



August 19, 2022

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

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

*Alexander Hammer*

**SUBJECT:** List of Surrogate Countries for Antidumping Investigations and  
Reviews from the People's Republic of China ("China")

---

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 China 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 China 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 China. 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 China. 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 China 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 China's, but still at a level of economic development comparable to China, 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, 2021 (\$USD)<sup>1</sup></u> |
|----------------|-------------------------------------------------|
| China          | 11,890                                          |
| Romania        | 14,170                                          |
| Panama         | 14,010                                          |
| Costa Rica     | 12,310                                          |
| Malaysia       | 10,930                                          |
| Bulgaria       | 10,720                                          |
| Turkey         | 9,830                                           |

---

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