

Reminder:
Shipments of Unassembled Pallets Must Meet Specific Requirements to be Eligible for Entry under 4415.20.8000

In September of 1998, U.S. Customs and Border Protection (CBP) (formerly known as "U.S. Customs Service") issued a Trade Information Notice at the Port of Blaine, WA that described what shipments of unassembled pallets must contain to be eligible for entry under classification 4415.20.8000. The notice provides that shipments of boards must consist of those pieces which will, at destination, be joined to each other without the addition of any other pieces to make a particular number of a particular type of pallet.

CBP also notes that pallets consist, at a minimum, of two types of components, that is, stringers and top (and bottom) boards. The boards are thin in comparison to the stringers. Certain so called "pallet kits" consisting of only one size lumber components, e.g. 2x4 lumber boards, are not recognizable as unassembled pallets, and the square cut lumber "components" are classifiable under 4407 of the Harmonized Tariff Schedule (HTS). Articles classified in 4407 of the HTS are subject to the applicable rules of the 2006 Softwood Lumber Agreement (SLA).

For those shipments of pallet stock that qualify for entry under 4415.20.8000, the shipment must have an invoice that includes the following statement:

- This load consists of unassembled pallets.
- The stringers and deck boards in this load are to be made into _____ finished pallets.
- The composition of each pallet is _____ pcs of (e.g. 1x6) and _____ pcs of (e.g. 2x4).

The invoice should also include the total number of stringers and deck boards shipped. Any additional notched stringers or boards must be listed separately on the invoice, and the boards will require a softwood lumber permit.

CBP further provides in a second Information Trade Notice from April of 1999 that unassembled pallets being imported pursuant to a sale to a pallet manufacturer who assembles them and sells them to an end user are not exempt from marking under any provision of Part 134.32 of the Customs Regulations. However, in lieu of having the components marked with the country of origin, importers of record may furnish CBP with blanket certificates of marking in accordance with 134.25 and 134.26 of the Customs Regulations. In other words, shipments of unassembled pallets must be marked with country of origin, or the shipment must be accompanied with a certificate of marking.

If you have any questions, or would like copies of the aforementioned Trade Notices, please contact us at compliance.us@ngjensen.com.

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