Country of Origin / Marking & Labeling Requirements

1. Declarations of Origin on Commercial Documents

PB is required to declare the correct country of origin of each item imported into the United States on the Customs entry. The importance of the origin of an article derives from a variety of statutes and regulations governing the importation of merchandise. For example, products may qualify for special duty benefits under trade agreements like NAFTA and GSP. Products may also have restrictions or additional duties based on the product origin or manufacturer. An incorrect designation of origin could result in the loss of duty benefits, improper imposition of duty, detention or exclusion of merchandise. As a result, the vendor must state the correct country of origin of the merchandise it is supplying to PB on its commercial invoice. Likewise, on PB-produced products, the documents must show the country of origin i.e., the country in which PB manufactured or produced the article. If the origin is not stated on the commercial invoice, the shipment may be delayed until the origin of the goods can be verified.

Please note for U.S. Law purposes, the country of exportation of merchandise does not determine the “country of origin” of an imported item. The country of origin of an item is the single country in which the item was manufactured, produced or grown. HOWEVER, if the goods are produced in more than one country (e.g., assembled in the UK with parts from Japan) U.S. Bureau of Customs and Border Protection (“CBP”) has specific rules that can affect a determination on what is the origin of a good. Generally, substantial further work or material added to an article in another country (other than the country in which the article was manufactured, produced or grown) can change the identified origin. However, the work or material added must effect a “substantial transformation” in order to render such other country the “Country of Origin.” 19 C.F.R. Part 134.1(b). If there are any questions as to the Country of Origin, you can contact the Import Operations Department for verification.

Particular attention should be paid to returned goods. These goods cannot be claimed to be U.S. origin simply because they were originally exported from the United States. The documentation should reflect the actual country of origin as marked on the products. If the PB products do not have a marking as to their country of origin you should notify Pitney Bowes.

The statement of the country of origin on the commercial documents must also be substantiated. This can be done by reviewing the physical items being shipped from your facility. If the origin of the articles is not marked on the articles and their cartons, you must contact the vendor and obtain, in writing, a statement as to the origin of the merchandise. Should you have difficulty obtaining this information, please feel free to either contact your supplier to obtain the data or contact the International Import Operations Department for PB US supplied goods.
2. Marking & Labeling Requirements

It is the Company’s policy to assure that all merchandise is properly marked in accordance with U.S. regulatory requirements (attachment 1). The responsibility for verifying marking and labeling requirements is assigned to the Import Operations Department, and to the qualified personnel to whom specific responsibility may be delegated from time to time. To this end, the Import Operations Department provides each vendor with detailed shipping, documentation and marking instructions. However, each Company employee must work with the Company to assure the vendors are shipping merchandise that is properly marked.

Generally, every article (and its outermost container) imported into the United States is required to be individually marked with its country of origin. This marking must be as legible, indelible, and permanent, as the nature of the article or container will permit. The marking must be conspicuous, i.e., easily readable and visible upon casual inspection. The marking must state “Product of (Country)” or “Made In (Country)” in English. Use of other terminology must be approved by the Import Operations Department. If an item is found not to be properly marked, the item could be detained in Customs, PB may be required to return the items to CBP or face a 10% marking duty.

If a product consists of multiple parts with different origins, it is may be necessary to state the origin of each component. If a product is assembled after importation and the assembly process obscures the country of origin, the finished product usually must be relabeled. In most cases, it is a violation of the law to remove country of origin marking from imported merchandise after entry.

If offered for retail sale in a package, the individual articles and the package must also be marked with the country of origin of the product or products contained in the package.

There are certain articles that are exempt from direct marking as noted on the “J list” (attachment 2). When an article is exempt, the outer carton, box or packaging MUST be marked with the correct country of origin of the contents.

Other exemptions may exist depending upon the nature and use of the article. However, before an item may be imported without proper marking, CBP must be notified and approve the importation.

The Company may also seek expert advice and support for its activities from its licensed CBP brokers, from counsel, and through consultation and rulings obtained from U.S. CBP and the other agencies whose regulations may be involved.
ATTACHMENT 1

EXAMPLE OF COUNTRY OF ORIGIN MARKING

Exterior Product Marking Model H201

Exterior Carton Marking: Made in UK
ATTACHMENT 2 - (J LIST)

Articles of a class or kind listed below are excepted from the individual requirements of country of origin marking. However, in the case of any article described in this list that is imported in a container, the outermost container is required to be marked to indicate the origin of its contents.

- Art, works of.
- Articles classified under subheadings 9810.00.15, 9810.00.25, 9810.00.40 and 9810.00.45, Harmonized Tariff Schedule of the United States.
- Articles entered in good faith as antiques and rejected as unauthentic.
- Bagging, waste.
- Bags, jute.
- Bands, steel.
- Beads, unstrung.
- Bearings, ball, 5/8-inch or less in diameter.
- Blanks, metal, to be plated.
- Bodies, harvest hat.
- Bolts, nuts, and washers.
- Briarwood in blocks.
- Briquettes, coal or coke.
- Buckles, 1 inch or less in greatest dimension.
- Burlap.
- Buttons.
- Cards, playing.
- Cellophane and celluloid in sheets, bands, or strips.
- Chemicals, drugs, medicinal, and similar substances, when imported in capsules, pills, tablets, lozenges, or troches.
- Cigars and cigarettes.
- Covers, straw bottle.
- Dies, diamond wire, unmounted.
- Dowels, wooden.
- Effects, theatrical.
- Eggs.
- Feathers.
- Firewood.
- Flooring, not further manufactured than planed, tongued and grooved.
- Flowers, artificial, except bunches.
- Flowers, cut.
- Glass, cut to shape and size for use in clocks, hand, pocket, and purse mirrors, and other glass of similar shapes and sizes, not including lenses or watch crystals.
- Glides, furniture, except glides with prongs.
- Hairnets.
- Hides, raw.
- Hooks, fish (except snelled fish hooks).
- Hoops (wood), barrel.
- Laths.
- Leather, except finished.
- Livestock.
- Lumber, sawed.
- Metal bars, except concrete reinforcement bars; billets, blocks, blooms; ingots; pigs; plates; sheets, except galvanized sheets; shafting; slabs; and metal in similar forms.
- Mica not further manufactured than cut or stamped to dimensions, shape or form.
- Monuments.
- Nails, spikes, and staples.
- Natural products, such as
vegetables, fruits, nuts, berries, and live or dead animals, fish and birds; all the foregoing which are in their natural state or not advanced in any manner further than is necessary for their safe transportation.

- Nets, bottle, wire.
- Paper, newsprint.
- Paper, stencil.
- Paper, stock.
- Parchment and vellum.
- Pickets (wood).
- Pins, tuning.
- Plants, shrubs and other nursery stock.
- Plugs, tie.
- Poles, bamboo.
- Posts (wood), fence.
- Pulpwood.
- Rags (including wiping rags)
- Rails, joint bars, and tie plates covered by subheadings 7302.10.10 through 7302.90.00, Harmonized Tariff Schedule of the United States.
- Ribbon.
- Rivets.
- Rope, including wire rope; cordage; cords; twines, threads, and yarns.
- Scrap and waste.
- Screws.
- Shims, track.
- Shingles (wood), bundles of (except bundles of red-cedar shingles).
- Skins, fur, dressed or dyed.
- Skins, raw fur.
- Sponges.
- Springs, watch.
- Stamps, postage and revenue, and other articles covered in subheadings 9704.00.00 and 4807.00.00, Harmonized Tariff Schedule of the United States.
- Staves (wood), barrel.
- Steel, hoop.
- Sugar, maple.
- Ties (wood), railroad.
- Tides, not over 1 inch in greatest dimension.
- Timbers, sawed.
- Tips, penholder.
- Trees, Christmas.
- Weights, analytical and precision in sets.
- Wicking, candle.
- Wire, except barbed.