Customs Compliance Guidance: Handbags that Include Charms, Hangoffs, Key Chains & Scarves, etc.

Key Review Factor: Is the item Decorative vs Functional?

Multi HTS Assigned

- FUNCTION and is REMOVEABLE
 - Functional Key Ring:
 - Acceptable format to secure keys, currently a split ring
 - Split ring needs to be at least the standard 1" diameter
 - Split ring could be used in combination with a *fastener
 - Scarves
 - Coin purse
 - Identification card case

Marketing / Labeling in support of the functionality, optional but encouraged

Not classified, not Multi HTS

- NOT removable considered a "Decorative" item, part of the bag
 - Charm
 - Hangoff
- Removable and NOT FUNCTIONAL
 - Pom-poms (charms) on *clip
 - Hangoff on *hinge ring
 - * Fastener that doesn't perform a function other than holding a decorative feature

Considerations

Item references are critical to support classification for example:

- "Key Chain" if providing a function (multi HTS)
- "Charms" or "Hangoff" if decorative (no additional HTS code)
- "Scarf" if scarf can be removed and utilized independently from the bag (multi HTS)
 - Exception: if it is a small piece of fabric that is for decoration only.
 This would also be considered an ancillary item (no HTS)
- Provide clear photos of items on and off the bag
- Material content of fastener required

Note: As fashion trends are constantly changing, each style is reviewed on a case-by-case basis. For accurate classification, a Binding Ruling might be necessary. This is where we send a sample to US Customs and they evaluate. If requesting a Binding Ruling, please allow 4-6 weeks for review. CROSS Customs Rulings

Terminology for fasteners:







Lobster Claw

Split Ring

Hinge Ring

Dog Clip

O Ring

Function vs Decoration Examples:



FUNCTION Scarf (Multi)



FUNCTION Key Chain w/Split Ring (Multi)



FUNCTION Key Chain w/Split Ring (Multi)



DECORATIVE O Ring



DECORATIVE Hinge Ring/Not Secure



DECORATIVE Hinge Ring/Not Secure