




August 27, 2024

MEMORANDUM TO: Scot Fullerton
Acting Deputy Assistant Secretary
AD/CVD Operations
Enforcement and Compliance

FROM: Constance Handley 
Acting Executive Director
Office of Policy
Enforcement and Compliance

SUBJECT: List of Surrogate Countries for Antidumping Investigations and
Reviews from the Russian Federation (“Russia”)

This memorandum provides (1) a surrogate country list for the purpose of selecting a primary surrogate country in antidumping duty (AD) proceedings concerning imports from Russia; and (2) guidance concerning Commerce’s process of selecting a primary surrogate country.

Since non-market economy (NME) countries do not operate on market principles of cost or pricing structures, the prices and costs in NME countries do not reflect the fair value of the merchandise.¹ Therefore, Commerce is required to use prices and costs of factors of production in one or more market economy countries to calculate AD duties. According to section 773(c)(4) of the Act (as amended) (the Act), these surrogate prices and costs must be, to the extent possible, from market economy countries that are at a level of economic development comparable to that of the NME country, and significant producers of comparable merchandise.

The surrogate country list for Russia provided below satisfies the first of the above-referenced requirements and includes six market economy countries that are at levels of economic development comparable to that of Russia’s, as determined by per capita levels of gross national income (GNI).

Commerce should treat the surrogate countries on the list with equal consideration and select the primary country from the surrogate country list that is a significant producer of comparable merchandise.² If more than one country from the surrogate country list or off the list satisfies both statutory criteria, Commerce should consider the public availability and quality of the data

¹ See section 771(18)(A) of the Act.

² The statute does not define “significant” or “comparable,” although “comparable” encompasses a larger set of products than “like product,” which is the legal standard enumerated in the Act for what the domestic industry produces which competes with the imports to be investigated. Comparable merchandise can be identified, for example, on the basis of similarities in production factors (physical and non-physical) and factor intensities.

on the record to make their determination.³ If none of the countries on the surrogate country list is a significant producer of comparable merchandise, Commerce may select a country that is not on the surrogate country list, but is a significant producer of comparable merchandise with the best available data provided on the record.

For other circumstances, see section 773(c)(2) of the statute and Import Administration Policy Bulletin 04.1 for guidance.

The below list constitutes the 2024 surrogate country list for Russia in consideration of the above-mentioned criteria, centered around Russia's per capita GNI level.

Surrogate Country List for Russia		
<u>Surrogate Countries</u>		<u>Per Capita Gross National Income Levels (in \$US)⁴</u>
Romania		16,670
Chile		15,820
Bulgaria		14,460
	Russia's Level	14,250
Costa Rica		13,850
Mexico		12,100
Malaysia		11,970

³ To assess the quality of the data, the case team should, to the extent possible, use factor prices reported on a duty- and tax-exclusive basis, giving due consideration to aggregation, small-quantity, contemporaneity, and data-source concerns.

⁴ World Bank, *World Bank Development Indicators*, <http://data.worldbank.org/indicator/NY.GNP.PCAP.CD> (accessed August 12, 2024). Per capita GNI data represent the latest available information as of 2023.

Gross national income per capita 2023, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
1	Bermuda	134,640	1	Singapore	118,710
2	Norway	102,460	2	Qatar	116,870
3	Switzerland	95,160	3	Bermuda	112,650
4	Luxembourg	88,370	4	Norway	108,790
5	Ireland	80,390	5	Ireland	98,650
6	United States	80,300	6	Luxembourg	98,490
7	Iceland	79,840	7	Switzerland	90,080
8	Isle of Man	76,300	8	Brunei Darussalam	87,550
9	Faroe Islands	74,420	9	United Arab Emirates	83,750
10	Denmark	73,360	10	United States	82,190
11	Singapore	70,590	11	Denmark	79,390
12	Qatar	70,070	12	Iceland	79,290
13	Cayman Islands	68,790	13	Faroe Islands	78,740 ^b
14	Australia	63,140	14	Hong Kong SAR, China	77,880
15	Sweden	61,650	15	Netherlands	77,750
16	Netherlands	60,670	16	Andorra	75,090 ^b
17	Hong Kong SAR, China	55,200	17	Austria	73,520
18	Austria	55,070	18	Macao SAR, China	73,180 ^h
19	Israel	55,020	19	Sweden	72,990
20	Belgium	54,530	20	Germany	72,110
21	Germany	53,970	21	Belgium	71,990
22	Canada	53,930	22	Kuwait	67,730
23	Finland	53,390	23	Australia	66,260
24	United Arab Emirates	53,290	24	Finland	64,940
25	Andorra	50,080	25	France	62,130
26	New Zealand	48,610	26	Canada	60,700
27	United Kingdom	47,800	27	Cayman Islands	60,120
28	San Marino	47,120	28	Bahrain	60,090
29	Kuwait	46,140	29	San Marino	59,020 ^b
30	France	45,070	30	Italy	58,650
31	Macao SAR, China	43,940	31	United Kingdom	58,140
32	Japan	39,030	32	Malta	56,880
33	Italy	38,200	33	Saudi Arabia	55,290
34	New Caledonia	37,370	34	Korea, Rep.	55,040
35	Sint Maarten (Dutch part)	36,960	35	Slovenia	54,130
36	Korea, Rep.	35,490	36	Israel	53,340
37	Brunei Darussalam	34,970	37	New Zealand	52,750
38	Malta	34,240	38	Japan	52,640
39	Aruba	33,410	39	Spain	52,420
40	Spain	32,180	40	Czech Republic	51,370
41	Bahamas, The	31,990	41	Cyprus	51,330 ^a
42	Cyprus	30,990 ^a	42	Lithuania	50,100
43	Slovenia	30,620	43	Guyana	50,060
44	Saudi Arabia	28,690	44	Portugal	47,850
45	Bahrain	28,280	45	Poland	47,380
46	Estonia	27,240	46	Estonia	47,350
47	Czech Republic	27,110	47	Sint Maarten (Dutch part)	47,250 ^h
48	Turks and Caicos Islands	26,570	48	Romania	46,620
49	Portugal	26,270	49	Croatia	45,950
50	Puerto Rico	25,240	50	Hungary	44,650
51	Lithuania	24,820	51	Türkiye	43,700
52	Slovak Republic	22,790	52	Aruba	43,670
53	Greece	22,580	53	Russian Federation	43,510 ^c
54	Nauru	22,090	54	Slovak Republic	43,500
55	Latvia	21,970	55	Latvia	41,420
56	Oman	21,540	56	Oman	41,280
57	St. Kitts and Nevis	21,380	57	Greece	40,880
58	Barbados	21,280	58	Panama	38,110
59	Croatia	20,670	59	Bulgaria	37,380
60	Curaçao	20,590	60	Malaysia	36,120
61	Guyana	20,360	61	Kazakhstan	35,420
62	Antigua and Barbuda	19,990	62	Bahamas, The	33,790 ^h
63	Hungary	19,820	63	Puerto Rico	32,990 ^b
64	Poland	19,730	64	St. Kitts and Nevis	32,540

Gross national income per capita 2023, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
65	Uruguay	19,530	65	Seychelles	32,440
66	Panama	18,010	66	Uruguay	31,690
67	Trinidad and Tobago	17,940	67	Chile	31,590
68	Seychelles	16,940	68	Montenegro	31,520
69	Romania	16,670	69	Trinidad and Tobago	30,400
70	Chile	15,820	70	Antigua and Barbuda	30,350
71	Bulgaria	14,460	71	Mauritius	30,230
72	Palau	14,250	72	Belarus	29,640
72	Russian Federation	14,250 ^c	73	Curaçao	29,470
74	Costa Rica	13,850	74	Argentina	28,710
75	China	13,400	75	Serbia	25,880
76	Argentina	12,520	76	Costa Rica	25,800
77	St. Lucia	12,400	77	Mexico	24,970
78	Mexico	12,100	78	Dominican Republic	24,460
79	Malaysia	11,970	79	China	24,380
80	Türkiye	11,650	80	Turks and Caicos Islands	23,760 ^h
81	Mauritius	11,530	81	North Macedonia	23,510
82	Montenegro	11,500	82	Georgia	23,040 ^d
83	Maldives	11,030	83	St. Lucia	22,980
84	Kazakhstan	10,940	84	Thailand	22,880
85	St. Vincent and the Grenadines	10,070	85	Bosnia and Herzegovina	22,790
86	Serbia	10,030	86	Azerbaijan	22,640
87	Grenada	9,800	87	Armenia	22,440
88	Dominican Republic	9,700	88	Maldives	21,720
89	Brazil	9,070	89	Nauru	21,570 ^b
90	Dominica	8,920	90	Colombia	21,420
91	Bosnia and Herzegovina	8,160	91	Albania	21,110
92	Gabon	7,960	92	Brazil	19,990
93	Belarus	7,780	93	St. Vincent and the Grenadines	19,740
94	North Macedonia	7,660	94	Gabon	19,710
95	Botswana	7,620	95	Libya	19,670 ^b
96	Albania	7,570	96	Suriname	19,330
96	Libya	7,570	97	Botswana	19,140
96	Marshall Islands	7,570	98	Ukraine	18,560 ^c
99	Tuvalu	7,550	99	Barbados	18,550 ^h
100	Armenia	7,330	100	Egypt, Arab Rep.	17,990
101	Belize	7,190	101	Palau	17,940 ^b
102	Thailand	7,180	102	Iran, Islamic Rep.	17,900 ^h
103	Peru	6,990	103	Dominica	17,650
104	Colombia	6,870	104	Moldova	17,600 ^f
105	South Africa	6,750	105	Paraguay	16,910
106	Azerbaijan	6,680	106	Algeria	16,790
106	Georgia	6,680 ^d	107	Grenada	16,550
108	Ecuador	6,510	108	Mongolia	16,390
109	Paraguay	6,200	109	Peru	15,860
110	Jamaica	6,150	110	South Africa	15,630
111	Moldova	6,110 ^f	111	Ecuador	15,510
112	Kosovo	5,980	112	Kosovo	15,310 ^b
113	Iraq	5,600	113	Indonesia	15,210
114	Fiji	5,580	114	Viet Nam	14,400
114	Guatemala	5,580	115	Bhutan	14,240
116	Suriname	5,360	116	Iraq	14,040
117	Equatorial Guinea	5,240	117	Fiji	14,000
118	Ukraine	5,070 ^c	118	Sri Lanka	13,990
119	Tonga	5,000	119	Guatemala	13,820
120	Algeria	4,960	120	Belize	13,710
121	Mongolia	4,950	121	Equatorial Guinea	13,420
122	El Salvador	4,920	122	Tunisia	13,310
123	Indonesia	4,870	123	Lebanon	12,490
123	Namibia	4,870	124	Namibia	12,170
125	Iran, Islamic Rep.	4,680	125	Philippines	11,940
126	Jordan	4,460	126	El Salvador	11,750

Gross national income per capita 2023, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
127	Cabo Verde	4,280	127	Jamaica	11,160
128	Philippines	4,230	128	Eswatini	10,950
129	West Bank and Gaza	4,220	129	Bolivia	10,490
130	Viet Nam	4,180	130	Jordan	10,360
131	Micronesia, Fed. Sts.	4,150	131	India	10,030
132	Samoa	4,020	132	Uzbekistan	9,640
133	Egypt, Arab Rep.	3,900	133	Morocco	9,600 e
134	Eswatini	3,860	134	Bangladesh	9,430
135	Tunisia	3,770	135	Cabo Verde	9,050
136	Lebanon	3,740	136	Lao PDR	8,640
137	Kiribati	3,730	137	Marshall Islands	8,570 b
138	Morocco	3,700 e	138	Tuvalu	7,790 b
139	Vanuatu	3,660	139	Nicaragua	7,640
140	Bolivia	3,600	140	Tonga	7,560 b
141	Bhutan	3,590	141	Côte d'Ivoire	7,480
142	Sri Lanka	3,540	142	Ghana	7,370
143	Djibouti	3,450	143	Angola	7,310
144	Honduras	2,900	144	West Bank and Gaza	7,060
145	Bangladesh	2,860	145	Djibouti	7,040
146	Papua New Guinea	2,840	146	Mauritania	6,930
147	Côte d'Ivoire	2,670	147	Kyrgyz Republic	6,750
148	India	2,540	148	Honduras	6,680
149	São Tomé and Príncipe	2,480	149	Samoa	6,600 b
150	Congo, Rep.	2,470	150	Congo, Rep.	6,550
151	Uzbekistan	2,360	151	Tajikistan	6,380
152	Ghana	2,340	152	Kenya	6,220
153	Nicaragua	2,270	153	Nigeria	6,200
153	Solomon Islands	2,270	154	São Tomé and Príncipe	6,140
155	Mauritania	2,150	155	Pakistan	6,110
156	Timor-Leste	2,140	156	Kiribati	5,900 b
157	Angola	2,130	157	Timor-Leste	5,880 b
158	Lao PDR	2,120	158	Myanmar	5,800 h
159	Kenya	2,110	159	Cambodia	5,460
160	Nigeria	1,930	160	Cameroon	5,270
161	Cambodia	1,810	161	Nepal	5,240
162	Haiti	1,740	162	Senegal	4,670
162	Zimbabwe	1,740	163	Micronesia, Fed. Sts.	4,620 b
164	Kyrgyz Republic	1,700	164	Papua New Guinea	4,340 b
165	Senegal	1,660	165	Benin	4,220
166	Cameroon	1,650	166	Zambia	3,960
167	Comoros	1,600	167	Guinea	3,940
168	Pakistan	1,500	168	Tanzania	3,900 g
169	Benin	1,440	169	Comoros	3,860
169	Tajikistan	1,440	170	Zimbabwe	3,850
171	Nepal	1,370	171	Vanuatu	3,770 b
172	Guinea	1,360	172	Rwanda	3,290
173	Zambia	1,320	173	Lesotho	3,270
174	Myanmar	1,210	174	Haiti	3,260 h
174	Tanzania	1,210 g	175	Togo	3,170
176	Lesotho	1,160	176	Gambia, The	3,120
177	Ethiopia	1,130	177	Sudan	3,110
178	Togo	1,030	178	Ethiopia	3,100
179	Sudan	990	179	Solomon Islands	3,080 b
180	Rwanda	980	180	Uganda	3,040
180	Uganda	980	181	Syrian Arab Republic	2,780
182	Guinea-Bissau	900	182	Guinea-Bissau	2,670
183	Mali	860	183	Burkina Faso	2,610
184	Burkina Faso	850	184	Mali	2,600
185	Gambia, The	830	185	Sierra Leone	2,130
186	Liberia	730	186	Afghanistan	2,100 b
187	Chad	710	187	Chad	1,940
188	Congo, Dem. Rep.	660	188	Madagascar	1,840

Gross national income per capita 2023, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
189	Malawi	640	189	Malawi	1,820
190	Somalia	610	190	Niger	1,750
191	Niger	600	191	Liberia	1,700
192	Sierra Leone	560	192	Congo, Dem. Rep.	1,620
192	Syrian Arab Republic	560	193	Somalia	1,610
194	Madagascar	530	194	Mozambique	1,510
194	Mozambique	530	195	Central African Republic	1,200
196	Central African Republic	470	196	Burundi	950
197	Afghanistan	360		American Samoa	-
198	Burundi	230		British Virgin Islands	-
	American Samoa	-		Channel Islands	-
	British Virgin Islands	-		Cuba	-
	Channel Islands	-		Eritrea	-
	Cuba	-		French Polynesia	-
	Eritrea	-		Gibraltar	-
	French Polynesia	-		Greenland	-
	Gibraltar	-		Guam	-
	Greenland	-		Isle of Man	-
	Guam	-		Korea, Dem. People's Rep.	-
	Korea, Dem. People's Rep.	-		Liechtenstein	-
	Liechtenstein	-		Monaco	-
	Monaco	-		New Caledonia	-
	Northern Mariana Islands	-		Northern Mariana Islands	-
	South Sudan	-		South Sudan	-
	St. Martin (French part)	-		St. Martin (French part)	-
	Turkmenistan	-		Turkmenistan	-
	Venezuela, RB	-		Venezuela, RB	-
	Virgin Islands (U.S.)	-		Virgin Islands (U.S.)	-
	Yemen, Rep.	-		Yemen, Rep.	-
World		13,212	World		22,855
	East Asia & Pacific	13,712		East Asia & Pacific	25,050
	Europe & Central Asia	29,061		Europe & Central Asia	49,423
	Latin America & Caribbean	9,566		Latin America & Caribbean	21,122
	Middle East & North Africa	8,732		Middle East & North Africa	20,626
	North America	77,494		North America	79,895
	South Asia	2,388		South Asia	9,291
	Sub-Saharan Africa	1,642		Sub-Saharan Africa	4,714
	Low income	769		Low income	2,356
	Lower middle income	2,513		Lower middle income	9,197
	Upper middle income	10,588		Upper middle income	22,817
	High income	48,224		High income	63,398

- Not available.

PPP is purchasing power parity; an international dollar has the same purchasing power over GDP as a U.S. dollar has in the United States. PPP figures are extrapolated in WDI from 2021 benchmark results by the International Comparison Program (ICP), unless otherwise footnoted. For OECD and Eurostat countries, PPP figures are sourced from their annual PPP programs.

Note: Table lists 217 economies, but rankings include only those with confirmed GNI per capita estimates for at least one year during the last three years period. Figures in italics are for 2022 or 2021.

a. Data are for the area controlled by the government of Cyprus. b. PPP is extrapolated from regression-based estimates. c. Based on data from official statistics of Ukraine and Russian Federation as well as the United Nations; by relying on these data, the World Bank does not intend to make any judgment on the legal or other status of the territories concerned or to prejudice the final determination of the parties' claims. d. Excludes Abkhazia and South Ossetia. e. Includes Western Sahara. f. Excludes Transnistria. g. Covers mainland Tanzania only. h. PPP is extrapolated from time series estimates based on previous benchmark data by the ICP. i. Not classified

<http://data.worldbank.org/data-catalog/world-development-indicators>