



August 24, 2023

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

**FROM:** Victoria Flynn *Alexander Hammer*  
Acting 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). 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.

<b>Surrogate Country List for VIETNAM</b>		
<b><u>Surrogate Countries</u></b>		<b><u>Per Capita Gross National Income Levels (in \$US)<sup>1</sup></u></b>
Indonesia		4,580
Jordan		4,260
Egypt		4,100
	Vietnam's Level	4,010
Philippines		3,950
Morocco		3,710
Sri Lanka		3,610

<sup>1</sup> World Bank, *World Bank Development Indicators*, <http://data.worldbank.org/indicator/NY.GNP.PCAP.CD> (accessed August 3, 2023). Per capita GNI data represent the latest available information as of 2022.

## Gross national income per capita 2022, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
1	Bermuda	125,240	1	Norway	118,440
2	Norway	95,510	2	Qatar	110,640
3	Luxembourg	91,200	3	Singapore	107,030
4	Switzerland	89,450	4	Bermuda	98,610
5	Ireland	81,070	5	Luxembourg	97,750
6	Isle of Man	79,300	6	Ireland	91,950
7	United States	76,370	7	United Arab Emirates	87,300
8	Denmark	73,200	8	Switzerland	78,040
9	Qatar	70,500	9	United States	77,530
10	Faroe Islands	69,560 <sup>i</sup>	10	Denmark	76,810
11	Iceland	68,220	11	Hong Kong SAR, China	73,940
12	Singapore	67,200	12	Macao SAR, China	70,930 <sup>k</sup>
13	Cayman Islands	65,190	13	Austria	68,170
14	Sweden	62,990	14	Brunei Darussalam	67,740
15	Australia	60,430	15	Sweden	67,040
16	Netherlands	57,430	16	Netherlands	66,750
17	Austria	56,140	17	Iceland	65,560
18	Israel	54,650	18	Germany	65,300
19	Hong Kong SAR, China	54,370	19	Kuwait	64,590
20	Finland	54,360	20	San Marino	61,060 <sup>b</sup>
21	Germany	53,390	21	Australia	60,350
22	Canada	52,960	22	Belgium	60,020
23	United Arab Emirates	48,950	23	Saudi Arabia	59,660
24	United Kingdom	48,890	24	Finland	58,950
25	Belgium	48,700	25	Canada	57,820
26	New Zealand	48,460	26	Bahrain	57,370
27	San Marino	47,120 <sup>i</sup>	27	France	57,090
28	France	45,860	28	Cayman Islands	55,720
29	Macao SAR, China	44,980	29	United Kingdom	54,920
30	Japan	42,440	30	Italy	52,470
31	Kuwait	39,570	31	Malta	51,590
32	Italy	37,700	32	Korea, Rep.	50,730
33	Korea, Rep.	35,990	33	New Zealand	50,380
34	Malta	33,550	34	Slovenia	49,200
35	Spain	31,680	35	Israel	48,820
36	Bahamas, The	31,530	36	Japan	48,470
37	Sint Maarten (Dutch part)	31,500 <sup>i</sup>	37	Czech Republic	47,780
38	Brunei Darussalam	31,410	38	Lithuania	46,790
39	Slovenia	30,600	39	Estonia	46,080
40	Cyprus	30,540 <sup>a</sup>	40	Cyprus	45,960 <sup>a</sup>
41	Aruba	29,460	41	Spain	45,950
42	Estonia	27,640	42	Aruba	41,610
43	Saudi Arabia	27,590	43	Poland	41,310
44	Bahrain	27,180	44	Portugal	40,870
45	Czech Republic	26,590	45	Croatia	40,740
46	Portugal	25,800	46	Hungary	40,620
47	Puerto Rico	24,560	47	Romania	40,600
48	Turks and Caicos Islands	24,160	48	Latvia	39,260
49	Lithuania	23,690	49	Oman	38,890
50	Slovak Republic	22,060	50	Bahamas, The	38,290
51	Greece	21,740	51	Guyana	37,710
52	Latvia	21,500	52	Panama	37,080
53	Oman	20,150	53	Türkiye	36,920
54	St. Kitts and Nevis	19,730	54	Slovak Republic	36,840
55	Croatia	19,470	55	Greece	36,600
56	Barbados	19,350	56	Russian Federation	35,770 <sup>c</sup>
57	Hungary	19,010	57	Sint Maarten (Dutch part)	35,230
58	Curaçao	18,430	58	Seychelles	33,480
59	Poland	18,350	59	Bulgaria	32,520
60	Antigua and Barbuda	18,280	60	Malaysia	32,250
61	Uruguay	18,030	61	St. Kitts and Nevis	32,180
62	Nauru	17,870	62	Chile	28,550
63	Panama	16,750	63	Puerto Rico	27,830 <sup>b</sup>

## Gross national income per capita 2022, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
64	Trinidad and Tobago	16,330	64	Montenegro	27,530
65	Romania	15,660	65	Mauritius	27,480
66	Chile	15,360	66	Kazakhstan	27,080
67	Guyana	15,050	67	Trinidad and Tobago	27,040
68	Seychelles	14,340	68	Uruguay	26,290
69	Bulgaria	13,250	69	Argentina	26,030
70	China	12,850	70	Antigua and Barbuda	24,500
71	Russian Federation	12,830 <sup>c</sup>	71	Curaçao	23,890
72	Palau	12,790	72	Libya	23,590 <sup>b</sup>
73	Costa Rica	12,670	73	Turks and Caicos Islands	22,860
74	Malaysia	11,780	74	Costa Rica	22,820
75	Argentina	11,620	75	Serbia	22,720
76	St. Lucia	11,160	76	Maldives	22,530
77	Maldives	11,030	77	Dominican Republic	21,910
78	Mauritius	10,760	78	Belarus	21,800
79	Türkiye	10,590	79	China	21,250
80	Mexico	10,410	80	Mexico	21,060
81	Montenegro	10,400	81	Bosnia and Herzegovina	20,220
82	Kazakhstan	9,470	82	Thailand	20,070
83	Grenada	9,340	83	Nauru	19,780 <sup>b</sup>
84	Serbia	9,140	84	Colombia	19,490
85	St. Vincent and the Grenadines	9,110	85	North Macedonia	19,290
86	Dominican Republic	9,050	86	Georgia	18,830 <sup>d</sup>
87	Dominica	8,460	87	Albania	18,210
88	Brazil	8,140	88	Iran, Islamic Rep.	18,130
89	Marshall Islands	7,920	89	Armenia	18,120
90	Bosnia and Herzegovina	7,660	90	Botswana	17,590
91	Gabon	7,540	91	Barbados	17,340
92	Botswana	7,350	92	Brazil	17,260
93	Libya	7,260	93	St. Lucia	17,110
94	Belarus	7,240	94	St. Vincent and the Grenadines	16,810
95	Thailand	7,230	95	Azerbaijan	16,530
96	Tuvalu	7,210	96	Suriname	16,080
97	Belize	6,800	97	Grenada	15,870
98	South Africa	6,780	98	South Africa	15,570
99	Albania	6,770	99	Palau	15,560 <sup>b</sup>
99	Peru	6,770	100	Paraguay	15,540
101	North Macedonia	6,640	101	Moldova	15,310 <sup>f</sup>
102	Colombia	6,510	102	Gabon	14,880
103	Ecuador	6,310	103	Kosovo	14,870 <sup>b</sup>
104	Armenia	5,960	104	Egypt, Arab Rep.	14,590
105	Paraguay	5,920	105	Indonesia	14,250
106	Jamaica	5,670	106	Peru	14,080
107	Azerbaijan	5,630	107	Sri Lanka	14,030
108	Georgia	5,620 <sup>d</sup>	108	Dominica	13,540
109	Kosovo	5,590	109	Lebanon	13,400 <sup>b</sup>
110	Guatemala	5,350	110	Fiji	13,370
111	Moldova	5,340 <sup>f</sup>	111	Ukraine	13,360 <sup>c</sup>
112	Equatorial Guinea	5,320	112	Algeria	12,930
113	Fiji	5,270	113	Equatorial Guinea	12,850
113	Iraq	5,270	114	Vietnam	12,810
115	Lebanon	4,970	115	Ecuador	12,630
116	Tonga	4,930	116	Mongolia	12,470
117	Namibia	4,880	117	Tunisia	12,160
117	Suriname	4,880	118	Jamaica	11,480
119	El Salvador	4,720	119	Bhutan	11,300
120	West Bank and Gaza	4,610	120	Belize	10,900
121	Indonesia	4,580	121	Jordan	10,890
122	Ukraine	4,270 <sup>c</sup>	121	Namibia	10,890
123	Jordan	4,260	123	Iraq	10,820
124	Mongolia	4,210	124	Philippines	10,730
125	Cabo Verde	4,140	125	Guatemala	10,610 <sup>k</sup>

## Gross national income per capita 2022, Atlas method and PPP

Ranking	Economy	Atlas methodology (US dollars)	Ranking	Economy	Purchasing power parity (international dollars)
126	Micronesia, Fed. Sts.	4,130	126	El Salvador	10,460
127	Egypt, Arab Rep.	4,100	127	Eswatini	9,920
128	Vietnam	4,010	128	Uzbekistan	9,640 b
129	Philippines	3,950	129	Bolivia	9,400
130	Algeria	3,900	130	Morocco	9,390 e
130	Iran, Islamic Rep.	3,900	131	Cabo Verde	8,970
132	Tunisia	3,840	132	Lao PDR	8,810
133	Eswatini	3,800	133	Marshall Islands	8,640 b
134	Morocco	3,710 e	134	India	8,210
135	Samoa	3,630	135	West Bank and Gaza	8,170
136	Sri Lanka	3,610	136	Bangladesh	7,690
137	Vanuatu	3,560	137	Tuvalu	7,310 b
138	Bolivia	3,450	138	Tonga	7,160 b
139	Kiribati	3,280	139	Angola	6,450
140	Djibouti	3,180	140	Ghana	6,380
141	Bhutan	3,040	140	Nicaragua	6,380
142	Bangladesh	2,820	142	Pakistan	6,350
143	Honduras	2,740	143	Côte d'Ivoire	6,330
144	Papua New Guinea	2,730	143	Mauritania	6,330
145	Côte d'Ivoire	2,620	145	Honduras	6,210
146	São Tomé and Príncipe	2,410	146	Samoa	5,870 b
147	India	2,380	147	Kyrgyz Republic	5,830
148	Lao PDR	2,360	148	Djibouti	5,780
149	Ghana	2,350	149	Kenya	5,680
150	Solomon Islands	2,220	149	Tajikistan	5,680
151	Uzbekistan	2,190	151	Nigeria	5,650
152	Kenya	2,170	152	Cambodia	5,080
153	Mauritania	2,160	153	Timor-Leste	4,780 b
154	Nigeria	2,140	154	São Tomé and Príncipe	4,770
155	Nicaragua	2,090	155	Myanmar	4,760
156	Congo, Rep.	2,060	156	Nepal	4,750
157	Timor-Leste	1,970	157	Kiribati	4,520 b
158	Angola	1,900	158	Cameroon	4,350
159	Cambodia	1,700	159	Micronesia, Fed. Sts.	4,280 b
160	Cameroon	1,660	160	Papua New Guinea	4,270 b
161	Senegal	1,640	161	Sudan	4,150
162	Comoros	1,610	162	Senegal	4,100
162	Haiti	1,610	163	Benin	4,020
164	Pakistan	1,580	164	Comoros	3,850
165	Zimbabwe	1,500	165	Vanuatu	3,780 b
166	Kyrgyz Republic	1,410	166	Zambia	3,680
167	Benin	1,400	167	Congo, Rep.	3,520
168	Nepal	1,340	168	Haiti	3,310
169	Lesotho	1,260	169	Lesotho	3,160
170	Myanmar	1,210	170	Tanzania	3,040 g
170	Tajikistan	1,210	171	Guinea	2,840
172	Tanzania	1,200 g	172	Ethiopia	2,800
173	Guinea	1,180	173	Rwanda	2,730
174	Zambia	1,170	174	Solomon Islands	2,670 b
175	Ethiopia	1,020	175	Uganda	2,650
176	Togo	990	176	Togo	2,610
177	Rwanda	930	177	Gambia, The	2,470
177	Uganda	930	178	Zimbabwe	2,460
179	Mali	850	179	Mali	2,420
180	Burkina Faso	840	180	Burkina Faso	2,400
181	Guinea-Bissau	820	181	Guinea-Bissau	2,220
182	Gambia, The	810	182	Sierra Leone	1,900
183	Sudan	760	183	Madagascar	1,720
183	Syrian Arab Republic	760 j	184	Malawi	1,700
185	Chad	690	185	Afghanistan	1,690 b
186	Liberia	680	186	Chad	1,640
187	Malawi	640	187	Liberia	1,620

## Gross national income per capita 2022, Atlas method and PPP

Ranking	Economy	Atlas methodology		Ranking	Economy	Purchasing power parity (international dollars)
		(US dollars)				
188	Niger	610		188	Niger	1,510
189	Congo, Dem. Rep.	590		189	Mozambique	1,410
190	Madagascar	510		190	Somalia	1,360 <sup>b</sup>
190	Sierra Leone	510		191	Congo, Dem. Rep.	1,280
192	Mozambique	500		192	Central African Republic	1,020
193	Central African Republic	480		193	Burundi	840
194	Somalia	470			American Samoa	-
195	Afghanistan	390			Andorra	-
196	Burundi	240			British Virgin Islands	-
	American Samoa	-	i		Channel Islands	-
	Andorra	-	i		Cuba	-
	British Virgin Islands	-	i		Eritrea	-
	Channel Islands	-	i		Faroe Islands	-
	Cuba	-	h		French Polynesia	-
	Eritrea	-	j		Gibraltar	-
	French Polynesia	-	i		Greenland	-
	Gibraltar	-	i		Guam	-
	Greenland	-	i		Isle of Man	-
	Guam	-	i		Korea, Dem. People's Rep.	-
	Korea, Dem. People's Rep.	-	j		Liechtenstein	-
	Liechtenstein	-	i		Monaco	-
	Monaco	-	i		New Caledonia	-
	New Caledonia	-	i		Northern Mariana Islands	-
	Northern Mariana Islands	-	i		South Sudan	-
	South Sudan	-	j		St. Martin (French part)	-
	St. Martin (French part)	-	i		Syrian Arab Republic	-
	Turkmenistan	-	h		Turkmenistan	-
	Venezuela, RB	-	i		Venezuela, RB	-
	Virgin Islands (U.S.)	-	i		Virgin Islands (U.S.)	-
	Yemen, Rep.	-	j		Yemen, Rep.	-
<b>World</b>		<b>12,804</b>		<b>World</b>		<b>20,510</b>
	East Asia & Pacific	13,485			East Asia & Pacific	22,297
	Europe & Central Asia	28,229			Europe & Central Asia	43,541
	Latin America & Caribbean	8,688			Latin America & Caribbean	18,412
	Middle East & North Africa	8,283			Middle East & North Africa	19,542
	North America	73,934			North America	75,470
	South Asia	2,278			South Asia	7,818
	Sub-Saharan Africa	1,638			Sub-Saharan Africa	4,292
	Low income	721			Low income	2,202
	Lower middle income	2,517			Lower middle income	8,294
	Upper middle income	10,530			Upper middle income	21,086
	High income	51,087			High income	60,988

- 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. PPP figures are extrapolated from 2017 benchmark estimates by the International Comparison Program (ICP), unless otherwise footnoted.

Note: Table list 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 2021 or 2020.

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. Estimated to be upper middle income (\$4,466 to \$13,845). i. Estimated to be high income (\$13,845 or more). j. Estimated to be low income (\$1,135 or less). k. PPP is extrapolated from revised 2011 benchmark estimates by the ICP. l. Not classified

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