

BETTER TRADE TOOL: CLASSIFICATION METHODOLOGY

Table of Contents

- Introduction 3
- Overview of the Harmonized System and Harmonized Tariff Schedule..... 3
- Classification Methodology..... 3
 - A. Define Product 3
 - B. Consider HTS Classification Options 4
 - C. Product Definition by Country 4
 - D. Documentation in the Product Reference Guide 4
- Annex A: Product Reference Guide 5

Introduction

The Classification Methodology used to classify goods by HTS/HS codes was designed to narrowly define the goods included in the *List of Goods Produced by Child Labor or Forced Labor* and *List of Products Produced by Forced or Indentured Child Labor*. The overarching goal was to develop and utilize a methodology that would classify a good as directly as possible, taking into account the research included in DOL reporting.

Overview of the Harmonized System and Harmonized Tariff Schedule

The Harmonized System (HS) was developed by the World Customs Organization (WCO) in 1988 to define and classify internationally traded goods with a universal 6-digit code. The HS codes are used by customs authorities around the world to describe internationally traded goods for tariff/duty, quota, and statistical purposes. The HS is updated approximately every five years, the seventh edition of HS nomenclature will go into effect on January 1, 2022.

While the first six digits (HS code) are universally standard, countries are allowed to add 1-6 digits after the universal code for further classification. The United States uses up to a 10-digit code to classify imports. The US Customs and Border Protection of the Department of Homeland Security is responsible for interpreting and enforcing the HTS, while the US International Trade Commission (USITC) is tasked with maintaining and publishing the HTS for US imports. The USG makes modifications to HTS throughout the year.

The HS codes start from 99 chapters classifying products by 2-digit code down to a more specific 6-digit code. The US HTS codes build on the HS system, but adds 6, 8, and 10- digit codes for a total of approximately 43,000 unique nomenclature codes.

Classification Methodology

In order to classify goods included on our Lists in the aforementioned classification systems, the following steps were taken:

A. Define Product

For simple commodities like blueberries, carrots, or strawberries the process of product identification was relatively clear. Much consideration was given to how to classify the product based on the criteria to only include the product or any processed product (and ensuing byproducts) reasonably required to preserve and prepare the good for international trade. Intermediate and downstream products were excluded. This process is documented in the Product Reference Guide. Please see Annex A.

This methodology also include any processed product (and ensuing byproducts) reasonably required to preserve and prepare the good for international trade. Transformed intermediate products or downstream products were excluded from this review.

B. Consider HTS Classification Options

After defining the product as completely as possible with available information, the goods were classified by HTS code. Using the US HTS (<https://hts.usitc.gov/>), goods were:

- 1) Searched for by keyword using the on-line search feature.
- 2) The full HTS was considered at a chapter level, and products were manually classified.
- 3) The notes in the relevant chapter were reviewed to check for meaning and other classification options.
- 4) The full HTS was reviewed to check for byproducts, intermediate processed goods, and downstream products.

Notes on this process are included under Annex A: Product Reference Guide.

C. Product Definition by Country

After compilation of identified HTS tariff codes, all codes were then reviewed relative to the listed country of origin, including consideration to any supplementary information available through additional research. In order to define each product as narrowly as possible, each product's HTS codes should be specific to each country. For this study, there was often insufficient information to edit on a national basis and therefore product categories were universally applied as a result. All decisions are documented in the Product Reference Guide.

D. Documentation in the Product Reference Guide

The classification process is documented in Annex A: Product Reference Guide to allow for transparency of classification methodology and serve as a reference for future research and revisions. Each product category contains an explanation of what products were included and excluded, potential downstream products, questions for future research, and comments on the classification along with the results of any stress tests performed.

Annex A: Product Reference Guide

List of Goods Produced by Child Labor or Forced Labor and *List of Products Produced by Forced or Indentured Child Labor* goods were narrowly defined to include the product or any processed product (and ensuing byproducts) reasonably required to preserve and prepare the good for international trade. Any modification to this standard, based on unique product or country information, is noted below. For each good, there is a brief written description of included and excluded goods.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Alcoholic Beverages	2203, 2204, 2205, 2206, 2207.10.3000, 2208	Beer, wine, vermouth, spirits, cider, rice wine, etc.	Dairy drinks with alcohol (2106.90.09, 2106.90.12, 2106.90.15, 2106.90.18)
Amber	9602	Worked vegetable or mineral carving material (9602)	Downstream products as listed below. Note, rough amber in chapter 25 is excluded as it is a mineral.
Artificial Flowers	6702	Flowers made of feathers, man-made fibers and plastics.	Flowers made out of clay or molds.
Baked Goods	1905	Bread, pastry, biscuits, crackers, pizza, etc. whether frozen or not (1905). Chips (1905.90.9030) were included as it was unclear whether chips are baked.	Mixes and doughs (1901.20), dry mixtures (1901), prepared foods obtained by swelling or roasting of cereals (1904), preparations suitable for infants or young children (1901)
Bamboo	4402.10, 4409.21, 4412.10, 4418.73, 4418.91, 4706.30.0000, 4823.61	Bamboo: wood charcoal, flooring, plywood, pulp, paper.	Bamboo food or houseware.
Bananas	0803.90	Bananas, fresh or dried (0803.90) and banana pulp (2008.99.13). Banana and plantain flour/powder/meal (1106.30.20), although the category is overbroad as it includes plantain flour.	Banana jams, pastes, purees (chapter 20).

GOODS	HTS CODE	INCLUDES	EXCLUDES
Beans	0708.20, 0710.22.1000, 0710.22.1500, 0710.22.2000, 0710.22.3700, 0710.22.4090	Beans whether fresh or frozen, preserved in vinegar or non-vinegar, shelled or not. Various types include: tonka beans (1211.90.60), peas, kidney, cowbeans, red, broad, etc. whether for sowing or human consumption.	Items assumed to be out of scope: cocoa beans (1801), “leguminous vegetables” (0708.90), lentils (legume not a bean) (0713.40), and bean cake (2008.99.9110). Thickener from locust beans (1302.32.40).
Beans (green beans)	0708.20.9010, 0710.22.2500, 0710.22.4010	Frozen, dried, and fresh green beans	Beans of the species Vigna mungo (0713.31) and Beans Vinga Phaseolus (0708.20). Other methods of preserving vegetables (chapter 20) are excluded, as there was not an HTS category specific to green beans, such as “preserved other than by acid mixture of vegetables other” (2005.99.97). Vegetable juice also excluded (2009.90.20).
Beans (green, soy, yellow)	0708.20.9010, 0710.22.2500, 0710.22.4010, 1201	Frozen, dried, and fresh green beans; soy beans; “yellow peas” (0713.31).	Other methods of preserving vegetables (chapter 20) are excluded, as there was not an HTS category specific to green beans, such as “preserved other than by acid mixture of vegetables other” (2005.99.97). Vegetable juice also excluded (2009.90.20).
Beef	0201, 0202, 0210.20.0000	Beef meat of bovine, whether fresh, frozen, salted smoke, or dried. Including: veal, different type of cuts, (rip, chuck, loin, etc.), carcass, bone-in/boneless, processed and high-quality beef cuts.	Meat from sheep and lambs (0204), swine (0203), horses (0205), poultry, edible offal of bovine animals fresh-whether chilled or frozen (0206), any byproduct of slaughter, flour of meat (2301).

GOODS	HTS CODE	INCLUDES	EXCLUDES
Bidis (hand-rolled cigarettes)	2402.20.8000	Classified as “cigarettes containing tobacco, paper wrapped” (2402.20.80)	HTS defined “Cigars, cheroots, cigarillos and cigarettes, of tobacco or of tobacco substitutes”, as well as “roll your own”, pipe tobacco, cigarettes containing cloves, manufactured tobacco and tobacco substitutes (Chapter 24). In addition, Bidi Disposable Sticks (2933.99) are marketed in the US, but these were excluded, given as the assumption production of vapor bidis would not be connected to the labor used to produce hand rolled bidis.
Blueberries	0810.40.0024, 0810.40.0026, 0810.40.0029	Blueberries whether fresh, cooked, steamed, boiled, frozen, canned, or wild.	Blueberry jellies and jams
Bovines	0102	Live bovine (oxen, cow, bison, and buffalo).	Meat and by-products of slaughter (see downstream products).
Brassware	7418.10.0002, 7418.10.0021, 7418.10.0023, 7418.10.0025, 7418.20.1000, 9405.10.40	Household items in brass and brass plated; chandeliers/lighting of brass (9405.10.40).	Brass in raw or processed form such as: alloy, sheets, strips, tubes, pipes (7407, 7408, 7409, 7411); brass plumbing (7419); brass instruments (9205). There is not a specific HTS code for brass handicraft, so handicrafts excluded as this category is too broad and would overstate actual value.
Brazil Nuts/Chestnuts	0801.21.0000, 0801.22.0000, 0802.41.0000, 0802.42.0000	Brazil nuts fresh or dried, in shell or shelled. Chestnuts fresh or dried, in shell or shelled. Chesnut preserved in vinegar.	N/A

GOODS	HTS CODE	INCLUDES	EXCLUDES
Bricks	6810.11, 6901, 6902.10, 6902.20.10, 6902.90.10, 6904	Bricks of different material and uses: building bricks, goods of siliceous, refractory bricks, ceramic bricks.	N/A
Bricks (clay)	6902.90.1010	Clay bricks (6902.90.10.10)	N/A
Broccoli	0704.10, 0704.90.4020, 0710.80.9722, 0710.80.9724, 0710.80.9726	Broccoli, sprouting broccoli, and broccoli spears whether fresh or chilled. Other mixed vegetables, broccoli (0012.90.8510).	Broccoli seeds (1209.91.80.05). Other forms of vegetable preservation excluded, as broccoli not specifically mentioned product categories deemed too broad, "other veg preserved in vinegar" (2001.90) and "other preserve, other veg, mixed" (2004.90).
Cabbages	0704.90.2000	Cabbage fresh or chilled	Cabbage seeds (1209.91.80.08); other vegetable preservation included in chapter 20, as cabbage not specifically identified, HTS category deemed overly large.
Carpets	5701, 5702, 5703, 5704, 5705	Carpet textile and floor coverings	N/A
Carrots	0706.10.0500, 0706.10.1000, 0706.10.2000, 0710.80.7040, 0712.90.1000	Carrots fresh, frozen, or in an airtight container. Mixed vegetables with carrots.	Carrot seeds (1209.91.80.10) and "other vegetable" juice (2009)
Cashews	0801.31.0000, 0801.32.0000	Cashews whether fresh or dried, shelled or not shelled. Cashews "other, including mixtures". Cashew "nut shell liquid" also included, as viewed as a byproduct of shelled nuts, and both shelled and unshelled cashews included in description.	Mixed nuts or mixed with dried fruit, where cashews were not specifically mentioned in HTS description, as this category deemed overly broad.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Cattle	0102.21, 0102.29	Live cows, bulls, heifer, steer whether purebred, for dairy, immediate slaughter, or breeding	Live buffalo and bison. By-products of cattle not related to slaughter/rendering, including: bovine semen (0511.10); cattle embryos (0511.99), glands for pharmaceuticals (0510), dung (for manure or fuel), dairy etc.
Cement	2523, 3909.50.2000, 6810, 6811	Cement, articles of cement	Cement resin, dental cement, prepared additives for cement, products agglomerated with cement, textile fabric for asbestos cement, refractory cement (3816)
Ceramics	69	Ceramics (chapter 69) which includes ceramic bricks, flooring, pipes, tiles, ceramic wares for laboratory use, tableware and household ceramic items, etc.	Agglomerated abrasives, glass ceramic, portland cement, etc. (6804.22) and magnets of ceramic (8505.11.00.30).
Cereal Grains	1001, 1002, 1003, 1004, 1005, 1007, 1008	Wheat, meslin, barley, rye, oats, corn, sorghum, buckwheat.	Seeds and prepared foods obtained from cereal grains (1904). Residues derived from working cereals (2302), as it seems that reflects a processing step to a downstream product rather than a preservation step.
Charcoal	4402	Charcoal, whether from bamboo or other plants	Animal charcoal, or "bone black" (note bone black was included in CBP WRO).

GOODS	HTS CODE	INCLUDES	EXCLUDES
Chile Peppers	0709.60.20	Fresh or chilled chile peppers, whether grown in a greenhouse or other. Also includes genus capsicus anuum “prepared or preserved other than by vinegar”.	Chile pepper vegetable seed (1290.9160). Also excludes fresh and chilled peppers that are not chile peppers such as: jalapenos, bell peppers, and ancho peppers Pimentos (0904).
Christmas Decorations	8539.22.4000, 9405.30, 9505.10	Specific HTS codes for Christmas decorations	Other items, not specified under HTS as for Christmas, that could be used for Christmas. For example, DOL research indicates prisoners make Christmas lights and gift bags- gift bags could potentially be reported under another HTS code.
Citrus Fruits	0805	Citrus fruit whether fresh or dried and preserved citrus peels. Mixture of citrus fruit and nuts (0812.90.20) also included because “citrus fruit” specified.	Fruit trees, as identified as an upstream product. Citrus seeds and pulp of citrus fruit (2008.30.35).
Cloves	0907	Cloves whether whole, crush, or ground.	⊖Oil of cloves (3301.29.5113) is excluded. Cigarettes that contain cloves (2402.20.1000)
Coal	2701	Coal, briquettes and similar; whether or not pulverized but not agglomerated.	Upstream product of coal: peat (2703).

GOODS	HTS CODE	INCLUDES	EXCLUDES
Cobalt ore (heterogenite)	2605.00.0000	Cobalt was defined slightly more broadly than other TVPRA/E.O minerals/ores per comments below. Cobalt is classified under HTS categories: cobalt ores and concentrates, cobalt oxide, sulfates of cobalt, cobalt carbonates, and radioactive cobalt-60. Note, cobalt ores can be hydroxides, oxides or sulphides. Cobalt mattes and other intermediate products- including unwrought cobalt, scrap (8105) were also included.	Electromagnets Sintered samarium-cobalt (8505)
Coca (stimulant plant)	1211.30.0000	Coca Leaf	N/A
Cocoa	1801.00.0000, 1802.00.0000	Cocoa beans, bean waste, cocoa fat, powder, paste.	Chocolate and other food prep excluded (1806)
Coconuts	0801.11.0000, 0801.12.0000, 0801.19.01	Fresh coconuts whether shelled or unshelled and coconut meat, as well as prepared/preserved coconuts.	Downstream products
Coffee	0901	Roasted and not roasted decaf or regular; husk skins; coffee sub mix	N/A
Copper	2603	Copper ore, copper oxide, and refined copper.	Ores with copper content, slag with copper content (2620.20, 2620.99, 2620.99.75), copper hydroxides, and sulfates of copper.
Corn	0709.99.4500, 0710.40.0000, 1005.10, 1005.90.2015, 1005.90.2025, 1005.90.4060	Corn whether fresh or frozen, organic or not (1005). Seed was included for corn, because the kernel is a seed.	Corn flour, syrup, starch, meals/flours/pellets/starch/oil/corn-soya milk blends/corn chips excluded, and corn oil (1515.21, 1515.29)

GOODS	HTS CODE	INCLUDES	EXCLUDES
Cotton	5201	Cotton whether or not carded or combed (5201, 5202, 5203), cotton waste.	cotton seed and linter were excluded.
Cottonseed (hybrid)	1207.21.0000, 1207.29.0000	Cottonseed (1207.21) and cotton linter, as cotton linter is a byproduct of cottonseed (1404.20).	Cotton seed oil (1512. 1517, etc.), considered a downstream product of cottonseed.
Cucumbers	0707.00	Cucumber fresh or chilled, provisionally preserved	Cucumber seeds for sowing (1209.91.8040)
Cumin	0909.31.0000, 0909.32.0000	Seeds of cumin, whether or not crushed/ground	N/A
Diamonds	7102	Worked and unworked diamonds; diamond dust powder – “of natural or synthetic stone” (7105.10)- may overstate value due to inclusion of synthetic stone.	Diamond jewelry.
Dried Fish	0305.31.0100, 0305.32, 0305.39, 0305.51.0000, 0305.52.0000, 0305.53.0000, 0305.54.0000, 0305.59.0001	Dried fish of several varieties. Byproducts of preparing and drying fishing, including: liver, roe, and milt whether smoked, dried, or salted; dried fish head, tail, and maws.	Flour meals/pellets of fish (0305.10). Smoked fish (0305.41) excluded, as ‘dried’ is distinct from ‘smoked’ in HTS classification. “Fish salted but not dried or smoked” (0305.61) also excluded. Fish in airtight containers, as it does not specify fish are dried.
Eggplants	0709.30	Eggplants, fresh or chilled	No HTS code for eggplant under different veg forms (frozen, preserved in vinegar, etc.), so no comment on common vegetable exclusions.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Electronics	85	HTS Chapter 85 “Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles”	Other items, potentially defined as electronics, as listed in Chapter 85 notes.
Embellished Textiles	5407.91.2010, 5407.92.2010, 5809.00.0000	Embellished textiles categorized under “material with metal thread” (5809, 5407.91.20.10, 5404.92.20.10)	Tulles and other net fabrics, not including woven, knitted or crocheted fabrics (5804); “lace in piece, strips or motifs, other than fabrics of headings 6002 to 6006”.
Emeralds	7103.10, 7103.91.0030	Worked emeralds have a unique HTS category (7103.91.00.30). Unworked emeralds are encompassed in a broader stone category (7103.10), and thus value in this category will overstate actual unworked emerald value.	“Precious stones (other than diamonds)” cut but not suitable for jewelry (7103.99)” as wanted to define the category narrowly and it was unclear if Emeralds would be part of this category. Semi-precious and precious dust excluded, as it is not emerald specific nor is it known to be a significant emerald byproduct.
Fashion Accessories	7117.19, 7117.90.1000, 7117.90.4500, 7117.90.5500, 7117.90.6000, 7117.90.7500, 7117.90.9000, 9601.90.2000, 9601.90.4000	Imitation jewelry, worked shell, and coral for use in jewelry.	Home decor as well as garments, including button holes, trimming, etc. were excluded based on DOL guidance. Imitation jewelry that is “metal, plastic, or religious” also excluded, although it is unclear if religious imitation jewelry is made with wood.
Fireworks	3604.10	Fireworks, narrowly defined	N/A
Fish	0301, 0302, 0303, 0304	Fish whether live, fresh, frozen, smoked or dried. Offal (including fish maws). Other marine animals.	Downstream products as well as fertilized fish eggs (0511.91), fish fat (1504), fish juices, and caviar (1603, 1604).

GOODS	HTS CODE	INCLUDES	EXCLUDES
Flowers	0603	Fresh cut flowers only	Bulbs, seeds, planted flowers (rose, orchid, etc.), artificial flowers, poppies.
Fluorspar (mineral)	2529.21.0000, 2529.22.0000	Fluorspar	N/A
Footwear	64	All of Chapter 64, "Footwear, Gaiters and the like; particles thereof", including footwear parts (6406).	"Worn items, other" (6309.20) as used footwear would not tie directly to labor used in manufacturing footwear.
Footwear (sandals)	6402.99.27, 6403.20.0000	Sandals out of plastic (note in HTS chapter notes it is indicated that for this definition the terms rubber and plastics include woven fabrics or other textile products with an external layer of rubber or plastics) and leather strap sandal.	Footwear parts and worn footwear (6309), orthopedic footwear (9021)
Fruits (Pome and Stone)	0808, 0809	Fresh or preserved apples, pears, apricots, cherries etc.	Avocados, and various jams and jellies (2007.99).
Furniture	94	Broadly defined, includes all of Chapter 94 "Furniture; bedding, mattresses, mattress supports, cushions and similar stuffed furnishings; lamps and lighting fittings, not elsewhere specified or included; illuminated sign illuminated nameplates and the like; prefabricated buildings"	Antique furniture (9706)
Furniture (steel)	9402.10.0000, 9402.90, 9403.10, 9403.20	Furniture for dental, barber, medical, office and other.	N/A

GOODS	HTS CODE	INCLUDES	EXCLUDES
Garlic	0703.20, 0712.90.40	Garlic, whether fresh, chilled, or in powder form.	Essential oil of garlic (3301.29.51.15). No HTS code for garlic preserved in oil/vinegar identified, except potentially for "other" category in Chapter 20, which was too broad and therefore excluded.
Garments	61, 62	All of Chapter 61 "Articles of apparel and clothing accessories, knitted or crocheted" and Chapter 62 "Articles of apparel and clothing accessories, not knitted or crocheted"	Worn clothing (6309), and other items listed in notes in chapters 61 and 62 that could potentially be described as a garment (i.e. surgical belts (9021))
Gems	7101, 7102, 7103	Diamonds, precious stones other than diamonds, dust, pearls	Semi-precious stones, imitation stones, gems cut but not set (7104),
Glass	70	Chapter 70 "Glass and glassware"	Products listed in notes of chapter 70 that could potentially be included as glass, or a downstream product of glass.
Glass Bangles	7117.90.5500, 7117.90.9000	Glass bangles classified under "Imitation Jewelry" (various 8-digit codes under 7117.90.55 and 7117.90.90).	Imitation Jewelry metal and plastic (under 7117). Also excludes "other articles of glass; other" (7020) as not related to glass jewelry.
Gloves	4203.29, 6116.91	Leather gloves that are not for sports (4203.29). Knit gloves of wool and/or fine animal hair (6116.91).	Gloves for other purposes (i.e. sports) as well as gloves made out of other material (rubber, cotton, etc.). Other knit gloves not listed above (6116) excluded as category is broad and would overstate actual value.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Goats	0104.20	Live goats.	Downstream products.
Gold	7108, 7115.90.0530	Gold, gold bars, and slag ash	Unwrought, coated with platinum, monetary, semi-manufactured (i.e. gold leaf), and ore with gold content
Granite	2516.11.0000, 2516.12	Granite that is “crude, roughly trimmed”, cut, or intended for buildings or statues.	Pebbles and crushed stone. Note, this HTS category is also contained in the TVPRA/E.O. product “Gravel (crush stones)”.
Granite (crushed)	2517	Pebbles, gravel	Crushed stone have many uses, notably in construction.
Grapes	0806.10	Grapes, whether fresh or preserved whether or not with sugar.	Dried grapes, HTS definition of dried grapes includes currants, raisins, and sultanas.
Gravel (crushed stones)	2517.10.0015	Pebbles, gravel	N/A
Gypsum (mineral)	2520.10.0000	Gypsum (anhydrite and plasters) (2520.10)	HTS categories of modeling paste (3407) and paper/board reinforced w/gypsum plaster (6809).
Hair Products	0501.00.0000, 6703.00.3000, 6704.20.0000	Human hair worked or unworked, as well as byproducts of human hair (wigs, eyelashes etc.).	Products for hair (shampoo, accessories, etc.)
Hazelnuts	0802.21.0000, 0802.22.0000	Hazelnuts whether shelled or unshelled and filberts whether prepared or preserved.	N/A
Hogs	0103	Live swine (0103)	Byproducts of hog slaughter, including: “ready for sausage casing” (0504.20), swine animal parts, hair/bristle (0502), organs, (0504) whole pieces etc., pork, pork and meat mix (1601), meat (0203), carcass, hides, etc.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Incense (agarbatti)	3307.41.0000	Agarbatti and other odoriferous preparations which operate by burning.	N/A
Iron	2601, 7206	Iron: pyrites, ores, slag, and oxides. Iron and non-alloy steel ingots.	Chlorieds etc. of iron (2827); pig iron (intermediate product in the production of steel) (7201). Ferrous products (when reducing iron ore) (7203), powders of pig iron (7205), semi finished products (7207), Flat rolled products or bars of iron (7209,7210,7211,7212,7213,7214,7215), other industrial products, etc.
Jade	7103.10, 7103.99, 7104.20.0000, 7104.90	Jade is categorized under "semi-precious stones". HTS category includes precious and semiprecious stones (excluding diamonds). Stones cut but not set included.	Rubies, emeralds, and sapphires; as well as semi-precious jewel dust.
Jute (textiles)	5301	Woven fabric, textiles, and carpet/textile floor coverings of jute. In addition, based on information in DOL reports, sacks and bags of jute are included.	Excludes jute that is raw or processed, but not spun (5303).
Khat (stimulant plant)	1211.90.9231	Classified under HTS category "fresh or dried Substances having anesthetic, prophylactic or therapeutic properties" (1211.90.92.31).	N/A
Khat/Miraa (stimulant plant)	1211.90.9231	Classified under HTS category "fresh or dried Substances having anesthetic, prophylactic or therapeutic properties" (1211.90.92.31).	N/A

GOODS	HTS CODE	INCLUDES	EXCLUDES
Leather	4104, 4105, 4106, 4107, 4112, 4113, 4114, 4115	Tanned leather, leather prepared after tanning, patent leather, composition leather	Raw skins
Leather Goods/Accessories	42	All of Chapter 42 "Articles of leather; saddlery and harness; travel goods, handbags and similar containers; articles of animal gut" (other than silkworm gut).	
Lettuce	0705.11, 0705.19	Lettuce whether fresh or chilled.	Lettuce seeds (1209)
Lobsters	0306.11, 0306.12, 0306.15.0000, 0306.31.0000, 0306.32, 0306.34.0000, 0306.91.0000, 0306.92.0000, 0306.94.0000	Lobster, whether live, fresh, chilled, or frozen as a whole lobster or lobster meat.	Lobster in prepared meal (1605.30.05)
Locks	8301.10, 8301.20, 8301.30, 8301.40, 8301.50, 8301.60	Padlocks and locks, whether operated by key, combination or electrically. Also included are HTS categories locks on motor vehicles, locks for furniture, luggage and door locks, claps incorporating locks, and lock parts.	Keys (8301.70)

GOODS	HTS CODE	INCLUDES	EXCLUDES
Manioc/Cassava	0714.10	Manioc, whether fresh or preserved and manioc starch (1108.14.0000).	Tapioca and like from cassava, arrowroot (1903.00.2000)
Matches	3605	Matches	Pyrotechnic
Meat	02	All of Chapter 2: "Meat and edible meat offal", which should be noted includes birds and land-based mammals; as well as sausages, preserved meat, juice of meat and organs of animals slaughtered.	Byproducts of slaughter included from Chapter 5, including heading 0511 which includes: bovine semen, cattle embryos, horsehair, animal fat (Chapter 15), bones and skin waste.
Melons	0807.11, 0807.19	Melons, including watermelons and cantaloupe (0807.11, 0807.19), whether fresh, steam, boiled or frozen; and melon peels (0814.00.40.	Melon seeds (1207.70)
Mica	2525.10	Mica whether crude, rifted, or powdered. Also includes mica waste and "worked mica".	Mica dielectric (8532).
Nails	7317, 7415.10.0000, 7616.10.1000	Nails made out of iron, steel, aluminum whether collated or not. Some categories of nails include tacks and staples.	
Nile Perch (fish)	0302.79.5025, 0303.29.0110, 0304.33.0000, 0304.63.0000, 0305.31.0100, 0305.44.0100, 0305.52.0000, 0305.64	There is a HTS category for fresh and frozen Nile Perch. However, classifying dried and smoked Nile Perch requires a larger category that includes multiple types of fish.	Fish offal, whether fresh, frozen, dried (which includes fish maws).

GOODS	HTS CODE	INCLUDES	EXCLUDES
Oil (palm)	1207.10.0000, 1511, 1513.21.0000, 1513.29.0000, 2306.60.0000	Palm and Palm kernel oil and its fractions, whether or not chemically modified. Palm nuts and kernels, oilcakes and other solid residues of palm nut or kernels. Industrial fatty acids and mixtures thereof.	Intermediate refining and downstream goods. Hydrogenated Palm Oil (1516) and other vegetable fat categories were excluded as category deemed overly broad (1516,1517,1518).
Olives	0709.92.0000, 0712.90.1500, 0712.90.2000	Olives whether fresh, prepared or preserved.	Olive oil and its fractions.
Onions	0703.10.2000, 0703.10.3000, 0712.20	Onions and pearled onions whether fresh, dried, or preserved.	Shallots, onion seeds, essential oil of onion (3301.29.5128)
Palm Thatch	4601.94.0500	Palm thatch categorized under HTS 4601.94.05 "plaiting and plaiting material of vegetable materials".	N/A
Peanuts	1202	Peanuts, whether ground or not; roasted or unroasted; shelled or unshelled.	Ground peanut oil and its fractions.
Pepper	0904.11, 0904.12.0000	Pepper of the genus Piper whether dried, crushed, or ground.	Black pepper oil (3301)
Peppers	0709.60.20, 0709.60.40, 0904.21, 0904.22	Pepper of the genus Capsicum and Pimenta whether dried or crushed or ground.	N/A
Physic Nuts	1207.30.0000, 1207.99.0391	HTS 1207.30.00. "Castor Oil Seeds". HTS 1207.99.03.91. Other (non-niger or hemp) oil seeds and oleaginous fruits, whether or not broken.	Exclude HTS 1515.30.00 "Castor Oil and its fractions" as a downstream product. Exclude 1515.80.90 "other" oils as a downstream product.
Pineapples	0804.30	Pineapple, whether fresh, dried, frozen, boiled, preserved with or without sugar.	Pineapple Jam/jelly (2007.99.40)

GOODS	HTS CODE	INCLUDES	EXCLUDES
Polysilicon	2804.61	High grade silicon, 99.9% pure	Lower grades of silicon.
Poppies	1302.11.0000	Vegetable sap and extracts; opium	Vegetable opium (1302.11)
Potatoes	0701	Potatoes whether fresh or chilled, cut or sliced. Potato flour meals or flakes of potato (1105) and potato starch included.	Potato chips (2005); Dextrin and starches derived from potato starch (3505)
Poultry	0105, 0207	Live poultry, poultry meat, and offal included	Eggs, goose liver, and prepared meals (1602)
Pulses (legumes)	0708, 0713	Pulses classified as "Leguminous vegetables, shelled or unshelled"	N/A
Pyrotechnics	3604, 3605	Fireworks (3604) and HTS category "matches, other than pyrotechnics of article 3604" (3605).	Ferrocium and other pyrophoric alloys in all forms; articles of combustible materials
Rice	1006, 1008.90.0120	Rice, including wild rice and rice flour.	
Rubber	4001	Natural latex and rubber (4001).	Synthetic rubber (4002), vulcanized rubber, and compounded rubber (4002).
Rubber Gloves	4015.11, 4015.19	Rubber gloves medical and other uses, of naturalized rubber.	Vulcanized rubber.
Rubies	7103.10, 7103.91.0010	Rubies worked (unique HTS for Rubies;) and unworked semi-precious gems, which is a broader category that includes non-rubies.	N/A
Salt	2501.00.0000	Salt, narrowly defined	N/A
Sand	2505	Natural Sand	Synthetic/mixed sands
Sandstone	2516.20	Sandstone	N/A
Sapphires	7103.10, 7103.91.0020	Worked HTS code is unique for sapphires; unworked HTS code is broader and includes other semiprecious stones.	Jewelry
Sesame	1207.40.0000	"Sesame seeds" whether or not broken	Sesame oil and its fractions (1515.50.00.00)

GOODS	HTS CODE	INCLUDES	EXCLUDES
Sheep	0104.10.0000	Live sheep	Downstream and byproducts.
Shellfish	0307	Shellfish (0307) a broad category that includes mollusks, clams, snails, etc. Shellfish is included whether it was frozen or fresh, live or killed, farmed or wild.	Shellfish juices
Shrimp	0306.16, 0306.17, 0306.35, 0306.36, 0306.95	Cold water and other shrimp or prawns and extracts and juices of meat.	Fish/crustacean byproducts (0519.11).
Silk Cocoons	5001.00.0000	Silkworm cocoons suitable for reeling and silk waste (cocoons unsuitable for reeling, yarn waste, etc.).	Raw silk (5002)
Silk Fabric	5007	Silk fabric (5007)	Silkworm cocoons, silk waste, silk yarn.
Silk Thread	5004.00.0000, 5005, 5006	Silk yarn (5004, 5005, 5006)	Silk cocoons, silk fabric
Silver	2616.10	Silver ore and concentrate as well as unwrought or semi-manufactured silver, where or not in powdered form.	Slag with silver content; other ores with silver content; leaded gasoline sludges containing silver (2602.29.0040 etc.); base metals clad with silver (7107, 7109,7111); and nickel silver.
Sisal	5607.21.0000, 5607.29.0000	Sisal is classified under HTS category of "Twine of sisal or other agave textures" (5607.21 and 5607.29)	Downstream products.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Soap	3401.11, 3401.19.0000, 3401.20.0000	Soap is classified under three HTS headings (3401.11, 3401.19, and 3401.20) in various forms.	Organic surface-active products and preparations for washing the skin, in the form of liquid or cream and put up for retail sale, whether or not containing soap. (3401.30)
Soccer Balls	9506.62.4080	Soccer balls	N/A
Stones	2513-2530	Stone is in most of Chapter 25: 2513-2530.	N/A
Stones (limestone)	2517.10.0020, 2521.00.0000	Limestone, whether or not crushed, whether or not intended to manufacture lime or cement.	Quicklime, slaked lime and hydraulic lime, other than calcium oxide and hydroxide of heading (2825), and other downstream products.
Stones (pumice)	2513.10	Pumice stone	N/A
Strawberries	0810.10	Strawberries, whether fresh, cooked, or frozen; as well as mixed berries with strawberries. Note, the mixed berry code (0811.90.8085) includes other berries and therefore would overstate.	HTS category “provisionally preserved two or more fruits”, as strawberries is not specifically mentioned (0812.90.10).
Sugar Beets	1212.91.0000	Sugar beets, whether fresh or chilled. Also includes beet pulp and molasses.	N/A
Sugarcane	1212.93.0000, 1701.13, 1701.14	Cane sugar, sugarcane, sugarcane solid, sugarcane molasses, bagasse, and sugarcane syrup.	Sugarcane flowerhead (edible), and downstream products.
Sunflowers	0603.90.0000	Fresh cut flowers, sunflower seeds, sunflower oil and sunflower oilcakes.	Sunflower seed oil and sunflower leaves as edible plant.

GOODS	HTS CODE	INCLUDES	EXCLUDES
Surgical Instruments	9018	Surgical instruments used in medical, surgical, dental, vet, etc. (9018).	Mechano-therapy devices, electro medical appliances, and orthopedic devices etc. including implants (9019, 1920 and others).
Sweet Potatoes	0714.20	Sweet potatoes, whether fresh, frozen or dried.	Yams and other potatoes are excluded.
Tantalum Ore (coltan)	2615.90.6030, 2615.90.6060	Tantalum ore and concentrates, as well as niobium ore and concentrates.	Tantalum from tin slag or scrap, as DOL research is specific to mining of coltan and no evidence of in-country refining. Synthetic tantalum-niobium (columbium) ore concentrates (2615.90.30) excluded, as derived from tin slag. Excludes vanadium ore and concentrate. HTS code for tantalum oxides and salt not identified. These items are also excluded, both because we consider them downstream products and it seems smelting and refining of products occurs in foreign countries.
Tanzanite (gems)	7103.10, 7103.99, 7104.20.0000, 7104.90	Classified under HTS category for "semi-precious stones".	Downstream products: jewelry, and dust of semiprecious stones (7105).
Tea	0902, 2101.20, 2106.90.9887	Tea whether or not flavored, including herbal tea and essence/concentrated tea	N/A

GOODS	HTS CODE	INCLUDES	EXCLUDES
Teak	4403.99.0195, 4407.29.0131	Classified under “wood sawn of chipped of teak” and “wood in the rough”. Note second category is overly broad as contains teak and nontek wood	Cumaru (Dipteryx spp.) also known as “Brazilian teak” (4409.22.0545). In addition, it is assumed that teak is a more expensive wood and would be unlikely to be used in general categories, therefore HTS codes that didn’t specify teak were excluded.
Textiles	50-63	Textiles in HTS Chapters 50-63	N/A
Textiles (hand-woven)	5111, 5208, 5209	Hand-woven fabric of wool, fine animal hair, or cotton.	Certified hand-loomed carpets, tapestries and clothing, and folklore products per DOL’s guidance. Also excludes hand-made lace (5804).
Thread/Yarn	5204, 5205, 5206, 5207, 5401, 5402, 5403, 5406, 5508, 5509, 5510, 5511	Yarn/thread made of cotton and human made filaments, whether or not for retail sale.	The following HTS categories are excluded: twine, rope, cables (5607), dental yarn/floss (3006), cotton yarn waste (5202), yarns suitable for making typewriter ribbon, rubber thread (5604), asbestos fibers/thread (6812), and paper yarn.
Tilapia (fish)	0302.71, 0303.23.0000, 0303.89.0040, 0304.31.0000, 0304.49.0112, 0304.51.0125, 0304.59.0030, 0304.61.0000, 0304.93, 0305.31.0100, 0305.44.0100, 0305.52.0000	Tilapia whether fresh, chilled, frozen, or dried.	Smoked fish and fish byproducts (juices, eggs, etc) as these HTS product categories include multiple types of fish, the classification was deemed too broad and not appropriate for Tilapia.
Timber	4403	Timber is classified under HTS code 4403, includes “poles, piles, and posts” as well as “logs and timber”.	

GOODS	HTS CODE	INCLUDES	EXCLUDES
Tin	80	HTS Chapter 80 "Tin and articles thereof"	"Tin ore and concentrates" (2609) and tin oxide
Tin ore (cassiterite)	2609	Tin ore and concentrate (2609)	Tin oxides (2825.90.20)
Tobacco	2401, 2403	Unmanufactured tobacco and manufactured tobacco.	Downstream products Cigar, cigarettes (2402).
Tomato products	0712.90.7400, 0712.90.7800, 2002.90, 2009.50, 1209.91.8070, 2103.20, 2103.90.9051, 2103.90.9059	Dried or preserved tomatoes as well as tomato juice, seeds, ketchup, and sauces.	Upstream "tomatoes"
Tomatoes	0702, 0710.80.4000, 0710.80.4500, 0710.80.5000	Tomatoes whether fresh, chilled, frozen or dried; prepared or preserved other than by vinegar; whether whole or in pieces. Both greenhouse and non-greenhouse tomatoes are included. Various types include: cherry, grape, roma, etc. (2002.10)	Downstream products.
Toys	9503, 9504, 9505.90.2000	There is a specific HTS toy category that includes: magic tricks, video games, tricycles, dolls, etc.	Toys for pets (4016, 6307), toy jewelry (7117), children's bicycles (8712), sporting equipment (rackets, fishing rods etc.).
Trona (mineral)	2836.20.0000, 2836.30.0000	There is not a specific HTS category for "trona" so this product is categorized under "Sodium bicarbonate" (baking soda) (2836.30) and "disodium carbonate" (soda ash) (2836.20).	N/A

GOODS	HTS CODE	INCLUDES	EXCLUDES
Tungsten ore (wolframite)	2611	Tungsten ore and concentrate (2611)	Tungsten ore in various refining and smelting forms, including: slag ash containing mainly tungsten (2825.90.20), tungsten oxides (2825.90.30), salts of Tungsten (2827.39.40), molybdates tungsten (wolframites) (2841.80.00), carbide of Tungsten (2849.90.30), hydrides of tungsten (2850.00.10).
Vanilla	0905	Vanilla, whether crushed or ground.	N/A
Wheat	1001	Wheat and meslin (1001) as well as wheat and meslin flours (1101).	Wheat pellets, meal, cereals, starch (1103); wheat gluten (1109)- a downstream product rather than a by-product.
Yerba Mate (stimulant plant)	0903.00.0000	Mate (0903)	N/A
Zinc	2608, 2620.11.0000, 2620.19.3000, 7901, 7902.00.0000, 7903, 7904.00.0000, 7905.00.0000	Zinc ore, as well as zinc as waste, bars, scraps, etc. as well as unwrought zinc.	Other ores and leaded gasoline with zinc content. Zinc oxide and peroxide, and all other alloys and downstream products with zinc.