

IMPORTING INTERNATIONAL PACKAGES

GENERAL US CUSTOMS CLEARANCE GUIDELINES

IMPORTANT NOTICE ON TARIFFS AND PURCHASING STRATEGY: Due to frequently changing tariffs and Emory's formal initiative to reduce expenditures, it is critical to ask your intended supplier whether a tariff will apply. Whenever possible, prioritize purchases from U.S. manufactured entities over suppliers using internationally sourced components or purchasing directly from an international supplier.

WHAT ARE MY RISKS?

IMPORTANT BUDGET CONSIDERATION - Import taxes, duties, tariffs and broker's fees can significantly add to departmental costs of imported goods. Avoid international suppliers if your existing departmental budget can't cover potential unanticipated costs, which may include:

- **Legal Penalties:** Be sure that the Country of origin of any item that you plan to purchase is not prohibited from import to the U.S. due to embargo and/or sanctions by reviewing the Office of Foreign Assets Control (OFAC) website: <https://ofac.treasury.gov/sanctions-programs-and-country-information>. Purchasing an item associated with one of these countries can cause both you and Emory to face severe financial penalties and potential legal repercussions, including criminal charges and/or asset forfeiture and should be avoided.
- **Tariffs:** The import may be subject to significant tariffs, e.g. Section 301 of the Trade Act of 1974 (19 USC 2411) tariffs (China) and/or Reciprocal Tariffs. Be sure to research all tariff types, as more than one website will likely be needed. See the notes under 'Tariff Information' in the 'Resources' section of this document.
 - Determine, or ask the supplier, if a Free Trade Agreement exists between the international country and the US. Reference: <https://www.cbp.gov/trade/priority-issues/trade-agreements/free-trade-agreements>.
 - **COD tariff payment upon delivery:** As of May 2025, some non-FedEx carriers are refusing to deliver packages until applicable tariffs are paid. This could also happen to FedEx packages that are using a shipper's FedEx account, unless the package were being shipped with DDP Incoterms. **It is the ordering department's responsibility to understand whether tariffs are due, and if so, to either ensure that Emory's custom broker (FedEx Logistics/FedEx Trade Networks (FTN)) is noted as the clearance broker, or to otherwise arrange for COD tariff payment before any delivery attempt is made.**
 - **Unanticipated tariffs:** Tariffs could be more or less than originally anticipated, as **your purchase is subject to the tariff schedules in place at the time of US Customs Clearance.**
- **Return shipping Costs:** Items not cleared by the deadline due to incomplete documentation are returned to the shipper. Your department would pay for return shipping and any future costs for redelivery attempts;
- **Storage Costs:** Carrier storage costs or US Customs seizure/storage fees;
- **Delays:** Cost of delays due to random Border Control or Other Governmental Agency inspections;
- **Replacement Costs:** Items could perish (biological) or be destroyed by Customs.

FOR MORE RECENT INFORMATION ON TARIFFS, PLEASE SEE 'RESOURCES' AT THE BOTTOM OF THIS JOB AID.

WHAT ARE MY RESPONSIBILITIES?

Before making an international purchase, ensure that standard Emory requirements have been met:

- 1) Your purchase satisfies Procurement Policy 2.121 and [Procurement Best Practices](#).
- 2) Your Chief Business Officer (CBO) is aware of any international purchases;
- 3) If importing biological materials, you must have an EHSO approved Biosafety protocol in place before receiving these items. Contact biosafe@emory.edu for protocol assistance;

- 4) A Material Transfer Agreement (MTA) exists if receiving: a) transfer of any drugs, devices, etc. to be used in/on/with human subjects; b) transfer of any research materials that will not be used in/on/with human subjects or c) transfer of certain equipment without payment and not for use in/on human subjects.
- 5) **Still desire to import an item? Ordering departments should work with the supplier to ensure all required clearance documents are contained within the package's shipping materials and/or shipping label, even if the order is placed through Emory Express.** US Customs only allows a short period for items to clear. To avoid an item's return to the shipper, seizure or destruction:
- If shipped via 'forwarder' (FedEx, DHL, etc.), shipments return to int'l shipper, if not cleared in 5-15 days.
 - If shipped directly via airline, US Customs seizes and places package in a holding facility after 15 days, charging \$1,000 (minimum) to retrieve it (a charge paid by your department).

The party responsible for handling importing documentation and payment of US Customs taxes, tariffs, and fees depends on the following:

- **If Shipper agrees to handle (and pay for) customs clearance responsibilities (DDP, "Delivery Duty Paid" Incoterms):** then Shipper should be listed as the Importer of Record and be responsible for providing needed documentation. Many international suppliers don't know the US's importing requirements, and the ordering department may need to guide them.
- **If Emory agrees to handle (and pay for) customs clearance responsibilities (Any other Incoterm):** then Emory University should be listed as the Importer of Record, and ordering department is responsible for submitting needed US Customs documents (generally via shipper to attach to package) and paying associated taxes and duties (using ordering departments' SpeedType). If shipper uses a non-FedEx carrier, they should note 'request broker select' on the airwaybill, with FedEx Logistics/FedEx Trade Networks (FTN_ATL_Brokerage@fedex.com) as Emory's Customs Clearance Broker.

US CUSTOMS DOCUMENTATION REQUIREMENTS:

If shipped by ocean vessel, a Time Sensitive Rule applies. An ISF Form (Import Security Filing) MUST be filed at least 24 hours before cargo loads on a US bound ship. Missing this deadline results in a \$5,000 - \$10,000 fine per shipment, paid for by the ordering department.

The shipper must ensure all required clearance documents are contained within the package's shipping materials and/or shipping label, even if the order is placed through Emory Express. **Ordering department will need to ensure that the shipper is aware of all of these requirements.**

1. The Air Waybill or Tracking # (and ideally an image of it).
2. A detailed Commercial Invoice (provided by shipping supplier), including:
 - a) **Importer of record: If Shipper is the Importer of Record, the shipper's name, address and Importer ID is noted.** If Emory is the Importer of Record, Emory University (not the ordering department) is noted as the Importer of Record. **Identify the address with the heading of "Importer of Record:"**
Importer of Record:
Emory University
1599 Clifton Rd, 3rd Floor
Atlanta, GA 30322
Importer ID: 58-0566256

- b) The Consignee (person/department receiving item) and shipping address. **Identify the address with the heading of "Consignee:"**

Consignee:

<Person's name receiving item>

Emory University <School of _____> (or <Department of _____>)

<Street Name, Suite #>

<City, State, Zip>

United States

By providing the Importer of Record and Consignee information, you are not required to fill out Form 5106.

- c) The "**country of origin**" also referred to as the "**country of manufacture**" refers to the location where the item, or its most significant component, was produced. This designation is based on where the core part of the imported item was created. For example, if an item is assembled in or shipped from a country not subject to tariffs, but includes key components made in China (or another tariff-affected country), then China would be listed as the country of origin. This is especially relevant when the item's primary function is driven by hardware or software developed in such a country—such as a computer chip or control software—even if the rest of the item was made elsewhere, like in the U.S. or another non-tariffed country. In the case of biological samples, the country of origin is the location where the samples were originally collected;
- d) The applicable **10-digit** HTS/HTC ('harmonized tariff system') code for each item, which is used to calculate taxes, tariffs and duties. If the supplier cannot provide this number, ask for the 6- or 8-digit world HTS number and enter it into the HTS/HTC code search engine at <https://hts.usitc.gov/> to obtain the full 10-digit code.
- e) Detailed description(s) of each item found in the inbound package, including manufacturer name, catalog #, etc. Include as much detail as possible;
- f) Detailed description(s) of the end use of item(s). If item(s) to be used are for research, note specific research being conducted as well as on who/what it is being conducted. The item description and the HTS code determine when 'Other/Partner Governmental Agency' (OGA/PGA) permits or codes are needed. *Some OGAs prefer this information on a separate document (on supplier letterhead);
- f) A **non-zero dollar value** must be provided for each item, regardless of its nature—whether it is a gift, a commercial purchase, or a previously owned item being returned after international repair. If a supplier is not charging for an item, the value may be listed at a low dollar amount, e.g. an auxiliary cord for \$2.00, etc. A value of **\$0.00 is not permitted**.
3. **Importing Permits:** Determine if items shipped to you will require 'Other/Partner Governmental Agency' (OGA or PGA) approval and/or permits (CDC, FDA, EPA, USDA, etc.). If so, each Agency may require advance permits or registration/reference numbers before clearance can occur. If you need additional information on importing permits, please contact biosafe@emory.edu.

If the HTS/HTC code for your imported item generally requires OGA/PGA clearance, but your item is exempt, attach a statement noting why it is exempt. Otherwise, the package will be held by these agencies for review. For example, if importing a tissue sample, OGA/PGA clearance is necessary if it is animal tissue (USDA), infectious (CDC), etc. If importing human, non-infectious tissue, note this either on the Commercial Invoice or via a separate statement to avoid OGA/PGA review/approval delays.

FOR INFORMATION AND LINKS TO BORDER PATROL OGA AND PGA GUIDELINES AND OFFICIAL OGA/PGA SITES, PLEASE SEE 'RESOURCES' AT THE BOTTOM OF THIS JOB AID.

4. **Upon Arrival:** An 'Arrival Notice' (from shipping carrier) noting exact US entry location of package.

WHAT ENTITIES CAN HANDLE CUSTOMS CLEARANCE WORK FOR EMORY UNIVERSITY?

Primary Entities Used for Brokerage Services: FedEx Logistics/FedEx Trade Networks (FTN) and FedEx Express

FedEx Logistics/FedEx Trade Networks (FTN): If international good(s) aren't shipped via FedEx Express, FedEx International LTL or World Courier (low dollar items only), use FTN to clear package through US customs. Emory's bond through FTN allows them to clear high dollar items. Email FTN_ATL_Brokerage@fedex.com in advance of incoming international package to request clearance assistance, attaching a minimum of a Commercial Invoice containing the required information noted above. To avoid clearance delays or package return, international shipper should select "Request Broker Select" on shipping label/airwaybills and provide FTN's email/contact information to their shipping carrier. Shipper's carrier should email an Arrival Notice to FTN upon entry to the US.

Charges from FTN will include their fees for customs clearance services as well as reimbursement for taxes or duties paid by them at the US border, any transfer fees charged by the originating shipping carrier, and/or storage fees paid by them if packages were held at the border longer than allowed for standard clearance. If the Importer of Record for the import is noted as Emory University at 1599 Clifton Rd/EIN# 58-0566256, then FTN submits their invoice through Emory University Accounts Payable. You must email the appropriate SpeedType along with the package shipping details to Emory.FSC@emory.edu to ensure proper payment of the charges.

FedEx Express: When importing items using FedEx Express or FedEx International Freight, FedEx can typically clear items under \$500,000. Ideally, the shipper should electronically attach all required documentation (as outlined above) to the shipping label at the time of creation. If documentation is incomplete at the time of shipment, it can be supplemented by emailing paperwork@fedex.com (for FedEx Express only). It is required that the FedEx tracking number (with no dashes) be noted in the subject line of the email.

Be aware that FedEx Express's policy allows them to return a shipment/an uncleared package to the shipper after five (5) business days if they've unsuccessfully obtained the necessary clearance information after three (3) call/contact attempts. Therefore, it is critical that documentation is considered in advance and provided to them in a timely manner.

If the **shipper's FedEx account** is used to pay for transport charges, but Emory is paying for Customs Clearance Fees, **the shipper must enter your departmental FedEx account number in the 'Bill duties/taxes/fees to:' field**. If your **departmental FedEx account** is being used for **both shipping and import services**, FedEx Express will initially pay the customs tax and duties for you. You will then receive two separate invoices: one for shipping charges, and a second requesting reimbursement for the Customs duties or taxes. These invoices are submitted by and paid to FedEx in the manner customary for your departmental FedEx account.

Alternatives to the Primary Entities Used for Brokerage Services:

World Courier is a specialized logistics provider with its own in-house brokerage team, focusing primarily on biomedical shipments that require strict temperature control. We hold a Power of Attorney with World Courier, allowing them to handle customs clearance for shipments with a declared value typically under \$2,500. For higher-value imports shipped via World Courier, **FTN** must be used as the designated U.S. Customs Clearance Broker. While World Courier's shipping and brokerage fees are generally higher than those of other carriers or brokers, they offer superior service in remote locations and for temperature-sensitive materials. **Always request a quote in advance** to estimate shipping and clearance costs before proceeding.

To ship with World Courier, you must either use or create an account under **Emory's Master Account**. To begin the enrollment process, contact Roxanna Martinez at roxanna.martinez@worldcourier.com to request the necessary forms and instructions. Once services are rendered, World Courier will submit an invoice for services and reimbursement for any fees paid by them to the email address provided during enrollment. These fees can then be processed via Check Request or P-Card.

Non-Contracted (Not Preferred) Brokers:

DHL – We discourage the use of DHL for import unless the imported item is of very low dollar value and not subject to any OGA/PGA clearances or permits. We have had inconsistent service with DHL clearing larger items. Therefore, if your supplier chooses to use DHL to ship higher valued item(s), it is critical that the international shipper lists Emory University as the Importer of Record, slates "Request Broker Select" on the shipping label/airwaybill, provides FTN's email/contact information to their shipping carrier, and instructs them to email the Arrival Notice to FTN as soon as the item reaches the US.

Supply Chain Solutions (SCS) - Emory has neither a contract nor account with SCS, but we have executed a Power of Attorney with them to allow them to clear items through US Customs on our behalf. Payment and arrangements for services with SCS would be agreed upon and handled directly by the importing department.

Nelson Duque DBA Floridian Customs Broker - Emory has neither a contract nor account with Floridian, but we have executed a Power of Attorney with them to allow them to clear items through US Customs on our behalf. **Unlike our other POA Agreements, Emory University's Importer of Record address is listed as 201 Dowman Dr, Atlanta, GA 30322.** Payment for services would be handled directly by the importing department, and arrangements would be agreed upon between the importing department and Floridian.

Other Carriers – If attempting to use other Customs Brokers, they will generally request that a Power of Attorney be completed. However, only specific individuals have the executive authority needed to complete a Power of Attorney, and these requests should be declined, in lieu of using one of the suppliers noted above.

EXPORTING ITEMS – GENERAL US CUSTOMS CLEARANCE GUIDELINES

International Customs

International Customs requirements vary widely by country particularly regarding the content of commercial invoices and any additional documentation required for entry. It is the responsibility of the U.S. party shipping the item (Emory department) to adhere to all statutes and regulations. For this reason, work closely with the recipient of your shipment to understand how to navigate foreign export. Typically, receiving parties facilitate and pay for the Customs Duty/Taxes process in their own country.

Export Control Regulations

When Emory is the exporter, and the shipment includes specialized lab instruments, supplies, technology, chemicals, samples, biological materials, and prototypes, an export license may be required before these items can be shipped outside the U.S. It is the responsibility of the Emory department initiating the shipment to ensure compliance with all applicable US export control laws and regulations. Violations of US policies can be severe. Please contact the Export Control Office (ECO) for guidance at exportcontrol@emory.edu.

Electronic Export Information

Electronic Export Information (EEI) filing is required for certain exports including shipments valued above \$2,500, shipments that require an export license or that are shipped under most license exceptions. Additionally, many

permanent shipments to China, Russia, and Venezuela require EEI filing regardless of the shipment's dollar value. Please contact the Export Control Office exportcontrol@emory.edu for help with EEI filing.

If using FedEx Logistics/FedEx Trade Networks or another broker that will arrange courier pick up of your item(s) and ship as cargo/freight, you may be asked to fill out a Shipper's Letter of Instruction (SLI) form. The SLI form will be used to file an EEI. The Export Control Office can help with certain trade-specific information required to complete that form, e.g., Harmonized Tariff Schedule Code and Export Control Classification Number. Please contact ECO in advance. Be sure to use Emory's Employee Identification Number (EIN) 58-0566256 on the form.

If dropping off your item at a FedEx store, please contact ECO as soon as possible for help with the EEI filing process and to provide an Internal Transaction Number (ITN), which must be included on the shipping label.

If you are hand-carrying items abroad, please contact ECO as soon as possible, as this does not exempt an item from exporting requirements. If an EEI filing is required, ECO will handle the filing on your behalf. Your flight information will be required.

Material Transfer Agreement (MTA): Ensure a Material Transfer Agreement (MTA) exists in the following circumstances: a) transfer of any drugs, devices, etc. to be used in/on/with human subjects; b) transfer of any research materials that will not be used in/on/with human subjects or c) transfer of certain equipment without payment and not for use in/on human subjects. See Resources for Emory MTA resources for each situation.

If using World Courier:

Emory often uses World Courier to export biological materials. Costs may exceed DHL or FedEx, but coverage in remote areas is often better. Remember to request a quote before shipping for estimated costs.

To use World Courier, you must either use or create an account under **Emory's Master Account**. To begin the enrollment process, contact Roxanna Martinez at roxanna.martinez@worldcourier.com to request the necessary forms and instructions. World Courier will bill email address provided during enrollment for associated fees, which can be paid via Check Request or P-Card.

**EMORY'S EXPORT CONTROL OFFICE (ECO) SHOULD BE THE PRIMARY SOURCE OF EXPORTING INFORMATION.
FOR ADDITIONAL INFORMATION, SEE THE RESOURCE SECTION BELOW.**

RESOURCES

EMORY RESOURCES

(For inquiries regarding import or export, contact the appropriate email address based on topic).

Shipping & Logistics

General FedEx inquiries: fedexrequest@emory.edu

Broker Fee SpeedType Submission: Emory.FSC@emory.edu

Biological & Hazardous Materials

Biosafety protocol & Import Permits (biological or dangerous/dangerous goods): Emory University Environmental Health & Safety Office (EHSO) – biosafe@emory.edu.

Export Control

Export Guidance (including hand carried items): Emory Export Control Office (ECO) exportcontrol@emory.edu

Material Transfer Agreement (MTA)

For drugs, devices, etc. used in/on/with human subjects: Emory Office of Sponsored Research (OSP) osp-contracts@listserv.cc.emory.edu

For research materials NOT involving human subjects OR equipment transfers without payment: Emory Office of Technology Transfer (OTT) at OTT-MTA@emory.edu

Helpful Job Aids

Strategic Procurement Policy 2.121: [Strategic Procurement Policy](#)

Procurement Best Practices: [Procurement Best Practices](#)

IMPORTING SELF-RESEARCH RESOURCES:

Restricted Countries

Office of Foreign Assets Control (OFAC) Sanctions and Embargo Information: <https://ofac.treasury.gov/sanctions-programs-and-country-information>

HTS Code Lookup and Tariff Information

- HTS Code Search - U.S. International Trade Commission (USITC) - <https://hts.usitc.gov/> (Does not include reciprocal tariffs.)
- US Border Patrol Tariff Site: <https://dataweb.usitc.gov/> (May not include reciprocal tariffs)
- World Trade Organization Tariff and Trade Data Site (Base (non-reciprocal) Duty/Fee) estimator: * <https://ttd.wto.org/en> (Does not include reciprocal tariffs)
- Reciprocal Tariff Tracker: * <https://www.tradecomplianceresourcehub.com/2025/06/02/trump-2-0-tariff-tracker/> **These Sites Are Independent Resources Provided as A Courtesy And Neither Endorsed By Emory University Nor Procurement)*

Free Trade Agreement

U.S. Customs and Border Protection – Free Trade Agreements - <https://www.cbp.gov/trade/priority-issues/trade-agreements/free-trade-agreements>.

Tip: Your international supplier may also be familiar with applicable agreements.

Other Governmental/Partner Governmental Agencies (OGA/PGA)

- General OGAs/PGAs Import Guidance - <https://www.cbp.gov/trade/basic-import-export/e-commerce/partner-government-agencies-import-guides>
- Infectious items – CDC Import Permit Program: https://www.cdc.gov/import-permit-program/php/?CDC_AAref_Val=https://www.cdc.gov/orr/ipp/index.htm
- Medical Items (used to cure, treat, prevent or diagnose disease) - FDA Import Program: <https://www.fda.gov/industry/import-program-food-and-drug-administration-fda>
- Chemicals (not in end-use container), e.g. lighter fluid in a bottle for distribution rather than a disposable lighter <https://www.epa.gov/importing-exporting>
- Non-human tissue and Egg products (anything that could potentially make US plants/animals sick): <https://www.fsis.usda.gov/inspection/import-export/import-guidance>

EXTERNAL IMPORTING/EXPORTING RESOURCES:

For general information about international (import and export) shipments: contact FedEx's international customer service at 1-800-247-4747 or navigate to [FedEx International Customer Service](#)

Need Help After Conducting Self-Research? You may contact FedEx's Regulatory Compliance Group (RCG) at RCG@fedex.com **if you have very specific questions relating to the topics below:**

- Commercial invoice (CI) and Electronic Export Information (EEI) Note: If EEI filing is required, Emory must be identified as the shipper of record.
- Required documents required for international shipments
- Duties and taxes (when the Harmonized System (HS) code is provided)
- FDA import and export documentation requirements
- International Traffic in Arms Regulations (ITAR) implications
- Prohibited commodities and commodity classification

If FedEx Logistics/FedEx Trade Networks is being used as our Customs Broker, and you wish to confirm that your import paperwork is sufficient: You may contact FedEx Logistics/FedEx Trade Networks (FTN) at FTN_ATL_Brokerage@fedex.com. Do not contact FTN unless you have at least a Commercial Invoice containing all of the items noted on pages 2 and 3 of this job aid and including needed HTS Codes for each line item.

If you require additional importing support beyond available resources provided through job aids and self-research: FedEx Logistics/FedEx Trade Networks Importing Consulting Services provides these services on a fee basis. Complete and submit the [Importing Consulting Request Form](#) to Tradesolutions@fedex.com to request import consulting services from the FedEx Logistics/FedEx Trade Networks importing team. The last digits of your credit card are required, with a minimum fee of \$137.50, and with hourly rates at \$275 per hour. This cost is due at the time of service to be charged to a credit card using the ordering department's funds.