



DEPARTMENT OF THE TREASURY  
U.S. CUSTOMS SERVICE

# PORT OF CHICAGO PIPELINE

NO. 97-18

July 17, 1997

TO : Customhouse Brokers, Importers and Others Concerned

SUBJECT : CR 141.89(a) - Additional Requirements for Metal Mill Products

This pipeline is concerned with Customs entries for metal mill products made by iron and steel mills, copper mills, and aluminum mills. Iron and steel mill products in particular show a low statistical compliance rate with entry requirements. A principal cause is the failure to comply with the mandatory requirements in CR 141.89(a). The certificates discussed below must be supplied with the CF 7501; they should be supplied with the CF 3461.

Subsection 141.89(a), Customs Regulations, is an alphabetical list by commodity of certain mandatory information requirements. The requirements are for specific entry information beyond the invoice information specified in CR 141.86. In some instances the additional requirements specify the form in which the information is to be supplied as well as the substance of the information.

HTS Chapters 72, 74, 76 and part of Chapter 73 are structured by the composition or chemistry of the product - if it is an alloy and the identity of the alloying elements - and by its shape and dimensions and by how it is made, which is to say through how many steps has the product progressed along all the possible mill manufacturing steps.

Composition or chemistry of metal mill products is the thrust of CR 141.89(a). The four subchapters of Chapter 72 are essentially in terms of chemical element composition. Part of Chapter 73 and Chapters 74 and 76 are less obviously structured although classification is still dependent upon alloy composition. But the required format of either mill test certificates or mill analyses will usually provide physical test results as well. Sometimes the only test measurements for entry of high strength steel (Chapter 72 Additional U.S. Note 1(a)) are found on the mill certificates or mill analyses. Entry filers

should note that U.S. Note 1(a) defines yield point but typical foreign mill analyses show yield strength test results. While there is a technical distinction between the two, Customs uses the terms interchangeably. Also, please note “mega Pascals” and “Newtons per square millimeter” are identical units of measurement.

With regard to the iron and steel paragraph below, note that this paragraph specifies both form and substance. “In the form of” means the mill analyses or mill test certificates from the mill that poured the molten iron or steel. It does not mean a transcription of those results or of selected results onto an exporter’s letterhead or onto the lower portion of the seller’s invoice. It does not mean the customer specifications or a copy of part of an ASTM or SAE or other standard.

These are the applicable mandatory entry requirements in CR 141.89(a) for aluminum mill products, copper mill products, and iron and steel mill products:

**Aluminum and alloys of aluminum** classifiable under subheadings 7601.10.60, 7601.20.60, 7601.20.90, or 7602.00.00 - Statement of the percentages by weight of any metallic element contained in the article.

**Copper articles** classifiable under the provisions of Chapter 74 - A statement of the weight of articles of copper, and a statement of percentage of copper content and all other elements - by weight - to articles classifiable according to copper content.

**Iron or steel** classifiable in Chapter 72 or headings 7301 through 7307 - Statement of the percentages by weight of carbon and any metallic elements contained in the articles, in the form of a mill analysis or mill test certificate.

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