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MEMORANDUM TO: James Maeder
Deputy Assistant Secretary
AD/CVD Operations
Enforcement and Compliance

FROM: Steven Presing
Executive Director *Alexander Hammer*
Office of Policy
Enforcement and Compliance

SUBJECT: List of Surrogate Countries for Antidumping Investigations and
Reviews from the Socialist Republic of Vietnam (“Vietnam”)

If you base normal value on surrogate country factor prices, then section 773(c)(4) of the statute requires, to the extent possible, that you use a surrogate country that (1) is at a level of economic development comparable to that of Vietnam and (2) is a significant producer of merchandise comparable to the subject merchandise.

With regard to the first statutory requirement, the six countries on the non-exhaustive list below are at the same level of economic development as Vietnam in terms of per capita gross national income (GNI). Per capita GNI is the primary indicator of a country’s level of economic development.

For purposes of selecting a surrogate country, you should, following *Magnesium from China* (59 FR 55424) and *Saccharin from China* (59 FR 58818), treat the six countries listed below as being at the same level of economic development as Vietnam. Next, determine which, if any, is a significant producer of comparable merchandise. The statute does not define “significant” or “comparable,” although “comparable” encompasses a larger set of products than “like product.” We have in past cases identified comparable merchandise on the basis of similarities in production factors (physical and non-physical) and factor intensities (*see, e.g., Magnesium*). *See* Import Administration Policy Bulletin 04.1 for further guidance.



If you find that more than one of the six countries satisfies both statutory requirements then you should, if possible, narrow the field to a single country on the basis of data availability and quality. *See Pencils from China* (59 FR 55625). Following the practice specified in *Certain Butt-Weld Carbon Steel Pipe Fittings from China* (57 FR 21062), all else being equal and to the extent possible, you should use broad, publicly available price measures. You should use, to the extent possible, factor prices reported on a duty- and tax-exclusive basis, giving due consideration, of course, to aggregation, small-quantity, contemporaneity, and data-source concerns.

This list provides you countries that are at the same level of economic development as Vietnam. In general, the countries listed below are likely to have good data availability and quality, *i.e.*, the specificity of these countries' data are more likely to assist the team in its valuation of inputs. However, you may also consider other countries on the case record that are significant producers of comparable merchandise if the record provides you adequate information to evaluate them. Countries on the case record that are at the same level of economic development as Vietnam should be given equal consideration for the purposes of selecting a surrogate country. Countries that are not at the same level of economic development as Vietnam's, but still at a level of economic development comparable to Vietnam, should be selected only to the extent that data considerations outweigh the difference in levels of economic development. As noted above, per capita GNI is the primary indicator of a country's level of economic development.

In exceptional cases, you may not be able to find an appropriate market economy country or countries that provide adequate factor data for the determination of normal value. If that is the case, you will have to rely on the price of comparable merchandise that is produced in a surrogate country and sold in other countries, including the United States. *See* section 773(c)(2) of the statute and Import Administration Policy Bulletin 04.1 for further guidance.

<u>Country</u>	<u>Per Capita GNI, 2021 (\$USD)¹</u>
Vietnam	3,560
Indonesia	4,140
Sri Lanka	3,820
Philippines	3,640
Egypt	3,510
Bolivia	3,360
Morocco	3,350

¹ World Bank, *World Bank Development Indicators*, <http://data.worldbank.org/indicator/NY.GNP.PCAP.CD> (accessed August 16, 2022).

Country Name	2021
Bermuda	116540
Switzerland	90360
Norway	84090
Ireland	74520
United States	70430
North America	68151.5835
Denmark	68110
Iceland	64410
Singapore	64010
Sweden	58890
Qatar	57120
Australia	56760
Netherlands	56370
Hong Kong SAR, China	54450
Finland	53660
Austria	52210
Germany	51040
Belgium	50510
Israel	49560
Post-demographic dividend	49101.4629
Canada	48310
High income	47903.6421
United Kingdom	45380
New Zealand	45340
France	43880
Japan	42620
OECD members	42094.8709
Euro area	41721.5125
European Union	37534.9544
Italy	35710
Korea, Rep.	34980
Malta	30560
Spain	29740
Slovenia	28240
Cyprus	28130
Bahamas, The	27220
Europe & Central Asia	26421.0043
Estonia	25970
Czech Republic	24070
Portugal	23730
Turks and Caicos Islands	23600
Lithuania	21610
Slovak Republic	20250
Greece	20140
Nauru	19470
Latvia	19370

St. Kitts and Nevis	18560
Hungary	17740
Central Europe and the Baltics	17435.8559
Croatia	17150
Barbados	16720
Poland	16670
Uruguay	15800
Trinidad and Tobago	15070
Chile	15000
Antigua and Barbuda	14900
Romania	14170
Panama	14010
Seychelles	13260
Other small states	12935.3483
East Asia & Pacific	12740.0087
Costa Rica	12310
World	12069.5966
China	11890
Small states	11742.3009
Russian Federation	11600
Malaysia	10930
Late-demographic dividend	10896.815
Mauritius	10860
Bulgaria	10720
Upper middle income	10363.0734
Argentina	10050
Turkiye	9830
St. Lucia	9680
Grenada	9630
East Asia & Pacific (IDA & IBRD countries)	9402.8556
Guyana	9380
Mexico	9380
Europe & Central Asia (IDA & IBRD countries)	9346.36514
Caribbean small states	9305.59651
Montenegro	9300
East Asia & Pacific (excluding high income)	9299.67319
Kazakhstan	8720
Serbia	8440
Libya	8430
Maldives	8400
Europe & Central Asia (excluding high income)	8351.26388
Dominican Republic	8220
St. Vincent and the Grenadines	8100
Latin America & Caribbean	8023.87562
Latin America & the Caribbean (IDA & IBRD countries)	7907.68641
Dominica	7760
Brazil	7720

Latin America & Caribbean (excluding high income)	7537.33286
Thailand	7260
Gabon	7100
Belarus	6950
Botswana	6940
IBRD only	6916.81047
Bosnia and Herzegovina	6770
Tuvalu	6760
Peru	6520
South Africa	6440
Colombia	6160
North Macedonia	6130
Albania	6110
Ecuador	5930
Middle income	5844.8856
Equatorial Guinea	5810
IDA & IBRD total	5475.67776
Moldova	5460
Paraguay	5340
Low & middle income	5297.55622
Marshall Islands	5050
Iraq	5040
Kosovo	4970
Guatemala	4940
Azerbaijan	4880
Fiji	4860
Jamaica	4800
Georgia	4740
Armenia	4560
Namibia	4550
Jordan	4480
Suriname	4440
Belize	4290
West Bank and Gaza	4220
Indonesia	4140
El Salvador	4140
Ukraine	4120
Micronesia, Fed. Sts.	3880
Pacific island small states	3866.35582
Samoa	3860
Sri Lanka	3820
Mongolia	3760
Eswatini	3680
Algeria	3660
Philippines	3640
Tunisia	3630
Early-demographic dividend	3627.34032

Vietnam	3560
Egypt, Arab Rep.	3510
Middle East & North Africa (excluding high income)	3460.61405
Middle East & North Africa (IDA & IBRD countries)	3451.19665
Lebanon	3450
Bolivia	3360
Morocco	3350
Cabo Verde	3330
Djibouti	3300
Vanuatu	3140
Papua New Guinea	2790
Bangladesh	2620
Honduras	2540
Lao PDR	2520
Lower middle income	2484.95081
Cote d'Ivoire	2450
Ghana	2360
Solomon Islands	2300
Sao Tome and Principe	2280
India	2170
South Asia	2104.36747
South Asia (IDA & IBRD)	2104.36747
Nigeria	2100
Kenya	2010
Nicaragua	2010
Uzbekistan	1960
Timor-Leste	1940
IDA blend	1830.39831
Angola	1770
Mauritania	1730
Africa Western and Central	1728.85038
Fragile and conflict affected situations	1665.5837
Congo, Rep.	1630
Cameroon	1590
Sub-Saharan Africa (IDA & IBRD countries)	1577.97357
Sub-Saharan Africa	1577.97357
Sub-Saharan Africa (excluding high income)	1576.97911
Cambodia	1550
Senegal	1540
Pakistan	1500
Africa Eastern and Southern	1475.69736
Comoros	1460
IDA total	1438.00911
Haiti	1420
Zimbabwe	1400
Pre-demographic dividend	1396.90898
Benin	1370

Lesotho	1270
IDA only	1239.94519
Nepal	1230
Kyrgyz Republic	1180
Least developed countries: UN classification	1161.41893
Tajikistan	1150
Myanmar	1140
Tanzania	1140
Zambia	1040
Heavily indebted poor countries (HIPC)	1015.5973
Guinea	1010
Togo	980
Ethiopia	960
Mali	870
Burkina Faso	860
Rwanda	850
Uganda	840
Gambia, The	800
Guinea-Bissau	780
Low income	721.621561
Sudan	670
Chad	650
Malawi	630
Liberia	620
Niger	590
Congo, Dem. Rep.	580
Central African Republic	530
Sierra Leone	510
Madagascar	500
Mozambique	480
Somalia	450
Burundi	240
Aruba	
Afghanistan	
Andorra	
Arab World	
United Arab Emirates	
American Samoa	
Bahrain	
Brunei Darussalam	
Bhutan	
Channel Islands	
Cuba	
Curacao	
Cayman Islands	
Eritrea	
Faroe Islands	

Gibraltar
Greenland
Guam
Isle of Man
Not classified
Iran, Islamic Rep.
Kiribati
Kuwait
Liechtenstein
Luxembourg
Macao SAR, China
St. Martin (French part)
Monaco
Middle East & North Africa
Northern Mariana Islands
New Caledonia
Oman
Palau
Puerto Rico
Korea, Dem. People's Rep.
French Polynesia
Saudi Arabia
San Marino
South Sudan
Sint Maarten (Dutch part)
Syrian Arab Republic
Turkmenistan
Tonga
Venezuela, RB
British Virgin Islands
Virgin Islands (U.S.)
Yemen, Rep.