



August 15, 2019

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

FROM: Carole Showers *Catf*
Executive Director
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). 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, 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, 2018 (\$USD)¹</u>
Vietnam	2,400
Angola	3,370
Bolivia	3,370
Egypt	2,800
Honduras	2,330
Nicaragua	2,030
India	2,020

¹ World Bank, *World Bank Development Indicators*, <http://data.worldbank.org/indicator/NY.GNP.PCAP.CD> (accessed August 12, 2019).

Gross national income per capita 2018, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
1	Switzerland	83,580	1	Qatar	124,130
2	Norway	80,790	2	Macao SAR, China	112,480
3	Isle of Man	80,340	3	Singapore	94,500
4	Macao SAR, China	78,320	4	Brunei Darussalam	85,790
5	Luxembourg	77,820	5	Kuwait	83,390
6	United States	62,850	6	Luxembourg	80,640
7	Qatar	61,190	7	United Arab Emirates	75,300
8	Iceland	60,740	8	Switzerland	69,220
9	Denmark	60,140	9	Hong Kong SAR, China	67,700
10	Ireland	59,360	10	Ireland	66,810
11	Singapore	58,770	11	Norway	66,390
12	Sweden	55,070	12	United States	63,390
13	Australia	53,190	13	Denmark	57,470
14	Netherlands	51,280	14	Netherlands	57,380
15	Hong Kong SAR, China	50,310	15	Austria	55,960
16	Austria	49,250	16	Germany	55,800
17	Finland	47,820	17	Saudi Arabia	55,650
18	Germany	47,450	18	Iceland	54,140
19	Belgium	45,430	19	Sweden	53,990
20	Canada	44,860	20	Belgium	51,470
21	Japan	41,340	21	Cayman Islands	50,510
22	United Kingdom	41,330	22	Australia	49,930
23	France	41,070	23	Finland	48,490
24	United Arab Emirates	41,010	24	Canada	47,280
25	Israel	40,850	25	France	46,900
26	New Zealand	40,820	26	United Kingdom	45,660
27	Kuwait	33,690	27	Japan	45,000
28	Italy	33,560	28	Bahrain	44,620
29	Brunei Darussalam	31,020	29	Italy	42,490
30	Korea, Rep.	30,600	30	Oman	41,230
31	Bahamas, The	30,210	31	Spain	40,840
32	Spain	29,450	32	Israel	40,800
33	Turks and Caicos Islands	26,740	33	Korea, Rep.	40,450
34	Cyprus	26,300 ^a	34	New Zealand	40,250
35	Malta	26,220	35	Slovenia	38,050
36	Slovenia	24,670	36	Czech Republic	37,870
37	Aruba	23,630	37	Malta	37,700
38	Bahrain	21,890	38	Aruba	36,960
39	Portugal	21,680	39	Cyprus	35,170 ^a
40	Saudi Arabia	21,540	40	Estonia	35,050
41	Puerto Rico	21,100	41	Slovak Republic	33,600
42	Estonia	20,990	42	Sint Maarten (Dutch part)	33,320
43	Czech Republic	20,250	43	Portugal	33,200
44	Greece	19,540	44	Trinidad and Tobago	32,060
45	Curaçao	19,070	45	Lithuania	31,920
46	St. Kitts and Nevis	18,640	46	Poland	31,110
47	Slovak Republic	18,330	47	Bahamas, The	30,920
48	Lithuania	17,360	48	Malaysia	30,600
49	Palau	16,910	49	St. Kitts and Nevis	30,120
50	Latvia	16,880	50	Hungary	29,790
51	Trinidad and Tobago	16,240	51	Greece	29,600
52	Antigua and Barbuda	15,810	52	Seychelles	29,070
53	Uruguay	15,650	53	Turkey	28,380
54	Seychelles	15,600	54	Latvia	28,170
55	Barbados	15,240	55	Curaçao	27,820
56	Oman	15,110	56	Puerto Rico	26,560
57	Chile	14,670	57	Russian Federation	26,470
58	Hungary	14,590	58	Mauritius	26,030
59	Panama	14,370	59	Romania	25,940
60	Poland	14,150	60	Croatia	25,830
61	Croatia	13,830	61	Antigua and Barbuda	25,160
62	Argentina	12,370 ^c	62	Turks and Caicos Islands	24,540
63	Mauritius	12,050	63	Chile	24,250
64	Costa Rica	11,510	64	Kazakhstan	24,230
65	Romania	11,290	65	Panama	23,510

Gross national income per capita 2018, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
66	Nauru	11,240	66	Uruguay	21,900
67	Malaysia	10,460	67	Bulgaria	21,220
68	Turkey	10,380	68	Iran, Islamic Rep.	21,050
69	Russian Federation	10,230 ^d	69	Libya	20,990
70	Grenada	9,780	70	Argentina	19,820 ^b
71	China	9,470	71	Montenegro	19,750
72	St. Lucia	9,460	72	Nauru	19,480
73	Maldives	9,310	73	Mexico	19,440
74	Mexico	9,180	74	Belarus	19,200
75	Brazil	9,140	75	Palau	18,820 ^b
76	Bulgaria	8,860	76	Turkmenistan	18,460 ^b
77	Montenegro	8,400	77	Equatorial Guinea	18,170
78	St. Vincent and the Grenadines	7,940	78	Thailand	18,160
79	Kazakhstan	7,830	79	China	18,140
80	Botswana	7,750	80	Botswana	17,970
81	Lebanon	7,690	81	Barbados	17,640
82	Dominican Republic	7,370	82	Iraq	17,290
83	Dominica	7,210	83	Azerbaijan	17,070
84	Equatorial Guinea	7,050	84	Dominican Republic	16,960
85	Gabon	6,800	85	Costa Rica	16,670
86	Turkmenistan	6,740	86	Gabon	16,580
87	Thailand	6,610	87	Brazil	15,820
88	Peru	6,530	88	Serbia	15,360
89	Serbia	6,390	89	Algeria	15,350
90	Libya	6,330	90	North Macedonia	14,690
91	Colombia	6,190	91	Colombia	14,490
92	Ecuador	6,120	92	Grenada	14,270
93	Fiji	5,860	93	Maldives	14,120
94	South Africa	5,720	94	Peru	13,810
95	Bosnia and Herzegovina	5,690	95	Bosnia and Herzegovina	13,670
96	Paraguay	5,680	96	Suriname	13,420
97	Belarus	5,670	97	South Africa	13,230
98	Iran, Islamic Rep.	5,470	98	St. Vincent and the Grenadines	13,210
99	North Macedonia	5,450	99	Paraguay	13,180
100	Tuvalu	5,430	100	Sri Lanka	13,090
101	Namibia	5,250	101	St. Lucia	12,970
102	Iraq	5,030	102	Albania	12,960
103	Jamaica	4,990	103	Indonesia	12,650
103	Suriname	4,990	104	Lebanon	12,610 ^b
105	Albania	4,860	105	Mongolia	12,220
106	Guyana	4,760	106	Egypt, Arab Rep.	12,080
107	Marshall Islands	4,740	107	Tunisia	12,060
108	Belize	4,720	108	Kosovo	11,580 ^b
109	Guatemala	4,410	109	Ecuador	11,410
110	Tonga	4,300	110	Namibia	10,920
111	Armenia	4,230	111	Georgia	10,900 ^e
111	Kosovo	4,230	112	Philippines	10,720
113	Jordan	4,210	113	Dominica	10,680
114	Samoa	4,190	113	Eswatini	10,680
115	Georgia	4,130 ^e	115	Armenia	10,460
116	Algeria	4,060	116	Fiji	10,250
116	Sri Lanka	4,060	117	Bhutan	9,680
118	Azerbaijan	4,050	118	Jordan	9,300
119	Eswatini	3,850	119	Ukraine	9,020
120	Indonesia	3,840	120	Jamaica	8,930
121	Philippines	3,830	121	Guyana	8,570 ^b
122	El Salvador	3,820	122	Morocco	8,410 ^f
123	West Bank and Gaza	3,710	123	Guatemala	8,310
124	Micronesia, Fed. Sts.	3,580	124	Belize	8,200
124	Mongolia	3,580	125	El Salvador	7,850
126	Tunisia	3,500	126	India	7,680
127	Cabo Verde	3,450	126	Moldova	7,680 ^g
128	Angola	3,370	128	Bolivia	7,670
128	Bolivia	3,370	129	Cabo Verde	7,330
130	Kiribati	3,140	130	Uzbekistan	7,230 ^b

Gross national income per capita 2018, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
131	Morocco	3,090 ^f	131	Lao PDR	7,090
132	Bhutan	3,080	132	Vietnam	7,030
133	Moldova	2,990 ^g	133	Timor-Leste	6,990 ^b
134	Vanuatu	2,970	134	Samoa	6,620 ^b
135	Egypt, Arab Rep.	2,800	135	Tonga	6,510 ^b
136	Ukraine	2,660 ^d	136	Myanmar	6,480 ^b
137	Papua New Guinea	2,530	137	Angola	6,150
138	Lao PDR	2,460	138	Tuvalu	6,090 ^b
139	Vietnam	2,400	139	West Bank and Gaza	5,990
140	Honduras	2,330	140	Pakistan	5,840
141	Djibouti	2,180	141	Nigeria	5,700
142	Ghana	2,130	142	Nicaragua	5,390
143	Nicaragua	2,030	143	Marshall Islands	5,290
144	India	2,020	144	Congo, Rep.	5,050
144	Uzbekistan	2,020	145	Honduras	4,780
146	Solomon Islands	2,000	146	Ghana	4,650
147	Nigeria	1,960	147	Bangladesh	4,560
148	São Tomé and Príncipe	1,890	148	Sudan	4,420
149	Timor-Leste	1,820	149	Kiribati	4,410 ^b
150	Zimbabwe	1,790	150	Mauritania	4,160
151	Bangladesh	1,750	150	Micronesia, Fed. Sts.	4,160 ^b
152	Congo, Rep.	1,640	152	Papua New Guinea	4,150 ^b
153	Kenya	1,620	153	Zambia	4,100
154	Côte d'Ivoire	1,610	154	Cambodia	4,060
155	Pakistan	1,580	155	Tajikistan	4,040
156	Sudan	1,560	156	Côte d'Ivoire	4,030
157	Cameroon	1,440	157	Kyrgyz Republic	3,780
158	Zambia	1,430	158	Cameroon	3,700
159	Senegal	1,410	159	Senegal	3,670
160	Cambodia	1,380	160	Lesotho	3,610
160	Lesotho	1,380	161	Kenya	3,430
162	Comoros	1,320	161	São Tomé and Príncipe	3,430
163	Myanmar	1,310	163	Tanzania	3,160 ^h
164	Kyrgyz Republic	1,220	163	Vanuatu	3,160 ^b
165	Mauritania	1,190	165	Nepal	3,090
166	Tanzania	1,020 ^h	166	Zimbabwe	3,010
167	Tajikistan	1,010	167	Comoros	2,730
168	Nepal	960	168	Yemen, Rep.	2,570
168	Yemen, Rep.	960	169	Guinea	2,480
170	Benin	870	170	Benin	2,400
171	Guinea	830	171	Solomon Islands	2,280
171	Mali	830	172	Mali	2,230
173	Haiti	800	173	Rwanda	2,210
174	Ethiopia	790	174	Ethiopia	2,010
175	Rwanda	780	175	Uganda	1,970
176	Guinea-Bissau	750	176	Afghanistan	1,960
177	Gambia, The	700	177	Burkina Faso	1,920
178	Chad	670	177	Chad	1,920
179	Burkina Faso	660	179	Haiti	1,870
180	Togo	650	180	Guinea-Bissau	1,790
181	Uganda	620	181	Togo	1,760
182	Liberia	600	182	Gambia, The	1,680
183	Afghanistan	550	183	Madagascar	1,580
184	Sierra Leone	500	184	South Sudan	1,550
185	Congo, Dem. Rep.	490	185	Sierra Leone	1,520
186	Central African Republic	480	186	Malawi	1,310
187	South Sudan	460	187	Mozambique	1,300
188	Madagascar	440	188	Liberia	1,130
188	Mozambique	440	189	Niger	1,030
190	Niger	380	190	Congo, Dem. Rep.	900
191	Malawi	360	191	Central African Republic	870
192	Burundi	280	192	Burundi	740
	American Samoa	.. ⁱ		American Samoa	..
	Andorra	.. ^j		Andorra	..
	Bermuda	.. ^j		Bermuda	..

Gross national income per capita 2018, Atlas method and PPP

<i>Ranking</i>	<i>Economy</i>	Atlas methodology (US dollars)	<i>Ranking</i>	<i>Economy</i>	Purchasing power parity (international dollars)
	British Virgin Islands	.. j		British Virgin Islands	..
	Cayman Islands	.. j		Channel Islands	..
	Channel Islands	.. j		Cuba	..
	Cuba	.. i		Djibouti	..
	Eritrea	.. k		Eritrea	..
	Faroe Islands	.. j		Faroe Islands	..
	French Polynesia	.. j		French Polynesia	..
	Gibraltar	.. j		Gibraltar	..
	Greenland	.. j		Greenland	..
	Guam	.. j		Guam	..
	Korea, Dem. People's Rep.	.. k		Isle of Man	..
	Liechtenstein	.. j		Korea, Dem. People's Rep.	..
	Monaco	.. j		Liechtenstein	..
	New Caledonia	.. j		Monaco	..
	Northern Mariana Islands	.. j		New Caledonia	..
	San Marino	.. j		Northern Mariana Islands	..
	Sint Maarten (Dutch part)	.. j		San Marino	..
	Somalia	.. k		Somalia	..
	St. Martin (French part)	.. j		St. Martin (French part)	..
	Syrian Arab Republic	.. k		Syrian Arab Republic	..
	Venezuela, RB	.. i		Venezuela, RB	..
	Virgin Islands (U.S.)	.. j		Virgin Islands (U.S.)	..
	World	11,101		World	17,902
	East Asia & Pacific	10,977		East Asia & Pacific	19,328
	Europe & Central Asia	24,276		Europe & Central Asia	34,705
	Latin America & Caribbean	8,700		Latin America & Caribbean	16,111
	Middle East & North Africa	7,652		Middle East & North Africa	20,680
	North America	61,031		North America	61,753
	South Asia	1,925		South Asia	7,068
	Sub-Saharan Africa	1,507		Sub-Saharan Africa	3,812
	Low income	790		Low income	2,225
	Lower middle income	2,245		Lower middle income	7,580
	Upper middle income	8,859		Upper middle income	18,745
	High income	44,166		High income	51,175

.. Not available. PPP is purchasing power parity; an international dollar has the same purchasing power over GNI as a U.S. dollar has in the United States.

Note: Rankings include all 217 World Bank Atlas economies, but only those with confirmed GNI per capita estimates for at least one year during last three year period. Figures in italics are for 2017 or 2016.

a. Data are for the area controlled by the government of Cyprus. b. Based on regression; other PPP figures are extrapolated from the 2011 International Comparison Program benchmark estimates. c. Based on data officially reported by the National Statistics and Censuses Institute of Argentina. The International Monetary Fund (IMF) has called on Argentina to adopt measures to address the quality of official GDP and consumer price index data, and issued an updated statement on Argentina's progress on August 31, 2016: <http://www.imf.org/en/News/Articles/2016/08/31/PR16389-Statement-by-the-IMF-Executive-Board-on-Argentina>. The World Bank systematically assesses the appropriateness of official exchange rates as conversion factors. For Argentina, an alternative conversion factor has been calculated using a weighted average method for the period from 2012 to 2015. d. Based on official statistics of Ukraine and Russian Federation; 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. e. Excludes Abkhazia and South Ossetia. f. Includes Former Spanish Sahara. g. Excludes Transnistria. h. Covers mainland Tanzania only. i. Estimated to be upper middle income (\$3,996 to \$12,375). j. Estimated to be high income (\$12,376 or more). k. Estimated to be low income (\$1,025 or less). l. Estimate lower middle income (\$1,026 to \$3,995).

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