

December 21, 2023

Ms. Lisa Wang
Assistant Secretary for Enforcement and Compliance
Office of Policy, Enforcement and Compliance
International Trade Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Request for Comments on Raw Honey from the Socialist Republic of Vietnam: Initiation of Antidumping Duty Changed Circumstances Review

Dear Ms. Wang,

The National Retail Federation is submitting these comments on behalf of our members in response to the Department of Commerce's [request for public comments](#) concerning Vietnam's status as a non-market economy (NME) for purposes of U.S. antidumping and countervailing duty investigations.

The National Retail Federation, the world's largest retail trade association, passionately advocates for the people, brands, policies and ideas that help retail succeed. From its headquarters in Washington, D.C., NRF empowers the industry that powers the economy. Retail is the nation's largest private-sector employer, contributing \$3.9 trillion to annual GDP and supporting one in four U.S. jobs — 52 million working Americans. For over a century, NRF has been a voice for every retailer and every retail job, educating, inspiring and communicating the powerful impact retail has on local communities and global economies.

Many NRF members have shifted their supply chains over the years and have relied upon Vietnam as an important sourcing partner. They have firsthand experience regarding the degree to which Vietnamese producers and the Government of Vietnam meet the criteria required for an economy to be treated as an NME. We agree with the Government of Vietnam in its request for a changed circumstance review (CCR) that the country does in fact meet the criteria and should be treated as an NME by the United States. This is especially true for important consumer goods like apparel, footwear, consumer electronics and furniture.

U.S. government policy in recent years has been focused on encouraging U.S. sourcing to move out of China and to alternative suppliers, including those in the United States. Vietnam has been a very important alternative for American companies and consumers, particularly for price-sensitive consumer goods. NRF members are encouraged that the Biden-Harris administration [views](#) Vietnam as a "key partner in our 'friendshoring' approach to deepen integration with a broad set of partners and allies to create diverse, resilient, and sustainable supply chains in key industries. We are encouraged by the growing investments that companies are making in

Vietnam and recognize Vietnam’s tremendous potential as a major play in the semiconductor industry.” We are also encouraged by the inclusion of language in the [joint leaders statement](#) following a September 10, 2023, meeting between President Biden and General Secretary Nguyen Phu Trong that the United States recognizes that it is time to revisit Vietnam’s NME status:

The United States applauds Vietnam’s progress in significant market-based economic reforms, and affirms its enthusiasm and commitment for a broad, strengthened, supportive, and constructive engagement with Vietnam in its transition to a market economy, and subsequently to market economy country status, under U.S. law. ... The United States will review Vietnam’s request as expeditiously as possible, in accordance with U.S. law. The United States appreciates Vietnam’s ongoing efforts to further modernize and enhance the transparency of its monetary policy and exchange rate management framework, to promote macroeconomic stability, and to ensure the safety and soundness of the banking system.

Recognizing Vietnam as a market economy will be an important element of that policy. NME status makes the imposition of antidumping or countervailing duties on U.S. imports from an NME-designated country much more likely. While NRF members are confident that the suppliers they work with are not violating U.S. trade remedy laws, the uncertainty about potential AD/CVD investigations imposes a level of uncertainty on sourcing from these companies that inevitably works its way into consumer prices. It also may give pause for some about the value of moving sourcing from China to Vietnam: If sourcing from both countries is uncertain, and moving supply is expensive, it may not be worth doing for some products.

Therefore, NRF and its member companies support a finding that Vietnam should be treated as a market economy, not only for purposes of U.S. trade remedy investigations but more generally as well.

Sincerely,



Jonathan Gold
Vice President, Supply Chain and Customs Policy