



September 10, 2025

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

**FROM:** Alexander Hammer  
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Enforcement and Compliance

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

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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 China; 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.<sup>1</sup> 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.<sup>2</sup>

The surrogate country list for China 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 China's, as determined by per capita levels of gross domestic product (GDP). The use of GDP instead of Gross National Income (GNI) that was used in prior years, reflects Commerce's changes in its regulatory practices as published in its *Regulations Enhancing the Administration of the Antidumping and Countervailing Duty Trade Remedy Laws* on December 16, 2024.<sup>3</sup>

Commerce should treat the surrogate countries on the list with equal consideration and select the

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<sup>1</sup> See section 771(18)(A) of the Act.

<sup>2</sup> In measuring economic comparability, Commerce may consider additional factors in determining whether certain market economy countries are at a level of economic development comparable to the NME country at issue. Moreover, Commerce will identify the factors it relies upon and provide an explanation for its decision. See 19 C.F.R. § 408(b)(1)(ii).

<sup>3</sup> See 19 C.F.R. § 351.408(d)(3) and (4); see also *Regulations Enhancing the Administration of the Antidumping and Countervailing Duty Trade Remedy Laws*, 89 Fed. Reg. 101,694, 101,720 (Dep't of Commerce Dec. 16, 2024).

primary country from the surrogate country list that is a significant producer of comparable merchandise.<sup>4</sup> If more than one country from the surrogate country list or not on the list satisfies both statutory criteria, Commerce should consider the public availability, the accessibility, and quality of the data on the record as well as the similarity of products manufactured in the potential surrogate countries in comparison to the subject merchandise to make their determination.<sup>5</sup> If no proposed value on the record from a market economy country that is at a level of economic development comparable to the NME country is appropriate to value a specific factor of production, Commerce may also use a value on the record derived from a market economy country which is not at a level of economic development comparable to the NME country and also may also use a value on the record derived from a market economy that is not a significant producer of merchandise comparable to the subject merchandise to value a specific factor of production. 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 2025 surrogate country list for China in consideration of the above criteria, centered around China’s 2024 per capita GDP level.

#### Surrogate Country List: CHINA<sup>6</sup>

<u>Surrogate Countries</u>	<u>Per Capita GDP Levels</u> <u>(in current \$US, 2024)<sup>7</sup></u>
Türkiye (Turkey)	15,473
Mexico	14,158
Serbia	13,524
<b>CHINA</b>	<b>13,303</b>
Malaysia	11,867
Dominican Republic	10,876
Brazil	10,280

<sup>4</sup> 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. If more than one economically comparable country produces comparable merchandise, Commerce will consider the totality of the information on the record in selecting a surrogate country. 19 C.F.R. § 351.408(b)(3).

<sup>5</sup> 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.

<sup>6</sup> The following countries were close to China’s 2024 per capita GDP levels but omitted on the surrogate country list given the identified rationale. In alphabetical order, they include: Argentina (high economic volatility in first half of 2024, with full-year average inflation exceeding 200%, heightened debt refinancing risks as demonstrated by elevated sovereign debt ratings, and associated downward exchange rate pressure affecting producer and other costs), Dominica (very small island economy with limited data availability), Grenada (very small island economy with limited data availability), Kazakhstan (structurally very different from China’s economy due to high dependence on oil and gas; the World Bank’s World Development Indicators’ latest comparable data show that fuel exports as a share of total merchandise export in China and Kazakhstan averaged 1.6 and 64.2, respectively, in the last 3 years of comparable data from 2021 to 2023, and manufacturing exports accounted for 91.9 percent and 19.0 percent (2023) in China and Kazakhstan, respectively). See <https://databank.worldbank.org/source/world-development-indicators>; Maldives (very small island economy, limited data availability), Mauritius (very small island economy with limited data availability), Montenegro (very small economy, limited data availability), Nauru (very small island economy with limited data availability), Russia (NME), St. Lucia (very small island economy with limited data availability), St. Vincent & the Grenadines (very small island economy with limited data availability). Consistent with Commerce’s regulations at 19 C.F.R. § 351.408(b)(1)(ii), Commerce is not foreclosed from considering additional factors in the future depending on the evidence on the record of a given proceeding.

<sup>7</sup> World Bank, *World Bank Development Indicators*, <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD> (accessed August 13, 2025). U.S. dollar denominated current per capita GDP data represent the latest available information as of 2024.