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June 17, 2019

**Submitted electronically (www.regulations.gov)
Docket ID No.: USTR-2019-0004**

Ambassador Robert E. Lighthizer
United States Trade Representative
600 17th Street N.W.
Washington, DC 20508

RE: Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 84 Fed. Reg. 22,564 (May 17, 2019)

Attn: William L. Busis, Chair, Section 301 Committee

Dear Mr. Ambassador Lighthizer:

Pursuant to the notice published by the Office of the U.S. Trade Representative ("USTR") in the *Federal Register*,¹ the North American Association of Food Equipment Manufacturers ("NAFEM") respectfully submits the following comments opposing the imposition of additional tariffs on certain products related to the foodservice industry and its domestically produced equipment and supplies.

NAFEM has been an active participant in USTR's Sec. 301 hearings and product determination process. Unfortunately, it has seen mixed results with respect to the prior lists of products considered for, and ultimately targeted with, Sec 301 tariffs ("List 1," "List 2," and "List 3"). While NAFEM appreciates that USTR has offered a product exclusion process, and NAFEM members will continue to seek such exclusions as available, we respectfully submit that failure to remove NAFEM's products at the outset only causes uncertainty in the market and has a negative impact on our members and the American jobs they provide. NAFEM members must spend additional time and resources pursuing product exclusions for items that, we respectfully submit, could have and should have been removed at the outset.

NAFEM wants to emphasize the negative impact that each new round of tariffs is having for its members, many of which are small and medium-sized businesses that require careful and strategic long-term business planning in order to survive. Of the tariff lines presently under consideration for additional tariffs, nearly 500 cover important products used by NAFEM members, the vast majority of which are materials, parts, and components used to manufacture commercial foodservice equipment and supplies.

¹ *Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 22,564 (May 17, 2019).

While it is of course true that the tariffs are not a black and white issue for all our members, even some members that rely less on imports of Chinese inputs reported as much as a 19% increase in costs of materials. In other words, between the Sec. 232 and Sec. 301 tariffs, our members – even ones using only domestic products – are taking a real hit, and each incremental increase in their costs pushes them closer to the edge. Moreover, the addition of more and more tariffs over time has made strategic business planning difficult at best, threatening these U.S. companies and the American manufacturing jobs they provide.

Nonetheless, NAFEM commends USTR and the inter-agency panel for their insightful questions about the potential impact of the tariffs in prior rounds, including the myriad of difficulties in changing supply sources for the targeted NAFEM products. As discussed further below, and as Mr. Souhrada will testify, the proposed tariffs will have a significant impact on NAFEM's members.

Thus, our comments on the new list of products proposed for additional tariffs – the Annex to USTR's *Federal Register* notice and referred to herein as "List 4"² – are largely based on the same issues underlying our comments on Lists 1, 2, and 3, issues exacerbated as the tariffs affect more and more products relied upon by NAFEM members. Namely, tariffs on certain of these products have the potential to harm NAFEM members, U.S. manufacturers and suppliers, either by targeting material inputs, tools, or the equipment used on the shop floor to manufacture commercial foodservice equipment and supplies. These issues are discussed below after background information concerning NAFEM.

I. About NAFEM

NAFEM (<https://www.nafem.org/>) is a trade association comprised of more than 550 foodservice equipment and supplies manufacturers providing products for food preparation, cooking, storage, and table service for the food-away-from-home market. These businesses, their workers, and the products they manufacture support the foodservice industry, which includes school cafeterias, colleges and universities, correctional facilities, hospitals and eldercare facilities, lodging and casinos, corporate cafeterias, supermarkets, convenience stores, and restaurant locations across the United States.

Since 1948, NAFEM has represented hundreds of U.S. companies that manufacture an array of foodservice equipment, ranging from primary cooking equipment such as stoves and ovens, to storage equipment such as refrigerators, freezers, and ice machines, along with preparation equipment like heated cabinets and racks, and serving equipment including tables, cookware, flatware, and beverage dispensers. In brief, NAFEM members provide everything to the commercial foodservice industry except the food.

NAFEM's members include a range of small, medium, and large U.S. businesses that provide indispensable U.S. manufacturing jobs throughout the United States. However, the majority of our members are small and medium-sized businesses. In fact, more than 60% of members have annual sales of \$5 - \$10 million and qualify as small businesses, according to

² See *id.* at Annex.

the Small Business Administration. This year, according to the National Restaurant Association (NRA), the restaurant industry will employ approximately 15.3 million workers and generate \$863 billion in sales. These businesses and their workers depend on NAFEM-member manufactured equipment and supplies to serve safe, flavorful food to consumers when and where they need it. Many are family-owned businesses that play an instrumental role in providing vital U.S. manufacturing and distribution jobs for thousands of American families, fueling the success of the U.S. economy.

II. NAFEM Requests that the USTR Remove Certain Items from List 4

NAFEM members are directly impacted by certain products being targeted with proposed increased tariffs, many of which are parts and components used by U.S. foodservice equipment and supplies manufacturers. A complete list of the nearly 500 specific products and the corresponding Harmonized Tariff Schedule of the United States (HTSUS) Subheading targeted are provided in Appendix A, along with an indication of whether supply adjustments would take a year or more.

Appendix A organizes the products into three categories: (1) Materials, parts, and components used to manufacture commercial foodservice equipment and supplies domestically; and (2) Equipment and tools used in the manufacturing process; and (3) Finished commercial foodservice products. Raising the cost of inputs for U.S. domestic producers is clearly contrary to the Administration's intent with this Section 301 investigation, but this is the real result NAFEM members are experiencing with the items remaining on Lists 1, 2, and 3 and will unfortunately experience if the proposed additional tariffs are imposed for items on List 4. Indeed, a large, multi-national restaurant chain has shared with their Congressional representatives concrete examples of the financial impact of the U.S. tariffs on imports from China, along with the loss of business and exports experienced as a result of the retaliation by China.

More specifically, NAFEM members are concerned with increased tariffs on particular components, such as conveyor belts and parts for items like trash compactors and bakery machinery, as well as important inputs such as a variety of flat-rolled iron and steel, stainless steel, and aluminum products. Furthermore, these listed items typically do not contain technology harming U.S. intellectual property rights, innovation, or technology development, undermining the intent of the Administration's Section 301 actions. To the contrary, smart, economically competitive sourcing by NAFEM members from China for certain products allow these U.S. companies to control costs and protect, and even expand, U.S. jobs nationwide.

Therefore, in the event that the United States applies significant increased tariffs on certain products listed in Appendix A pursuant to the Section 301 proposal, NAFEM's concerns are twofold: NAFEM members expect to lose good-paying U.S. manufacturing jobs directly, followed by a potentially negative business impact on our customers, which includes hundreds of thousands of restaurants, convenience stores, and hotels around the world. Unfortunately, the adverse trade and economic effects of targeting these products will not be isolated to NAFEM members alone.

Such adverse market effects also are anticipated by many of the component suppliers to NAFEM manufacturing companies, given that numerous parts, components, electronics, and other essential controls are frequently sourced from Chinese suppliers. NAFEM companies' supply-chain adjustments, therefore, will require several months if not years of diligence, establishing reliable relationships, sourcing shifts, possible re-testing and certification for safety compliance, and perhaps even production relocations. Therefore, a transition time is needed for U.S. manufacturers in the foodservices industry to properly strategize and fully implement U.S. market corrections as a consequence of the imminently increasing tariffs. These business changes cannot occur overnight, despite the immediate application of the increased tariffs.

Consequently, NAFEM members prefer and respectfully request to have the particular products listed on Appendix A removed from the proposed List 4. The failure to do so will increase U.S. production costs, jeopardize manufacturing jobs throughout the U.S. and will negatively impact NAFEM's members and its foodservice industry customers nationwide.

Alternatively, if the request to remove these products from the proposal is denied when USTR finalizes List 4, NAFEM requests that the USTR provide a product exclusion process, as it has for products included in List 1 and List 2, and intends to provide for products included in List 3. Additionally, NAFEM respectfully requests a transition time to implement the tariffs for U.S. manufacturing companies to properly adjust their global sourcing strategies before the United States fully implements the Section 301 proposal.

NAFEM appreciates USTR's consideration of these comments. Please do not hesitate to contact us, if you have any questions regarding the comments.

Respectfully submitted,



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Enclosure: Appendix A – NAFEM's List 4 Products of Concern by HTS Subheading

Attachment A
List 4 Products of Concern to NAFEM

No.	HTSUS Subheading	Product Description	Supply Adjustments Will Require Time [1]
Materials, Parts, and Components Used to Manufacture Commercial Foodservice Equipment & Supplies			
1	3926.30.10	Handles and knobs for furniture, coachwork or the like, of plastics	✓
2	3926.30.50	Fittings for furniture, coachwork or the like, other than handles and knobs, of plastics	✓
3	3926.90.25	Handles and knobs, not used as fittings for furniture, coachwork or the like, of plastics	✓
4	4009.42.00	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, reinforced or combined with other materials nesoi, with fittings	✓
5	4010.11.00	Conveyor belts or belting of vulcanized rubber reinforced only with metal	✓
6	7206.10.00	Iron and nonalloy steel ingots	✓
7	7206.90.00	Iron and nonalloy steel in primary forms (o/than ingots)	✓
8	7207.11.00	Iron or nonalloy steel semifinished products, w/less than 0.25% carbon, w/rect. cross sect.(incl. sq.), w/width less than twice thickness	✓
9	7207.12.00	Iron or nonalloy steel semifinished products, w/less than 0.25% carbon, w/rect. cross sect. (exclud. sq.), nesoi	✓
10	7207.19.00	Iron or nonalloy steel semifinished products, w/less than 0.25% carbon, o/than w/rect. cross section	✓
11	7207.20.00	Iron or nonalloy steel semifinished products, w/0.25% or more of carbon	✓
12	7208.10.15	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, w/patterns in relief, in coils, pickled, not clad/plated/coated	✓
13	7208.10.30	Iron/nonalloy steel,width 600mm+,hot-rolled flat-rolled product,in coil,w/pattern in relief,w/thick 4.75mm+,not pickld,not clad/plated/coatd	✓
14	7208.10.60	Iron/nonalloy steel,width 600mm+,hot-rolled flat-rolled product,in coil,w/pattern in relief,w/thick <4.75mm,not pickld,not clad/plated/coatd	✓
15	7208.25.30	Nonalloy hi-strength steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick 4.75mm+, pickled, not clad/plated/coated	✓

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16	7208.25.60	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick 4.7mm or more, pickled, not clad/plated/coated	✓
17	7208.26.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick 3mm or mor but less 4.75mm, pickled, not clad/plated	✓
18	7208.27.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick less than 3mm, pickled, not clad/plated/coated	✓
19	7208.36.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick o/10mm, not pickled/clad/plated/coated	✓
20	7208.37.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick 4.75mm or more & n/o 10mm, not pickled/clad/plated	✓
21	7208.38.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick 3mm or more & less 4.75mm, not pickld/clad/plated	✓
22	7208.39.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick less than 3mm, not pickled/clad/plated/coated	✓
23	7208.40.30	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, w/pattern in relief,not coils,w/thick 4.75 or more, n/clad/plated/coated	✓
24	7208.40.60	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, w/pattern in relief,not coils,w/thick < 4.75mm, not clad/plated/coated	✓
25	7208.51.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, nesoi, not in coils, w/thick o/10mm, not clad/plated/coated	✓
26	7208.52.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, neosi, not in coils, w/thick 4.75mm+ but n/o 10mm, not clad/plated/	✓
27	7208.53.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, neosi, not in coils, w/thick 3mm+ but < 4.75mm, not clad/plated/coated	✓
28	7208.54.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, neosi, not in coils, w/thick less than 3mm, not clad/plated/coated	✓
29	7208.90.00	Iron/nonalloy steel, width 600mm+, hot-rolled flat-rolled products, nesoi, not clad/plated/coated	✓
30	7209.15.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, in coils, w/thick 3mm+, not clad/plated/coated	✓
31	7209.16.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, in coils, w/thick o/1mm but less than 3mm, not clad/plated/coated	✓
32	7209.17.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, in coils, w/thick 0.5mm or more but n/o 1mm, not clad/plated/coated	✓
33	7209.18.15	Nonalloy hi-strength steel, width 600mm+, cold-rolled flat-rolled products, in coils, w/thick less than 0.5mm, not clad/plated/coated	✓

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34	7209.18.25	Nonalloy steel(blackplate), width 600mm+, cold-rolled flat-rolled products, in coils, w/thick less than 0.361mm, not clad/plated/coated	✓
35	7209.18.60	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, in coils, w/thick 0.361mm+ but less 5mm, not clad/plated/coated	✓
36	7209.25.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, not in coils, w/thick 3mm or more, not clad/plated/coated	✓
37	7209.26.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, not in coils, w/thick o/1mm but less than 3mm, not clad/plated/coated	✓
38	7209.27.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, not in coils, w/thick 0.5mm+ but n/o 1mm, not clad/plated/coated	✓
39	7209.28.00	Iron/nonalloy steel, width 600mm+, cold-rolled flat-rolled products, not in coils, w/thick less than 0.5mm, not clad/plated/coated	✓
40	7209.90.00	Iron/nonalloy steel, width 600mm+, flat-rolled products further worked than cold-rolled, not clad/plated/coated, nesoi	✓
41	7210.11.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with tin, w/thick. 0.5 mm or more	✓
42	7210.12.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with tin, less than 0.5 mm thick	✓
43	7210.20.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with lead, including terneplate	✓
44	7210.30.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, electrolytically plated or coated with zinc	✓
45	7210.41.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with zinc (other than electrolytically), corrugated	✓
46	7210.49.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with zinc (other than electrolytically), not corrugated	✓
47	7210.50.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with chromium oxides or with chromium and chromium oxides	✓
48	7210.61.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with aluminum-zinc alloys	✓
49	7210.69.00	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated with aluminum o/than aluminum-zinc alloy	✓
50	7210.70.30	Iron/nonalloy steel, width 600mm+, flat-rolled products, painted/varnished or coated w/plastic but not plated/coated or clad w/metal	✓
51	7210.70.60	Iron/nonalloy steel, width 600mm+, flat-rolled products, painted/varnished or coated w/plastic, nesoi	✓

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52	7210.90.10	Iron/nonalloy steel, width 600mm+, flat-rolled products, clad	✓
53	7210.90.60	Iron/nonalloy steel, width 600mm+, flat-rolled products, electrolytically coated or plated with base metal, nesoi	✓
54	7210.90.90	Iron/nonalloy steel, width 600mm+, flat-rolled products, plated or coated, nesoi	✓
55	7211.13.00	Iron/nonalloy steel, width less th/600mm, hot-rolled flat-rolled universal mill plate, not clad/plated/coated	✓
56	7211.14.00	Iron/nonalloy steel, width less th/600mm, hot-rolled flat-rolled products, nesoi, w/thick of 4.75mm or more, not clad/plated/coated	✓
57	7211.19.15	Nonalloy hi-strength steel, width less th/300mm, hot-rolled flat-rolled products, not clad/plated/coated	✓
58	7211.19.20	Iron/nonalloy steel, nesoi, width less th/300mm, hot-rolled flat-rolled products, w/thick o/1.25 mm but n/o 4.75 mm, n/clad/plated/coated	✓
59	7211.19.30	Iron/nonalloy steel, nesoi, width less th/300mm, hot-rolled flat-rolled products, w/thick 1.25mm or less, not clad/plated/coated	✓
60	7211.19.45	Nonalloy hi-strength steel, width 300mm+ but less th/600mm, hot-rolled flat-rolled products, not clad/plated/coated	✓
61	7211.19.60	Iron/nonalloy steel, nesoi, width 300mm+ but less th/600mm, hot-rolled flat-rolled products, pickled, not clad/plated/coated	✓
62	7211.19.75	Iron/nonalloy steel, nesoi, width 300mm+ but less th/600mm, hot-rolled flat-rolled products, not pickled, not clad/plated/coated	✓
63	7211.23.15	Nonalloy hi-strength steel, width less th/300mm, cold-rolled flat-rolled, <0.25% carbon, w/thick o/1.25mm, not clad/plated/coated	✓
64	7211.23.20	Iron/nonalloy steel, nesoi, width less th/300mm, cold-rolled flat-rolled, <0.25% carbon, w/thick o/1.25mm, not clad/plated/coated	✓
65	7211.23.30	Iron/nonalloy steel, nesoi, width less th/300mm, cold-rolled flat-rolled, <0.25% carbon, w/thick o/0.25mm n/o 1.25mm, not clad/plated	✓
66	7211.23.45	Iron/nonalloy steel, nesoi, width less th/300mm, cold-rolled flat-rolled, <0.25% carbon, w/thick n/o 0.25mm, not clad/plated/coated	✓
67	7211.23.60	Iron/nonalloy steel, nesoi, width 300mm+ but less th/600mm, cold-rolled flat-rolled, <0.25% carbon, not clad/plated/coated	✓
68	7211.29.20	Iron/nonalloy steel, width less th/300mm, cold-rolled flat-rolled, w/0.25% or more carbon, w/thick o/0.25mm, not clad/plated/coated	✓
69	7211.29.45	Iron/nonalloy steel, width less th/300mm, cold-rolled flat-rolled, w/0.25% or more carbon, w/thick 0.25mm or less, not clad/plated/coated	✓

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70	7211.29.60	Iron/nonalloy steel, width 300mm+ but less th/600mm, cold-rolled flat-rolled, w/0.25% or more carbon, not clad/plated/coated	✓
71	7211.90.00	Iron/nonalloy steel, width less th/600mm, flat-rolled further worked than cold-rolled, not clad, plated or coated	✓
72	7212.10.00	Iron/nonalloy steel, width less th/600mm, flat-rolled products, plated or coated with tin	✓
73	7212.20.00	Iron/nonalloy steel, width less th/600mm, flat-rolled products, electrolytically plated or coated with zinc	✓
74	7212.30.10	Iron/nonalloy steel, width less th/300mm, flat-rolled products, plated/coated with zinc (other than electrolytically), w/thick o/0.25mm	✓
75	7212.30.30	Iron/nonalloy steel, width less th/300mm, flat-rolled products, plated/coated w/zinc (other than electrolytically), w/thick 0.25mm or less	✓
76	7212.30.50	Iron/nonalloy steel, width 300+ but less th/600mm, flat-rolled products, plated or coated with zinc (other than electrolytically)	✓
77	7212.40.10	Iron/nonalloy steel, width less th/300mm, flat-rolled products, painted, varnished or coated w/plastic	✓
78	7212.40.50	Iron/nonalloy steel, width 300+ but less th/600mm, flat-rolled products, painted, varnished or coated w/plastic	✓
79	7212.50.00	Iron/nonalloy steel, width less th/600mm, flat-rolled products, plated or coated nesoi	✓
80	7212.60.00	Iron/nonalloy steel, width less th/600mm, flat-rolled products, clad	✓
81	7213.10.00	Iron/nonalloy, concrete reinforcing bars and rods in irregularly wound coils, hot-rolled	✓
82	7213.20.00	Free-cutting steel, bars and rods in irregularly wound coils, hot-rolled	✓
83	7213.91.30	Iron/nonalloy steel, nesoi, hot-rolled bars & rods in irregularly wound coils, w/cir. x-sect. diam. <14mm, n/tempered/treated/partly mfd	✓
84	7213.91.45	Iron/nonalloy steel, nesoi, hot-rolled bars & rods in irregularly wound coils, w/cir. x-sect. diam. <14mm, w/0.6%+ of carbon, nesoi	✓
85	7213.91.60	Iron/nonalloy steel, nesoi, hot-rolled bars & rods in irregularly wound coils, w/cir. x-sect. diam. <14mm, w/less th/0.6% carbon, nesoi	✓
86	7213.99.00	Iron/nonalloy steel, nesoi, hot-rolled bars & rods, w/cir. x-sect. diam 14+mm or non-circ. x-sect., in irregularly wound coils, nesoi	✓
87	7214.10.00	Iron/nonalloy steel, forged bars and rods, not in coils	✓

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88	7214.20.00	Iron/nonalloy steel, concrete reinforcing bars and rods, not further worked than hot-rolled, hot-drawn or hot-extruded, n/coils	✓
89	7214.30.00	Free-cutting steel, bars and rods, not further worked than hot-rolled, hot-drawn or hot-extruded, n/coils, nesoi	✓
90	7214.91.00	Iron/nonalloy steel, bars and rods, not further worked than hot-rolled, hot-drawn or hot-extruded, w/rectangular (o/than square) X-section	✓
91	7214.99.00	Iron/nonalloy steel, bars and rods, not further worked than hot-rolled, hot-drawn or hot-extruded, w/non-rectangular X-sect, not in coils	✓
92	7215.10.00	Free-cutting steel, bars and rods, not further worked than cold-formed or cold-finished, not in coils	✓
93	7215.50.00	Iron/nonalloy steel nesoi, bars and rods, not further wkd. than cold-formed or cold-finished, not in coils	✓
94	7215.90.10	Iron/nonalloy steel, bars and rods, not cold-formed, plated or coated with metal	✓
95	7215.90.30	Iron/nonalloy steel, bars and rods, cold-formed, plated or coated with metal	✓
96	7215.90.50	Iron/nonalloy steel, bars and rods, further worked than cold-formed or cold-finished, nesoi	✓
97	7216.10.00	Iron/nonalloy steel, U,I or H-sections, not further worked than hot-rolled, hot-drawn or extruded, w/height under 80 mm	✓
98	7216.21.00	Iron/nonalloy steel, L-sections, not further worked than hot-rolled, hot-drawn or extruded, w/height under 80 mm	✓
99	7216.22.00	Iron/nonalloy steel, T-sections, not further worked than hot-rolled, hot-drawn or extruded, w/height under 80 mm	✓
100	7216.31.00	Iron/nonalloy steel, U-sections, not further worked than hot-rolled, hot-drawn or extruded, w/height of 80 mm or more	✓
101	7216.32.00	Iron/nonalloy steel, I-sections (standard beams), not further worked than hot-rolled, hot-drawn or extruded, w/height 80 mm or more	✓
102	7216.33.00	Iron/nonalloy steel, H-sections, not further worked than hot-rolled, hot-drawn or extruded, w/height 80 mm or more	✓
103	7216.40.00	Iron/nonalloy steel, L or T-sections, not further worked than hot-rolled, hot-drawn or extruded, w/height 80 mm or more	✓
104	7216.50.00	Iron/nonalloy steel, angles, shapes & sections nesoi, not further worked than hot-rolled, hot-drawn or extruded	✓
105	7216.99.00	Iron/nonalloy steel, angles, shapes & sections nesoi, further wkd. than cold-formed or cold-finished and not from flat-rolled products	✓

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106	7217.10.10	Iron/nonalloy steel, flat wire, <0.25% carbon, not plated or coated, w/thick n/o 0.25 mm	✓
107	7217.10.20	Iron/nonalloy steel, flat wire, <0.25% carbon, not plated or coated, w/thick o/0.25mm but n/o 1.25 mm	✓
108	7217.10.30	Iron/nonalloy steel, flat wire, <0.25% carbon, not plated or coated, w/thick o/1.25 mm	✓
109	7217.10.40	Iron/nonalloy steel, round wire, <0.25% carbon, not plated or coated, w/diameter less than 1.5 mm	✓
110	7217.10.50	Iron/nonalloy steel, round wire, <0.25% carbon, not plated or coated, w/diameter of 1.5 mm or more	✓
111	7217.10.60	Iron/nonalloy steel, wire (other than flat or round), <0.25% carbon, not plated or coated	✓
112	7217.10.70	Iron/nonalloy steel, flat wire, w/0.25% or more carbon, not plated or coated	✓
113	7217.10.80	Iron/nonalloy steel, round wire, w/0.25% or more carbon, not plated or coated	✓
114	7217.10.90	Iron/nonalloy steel, wire (other than flat or round), w/0.25% or more of carbon, not plated or coated	✓
115	7217.20.15	Iron/nonalloy steel, flat wire, plated or coated with zinc	✓
116	7217.20.30	Iron/nonalloy steel, round wire, <0.25% carbon, plated or coated with zinc, w/diameter of 1.5 mm or more	✓
117	7217.20.45	Iron/nonalloy steel, round wire, w/0.25% or more carbon and/or <1.5mm diam, plated or coated with zinc	✓
118	7217.20.60	Iron/nonalloy steel, wire (other than flat or round), <0.25% carbon, plated or coated with zinc	✓
119	7217.20.75	Iron/nonalloy steel, wire (other than flat or round), w/0.25% or more of carbon, plated or coated with zinc	✓
120	7217.30.15	Iron/nonalloy steel, flat wire, plated or coated with base metal other than zinc	✓
121	7217.30.30	Iron/nonalloy steel, round wire, <0.25% carbon, plated or coated with base metal other than zinc, w/diam. of 1.5 mm or more	✓
122	7217.30.45	Iron/nonalloy steel, round wire, w/0.25% or more carbon and/or <1.5mm diam, plated or coated with base metal other than zinc	✓
123	7217.30.60	Iron/nonalloy steel, wire (other than flat or round), <0.25% carbon, plated or coated with base metal other than zinc	✓
124	7217.30.75	Iron/nonalloy steel, wire (other than flat or round), w/0.25% or more of carbon, plated or coated with base metal other than zinc	✓

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125	7217.90.10	Iron/nonalloy steel, wire, coated with plastics	✓
126	7217.90.50	Iron/nonalloy steel, wire, plated or coated with materials other than base metals or plastics	✓
127	7218.10.00	Stainless steel, ingots and other primary forms	✓
128	7218.91.00	Stainless steel, semifinished products of rectangular (other than square) cross-section	✓
129	7218.99.00	Stainless steel, semifinished products, other than of rectangular (other than square) cross-section	✓
130	7219.11.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thickness o/10 mm	✓
131	7219.12.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick. 4.75 mm or more but n/o 10 mm	✓
132	7219.13.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick. 3 mm or more but less than 4.75 mm	✓
133	7219.14.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thickness less than 3 mm	✓
134	7219.21.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, not in coils, w/thickness o/10 mm	✓
135	7219.22.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, not in coils, w/thick. 4.75 mm or more but n/o 10 mm	✓
136	7219.23.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, not in coils, w/thick. 3 mm or more but less than 4.75 mm	✓
137	7219.24.00	Stainless steel, width 600mm+, hot-rolled flat-rolled products, not in coils, w/thickness less than 3 mm	✓
138	7219.31.00	Stainless steel, width 600mm+, cold-rolled flat-rolled products, w/thickness of 4.75 mm or more	✓
139	7219.32.00	Stainless steel, width 600mm+, cold-rolled flat-rolled products, w/thickness of 3 mm or more but less than 4.75 mm	✓
140	7219.33.00	Stainless steel, width 600mm+, cold-rolled flat-rolled products, w/thickness o/1 mm but less than 3 mm	✓
141	7219.34.00	Stainless steel, width 600mm+, cold-rolled flat-rolled products, w/thickness of 0.5 mm or more but n/o 1 mm	✓
142	7219.35.00	Stainless steel, width 600mm+, cold-rolled flat-rolled products, w/thickness of less than 0.5 mm	✓
143	7219.90.00	Stainless steel, width 600mm+, flat-rolled products, nesoi, further worked than cold-rolled	✓

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144	7220.11.00	Stainless steel, width less th/600mm, hot-rolled flat-rolled products, w/thickness of 4.75 mm or more	✓
145	7220.12.10	Stainless steel, width 300m+ but less th/600mm, hot-rolled flat-rolled products, w/thickness of less than 4.75 mm	✓
146	7220.12.50	Stainless steel, width less th/300mm, hot-rolled flat-rolled products, w/thickness of less than 4.75 mm	✓
147	7220.20.10	Stainless steel, width 300+ but less th/600mm, cold-rolled flat-rolled products	✓
148	7220.20.60	Stainless steel, width less th/300mm, cold-rolled flat-rolled products, w/thickness o/1.25 mm	✓
149	7220.20.70	Stainless steel, width less th/300mm, cold-rolled flat-rolled products, w/ thickness of 0.25 mm but n/o 1.25 mm	✓
150	7220.20.80	Stainless razor blade steel, width less th/300mm, cold-rolled flat-rolled, w/thickness n/o 0.25 mm	✓
151	7220.20.90	Stainless steel (o/than razor blade steel), width less th/300mm, cold-rolled flat-rolled products, w/thickness n/o 0.25 mm	✓
152	7220.90.00	Stainless steel, width less th/600mm, flat-rolled products further worked than cold-rolled	✓
153	7221.00.00	Stainless steel, bars and rods in irregularly wound coils, hot-rolled	✓
154	7222.11.00	Stainless steel, bars and rods, hot-rolled, hot-drawn or extruded, of circular cross-section	✓
155	7222.19.00	Stainless steel, bars and rods, hot-rolled, hot-drawn or extruded, other than of circular cross-section	✓
156	7222.20.00	Stainless steel, bars and rods, not further worked than cold-formed or cold-finished, nesoi	✓
157	7222.30.00	Stainless steel, bars and rods, further worked than cold-formed or cold-finished, nesoi	✓
158	7222.40.30	Stainless steel, angles, shapes & sections, hot-rolled, not drilled/punched or otherwise advanced	✓
159	7222.40.60	Stainless steel, angles, shapes & sections, other than hot-rolled and not drilled/punched or otherwise advanced	✓
160	7223.00.10	Stainless steel, round wire	✓
161	7223.00.50	Stainless steel, flat wire	✓
162	7223.00.90	Stainless steel, wire (other than round or flat wire)	✓

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163	7224.10.00	Alloy (o/than stainless) steel, ingots and other primary forms	✓
164	7224.90.00	Alloy (o/than stainless) steel, semifinished products	✓
165	7225.11.00	Alloy silicon electrical steel (grain-oriented), width 600mm+, flat-rolled products	✓
166	7225.19.00	Alloy silicon electrical steel (other than grain-oriented), width 600mm+, flat-rolled products	✓
167	7225.30.11	Alloy tool steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick. of 4.75 mm or more	✓
168	7225.30.30	Alloy (o/th stainless, silicon elect., hi-speed, or tool) steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick 4.75mm+	✓
169	7225.30.51	Alloy tool steel, width 600mm+, hot-rolled flat-rolled products, in coils, w/thick. of less than 4.75 mm	✓
170	7225.30.70	Alloy (o/th stainless, silicon elect., hi-speed, or tool) steel, width 600mm+, hot-rolled flat-rolled prod., in coils, w/thick less 4.75mm	✓
171	7225.40.11	Alloy tool steel, width 600mm+, hot-rolled flat-rolled products, n/coils, w/thick. of 4.75 mm or more	✓
172	7225.40.30	Alloy (o/th stainless, silicon elect., hi-speed, or tool) steel, width 600mm+, hot-rolled flat-rolled products, n/coils, w/thick 4.75mm+	✓
173	7225.40.51	Alloy tool steel, width 600mm+, hot-rolled flat-rolled products, n/coils, w/thick. of less than 4.75 mm	✓
174	7225.40.70	Alloy (o/th stainless, silicon elect., hi-speed, or tool) steel, width 600mm+, hot-rolled flat-rolled prod., n/coils, w/thick less 4.75mm	✓
175	7225.50.11	Alloy tool steel, width 600mm+, cold-rolled flat-rolled products	✓
176	7225.50.60	Alloy steel (o/ than tool), width 600mm+, cold-rolled flat-rolled products, w/thickness 4.75 mm or more	✓
177	7225.50.70	Alloy heat-resisting steel, width 600mm+, cold-rolled flat-rolled products, w/thickness less than 4.75 mm	✓
178	7225.50.80	Alloy steel (o/th heat-resisting), width 600mm+, cold-rolled flat-rolled products, w/thickness less than 4.75 mm	✓
179	7225.91.00	Alloy steel, width 600mm+, flat-rolled products further worked than cold-rolled, electrolytically plated or coated with zinc	✓
180	7225.92.00	Alloy steel, width 600mm+, flat-rolled products further worked than cold-rolled, plated or coated with zinc (o/than electrolytically)	✓

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181	7225.99.00	Alloy steel, width 600mm+, flat-rolled products further worked than cold-rolled, nesoi	✓
182	7226.11.10	Alloy silicon electrical steel (grain-oriented), width 300mm+ but less th/600mm, flat-rolled products	✓
183	7226.11.90	Alloy silicon electrical steel (grain-oriented), width less th/300mm, flat-rolled products	✓
184	7226.19.10	Alloy silicon electrical steel (o/than grain-oriented), width 300mm+ but less th/600mm, flat-rolled products	✓
185	7226.19.90	Alloy silicon electrical steel (o/than grain-oriented), width less th/300mm, flat-rolled products	✓
186	7226.20.00	Alloy high-speed steel, width less th/600mm, flat-rolled products of high-speed steel	✓
187	7226.91.05	Alloy chipper knife tool steel (o/than hi-speed), width less th/600mm, hot-rolled flat-rolled products	✓
188	7226.91.15	Alloy tool steel (o/than hi-speed/chipper knife), width 300mm+ but less th/600mm, hot-rolled flat-rolled products	✓
189	7226.91.25	Alloy tool steel (o/than hi-speed/chipper knife), width less th/300mm, hot-rolled flat-rolled products	✓
190	7226.91.50	Alloy steel (o/than silicon elect./tool), width less th/600mm, hot-rolled flat-rolled products, w/thickness of 4.75 mm or more	✓
191	7226.91.70	Alloy steel (o/than silicon elect./tool), width 300mm+ but less th/600mm, hot-rolled flat-rolled products, w/thickness less than 4.75 mm	✓
192	7226.91.80	Alloy steel (o/than silicon elect./tool), width less th/300mm, hot-rolled flat-rolled products, w/thickness less than 4.75 mm	✓
193	7226.92.10	Alloy tool steel (o/than hi-speed), width 300mm+ but less th/600mm, cold-rolled flat-rolled products	✓
194	7226.92.30	Alloy tool steel (o/than hi-speed), width less th/300mm, cold-rolled flat-rolled products	✓
195	7226.92.50	Alloy steel (o/than tool), width 300mm+ but less th/600mm, cold-rolled flat-rolled products	✓
196	7226.92.70	Alloy steel (o/than tool), width less th/300mm, cold-rolled flat-rolled products, w/thickness n/o 0.25 mm	✓
197	7226.92.80	Alloy steel (o/than tool), width less th/300mm, cold-rolled flat-rolled products, w/thickness o/0.25 mm	✓
198	7226.99.01	Alloy steel, width less than 600mm, flat-rolled products further worked than cold-rolled, nesoi	✓

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199	7227.10.00	Alloy high-speed steel, bars and rods in irregularly wound coils, hot-rolled	✓
200	7227.20.00	Alloy silico-manganese steel, bars and rods in irregularly wound coils, hot-rolled	✓
201	7227.90.10	Alloy tool steel (other than hi-speed), bars & rods in irregular wound coils, hot-rolled, not tempered, treated or partly manufactured	✓
202	7227.90.20	Alloy tool steel (other than hi-speed), bars and rods in irregularly wound coils, hot-rolled, not tempered	✓
203	7227.90.60	Alloy steel (other than hi-speed/silico-mang./tool) steel, bars and rods in irregularly wound coils, hot-rolled	✓
204	7228.10.00	Alloy high-speed steel, bars and rods, other than hot-rolled and in irregularly wound coils	✓
205	7228.20.10	Alloy silico-manganese steel, bars and rods, not cold-formed, other than hot-rolled and in irregularly wound coils	✓
206	7228.20.50	Alloy silico-manganese steel, bars and rods, cold formed, other than hot-rolled and in irregularly wound coils	✓
207	7228.30.20	Alloy ball-bearing tool steel, bars and rods, not further worked than hot-rolled, hot-drawn or extruded	✓
208	7228.30.40	Alloy chipper knife tool steel, bars and rods, not cold-formed & not further worked than hot-rolled, hot-drawn or extruded	✓
209	7228.30.60	Alloy tool steel (other than ball-bearing/chipper knife), bars and rods, not further worked than hot-rolled, hot-drawn or extruded	✓
210	7228.30.80	Alloy steel (other than hi-speed, silico-mang./tool), bars and rods, not further worked than hot-rolled, hot-drawn or extruded	✓
211	7228.40.00	Alloy steel, bars and rods, not further worked than forged	✓
212	7228.50.10	Alloy tool steel (other than hi-speed), bars and rods, not further worked than cold-formed or cold-finished	✓
213	7228.50.50	Alloy steel (other than tool), bars and rods, not further worked than cold-formed or cold-finished	✓
214	7228.60.10	Alloy tool steel (other than hi-speed), bars and rods, further worked than hot-rolled, forged, cold-formed or cold-finished	✓
215	7228.60.60	Alloy steel (other than tool), bars and rods, further worked than hot-rolled, forged but not cold-formed	✓
216	7228.60.80	Alloy steel (other than tool), bars and rods, cold-formed	✓
217	7228.70.30	Alloy steel, angles, shapes and sections, hot-rolled & not drilled/not punched and not otherwise advanced	✓

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218	7228.70.60	Alloy steel, angles, shapes and sections, o/than hot-rolled & not drilled/punched and not otherwise advanced	✓
219	7228.80.00	Alloy steel hollow drill bars and rods	✓
220	7229.20.00	Alloy silico-manganese steel, wire	✓
221	7229.90.05	Alloy high-speed steel, wire	✓
222	7229.90.10	Alloy steel (o/than hi-speed/silico-mang.), flat wire	✓
223	7229.90.50	Alloy steel (o/than hi-speed/silico-mang.), round wire	✓
224	7229.90.90	Alloy steel (o/than hi-speed/silico-mang.), wire (o/than flat or round wire)	✓
225	7301.10.00	Iron or steel sheet piling, whether or not drilled, punched or made from assembled elements	✓
226	7304.41.30	Stainless steel, seamless, cold-drawn/cold-rolled, tubes, pipes and hollow profiles, w/circular cross section & extern. diam less than 19mm	✓
227	7304.41.60	Stainless steel, seamless, cold-drawn/cold-rolled, tubes, pipes and hollow profiles, w/circular cross section & extern. diam of 19mm or more	✓
228	7304.49.00	Stainless steel, seamless, not cold-drawn/cold-rolled, tubes, pipes and hollow profiles, w/circular cross section	✓
229	7304.51.10	Alloy steel (o/than stainless), seamless, cold-drawn/cold-rolled, tubes, pipes, etc., w/circ. cross sect., for mfr of ball/roller bearings	✓
230	7304.51.50	Alloy steel (o/than stainless), seamless, cold-drawn/cold-rolled, tubes, pipes and hollow profiles, w/circular cross section, nesoi	✓
231	7304.59.10	Alloy steel (o/than stainless), seamless, n/cold-drawn/cold-rolled, tubes, pipes, etc. w/circ. cross sect., for mfr ball/roller bearings	✓
232	7304.59.20	Alloy steel (o/than stainless), seamless, n/cold-drawn/cold-rolled, tubes, pipes, etc. w/circ. cross sect., for boilers, heaters, etc	✓
233	7304.59.60	Heat-resisting alloy steel (o/than stainless), seamless, n/cold-drawn/cold-rolled, tubes, pipes, etc., w/circ. cross sect., nesoi	✓
234	7304.59.80	Alloy steel (o/than heat-resist or stainless), seamless, n/cold-drawn/cold-rolled, tubes, pipes and hollow prof., w/circ. cross sect., nesoi	✓
235	7304.90.10	Iron (o/than cast) or nonalloy steel, seamless, tubes, pipes and hollow profiles, o/than circ. cross sect., w/wall thickness of 4 mm or more	✓

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236	7304.90.30	Alloy steel (o/than stainless), seamless, tubes, pipes and hollow profiles, o/than circ. cross sect., w/wall thickness of 4 mm or more	✓
237	7304.90.50	Iron (o/than cast) or nonalloy steel, seamless, tubes, pipes and hollow profiles, o/than circ. cross sect., w/wall thickness less than 4 mm	✓
238	7304.90.70	Alloy steel (o/than stainless), seamless, tubes, pipes and hollow profiles, o/than circ. cross sect., w/wall thickness less than 4 mm	✓
239	7306.30.50	Iron or nonalloy steel, welded, w/circ. x-sect & ext. diam. 406.4mm or less, pipes, tubes & holl. prof., w/wall thick. of 1.65 mm or more	✓
240	7306.40.10	Stainless steel, welded, w/circ. x-sect & ext. diam. 406.4mm or less, tubes, pipes, hollow profiles, w/wall thick. less than 1.65 mm	✓
241	7306.40.50	Stainless steel, welded, w/circ. x-sect & ext. diam. 406.4mm or less, tubes, pipes, hollow profiles, w/wall thick. of 1.65 mm or more	✓
242	7306.50.10	Alloy steel (o/stainless), welded, w/circ. x-sect & ext. diam. 406.4mm or less, tubes, pipes, hollow prof., w/wall thick. less th/1.65 mm	✓
243	7306.50.30	Alloy steel (o/stainless), welded, w/circ. x-sect & ext. diam. 406.4mm or less, tapered pipes & tubes, w/wall thick. of 1.65 mm+, pts. Illum	✓
244	7306.50.50	Alloy steel (o/stainless), welded, w/circ. x-sect & ext. diam. 406.4mm or less, tubes, pipes, hollow prof., w/wall thick. of 1.65 mm+	✓
245	7306.61.10	Iron or nonalloy steel, welded, w/square or rectangular x-sect, tubes, pipes and hollow profiles, w/wall thickness of 4 mm or more	✓
246	7306.61.30	Alloy steel, welded, w/square or rectangular x-sect, tubes, pipes and hollow profiles, w/wall thickness of 4 mm or more	✓
247	7306.61.50	Iron or nonalloy steel, welded, w/square or rectangular x-sect, tubes, pipes and hollow profiles, w/wall thickness less than 4 mm	✓
248	7306.61.70	Alloy steel, welded, w/square or rectangular x-sect, tubes, pipes and hollow profiles, w/wall thickness less than 4 mm	✓
249	7306.69.10	Iron or nonalloy steel, welded, w/other non-circ. x-sect, tubes, pipes and hollow profiles, w/wall thickness of 4 mm or more	✓
250	7306.69.30	Alloy steel, welded, w/other non-circ. x-sect, tubes, pipes and hollow profiles, w/wall thickness of 4 mm or more	✓
251	7306.69.50	Iron or nonalloy steel, welded, w/other non-circ. x-sect, tubes, pipes and hollow profiles, w/wall thickness less than 4 mm	✓
252	7306.69.70	Alloy steel, welded, w/other non-circ. x-sect, tubes, pipes and hollow profiles, w/wall thickness less than 4 mm	✓
253	7306.90.10	Iron or nonalloy steel, seamed o/welded, w/non-circ. x-sect. or circ. x-sect. w/ext. diam. 406.4mm or less, tubes, pipes & hollow profiles	✓

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254	7306.90.50	Alloy steel, seamed o/than welded, w/non-circ. x-sect or circ. x-sect w/ext. diam. 406.4mm or less, tubes, pipes and hollow profiles	✓
255	7323.91.10	Cast iron, table, kitchen or o/household arts. and parts thereof, not enameled but coated or plated with precious metals	✓
256	7323.91.50	Cast iron, table, kitchen or o/household arts. and parts thereof, not enameled & not coated or plated with precious metals	✓
257	7323.92.00	Cast iron, table, kitchen or o/household arts. and parts thereof, enameled	✓
258	7323.93.00	Stainless steel, table, kitchen or o/household arts. amd parts thereof	✓
259	7323.94.00	Iron (o/than cast) or steel (o/than stainless), table, kitchen or o/household arts. and parts thereof, enameled	✓
260	7323.99.10	Iron (o/th cast) or steel (o/th stainless), table, kitchen or o/household arts. & parts thereof, not enameled but plated/coat. w/silver	✓
261	7323.99.30	Iron (o/th cast)/steel (o/th stainless), table/kitchen /household arts. & parts thereof, not enameled but plated/coat. w/prec metal o/silver	✓
262	7323.99.50	Tinplate, table, kitchen or o/household arts. & parts thereof, not coated or plated w/precious metal	✓
263	7323.99.70	Iron (o/th cast) or steel (o/than tinplate or stainless), cookingware, not coated or plated with precious metal	✓
264	7324.29.00	Iron (o/than cast) or steel, baths (whether or not enameled)	✓
265	7418.10.00	Copper & copper alloy table, kitchen, household articles & parts; pot scourers, scouring & polishing pads, gloves, etc	✓
266	7601.10.30	Aluminum (o/than alloy), unwrought, in coils, w/uniform x-section throughout length & w/least cross-sectional dimension n/o 9.5 mm	✓
267	7601.10.60	Aluminum (o/than alloy), unwrought nesoi	✓
268	7601.20.30	Aluminum alloys, unwrought, in coils, w/uniform x-section throughout length & w/least cross-sectional dimension n/o 9.5 mm	✓
269	7601.20.60	Aluminum alloys, w/25% or more by weight of silicon, unwrought nesoi	✓
270	7601.20.90	Aluminum alloys nesoi, unwrought nesoi	✓
271	7604.10.10	Aluminum (o/than alloy), profiles	✓

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272	7604.10.30	Aluminum (o/than alloy), bar and rods, with a round cross section	✓
273	7604.10.50	Aluminum (o/than alloy), bar and rods, other than with a round cross section	✓
274	7604.21.00	Aluminum alloy, hollow profiles	✓
275	7604.29.10	Aluminum alloy, profiles (o/than hollow profiles)	✓
276	7604.29.30	Aluminum alloy, bars and rods, having a round cross section	✓
277	7604.29.50	Aluminum alloy, bars and rods, other than with a round cross section	✓
278	7605.11.00	Aluminum (o/than alloy), wire, with a maximum cross-sectional dimension over 7 mm	✓
279	7605.19.00	Aluminum (o/than alloy), wire, with a maximum cross-sectional dimension of 7 mm or less	✓
280	7605.21.00	Aluminum alloy, wire, with a maximum cross-sectional dimension over 7 mm	✓
281	7605.29.00	Aluminum alloy, wire, with a maximum cross-sectional dimension of 7 mm or less	✓
282	7606.11.30	Aluminum (o/than alloy), plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), not clad	✓
283	7606.11.60	Aluminum (o/than alloy), plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), clad	✓
284	7606.12.30	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), not clad	✓
285	7606.12.60	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), clad	✓
286	7606.91.30	Aluminum (o/than alloy), plates/sheets/strip, w/thick. o/0.2mm, o/than rectangular (incl. sq), not clad	✓
287	7606.91.60	Aluminum (o/than alloy), plates/sheets/strip, w/thick. o/0.2mm, o/than rectangular (incl. sq), clad	✓
288	7606.92.30	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, o/than rectangular (incl. sq), not clad	✓
289	7606.92.60	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, o/than rectangular (incl. sq), clad	✓
290	7607.11.30	Aluminum, foil, w/thickness n/o 0.01 mm, rolled but not further worked, not backed	✓

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291	7607.11.60	Aluminum, foil, w/thickness over 0.01 mm but n/o 0.15 mm, rolled but not further worked, not backed	✓
292	7607.11.90	Aluminum, foil, w/thickness over 0.15 mm but n/o 0.2 mm, rolled but not further worked, not backed	✓
293	7607.19.10	Aluminum, etched capacitor foil, w/thickness n/o 0.2 mm, not rolled or rolled and further worked, not backed	✓
294	7608.10.00	Aluminum (o/than alloy), tubes and pipes	✓
295	7608.20.00	Aluminum alloy, tubes and pipes	✓
296	7609.00.00	Aluminum, fittings for tubes and pipes	✓
297	7610.10.00	Aluminum, doors, windows and their frames and thresholds for doors	✓
298	8435.90.00	Parts of presses, crushers and similar machinery used in the manufacture of wine, cider, fruit juices or similar beverages	✓
299	8438.90.10	Parts of machinery for sugar manufacture, nesoi	✓
300	8479.89.55	Electromechanical appliances with self-contained electric motor, trash compactors	✓
301	8479.89.65	Electromechanical appliances with self-contained electric motor, nesoi	✓
302	8479.90.41	Parts of floor polishers of subheading 8479.89.20; parts of carpet sweepers	✓
303	8479.90.45	Parts of trash compactors, frame assemblies	✓
304	8479.90.55	Parts of trash compactors, ram assemblies	✓
305	8479.90.65	Parts of trash compactors, container assemblies	✓
306	8479.90.75	Parts of trash compactors, cabinets or cases	✓
307	8479.90.85	Parts of trash compactors, nesoi	✓
Equipment & Tools Used in the Manufacturing Process			
308	3926.90.10	Buckets and pails, of plastics, nesoi	✓

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309	6506.10.30	Safety headgear of reinforced or laminated plastics, whether or not lined or trimmed	✓
310	6506.10.60	Safety headgear, other than of reinforced or laminated plastics, whether or not lined or trimmed	✓
Finished Commercial Foodservice Products			
311	3924.10.10	Salt, pepper, mustard and ketchup dispensers and similar dispensers, of plastics	✓
312	3924.10.20	Plates, cups, saucers, soup bowls, cereal bowls, sugar bowls, creamers, gravy boats, serving dishes and platters, of plastics	✓
313	3924.10.30	Trays, of plastics	✓
314	3924.10.40	Tableware and kitchenware articles, nesoi, of plastics	✓
315	3926.20.10	Gloves, seamless, of plastics	✓
316	3926.20.40	Gloves, nesoi, of plastics	✓
317	4419.11.00	Bread boards, chopping boards and similar boards of bamboo	✓
318	4419.12.00	Chopsticks of bamboo	✓
319	4419.19.10	Forks and spoons of bamboo	✓
320	4419.19.90	Tableware and kitchenware of bamboo, other than bread boards, chopping boards and similar boards, chopsticks , forks, spoons	✓
321	4419.90.10	Forks and spoons of wood, other than of bamboo	✓
322	4419.90.90	Tableware and kitchenware of wood other than of bamboo, other than bread boards, chopping boards and similar boards, chopsticks , forks, spoons	✓
323	4421.91.50	Toothpicks of bamboo	✓
324	4421.91.60	Skewers, candy sticks, ice cream sticks, tongue depressors, drink mixers and similar wares, other than toothpicks, of bamboo	✓
325	4421.99.50	Toothpicks of wood other than of bamboo	✓

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326	4421.99.60	Skewers, candy sticks, ice cream sticks, tongue depressors, drink mixers and similar wares, other than toothpicks, of wood other than bamboo	✓
327	6302.40.10	Table linen, knitted or crocheted, of vegetable fiber (except of cotton)	✓
328	6302.40.20	Table linen, knitted or crocheted, nesoi	✓
329	6302.51.10	Damask tablecloths and napkins, not knitted or crocheted, of cotton	✓
330	6302.51.20	Plain woven tablecloths and napkins, not knitted or crocheted, of cotton	✓
331	6302.51.30	Tablecloths and napkins, other than plain woven or damask, not knitted or crocheted, of cotton	✓
332	6302.51.40	Table linen, other than tablecloths and napkins, not knitted or crocheted, of cotton, nesoi	✓
333	6302.53.00	Table linen of man-made fibers, not knitted or crocheted	✓
334	6302.59.10	Tablecloths and napkins of flax, not knitted or crocheted	✓
335	6302.59.20	Table linen of flax, other than tablecloths and napkins, not knitted or crocheted	✓
336	6302.59.30	Table linen, of textile materials other than of cotton, flax or man-made fibers, not knitted or crocheted	✓
337	6302.60.00	Toilet linen and kitchen linen, of terry toweling or similar terry fabrics, of cotton	✓
338	6302.91.00	Toilet and kitchen linen, other than terry toweling or similar terry fabrics of cotton	✓
339	6302.93.10	Toilet and kitchen linen, of manmade fibers, of pile or tufted construction	✓
340	6302.93.20	Toilet and kitchen linen, of manmade fibers, nesoi	✓
341	6302.99.10	Toilet and kitchen linen of textile materials nesoi, containing 85% or more by weight of silk or silk waste	✓
342	6302.99.15	Toilet and kitchen linen of flax	✓
343	6302.99.20	Toilet and kitchen linen of textile materials nesoi, containing less than 85% by weight of silk or silk waste	✓
344	6402.91.20	Footwear, covers ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued over \$3 but n/o \$6.50/pair	✓

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345	6402.91.26	Footwear, covers ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued o/\$6.50 but n/o \$12/pair	✓
346	6402.91.30	Footwear, covers ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued over \$12/pair	✓
347	6402.91.50	Footwear w/outer soles & uppers of rubber or plastics, nesoi, covering ankle, designed as protection against liquids, chemicals, weather	✓
348	6402.99.04	Footwear not cov. ankle, w/outer soles of rubber or plastics, nesoi, w/metal toe-cap, w/ext. surf. uppers o/90% rubber or plastics	✓
349	6402.99.08	Footwear not cov. ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, to protect against liquids, chem, weather	✓
350	6402.99.12	Footwear not cov. ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued n/o \$3/pair	✓
351	6402.99.16	Footwear not cov. ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued > \$3 but n/o \$6.50/pair	✓
352	6402.99.19	Footwear not cov. ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued o/\$6.50 but n/o \$12/pair	✓
353	6402.99.21	Footwear not cov. ankle, w/outer soles & uppers of rubber or plastics, nesoi, w/metal toe-cap, not protective, valued over \$12/pair	✓
354	6402.99.33	Footwear w/outer soles & uppers of rubber or plastics, nesoi, n/cov. ankle, nesoi, design. as protection against liquids/chemicals/weather	✓
355	6403.40.30	Footwear w/outer soles of rubber/plastics/leather/comp. leather & uppers of leather, w/protective metal toe-cap, welt	✓
356	6403.40.60	Footwear w/outer soles of rubber/plastics/leather/comp. leather & uppers of leather, w/protective metal toe-cap, n/welt	✓
357	6403.51.11	Footwear w/outer soles of leather & uppers of leather, covering ankle, made on a base or platform of wood, w/o insole or metal toe-cap	✓
358	6404.19.20	Footwear w/outer soles rubber/plastic & uppers textile, nesoi, designed to protect against liquids, chemicals & weather	✓
359	6505.00.01	Hair-nets of any material, whether or not lined or trimmed	✓
360	6601.10.00	Garden or similar umbrellas	✓
361	6912.00.10	Course-grained earthen/stoneware tabl & kitchware; fine-grain earthenware tabl & kitch.ware w/reddish body & lustrous colored/mottled glaze	✓
362	6912.00.20	Ceramic (o/than porcelain or china) hotel, restaurant or nonhousehold tableware and kitchenware	✓

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363	6912.00.35	Ceramic (o/than porcelain or china) household table and kitchenware, in sets in which aggregate val. of arts./US note 6(b) n/o \$38	✓
364	6912.00.39	Ceramic (o/than porcelain or china) household table and kitchenware, in sets in which aggregate val. of arts./US note 6(b) o/\$38	✓
365	6912.00.41	Ceramic (o/than porcelain or china) hsehld steins w/pewter lids, decanters, punch bowls, spoons & rests, salt/pepper sets, etc.	✓
366	6912.00.44	Ceramic (o/than porcelain or china) household mugs and steins w/o attached pewter lids	✓
367	6912.00.45	Ceramic (o/than porcelain or china) household tabl/kitch. ware,n/in specif. sets, cups o/\$5.25/dz, saucers o/\$3/dz, etc.	✓
368	6912.00.46	Ceramic (o/than porcelain or china) household serviette rings	✓
369	6912.00.48	Ceramic (o/than porcelain or china) household tableware and kitchenware, nesoi	✓
370	6912.00.50	Ceramic (o/than porcelain or china) household articles and toilet articles (o/than table and kitchenware), nesoi	✓
371	6913.10.10	Porcelain or china statues, statuettes & handmade flowers, valued o/\$2.50 each, of original work by professional sculptors	✓
372	6913.10.20	Bone china statuettes and other ornamental articles, nesoi	✓
373	6913.10.50	Porcelain or china (o/than bone china) statuettes and other ornamental articles, nesoi	✓
374	6913.90.10	Ceramic (o/than porcelain or china) statues, statuettes, handmade flowers, val. o/\$2.50 each, of original work by professional sculptors	✓
375	6913.90.20	Ornamental articles of ceramic tile	✓
376	6913.90.30	Earthenware ornamental articles, having a reddish-colored body and a lustrous glaze of differing colors	✓
377	6913.90.50	Ceramic (o/than porcelain, china or earthenware) ornamental articles, nesoi	✓
378	7013.10.10	Transparent glass-ceramic kitchenware 75% by vol. crystalline, of lithium aluminosilicate, w/low lin. coefficient of expansion	✓
379	7013.10.50	Glass-ceramic ware of a kind used for household, office, indoor decoration or similar purposes, nesoi	✓
380	7013.22.10	Stemware drinking glasses of lead crystal, valued n/over \$1 each	✓

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381	7013.22.20	Stemware drinking glasses of lead crystal, valued o/\$1 but n/over \$3 each	✓
382	7013.22.30	Stemware drinking glasses of lead crystal, valued o/\$3 but n/over \$5 each	✓
383	7013.22.50	Stemware drinking glasses of lead crystal, valued over \$5 each	✓
384	7013.28.05	Stemware of pressed and toughened (specially tempered) glass, o/than lead crystal	✓
385	7013.28.10	Stemware, o/than of pressed and toughened glass, o/than lead crystal, valued n/over \$0.30 each	✓
386	7013.28.20	Stemware, o/than of pressed and toughened glass, o/than lead crystal, valued o/\$0.30 but n/over \$3 each	✓
387	7013.28.30	Stemware, o/than of pressed and toughened glass, o/than lead crystal, cut or engraved, valued o/\$3 but n/over \$5 each	✓
388	7013.28.40	Stemware, o/than of pressed and toughened glass, o/than lead crystal, cut or engraved, valued over \$5 each	✓
389	7013.28.50	Stemware, o/than of pressed and toughened glass, o/than lead crystal, not cut or engraved, valued o/\$3 but n/over \$5 each	✓
390	7013.28.60	Stemware, o/than of pressed and toughened glass, o/than lead crystal, not cut or engraved, valued over \$5 each	✓
391	7013.33.10	Drinking glasses, nesoi, of lead crystal, valued n/over \$1 each	✓
392	7013.33.20	Drinking glasses, nesoi, of lead crystal, valued o/\$1 but n/over \$3 each	✓
393	7013.33.30	Drinking glasses, nesoi, of lead crystal, valued o/\$3 but n/over \$5 each	✓
394	7013.33.50	Drinking glasses, nesoi, of lead crystal, valued over \$5 each	✓
395	7013.37.05	Drinking glasses, nesoi, of pressed and toughened (specially tempered) glass, o/than lead crystal	✓
396	7013.37.10	Drinking glasses, nesoi, o/than of pressed and toughened glass, o/than lead crystal, valued n/over \$0.30 each	✓
397	7013.37.20	Drinking glasses, nesoi, o/than of pressed and toughened glass, o/than lead crystal, valued o/\$0.30 but n/over \$3 each	✓
398	7013.37.30	Drinking glasses, nesoi, o/than of pressed and toughened glass, o/than lead crystal, cut or engraved, valued o/\$3 but n/over \$5 each	✓
399	7013.37.40	Drinking glasses, nesoi, o/than of pressed and toughened glass, o/than lead crystal, cut or engraved, valued over \$5 each	✓

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400	7013.37.50	Drinking glasses, nesoi, o/than of pressed and toughened glass, o/than lead crystal, not cut or engraved, valued o/\$3 but n/over \$5 each	✓
401	7013.37.60	Drinking glasses, nesoi, o/than of pressed and toughened glass, o/than lead crystal, not cut or engraved, valued over \$5 each	✓
402	7013.41.10	Glassware for table or kitchen purposes (o/than drinking glasses), of lead crystal, valued n/over \$1 each	✓
403	7013.41.20	Glassware for table or kitchen purposes (o/than drinking glasses), of lead crystal, valued over \$1 but n/over \$3 each	✓
404	7013.41.30	Glassware for table or kitchen purposes (o/than drinking glasses), of lead crystal, valued over \$3 but n/over \$5 each	✓
405	7013.41.50	Glassware for table or kitchen purposes (o/than drinking glasses), of lead crystal, valued over \$5 each	✓
406	7013.42.10	Glassware for table or kitchen purposes (o/than drinking glasses), of pressed and toughened low coefficient of heat expansion glass	✓
407	7013.42.20	Glassware for table or kitchen purposes (o/than drinking glasses), of low coefficient of heat expansion glass, n/o \$3 each	✓
408	7013.42.30	Glassware for table or kitchen purposes (o/than drinking glasses), of low coefficient of heat expansion glass, over \$3 but n/o \$5 each	✓
409	7013.42.40	Glassware for table or kitchen purposes (o/than drinking glasses), of low coefficient of heat expansion, over \$5 each	✓
410	7013.49.10	Glassware for table or kitchen purposes (o/than drinking glasses), of pressed and toughened glass, nesoi	✓
411	7013.49.20	Glassware for table or kitchen purposes (o/than drinking glasses), nesoi, valued n/over \$3 each	✓
412	7013.49.30	Glassware for table or kitchen purposes (o/than drinking glasses), nesoi, cut or engraved, valued over \$3 but n/over \$5 each	✓
413	7013.49.40	Glassware for table or kitchen purposes (o/than drinking glasses), nesoi, cut or engraved, valued over \$5 each	✓
414	7013.49.50	Glassware for table or kitchen purposes (o/than drinking glasses), nesoi, n/cut or engraved, valued over \$3 but n/o \$5 each	✓
415	7013.49.60	Glassware for table or kitchen purposes (o/than drinking glasses), nesoi, n/cut or engraved, valued over \$5 each	✓
416	7013.91.10	Glassware for toilet/office/indoor decor. & similar purposes, of lead crystal, valued n/over \$1 each	✓
417	7013.91.20	Glassware for toilet/office/indoor decor. & similar purposes, of lead crystal, valued over \$1 but n/over \$3 each	✓

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418	7013.91.30	Glassware for toilet/office/indoor decor. & similar purposes, of lead crystal, valued over \$3 but n/over \$5 each	✓
419	7013.91.50	Glassware for toilet/office/indoor decor. & similar purposes, of lead crystal, valued over \$5 each	✓
420	7013.99.10	Glassware, nesoi, decorated/colored within the body prior to solidification; millefiori glassware; glassware colored & w/bubbles etc	✓
421	7013.99.20	Glassware for toilet/office/indoor decor. & similar purposes, of pressed and toughened (specially tempered) glass	✓
422	7013.99.35	Votive-candle holders of glass, nesoi	✓
423	7013.99.40	Glassware for toilet/office/indoor decor. or similar purposes, nesoi, valued n/over \$0.30 each	✓
424	7013.99.50	Glassware for toilet/office/indoor decor. or similar purposes, nesoi, valued over \$0.30 but n/over \$3 each	✓
425	7013.99.60	Glassware for toilet/office/indoor decor. or similar purposes, nesoi, cut or engraved, valued over \$3 but n/over \$5 each	✓
426	7013.99.70	Glassware for toilet/office/indoor decor. or similar purposes, nesoi, cut or engraved, valued over \$5 each	✓
427	7013.99.80	Glassware for toilet/office/indoor decor. or similar purposes, nesoi, n/cut or engraved, valued over \$3 but n/over \$5 each	✓
428	7013.99.90	Glassware for toilet/office/indoor decor. or similar purposes, nesoi, n/cut or engraved, valued over \$5 each	✓
429	7607.19.30	Aluminum, foil nesoi, w/thickness n/o 0.15 mm, cut to shape, not rolled, not backed	✓
430	7607.19.60	Aluminum, foil nesoi, w/thickness o/0.15mm but n/o 0.2 mm or 0.15mm or less & not cut to shape, not rolled, not backed, nesoi	✓
431	7607.20.10	Aluminum, foil, w/thickness n/o 0.2 mm, backed, covered or decorated with a character, design, fancy effect or pattern	✓
432	7607.20.50	Aluminum, foil, w/thickness n/o 0.2 mm, backed, nesoi	✓
433	7615.10.11	Aluminum, pot scourers, scouring or polishing pads, gloves and the like	✓
434	7615.10.20	Aluminum, cast cooking and kitchen ware, enameled or glazed or containing nonstick interior finishes	✓
435	7615.10.30	Aluminum, cooking and kitchen ware (o/than cast), enameled or glazed or containing nonstick interior finishes	✓
436	7615.10.50	Aluminum, cast cooking and kitchen ware, not enameled or glazed and not containing nonstick interior finishes	✓

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437	7615.10.71	Aluminum, cooking and kitchen ware (o/than cast), not enameled or glazed and not containing nonstick interior finishes	✓
438	7615.10.91	Aluminum, table, kitchen or other household articles (o/than cooking or kitchen ware) and parts thereof	✓
439	7907.00.10	Zinc, household, table or kitchen use articles; zinc toilet and sanitary wares; zinc parts of all the foregoing	✓
440	8211.10.00	Sets of assorted knives w/cutting blades serrated or not (including pruning knives)	✓
441	8211.91.10	Table knives with fixed blades and silver-plated handles	✓
442	8211.91.20	Table knives w/fixed blades, w/stain. steel handles w/Ni or ov 10% by wt. of Mn, w/overall length 25.9cm or less & val. <than 25 cents ea	✓
443	8211.91.25	Table knives w/fixed blades, w/stain. steel handles cont. Ni or ov 10% by wt of Mn, nesoi	✓
444	8211.91.30	Table knives w/fixed blades, w/stain. steel handles, nesoi, not ov 25.9 cm in overall length & val less than 25 cents each	✓
445	8211.91.40	Table knives w/fixed blades, w/stain. steel handles, nesoi	✓
446	8211.91.50	Table knives w/fixed blades, with rubber or plastics handles	✓
447	8211.91.80	Table knives w/fixed blades, w/handles other than of silver-plate, stainless steel, rubber or plastics	✓
448	8211.92.20	Kitchen and butcher knives w/fixed blades, with rubber or plastics handles	✓
449	8211.92.40	Knives w/fixed blades (o/than table or kitchen and butcher knives), with rubber or plastic handles	✓
450	8214.90.30	Butchers' or kitchen cleavers with their handles, nesoi, and base metal parts thereof	✓
451	8214.90.60	Butchers' or kitchen chopping or mincing knives (o/than cleavers w/their handles), and base metal parts thereof	✓
452	8214.90.90	Articles of cutlery, nesoi, and base metal parts of cutlery, nesoi	✓
453	8215.10.00	Sets of assted. base metal spoons, forks, ladles, etc. & similar kitchen or tableware, w/at least one article plated w/prec. Metal	✓
454	8215.91.30	Base metal forks plated with precious metal	✓
455	8215.91.60	Base metal spoons and ladles plated with precious metal	✓

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456	8215.91.90	Base metal skimmers, cake-servers, fish-knives, etc. and similar kitchen or tableware and parts, plated with precious metal	✓
457	8215.99.01	Base metal forks, w/stainless steel handles cont. Ni or o/10% by wt of Mn, w/overall length n/o 25.9cm, valued under 25cents ea	✓
458	8215.99.10	Base metal forks, w/stainless steel handles, nesoi, valued under 25 cents each	✓
459	8215.99.15	Base metal forks, w/stainless steel handles, nesoi, valued at 25 cents each or more	✓
460	8215.99.20	Base metal forks, with rubber or plastic handles	✓
461	8215.99.22	Base metal forks, without their handles	✓
462	8215.99.24	Base metal table forks and barbecue forks, with wood handles	✓
463	8215.99.26	Base metal forks (o/than plated w/prec. metal, or w/handles of stain. steel, wood, rubber or plastics), nesoi	✓
464	8215.99.30	Base metal spoons, w/stainless steel handles & valued under 25 cents each	✓
465	8215.99.35	Base metal spoons, w/stainless steel handles & valued at 25 cents and over, and base metal ladles w/stainless steel handles	✓
466	8215.99.40	Base metal spoons and ladles with handles of base metal (o/than stain. steel) or w/nonmetal handles	✓
467	8215.99.45	Base metal spoons and ladles, nesoi	✓
468	8215.99.50	Base metal skimmers/cake-servers/butter-knives/sugar tongs & similar kitchen or tableware, & base metal parts (incl. pts. of forks/spoons)	✓
469	8417.20.00	Bakery ovens, including biscuit ovens	✓
470	8419.81.50	Cooking stoves, ranges & ovens, other than microwave, for making hot drinks or for cooking or heating food, not used for domestic purposes	✓
471	8419.81.90	Machinery and equipment nesoi, for making hot drinks or for cooking or heating food, not used for domestic purposes	✓
472	8435.10.00	Presses, crushers and similar machinery used in the manufacture of wine, cider, fruit juices or similar beverages	✓
473	8438.10.00	Bakery machinery and machinery for the manufacture of macaroni, spaghetti or similar products, nesoi	✓

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474	8438.20.00	Machinery for the manufacture of confectionery, cocoa or chocolate, nesoi	✓
475	8438.30.00	Machinery for sugar manufacture, nesoi	✓
476	8438.40.00	Brewery machinery, nesoi	✓
477	8509.40.00	Electromechanical food grinders, processors, mixers, fruit or vegetable juice extractors, w self-contained electric motor, for domestic uses	✓
478	8509.80.10	Electromechanical floor polishers, with self-contained electric motor, for domestic uses	✓

[1] Checkmark denotes affirmative “yes” response.

Blue highlighting denotes materials, parts and components used to manufacture commercial foodservice equipment.

Green highlighting denotes equipment and tools used in the manufacturing process.

Yellow highlighting denotes finished products.