

After an extensive process that included multiple contacts with agencies responsible for the review and implementation of U.S. Economic Sanctions in regards to Syria, HHGFAA Legal Council provided the following guidance for the sanctions as they pertain to the shipment of household goods and personal effects.

Re: Household Goods Shipments to Syria

We are finally able to provide guidance that allows shipments of household goods from the United States to Syria. Boris had previously been advised by the United States Treasury Department, Office of Foreign Assets Control, that household goods shipments to Syria are prohibited by President Bush's Executive Order 13338 even though the Executive Order does not specifically mention household goods. We received the same advice from the Office of Foreign Assets Control.

After further inquiry, however, we have determined that the Department of Commerce, Bureau of Industry and Security (BIS), is the agency with responsibility for licensing exports and its Export Administration Regulation has an exemption which permits shipments of household goods and personal effects from the United States to Syria for personal use under 15 C.F.R. Part 740, License Exceptions. This exception does not apply to import shipments from Syria.

The specific regulation is 15 C.F.R. §740.14, Baggage (BAG), which permits persons leaving the United States to ship (1) personal effects, (2) household goods, (3) vehicles and (4) tools of trade as long as the items are owned by the shipper or his family, are for personal use, and not for sale or other disposal and are not exported as cargo. The relevant regulations 15 C.F.R. §§740.1, 740.2 and 740.14 are attached.

This is a general license exception which does not require any special agency approval. The regulations provide that the Shippers' Export Declaration or Automated Export System record for the shipment must show the license exception by the three-letter code "BAG."

The Shippers' Export Declaration or Automated Export System record must also contain the Export Control Classification Number (ECCN) from the Commerce Control List (CCL), 15 C.F.R. §774, Supplement 1. The ECCN for household goods and baggage is EAR99 for items not specified on the CCL. However, a personal property shipment may contain items which are specified on the CCL, such as a computer, CCL 4A994 or computer software, CCL 5D992.