



Case No. A-552-833

Total No. of Pages: 2

§ 751(b) Changed Circumstances Review – NME Status CCR

AD/CVD Operations, Office IV

PUBLIC DOCUMENT

Dear Secretary Raimondo:

On behalf of The Committee To Support U.S. Trade Laws (“CSUSTL”), we write to express our opposition to the letter submitted on behalf of the Government of the Socialist Republic of Vietnam (“Vietnam”) requesting that the U.S. Department of Commerce (“Commerce”) conduct a changed circumstances review and determine that Vietnam is now operating as a market economy for purposes of the U.S. trade laws.<sup>1</sup> CSUSTL believes that Vietnam’s request for market economy status is premature and threatens to undermine Commerce’s administration of the U.S. laws to prevent unfair trade.

CSUSTL is a national organization of companies, trade associations, labor unions, law firms and individuals located in all 50 states of the nation and is committed to preserving and enhancing U.S. trade laws and supporting trade policies that benefit the United States-based productive economy. CSUSTL consists of over 435 companies and organizations representing 171 industries, including manufacturing, technology, agriculture, mining, energy, and services. For more than 30 years, CSUSTL has worked to maintain and advance U.S. trade remedy laws. CSUSTL is dedicated to ensuring that laws against unfair trade are preserved and enhanced and to supporting trade policies that benefit U.S. manufacturing and agricultural sectors.

CSUSTL shares the concerns expressed in the letter submitted in this proceeding on behalf of the U.S. raw honey industry that Vietnam’s request for market economy status is

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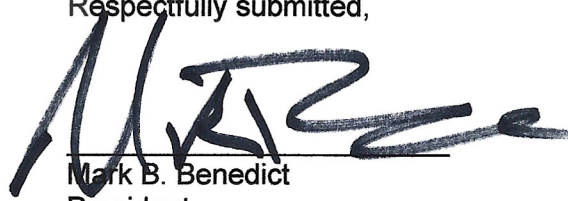
<sup>1</sup> Letter from the Ministry of Industry and Trade for the Socialist Republic of Vietnam re: Request for the U.S. Department of Commerce to Initiate a Changed Circumstances Review on Behalf of the Socialist Republic of Viet Nam (September 8, 2023).

premature on both procedural and substantive grounds. Critically, and as discussed in that letter, recent public reports and statements issued by numerous U.S. government agencies, including the U.S. Department of Treasury, U.S. Department of State, U.S. Department of Commerce, as well as The Organisation for Economic Co-operation and Development (“OECD”), indicate that non-market principles and practices persist in Vietnam’s economy. While CSUSTL appreciates that the United States and Vietnam are important trading partners, Commerce’s assessment of Vietnam’s request must adhere to the statutory factors that govern whether market economy status is warranted. Prematurely granting market economy status to a country in which non-market principles and practices persist prevents U.S. manufacturing industries from competing on a level playing field, and also threatens to lower the standard applied by Commerce when other countries seek market economy designation. CSUSTL and its members urge Commerce to carefully consider Vietnam’s request in light of the procedural and substantive shortcomings that are already evident.

If Commerce determines to conduct a changed circumstances review based on Vietnam’s request, CSUSTL intends to participate fully in that proceeding to oppose granting Vietnam market economy status and expects that its members will participate in opposition as well.

CSUSTL appreciates the opportunity to provide these comments and commends the Administration and Commerce for its ongoing commitment to the strong enforcement of U.S. trade laws.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark B. Benedict', is written over a horizontal line.

Mark B. Benedict  
President  
Committee to Support U.S. Trade Laws