

## MILL CERTIFICATE REQUIREMENTS FOR IRON AND STEEL FITTINGS IN HEADING 7307

There has been a trend at US Customs over the last several years towards more scrutiny and enforcement of regulations on steel and aluminum products with the implementation of Section 232 duties and quotas on some steel and aluminum items. In 2020, the Steel Import Monitoring Analysis system began requiring the countries of melt and pour for steel products. In 2022, US Customs implemented the requirements for mill certificates to be submitted with the entry documents for steel and aluminum products. As of earlier this month, the countries of melt and pour are required to be reported on the entry.

Iron and Steel fittings under HTS heading 7307 are not subject to Section 232 duties and do not require a steel license. However, per 19 CFR 141.89 for iron or steel imports classifiable in Chapter 72 or headings 7301 to 7307 of the HTSUS, a statement of the percentages by weight or carbon and any metallic elements contained in the articles, in the form of a mill analysis or mill test certificate are required.

In most cases, we received the mill analysis or mill test certificate as required from your shippers, with the exception of tube and pipe fittings. Historically, since fittings are more of a finished good, we do not always receive the mill certificate. Although we may have details necessary for proper classification and application of additional duties, Customs has recently started to strictly enforce the mill certificate requirement on fittings under heading 7307. Customs has advised that these are required documents which are important for supporting entry and entry summary information, including, but not limited to, HTSUS classification, Antidumping and Countervailing Duty Orders, Section 232 duty and quota requirements, Section 232 exclusions, and/or Section 232 melt and pour requirements.

If you are importing shipments of iron or steel fittings under heading 7307, please advise your suppliers they must provide the mill certificate or mill analysis for entry, or we may be unable to file entry for release on these goods which could result in costly manipulations or delays.