

## ARTICLE

# ITC Statistical Tariff Breakout Categories Could Benefit Your Import/Export Business

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Each year in April and August, the U.S. International Trade Commission (ITC) accepts requests to amend U.S. import and export classifications to provide more specific data on imported and exported goods. The resulting statistical classification provisions can allow companies to better monitor imports and exports for purposes of business planning, identifying market trends or even promoting industry-wide recycling and collection efforts. Companies that import or export goods to or from the U.S. should review the existing import and export classifications for those goods and their critical inputs, and consider whether additional statistical provisions could add value to the company's business operations.

Each product that is imported into or exported from the U.S. must be identified under a specific provision of the Harmonized Tariff Schedule of the United States (for imports) or Schedule B (for exports). While many highly specific classifications exist, others are more general, corresponding to many products that may be considered quite different within the trade. Where classifications are general, import and export statistics will be also be general, depriving companies of the benefits of critical volume and pricing data for specific goods. A statistical classification, however, allows that company to identify the specific type of product being imported or exported, permitting use of valuable volume and price data to identify market trends and to assist in business planning and other efforts.

Under the ITC's process for requesting statistical provisions, a party could request a new classification for imports or exports, or both. A statistical classification may benefit your company or industry if your company engages in the following:

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## Practice Areas

Export Controls and Economic Sanctions  
International Trade

- Monitoring of imports or exports for planning and marketing purposes;
- Identifying imports into the U.S. for anti-dumping or countervailing duty purposes;
- Monitoring imports or exports of raw materials that comprise a significant amount of a product's value;
- Identifying imports or exports for recycling efforts; and
- Coordinating industry-wide cooperative efforts towards a specific goal.

While statistical classifications can be extremely beneficial to companies, the ITC does not approve all requests. For example, to prevent or avoid the disclosure of confidential business information, the ITC will generally not approve a proposed statistical category under which three or fewer importers or exporters would likely report shipments. Furthermore, the ITC would likely not approve a statistical classification if it would be significantly difficult for the U.S. Customs and Border Protection to enforce the proper classification of goods within the provision.

Requests for statistical classifications effective as of July 1, 2014 must be submitted by April 1, 2013.