



1. Confirm whether the merchandise is on a Section 301 list.
2. Determine if the imported products can take advantage of one of the many exclusions from these additional duties granted by the Office of the U.S. Trade Representative (USTR). These exclusions are based on tariff classifications, modified by specific product descriptions.
3. Note that all exclusions have an expiration date, unless the exclusion approval has been extended. To date, no exclusions extend beyond Dec. 31, 2020.
4. USTR has yet to release the list of products that will be subject to a specific exclusion for COVID-19-related products. The Section 301 situation for products from China is fluid and requires constant monitoring.
5. The country of origin of all imported products must be declared to CBP at entry, and all products of foreign origin must be properly marked with the country of origin (usually, but not always, the country of manufacture). Because of the additional tariffs for Chinese products, CBP is especially attuned to the potential for transshipment and carefully monitors shipments for misdeclaration or mismarked goods.
6. Finally, most PPE articles, in addition to complying with CBP import requirements, must also comply with U.S. Food and Drug Administration (FDA)-related regulatory requirements. Failure to fully comply with FDA regulations will result in the goods being denied entry into the United States.

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