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November 20, 2023

Lisa W. Wang  
Assistant Secretary for Enforcement and Compliance  
U.S. Department of Commerce  
1401 Constitution Avenue  
NW, Washington, DC 20230

**RE: Raw Honey From the Socialist Republic of Vietnam: Initiation of Antidumping Duty Changed Circumstances Review (ITA–2023–0010)**

Dear Assistant Secretary Wang:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to comment on the International Trade Administration's Change of Circumstance Review of the antidumping duty (AD) order on raw honey from the Socialist Republic of Vietnam (Vietnam) to examine whether Vietnam remains a non-market economy (NME) country for purposes of the application of the AD law. NASDA supports the initiation of the Change of Circumstances Review and believes that sufficient progress has been made by Vietnam to warrant a favorable determination of their Market Economy status.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and 4 U.S. territories. State departments of agriculture are responsible for a wide range of programs, with agricultural trade promotion among our many priorities.

In 2022, the National Association of State Departments of Agriculture was awarded funding through the United States Department of Agriculture Foreign Agricultural Service Emerging Markets Program. The Emerging Markets Program helps organizations promote exports of U.S. agricultural products to developing countries with strong growth potential.

NASDA's first Emerging Markets Program trade mission took place in Vietnam on January 9-13, 2023 during which the delegation met with the Vietnamese Ministry of Agriculture and Rural Development, covering topics such as the progression of the Vietnamese economy and market access for agricultural products such as animal feed and specialty crops. Further discussions focused on cotton, dairy, grains, beef, tree nuts, lumber, and fresh fruit. These discussions have been extremely valuable for better understanding the market potential, political reforms that have been successfully implemented, and continuing challenges impacting market access for U.S. agriculture.

Vietnam is a growing and vibrant market for U.S. food and agricultural products. USDA's Foreign Agricultural Service reports that our agricultural exports have increased from \$2.4 billion to \$3.9 billion from 2013 to 2022 with an average compound growth of nearly 5% per year. Vietnam is now 9<sup>th</sup> among our agricultural export markets according to USDA's statistics.

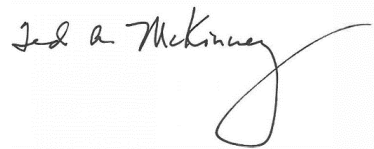
It is critical that we continue to prioritize actions that nurture this market and enhance opportunities for expanded trade.

NASDA is aware that since 2018, 72 countries have recognized Vietnam as a market economy. While we do not claim to having conducted a review of each country's methodology for reaching this determination, we do believe that our continuing to treat Vietnam as a Non-Market Economy could potentially interfere with our efforts to expand our exports to this growing market.

NASDA is likewise aware of the market sensitivities for certain agricultural products such as raw honey. We understand that honey imports from Vietnam at below market price continue to negatively impact the economic vitality of domestic honey production reinforcing the continuing need to invoke antidumping and countervailing duties on these honey imports. Nevertheless, we believe that Vietnam can now be designated as a market economy, and with aggressive oversight to ensure data accuracy, we are confident that Vietnam has progressed to the point where their domestic data can and should be used in ongoing and future antidumping and countervailing duty determinations.

Thank you for your ongoing efforts to ensure US agriculture is treated fairly in international commerce. Please let us know if we can be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted McKinney", with a large, stylized flourish extending from the end of the name.

Ted McKinney  
Chief Executive Officer