UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

November 18, 2026

MEMORANDUM TO: Scot Fullerton
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AD/CVD Operations
Enforcement and Compliance

FROM: Alexander Hammer ABH
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SUBJECT: List of Surrogate Countries for Antidumping Investigations and Reviews for the Georgia

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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 Georgia; 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 market-determined value of the merchandise.[1] Therefore, Commerce is required to use prices and costs of factors of production in one or more market economy country/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.[2]

The surrogate country list for Georgia 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 Georgia'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 until 2024, 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. [3]

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

[1] *See* section 771(18)(A) of the Act.

[2] 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).

[3] *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 FR 101694, 101720 (December 16, 2024).

primary country from the surrogate country list that is a significant producer of comparable merchandise.[4] If more than one country from the surrogate country 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.[5] If no proposed value on the record from a market economy country that is at a level of economic development comparable to that of the NME country is appropriate to value a specific factor of production, Commerce may 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 2026 surrogate country list for Georgia in consideration of the above criteria, centered around Georgia' 2025 per capita GDP level.

Surrogate Country List: GEORGIA[6]

Surrogate Countries		**Per Capita GDP Levels (in current $US, 2025)[7]**
Thailand		8,057
Colombia		8,562
Peru		9,684
	GEORGIA	**9,692**
Bosnia and Herzegovina		10,382
North Macedonia		10,490
Brazil		10,713

[4] 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 CFR 351.408(b)(3).

[5] 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.

[6] The following countries were close to Georgia' 2025 per capita GDP levels but omitted from the surrogate country list given the identified rationale. In cases where high political instability was identified, Commerce omitted certain countries given their low rankings on the World Bank's "Political Stability" index. Commerce also omitted certain countries based on whether they were an existing Commerce-determined non-market economy, small-island economy, or information known about the comparative structures of their economies (relative to Georgia) and/or the reliability of their officially published trade statistics. In alphabetical order, the excluded countries and the rational for excluding them are: Armenia (currently designated as a "non-market economy"), Belarus (currently designated as a "non-market economy"), Gabon (structurally dissimilar economic/export composition), Marshall Islands (small island economy with limited data availability), and the Republic of Moldova (currently designated as a "non-market economy"). Consistent with Commerce's regulations at 19 CFR 351.408(b)(1)(ii), Commerce is not foreclosed from considering additional factors in the future depending on the record evidence of a given proceeding.

[7] World Bank, *World Bank Development Indicators*, https://data.worldbank.org/indicator/NY.GDP.PCAP.CD (accessed September 18, 2026). U.S. dollar denominated current per capita GDP data represent the latest available information as of 2026.