**Iron and Steel Compliance Requirements F.A.Q.**

If you have additional questions that are not answered below then please send an email to [iron.steel@cummins.com](mailto:iron.steel@cummins.com) with “**QUESTION**” in the subject bar

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| Will the presentation / webcast recording / 6th Oct letter be shared? | Yes at [www.supplier.cummins.com](http://www.supplier.cummins.com) – this does not need a log in to access |
| Are parts produced before Sept 30th in scope of these sanctions? | In the EU, production before June 24, 2023, is exempt from this documentation requirement. In the UK we are not aware of any such exemption. Therefore, we are collecting documentation for all items. |
| If we are on INCO Terms FCA, how we can know if a part is affected by the new regulation? | A part is affected if it has an HS code listed in the Cummins communication as per the letter on [www.summlier.cummins.com](http://www.summlier.cummins.com). Cummins will notify you if we identify any discrepancy between your export HS code and our import HS code used in the UK or the European Union. |
| If our products are not classified under the mentioned HS codes, what do we need to send? | If you determine you do not have in-scope parts, send an email to [iron.steel@cummins.com](mailto:iron.steel@cummins.com) with the subject following the format “NO IRON AND STEEL ARTICLES – SUPPLIER NAME” and confirm any relevant details in your email. |
| With out-of-scope parts, do we have to provide the confirmation with each shipment? | No, but if you expect the situation to cause confusion based on the specific situation, then it is recommended to include such a statement to avoid preventable delays. |
| Does this apply to Suppliers outside of the EU & UK? | Yes, this applies to all our Global suppliers where parts are deemed as being in-scope of the HS codes. |
| How do we know what the HS codes are? | Your logistics department, freight forwarder or customs broker can help you determine your HS codes. See also:  <https://www.gov.uk/guidance/classifying-iron-and-steel> |
| Please can you elaborate on cost recovery after October 15th | Lack of documentation to meet this regulation is already having significant disruption on Cummins import, production and shipping. Therefore, this needs to be a top priority for all suppliers to ensure this documentation is provided as soon as possible. Non-compliance by this date may result in Cummins seeking cost recovery. |
| What team(s) are leading these efforts to get this information from suppliers? | Cummins Supply Continuity, specifically the EMEA Continuity Team has led, but this is a global effort as it applies to any Global Suppliers supplying into EU/UK. |
| We import from our factory in Germany into our warehouse in the UK we then deliver to Daventry, so we are the importer not Cummins, as this is the process do we need to confirm no Russian Content? German Federal Law prohibits any Russian Content, will at Long Term declaration suffice? | As the importer, you are legally responsible to make this determination.  We suggest you consider: <https://www.gov.uk/government/publications/notice-to-importers-2953-russia-import-sanctions/guidance-on-third-country-processed-iron-and-steel-measures>  In particular, the section “Demonstrating supply chain history” may be helpful to you to arrive at this determination. |
| If we do not supply to these HS codes but a subcomponent as part of a bigger assembly would be iron/steel do we still need to do this? | The scope of the regulation is limited to providing evidence related to imports under the following HS headings: 7206; 7207; 7208; 7209; 7210; 7211; 7212; 7213; 7214; 7215; 7216; 7217; 7218; 7219; 7220; 7221; 7222; 7223; 7224; 7225; 7226; 7227; 7228; 7229; 7301; 7302; 7303; 7304; 7305; 7306; 7307; 7308; 7309; 7310; 7311; 7312; 7313; 7314; 7315; 7316; 7317; 7318; 7319; 7320; 7321; 7322; 7323; 7324; 7325; and 7326. If the parts crossing the border entering the UK and/or the EU are outside these headings, then the requirement does not apply. |
| We machine and assembly iron castings. Would that require this additional paperwork for export as I do not see where these fall into the HS codes listed. | You should work with an expert to determine the applicable HS codes, such as a consultant, customs broker or freight forwarder. You may find this helpful: <https://www.gov.uk/guidance/classifying-iron-and-steel> |
| The parts we supply are included in the HS headings. But the raw materials we use are not, what should we do? | The scenario described here would be exempt from the iron & steel sanctions. Please provide Cummins a signed declaration describing the products and clearly explaining that the products are exempt because the raw materials are classified outside of the HS codes covered by the requirements. |
| Our steel / iron raw materials do not have Mill Certificates – what should I do? | If you are supplying Cummins with products that are in-scope for the requirements but do not have Mill Test Certificates, you must conduct other due diligence to ascertain that the origin of the affected iron & steel inputs is not Russian. This can be done through a wide variety of due diligence measures, such as reviewing:   * Invoices from iron and steel sources; * Delivery notes from iron and steel sources; * Quality certificates of iron and steel inputs; * Long-term supplier declarations of iron and steel sourcing; * Costing and production documents related to iron and steel inputs; * Customs documents of the exporting country of the iron and steel sources; * Trade correspondence; * Production descriptions; * Exclusion clauses in sales contracts; * and Manufacturer's statements if they refer directly to the shipment in question (not general statements) |
| As a 3PL warehouse, am i correct in saying that this is the responsibility of the Parent Supplier / manufacturer? | The importer is responsible to have documentation to support their import declaration. As an importer, Cummins is requiring our suppliers to provide us with sufficient documentation to demonstrate due diligence has been conducted. If you are a supplier to Cummins, then you need to take action to collect and review documentation (e.g., from the manufacturer or other supplier) to provide sufficient confirmation to Cummins. |
| Cummins are a significant supplier of parts for our top-level assemblies – will Cummins confirm compliance to me for the parts they supply so I can re-confirm compliance of the top-level assembly? | Yes. Cummins is preparing certifications for our customers after we confirm we have sufficient supplier documentation and/or declarations to support it. You can submit your requests to [iron.steel@cummins.com](mailto:iron.steel@cummins.com). If you provide details such as specific part numbers it will help expedite our processing of your request. |
| How can I make a long term declaration? | Please use the format provided in Appendix A, Option A |
| Do you require a declaration per shipment and a one-time declaration? If both then is a Suppliers own approved declaration acceptable? | Yes, we require both a one-time declaration and per shipment. Using the Cummins-approved template is required. This will facilitate processing and approvals.  We suggest establishing a new process to have your Logistics teams send such documents with each shipment going to Cummins. For international shipments, these documents must arrive in the document packet received by our customs broker along with the commercial invoice. |
| If we supply Option A, on Appendix A, does this have to be supplied on each shipment? | Yes. Please insert the same document with each shipment. This will facilitate the clearance at the port. |
| We have multiple supplier codes; do you need separate emails for each supplier code? | This is not needed if your declaration covers shipments from all your company's affiliates and subsidiaries which have a Cummins supplier code. |
| As per Appendix A, we have sent the email to the address mentioned in step 4. However, we have not received any acknowledgment of its receipt, will I get one? | At this time, there will be no email acknowledgement. Our teams are logging responses received and will reach out with any questions or follow-ups. |
| Effective & meaningful due diligence will of course take time - presumably we should not provide the confirmation you are requesting until we have completed that process? | This is correct. Please only provide certification once the necessary due diligence has been completed but please remember, time is of the essence and if Cummins does not have the needed documentation, this may cause disruption within the Cummins supply chain. |
| We purchase raw materials for incorporation into our UK manufactured steel products which are exported to EU, do you need documentation? | Please follow the steps to confirm if the parts you supply are in-scope of the HS codes. If they are, then any cross-border movement of the goods into the EU or the UK will trigger the requirement and necessitate having due diligence completed on the iron and steel inputs. |
| Do we need to run the process for suppliers supplying outside EU/UK? | Yes, this applies to all our Global suppliers where parts are deemed as being in-scope of the HS codes. This is because parts within the Cummins supply chain frequently move around the world, including into the EU and the UK, where they require this documentation. |
| If parts come from Germany into UK, will this documentation be required? | Yes, the documentation is required for import into the UK. |
| What is the deadline for this please? What if we haven't completed our due diligence by then? | The deadline for this was September 30th 2023. |
| How long will a long-term Supplier declaration last? | Under the Cummins template, the supplier confirms the declaration is valid until the supplier notifies Cummins there has been a change. |