, dan Adithya Nini Rizki Apriliana, *PENGANTAR HUKUM INTERNASIONAL Pendekatan Kemahiran hukum, Etika Hukum, Hukum dan Gender, serta Hukum dalam Konteks Lokal*, Kencana, Jakarta, 2023, hlm. 133

2 Peter Van den Bosche, Daniar Natakusumah, dan Joseph Wira Koesnaldi, 2010, *Pengantar Hukum WTO (World Trade Organization)*, Penerbit Yayasan Obor Indonesia, Jakarta, Hlm 98-102

3 World Trade Organization, *Dispute Settlement Body (DSB)*, https://www.wto.org/english/tratop_e/dispu_e/dispu_body_e.htm diakses pada 25 Juni 2025

4 World Trade Organization, *Daftar Kronologi Kasus Sengketa*, diakses pada 26 Juni 2025 https://www.wto.org/english/tratop_e/dispu_e/dispu_status_e.htm

5 World Trade Organization, *Indonesia and the WTO*, diakses pada 26 Juni 2025 https://www.wto.org/english/thewto_e/countries_e/indonesia_e.htm#disputesHeading

may be applied, namely a retaliatory measure imposed by an importing country against goods from an exporting country found to be engaged in dumping.⁶

Under Article VI of GATT 1994, each GATT member is permitted to impose anti-dumping measures on imported goods that are sold at an export price below the normal value of like products in the domestic market of the exporting country, where such imports cause injury to the domestic industry of the importing country. Such measures must be applied in accordance with the procedures, requirements, and limitations for the imposition of anti-dumping measures as regulated under Article VI of the General Agreement on Tariffs and Trade 1994 and the WTO Anti-Dumping Agreement.⁷

As global concern over environmental issues and renewable energy has increased, Indonesian palm-based biodiesel has become an important export commodity to the European Union. However, since 2013, Indonesia has faced trade challenges in the form of dumping allegations and the imposition of high anti-dumping duties by the European Union. This policy significantly affected Indonesia's biodiesel exports to Europe, causing a drastic decline from USD 635 million in 2013 to USD 9 million in 2016.⁸

This policy was considered unfair and inconsistent with the WTO Anti-Dumping Agreement (ADA), prompting Indonesia to bring the dispute before the dispute settlement forum of the World Trade Organization (WTO). Indonesia officially requested the establishment of a panel under the Dispute Settlement Body (DSB), the WTO's dispute settlement mechanism, in case WT/DS480.⁹

In this process, the WTO Panel reviewed and juridically examined the European Union's anti-dumping measures and issued a ruling finding that the European Union's policy was inconsistent with the provisions of the Anti-Dumping Agreement (ADA) and GATT 1994. In dispute DS480, the WTO Panel officially ruled in favor of Indonesia and recommended that the European Union adjust its anti-dumping measures accordingly.

As a result, there was an inconsistency between the formal provisions regulated under the WTO Anti-Dumping Agreement (ADA) and the European Union's investigation practices and implementation of anti-dumping measures, which were considered not to fully comply with the principles of fairness and transparency as set out in the agreement. This situation became an obstacle to ensuring the full implementation of the Panel's recommendations by the European Union, thereby creating legal uncertainty for Indonesia as the injured party in this dispute.

This research focuses on two main aspects. First, it examines the legal considerations of the WTO Panel in deciding case DS480, which reflect the legal interpretation of anti-dumping rules in the context of the biodiesel dispute between Indonesia and the European Union. Second, this research analyzes the legal measures that Indonesia may take to ensure that the European Union implements the dispute settlement recommendations in accordance with WTO rules. Thus, this research seeks to fill the juridical gap by

6 Dr. Agus Wibowo dan M.Kom, M.Si, MM.Dr. Sri Yulianingsih, SH, M.Kn, *HUKUM DAGANG INTERNASIONAL* Semarang, Yayasan Prima Agus Teknik bekerja sama dengan Universitas Sains & Teknologi (Universitas STEKOM), hlm. 126

7 WTO, Agreement on implementation of Article VI of the General Agreement on Tariffs and Trade 1994 diakses pada 30 Juni 2025 https://www.wto.org/english/tratop_e/adp_e/antidum2_e.htm

8 Ibid

9 WTO, DS480 *European Union — Anti-Dumping Measures on Biodiesel from Indonesia*, https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds480_e.htm

providing an in-depth analysis of the dispute settlement process and the implementation of the Panel's decision.

This approach enables a comprehensive understanding of how the provisions of the Anti-Dumping Agreement and GATT 1994 were interpreted and applied by the Panel in deciding the case. An in-depth study of this decision is particularly important because it concerns Indonesian products traded in foreign markets. Based on this context, this research aims to juridically analyze the legal considerations of the WTO Panel in the DS480 decision and to identify the legal measures that Indonesia may take to ensure that the European Union effectively implements the Panel's recommendations. This study is expected to contribute to the development of international law scholarship and to enrich strategies for protecting national industries in facing the challenges of global trade.

B. RESEARCH METHOD

This research is normative juridical research, namely research that uses a library-based analytical method. It examines legal norms, principles, doctrines, expert opinions, legal rules, legal theories, and other literature relevant to answering the research questions. Normative legal research generally relies on legal sources such as international agreements, conventions, and other rules of international law, particularly those relating to international trade law.

C. RESULT AND DISCUSSION

1. Legal Considerations of the WTO Panel in Issuing Recommendations Based on International Law Rules and WTO Principles

Based on the review of the anti-dumping measures imposed by the European Union on biodiesel originating from Indonesia in dispute DS480, it can be concluded that such measures reflected a form of disguised protectionism that was inconsistent with the principles of fair and transparent international trade as regulated under the WTO Anti-Dumping Agreement.

The European Union used a cost adjustment method that replaced the actual cost data of Indonesian producers with international market prices that did not reflect the real conditions in Indonesia. It also determined a disproportionate profit margin without considering actual profit data. The lack of transparency in the investigation process and the limited access to data for the Indonesian party also indicated a violation of the transparency obligations under WTO agreements. Moreover, this policy failed to demonstrate objective evidence of injury suffered by the European Union biodiesel industry as a result of imports from Indonesia.¹⁰

The dispute between Indonesia and the European Union in case DS480 arose from the European Union's policy of imposing anti-dumping duties on biodiesel originating from Indonesia. The European Union accused Indonesia of engaging in dumping

10 Council Regulation (EU) No 1194/2013 of 19 November 2013 imposing a definitive anti-dumping duty on imports of biodiesel originating in Indonesia and Argentina and collecting definitively the provisional duty imposed, 2013 O.J. (L 315)
2. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013R1194> diakses pada 2 Juli 2024

practices by selling biodiesel in its market below normal value, thereby causing injury to its domestic industry. However, Indonesia argued that the European Union's measures were inconsistent with the WTO Anti-Dumping Agreement (ADA) and GATT 1994, due to the use of inaccurate production cost data and dumping margins, as well as investigation procedures that were not objective and transparent.¹¹

Indonesia filed a complaint with the WTO by requesting the establishment of a Panel following the anti-dumping measures imposed by the European Union, which was registered as WTO case number DS480. This process marked a formal step within the WTO dispute settlement mechanism, in which trade disputes between members are resolved through structured procedures based on mutually agreed rules of international law. In this context, the role and authority of the WTO are highly important, particularly through the Dispute Settlement Body (DSB), which is responsible for managing the establishment of panels, monitoring the implementation of rulings, and ensuring that dispute resolution is conducted in a fair, transparent, and effective manner in accordance with the principles of multilateral trade.

The role and authority of the World Trade Organization (WTO) in the settlement of international trade disputes are primarily exercised through the Dispute Settlement Body (DSB). The DSB is part of the WTO General Council and has special authority to handle disputes arising between WTO members. The main functions of the DSB are to establish dispute settlement panels, adopt or reject panel and Appellate Body reports, and monitor the implementation of recommendations or rulings issued in such disputes. The DSB also has the authority to authorize the suspension of concessions or countermeasures against members that fail to comply with its rulings.¹²

The dispute settlement process begins with mandatory consultations between the disputing parties. If the consultations fail, the process continues with the establishment of an investigative panel tasked with objectively assessing the case and issuing findings based on WTO rules. This panel is ad hoc in nature and is established within a strict timeframe to ensure that dispute settlement proceeds quickly and effectively. In addition to establishing panels, the DSB also provides the parties with an opportunity to appeal panel decisions to the Appellate Body, which focuses on legal issues and the interpretation of WTO rules.

The implementation of DSB decisions is binding and must be complied with by member states. A state found to have violated WTO provisions is required to adjust its policies or measures in accordance with the ruling within a reasonable period of time, under the supervision of the DSB. If the respondent state fails to comply with the ruling, the complainant state may request authorization from the DSB to take retaliatory measures, such as imposing countervailing tariffs. This mechanism makes the DSB an important instrument in maintaining certainty, fairness, and stability in international trade, while also providing effective legal protection for WTO members, including developing countries, in addressing unfair trade practices.¹³

11 WTO Panel Report DS480, "European Union – Anti-Dumping Measures on Biodiesel from Indonesia," https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds480_e.htm diakses pada 20 Agustus 2025

12 Muhammad Reza Syarifuddin Zaki, "Hukum Perdagangan Internasional", KENCANA, Jakarta 2021, Hlm. 166-167

13 Luh Intan Purnama Dewi, I Made Yudana, dan Dewa Gede Sudika Mangku, "Penyelesaian Sengketa Dagang Internasional atas Kebijakan Report Palm Oil oleh Uni Eropa terhadap Indonesia Ditinjau dari World Trade Organization," *e-Journal Komunikasi Yustisia Universitas Pendidikan Ganesha*, Program Studi Ilmu Hukum, Vol. 5, No. 2, Agustus 2022. Hlm. 106

In the Indonesian biodiesel anti-dumping dispute, the WTO Panel considered that the use of production cost data applicable in the country of origin must be based on the actual records of producers and exporters. In this case, Indonesian biodiesel producers such as PT Musim Mas and Wilmar had used generally accepted accounting standards, both nationally and internationally, including IFRS. The Panel found that the European Union had failed to adequately prove the existence of market distortions that would justify the use of international market prices as a substitute for the original production cost data. Therefore, the use of constructed value that replaced actual cost data constituted a violation of Articles 2.2 and 2.2.1.1 of the Anti-Dumping Agreement.¹⁴

Furthermore, the Panel also criticized the method used by the European Union to determine the profit margin. The European Union tended to apply a linear profit cap that was not based on the actual profit data of Indonesian producers, and even rejected the profit data submitted by Indonesian producers. This method was inconsistent with Article 2.2.2(iii) of the Anti-Dumping Agreement, which requires the use of a fair and proportional method for determining the profit margin. As a result, the calculated dumping margin did not reflect the actual economic reality.

Subsequently, the verification of injury to the European Union's domestic industry also received significant attention. The Panel considered that it was necessary not only to prove an increase in the volume of dumped imports, but also to demonstrate their impact on domestic prices and their actual economic effects on the European Union biodiesel industry. In this case, the Panel found that the European Union's claim of injury was not supported by a comprehensive and transparent examination. Several external factors, such as changes in subsidy policies and issues of excess production capacity affecting the condition of the industry, were not properly taken into account.

Overall, the WTO Panel ruled that the European Union's anti-dumping measures in case DS480 were inconsistent with the provisions of the Anti-Dumping Agreement and GATT 1994. The Panel recommended that the European Union adjust its measures, including by removing unlawfully imposed anti-dumping duties, and ensure the protection of the interests of Indonesian exporters in accordance with the WTO principles of fairness and non-discrimination.

2. Measures Taken by the Government of Indonesia to Follow Up on the WTO Panel Decision in Case No. DS480

After the WTO Panel's final report is issued and adopted by the Dispute Settlement Body (DSB), the implementation stage that must be carried out by the respondent state consists of several important steps. First, the losing state is required to state its intention to comply with and implement the recommendations or rulings within 30 days after the adoption of the decision. If immediate compliance is not possible, the respondent state is granted a "reasonable period of time" to adjust the policy or measure found to be inconsistent with WTO rules.

During this adjustment period, the DSB monitors the progress of the implementation of the recommendations. If no significant changes are made after the given period has

¹⁴ Mahbub Junaedi, "Legal Analysis of Injury Determination in Indonesian Antidumping Investigation and its Accordance with Article VI of The GATT 1994," Fakultas Hukum Universitas Indonesia, 2011, <https://lib.ui.ac.id/file?file=digital%2F2016-8%2F20325550-S24777-Mahbub+Junaedi.pdf>

expired, the complainant state may request compensation from the respondent state, usually in the form of concessions or tariff reductions in other sectors of particular interest to the complainant. If compensation negotiations do not result in an agreement within 20 days, the complainant state has the right to request authorization from the DSB to suspend concessions or other obligations toward the respondent state, commonly known as retaliation.

In addition, both the plaintiff and the defendant have the right to appeal the panel's decision to the Appellate Body. These appeals are limited to legal aspects such as regulatory interpretation, without reviewing the evidence or introducing new issues. During the appeal process, the name of the panel's decision could not be immediately accepted, but the defendant's state was still obliged to declare its intention to comply with the decision after the appeal report was received. With this mechanism, the WTO ensures the effective implementation of the judgment and provides an opportunity for aggrieved parties to obtain justice in the settlement of international trade disputes.

Following up on the WTO panel's ruling that won in Indonesia's DS480 case, the Indonesian government took various strategic steps to ensure the implementation of the ruling in accordance with WTO provisions. The first step taken is to coordinate across ministries, involving the Ministry of Trade, the Ministry of Foreign Affairs, and the Coordinating Ministry for Economic Affairs. This coordination aims to ensure that the policies and actions taken can be consistent and integrated in overseeing EU compliance and protecting the interests of the national biodiesel industry.

In addition, Indonesia strengthens the capacity of data management of the biodiesel industry, especially by ensuring production cost data and producer financial records in accordance with applicable accounting standards. Improving the quality of this data is important to deal with future dumping allegations and prepare strong evidence in international trade dispute settlement mechanisms. The government is also trying to encourage the use of Indonesia Sustainable Palm Oil (ISPO) sustainability certification as a recognized biodiesel industry standard. Although it has not been recognized as an equivalent by the European Union, strengthening ISPO is a preventive measure to face technical and non-tariff obstacles that are claimed to be based on environmental sustainability.¹⁵

Multilateral diplomacy is another important part, where Indonesia actively collaborates with other palm oil producing countries through the Council of Palm Oil Producing Countries (CPOPC) forum. Through this forum, Indonesia seeks to strengthen its bargaining position and gather international support so that the covert protectionism policies carried out by the European Union can be reduced or eliminated. In the face of the new EU policy in the form of non-tariff barriers through the Renewable Energy Directive II (RED II), the government continues to monitor and conduct studies to formulate compensation measures or submit further lawsuits at the WTO. such as the DS618 case on biodiesel subsidies.¹⁶

15 Musim Mas, "ISPO Certified Palm Oil Supplier," 2023, <https://www.musimmas.com/sustainability/certifications-and-verifications/ispo-certified-palm-oil-supplier/>, diakses pada 13 Agustus 2025

16 Asia Palm Oil, "Supplying 70% of Global CPO, Indonesia and Malaysia Agree on Palm Oil Industry Collaboration," 29 November 2024, <https://www.asia-palmoil.com/post/supplying-70-of-global-cpo-indonesia-and-malaysia-agree-on-palm-oil-industry-collaboration>, diakses 15 Agustus 2025

Indonesia is also preparing a retaliatory option that can be submitted to the WTO Dispute Settlement Council if the EU does not comply with the ruling within a reasonable period of time. This retaliation is in the form of suspension of trade concessions or the imposition of retaliatory tariffs that can put diplomatic and economic pressure on the EU to immediately adjust its policies. However, the government emphasized that the implementation of retaliation must be carried out with careful consideration and good coordination to avoid the escalation of trade conflicts that can harm both countries.¹⁷

D. CONCLUSION

Legal considerations of the World Trade Organization (WTO) panel judge in deciding the European Union's Anti-Dumping case against biodiesel from Indonesia. The panel judge found that the EU's anti-dumping policy was not in accordance with the provisions of the Anti-Dumping Agreement (ADA) and the General Agreement on Tariffs and Trade (GATT) 1994, especially in the aspects of determining the proper cost of production, the calculation of fair dumping margins, and evidence of real losses to the EU's domestic industry that must meet the standards of objectivity and transparency. The panel also asserted that the EU failed to use actual production cost data and denied transparent access to investigative methodologies, so the anti-dumping policy was not based on applicable international trade law.

Legal steps that Indonesia can take in implementing the WTO Dispute Settlement Body (DSB) decision. Indonesia needs to take proactive steps in overseeing the implementation of the decision through cross-ministerial coordination such as the Ministry of Trade, the Ministry of Foreign Affairs, and the Coordinating Ministry for Economic Affairs. Strengthening the capacity of data management and certification of the biodiesel industry, especially through the Indonesia Sustainable Palm Oil (ISPO), is important in facing protectionist challenges, including non-tariff barriers. In addition, diversifying the biodiesel export market outside the European Union is also an important strategy to reduce dependence and strengthen Indonesia's bargaining position in the global market. In addition to proactive steps in overseeing the implementation of the ruling through cross-ministerial coordination, Indonesia also has a retaliatory instrument that can be used if the EU does not comply with the WTO DS480 panel ruling. This retaliation is in the form of the right for Indonesia to seek the approval of the WTO's Dispute Settlement Agency (DSB) to suspend concessions or obligations granted to the European Union, including retaliatory measures such as the imposition of retaliatory tariffs or other proportionate trade restrictions to compel EU compliance. However, the implementation of retaliation must be carried out with full calculation and coordination so as not to cause wider trade conflicts and maintain bilateral economic relations. Thus, retaliation becomes a legal strategic tool that strengthens Indonesia's negotiating position in international trade.

17 WTO Dispute Settlement Body, *Retaliation and Suspension of Concessions in WTO*, https://www.wto.org/english/thewto_e/whatis_e/tif_e/dev7_wto_trade_disputes.htm

REFERENCES

Books

- Risnain, M., Nurbani, E. S., Pitaloka, D., & Apriliana, A. N. R. (2023). *Introduction to International Law: Approaches to Legal Proficiency, Legal Ethics, Law and Gender, and Law in Local Contexts*. Jakarta: Kencana
- Peter Van den Bosche, Daniar Natakusumah, and Joseph Wira Koesnaldi (2010), *Introduction to WTO (World Trade Organization) Law*, Publisher of the Indonesian Torch Foundation, Jakarta
- Wibowo, Agus, M.Kom, M.Si, MM., and Sri Yulianingsih, SH, M.Kn. (2024). *International Commercial Law*. Semarang: Yayasan Prima Agus Teknik in collaboration with the University of Science & Technology (STEKOM University)
- Zaki, Muhammad Reza Syarifudin. (2021). *International Trade Law*. Jakarta: KENCANA

Journal

- Dewi, Luh Intan Purnama, Yudana, I Made, & Mangku, Dewa Gede Sudika. (2022). *International Trade Dispute Settlement on the Palm Oil Report Policy by the European Union against Indonesia Reviewed from the World Trade Organization*. *e-Journal of Judicial Communication Ganesha University of Education*, 5(2), 106.
- Junaedi, M. (2011). *Legal Analysis of Injury Determination in Indonesian Antidumping Investigation and its Accordance with Article VI of The GATT 1994*. Fakultas Hukum Universitas Indonesia. <https://lib.ui.ac.id/file?file=digital%2F2016-8%2F20325550-S24777-Mahbub+Junaedi.pdf>

Website

- Asia Palm Oil. (2024, November 29). Supplying 70 % of global CPO, Indonesia and Malaysia agree on palm oil industry collaboration. <https://www.asia-palmoil.com/post/supplying-70-of-global-cpo-indonesia-and-malaysia-agree-on-palm-oil-industry-collaboration>
- Musim Mas. (2023). ISPO Certified Palm Oil Supplier. <https://www.musimmas.com/sustainability/certifications-and-verifications/ispo-certified-palm-oil-supplier/>

Official online source/International Agreements

- World Trade Organization. *WTO Dispute Settlement Body: Retaliation and Suspension of Concessions in WTO*. https://www.wto.org/english/thewto_e/whatis_e/tif_e/dev7_wto_trade_disputes.h
- World Trade Organization, *Daftar Kronologi Kasus Sengketa*, https://www.wto.org/english/tratop_e/dispu_e/dispu_status_e.htm
- World Trade Organization, *Indonesia and the WTO* https://www.wto.org/english/thewto_e/countries_e/indonesia_e.htm#disputesHeading
- World Trade Organization. (2025). *Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (Anti-Dumping Agreement)*.

https://www.wto.org/english/docs_e/legal_e/adp_e.htm

World Trade Organization. (2025). *Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (Anti-Dumping Agreement)*.
https://www.wto.org/english/docs_e/legal_e/adp_e.htm

European Commission. (2013). *Council Regulation (EU) No 1194/2013 of 19 November 2013 imposing a definitive anti-dumping duty on imports of biodiesel originating in Indonesia and Argentina and collecting definitively the provisional duty imposed*. *Official Journal of the European Union*, L 315/2.
<https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX:32013R1194>

WTO Panel Report DS480, “European Union – Anti-Dumping Measures on Biodiesel from Indonesia,”
https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds480_e.htm