

ITEM: Hard capsules filling machines, designed to automatically or semi-automatically fill ingestible empty hard capsules with ingredients for pharmaceutical or dietary supplement products.

Tariff Classification Suggestion

Phase 1

Top 3 candidate chapters

Chapter	Justification
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84	By GRI 1, the text of heading 84.22 covers machinery for filling/closing/labeling containers and other packing/wrapping machinery, which directly captures capsule filling/closing machines for ingestible products. GRI 3(a) favors this specific heading over residual options, and Ch. 84 Note 2 directs precedence to 84.01–84.24 (e.g., 84.22) over 84.25–84.80 (e.g., 84.79). The explicit exclusions from 84.22 remove only sewing or office machines (not applicable).
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Phase 2

TARIFF CLASSIFICATION OPINION

I. Applicable normative framework

- General Rules of Interpretation (GRI): • “THE TITLES OF SECTIONS, CHAPTERS OR SUBCHAPTERS ARE PROVIDED FOR EASE OF REFERENCE ONLY; FOR LEGAL PURPOSES, CLASSIFICATION SHALL BE DETERMINED ACCORDING TO THE TERMS OF THE HEADINGS AND ANY RELATIVE SECTION OR CHAPTER NOTES...” • GRI 3(a): “THE HEADING WHICH PROVIDES THE MOST SPECIFIC DESCRIPTION SHALL BE PREFERRED TO HEADINGS PROVIDING A MORE GENERAL DESCRIPTION.” • GRI 3(b): “...MIXTURES, COMPOSITE GOODS... SHALL BE CLASSIFIED AS IF THEY CONSISTED OF THE MATERIAL OR COMPONENT WHICH GIVES THEM THEIR ESSENTIAL CHARACTER, INsofar AS THIS CRITERION IS APPLICABLE.” • GRI 6: “THE CLASSIFICATION OF GOODS IN THE SUBHEADINGS OF A HEADING SHALL BE DETERMINED ACCORDING TO THE TERMS OF THOSE SUBHEADINGS... AND, MUTATIS MUTANDIS, TO THE ABOVE RULES...”
- Chapter 84, legal texts and national/explanatory notes: • Heading 84.22, subheading 8422.30: “Machinery for filling, closing, sealing or labeling bottles, cans,

boxes, bags or other containers; machinery for capsuling bottles, jars, tubes and similar containers; machinery for aerating beverages.” • Chapter 84 notes (scope boundaries): “Heading 84.22 does not cover: 1) sewing machines for closing packages (heading 84.52); 2) office machines of heading 84.72.” • Note on multi-use machines: when a principal use is identifiable, classify in the heading of that use; otherwise, in 84.79.

II. Legal-technical analysis Product described: Machines designed to automatically or semi-automatically fill ingestible empty hard capsules with ingredients for pharmaceutical or dietary supplement products.

1) Chapter and heading

- By GRI 1, classification is determined by the heading texts and legal notes. The function is to fill a container (the hard capsule) with a product dose. Heading 84.22 expressly covers “machinery for filling... bottles, cans, boxes, bags or other containers,” which includes “other containers.” Hard capsules are containers for ingestible products; therefore, the merchandise falls within heading 84.22 under the terms “for filling... [other containers].”

2) Subheading

- Within heading 84.22, GRI 6 directs the choice of subheading based on the subheading texts. Subheading 8422.30 specifically covers “Machinery for filling, closing, sealing or labeling... [other containers],” which directly matches the principal function of filling containers. Where the machine also closes capsules after filling (common in capsule fillers), that operation remains encompassed within 8422.30, as the text covers both filling and closing/sealing/capping of containers.
- Even when the equipment integrates dosing by volume or weight, such dosing remains incidental to the packaging/filling operation, as reflected nationally by items under 8422.30 that include “filling/packing machines with dosing... by weight” (evidence that the legal scope of 8422.30 includes filling with integrated dosing).

Conclusion at this stage: By application of GRI 1 and GRI 6, the machine is classifiable in subheading 8422.30.

III. Exclusion of alternative headings or subheadings within Chapter 84

- 8422.40 (packing/wrapping machines): “Other machinery for packing or wrapping goods...” These are for encasing/wrapping goods, not for filling containers with product. The goods at issue perform filling of containers (capsules), which is textually covered more specifically by 8422.30. By GRI 3(a), the more specific “filling”

subheading prevails over the more generic “packing/wrapping” provision. Therefore, 8422.40 does not apply.

- 8422.20 (cleaning/drying of bottles or other containers): These appliances prepare containers by cleaning/drying and do not perform filling. The described merchandise performs filling; thus, 8422.20 is inapplicable by text (GRI 1).
- 84.23 (weighing machines): “Weighing machinery...” covers weighing equipment. The essential function here is not weighing but filling containers. Even where a filler doses by weight, the legal scope of 84.22.30 remains controlling for filling/packaging machines, as noted above; hence 84.23 is excluded by GRI 1 and 3(a).
- 84.72 (office machines): Chapter 84 notes exclude office machines from 84.22 and are unrelated to pharmaceutical capsule filling; not applicable by the legal note itself.
- 84.79 (other machines with individual functions): Residual heading “not specified or included elsewhere in this Chapter” applies only if no other heading covers the function. Here, heading 84.22 explicitly covers the “filling” of containers; therefore, 84.79 is barred by GRI 1 and 3(a). Note 8 to Chapter 84 further supports resort to 84.79 only when a principal use heading is not found.

IV. Documentary requirements for the importer To confirm the scope and ensure correct subheading application (and, where relevant, national fraction and NICO):

- Technical data sheet and user manual detailing: operating principle, whether the machine only fills or also closes/locks capsules, dosing method (volume/weight), and level of automation.
- Photos/videos of the machine in operation showing container handling (separation/re-joining of capsule halves), dosing stations, and closing.
- Throughput (capsules per hour), capsule sizes handled, and intended products (powders, pellets, micro-tablets).
- Confirmation whether supplied as a complete machine or as parts/modules only (relevant to 8422.90 at parts level, if applicable).

V. Conclusion

- Proposed tariff classification (to subheading level only): • Chapter: 84 • Heading: 8422 • Subheading: 8422.30 • National fraction: Not determined in this opinion

91 (beyond requested level) • NICO: Not determined in this opinion (beyond requested
92 level)

93 Resolution: By application of GRI 1 and GRI 6 to the text “Machinery for filling... [other
94 containers]” in subheading 8422.30, and considering Chapter 84 notes and exclusions, the
95 merchandise described as hard capsules filling machines is classifiable in 8422.30.