

BEARINGS:

Country of Origin Marking

THE LAW.....

1. All bearings are to be marked in a legible, conspicuous, permanent manner, in English with their country of origin.
2. Country of origin is determined by that country in which the races (rings) were produced, whether ground or unground, heat treated or not. Grinding, polishing or assembly of components in country A, that were produced in country B, does not allow country A to be the country of origin.

PURPOSE OF THESE MARKING REQUIREMENTS

The purpose of marking requirements is to carefully monitor the country of origin of bearings so as to determine the applicability of special duties - Special duties being attached to specific commodities manufactured by specific companies or within specific countries.

ACCEPTABLE METHODS OF MARKING

1. Bearings shall be marked either by die-stamping, acid etching, laser etching, or engraving on the side of one of the races or on the surface of the outer race (common for acid or laser etching). The alternative: permanent marking on the metal shields or rubber seals of those bearings so equipped, is acceptable.
2. J-list Bearings ... The marking regulations provide a specific marking exclusion for bearings with an outer diameter of 5/8 inch or less. The exclusion states that the bearing itself does not need to be individually marked with the Country of Origin. However, the regulations go on to state that the bearings will be sold in a container that clearly displays the country of origin.
3. The Bearing itself may be excepted from the marking if imported in individual retail boxes, provided the Port Director determines that the box is clearly marked with the country of origin.
4. With the possible exception of No. 2 above, the marking of plastic tubes or the outer surface of bulk wrappers, in which multiple bearings are packed, is not an acceptable substitute for individual marking.
5. The only acceptable country of origin marking is die stamping of the country name on to the bearing. Because of space limitation it is not necessary to state "Made in". Unless otherwise excepted by U.S. Customs, the full country name must appear, not unfamiliar abbreviations. Terms such as PRC (China), RO (Romania), CSSR (Czech Rep. Or Slovak Rep), TW (Taiwan) are not permitted.

EXCEPTIONS

- Bearings that may qualify as NAFTA goods are governed by NAFTA country of origin rules.
- Bearings otherwise qualify for country of origin marking as per CFR 134.32 . The features of CFR 134.32 allow for exceptions to the marking requirements;
 - * Articles that are incapable of being marked.
 - * Articles that cannot be marked prior to shipment to the United States without injury.
 - * Articles that cannot be marked prior to shipment to the United States except at an expense economically prohibits of its importation
 - * Articles for which the marking of the containers might reasonably indicate the origin of the articles.
 - * Articles imported for use by the imported and not intended for sales in the imported for any other form.
 - * Articles to be processed in the United States by the importer or for his account other than for the purposes of concealing the origin of such articles and in such manner that any make contemplated would necessarily be obliterated, destroyed or permanently concealed.
 - * Articles for which the ultimate purchaser must necessarily know, or in the case of goods from a NAFTA country, must reasonably know, the country of origin by reason of the circumstances of their importation or by reason of the character of the articles even though they are not marked to indicate their origin.
 - * Articles that cannot be marked after importation except at an expense that would be economically prohibitive unless the importer, producer, seller or shipper failed to make the articles before importation to avoid meeting the requirement of law.
 - * Ultimate purchase exceptions. Normally an OEM that incorporated the bearings into his product. Then the must file request with Port Director in advance.
- J-List exceptions - previously noted above.

Refer to Administrative message 96-0827 (9/30/96), 96-0938 and 96-1051