



## FTZ TRADE REMEDIES MANAGEMENT

We have been informed that CBP Officers have recently been directed to validate Trade Remedy compliance on merchandise admitted into and entered from Foreign-Trade Zones (FTZs). It is most important that clients validate that all materials admitted into their FTZs which are properly classified in HTS tariff provisions subject to Trade Remedies have been, and are being, admitted in Privileged Foreign (PF) status and the applicable HTS Chapter 99 additional duties are declared on Customs entries of merchandise entered into U.S. commerce. The e-214 is not programmed to identify Trade Remedy merchandise. All Trade Remedies (including Section 201 – Solar Cells and Panels and Washing Machines and Parts; Section 232 – Steel and Aluminum, China Section 301 – Products from China-List 1, List 2, and List 3) require the election of PF status on the Admission of these imported products into a Foreign-Trade Zone on and after the respective effective date. We strongly recommend that clients review their Item Master and e-214s. Where errors are identified, further action is necessary to protect against potential Customs penalties and/or liquidated damages. Please contact [Marshall Miller](#), [Linda King](#), [Lori Hessler](#), or [Brian Murphy](#) with questions or to discuss further actions.

For your convenience, below are Trade Remedy HTS resources.

HTSUS: <https://hts.usitc.gov/>

### CHINA SECTION 301 LISTS

- <https://www.cbp.gov/trade/remedies/301-certain-products-china>
- <https://www.cbp.gov/document/guidance/section-301-htsus-reference-guide>
- <https://ustr.gov/issue-areas/enforcement/section-301-investigations/section-301-china/section-301-exclusion-process>
- <https://ustr.gov/issue-areas/enforcement/section-301-investigations/search>

### SECTION 232 STEEL AND ALUMINUM:

- <https://www.cbp.gov/trade/remedies/232-tariffs-aluminum-and-steel>
- <https://www.govinfo.gov/content/pkg/FR-2018-03-15/pdf/2018-05478.pdf>
- <https://www.govinfo.gov/content/pkg/FR-2018-03-15/pdf/2018-05477.pdf>

### SECTION 201 TRADE REMEDY ON SOLAR CELLS AND PANELS AND WASHING MACHINES AND PARTS:

- <https://www.cbp.gov/trade/remedies/201-solar-cells-panels-washing-machines>
- <https://www.govinfo.gov/content/pkg/FR-2018-01-25/pdf/2018-01592.pdf>
- <https://www.govinfo.gov/content/pkg/FR-2018-01-25/pdf/2018-01604.pdf>

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## IMPORTS EXPORTS FOREIGN-TRADE ZONES

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