

ITEM: Electronic blood pressure monitor for automatic blood pressure and pulse measurement, designed for home use. It consists of a wrist cuff and a pump for its inflation, a blood pressure measuring sensor, a display showing the measurement readings, the time and the date, and other electronic components. The product is put up for retail sale as a set with two batteries, a storage box and an instruction manual.

Tariff Classification Suggestion

Phase 1

Top 3 candidate chapters

Chapter	Justification
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| 90 | By GRI 1, heading 90.18 covers medical instruments and appliances, including other electro-medical apparatus; an automatic electronic blood-pressure monitor fits this scope. As a retail set (monitor + cuff + batteries + case + manual), classify by the component conferring essential character—the measuring monitor—per GRI 3(b) and the set criteria. |
| 85 | Chapter 85’s residual 85.43 (electrical machines/apparatus with their own function, not elsewhere specified) could be considered, but it yields to the more specific medical heading 90.18 under GRI 1. Chapter 85 notes also direct certain medical-type appliances to 90.18 (illustrative exclusion). |
| 91 | The device shows time/date, but Chapter 91 excludes apparatus of Chapter 90 even when they have watch mechanisms (note under 91.06), so time functions do not control classification. GRI 3(b) supports that the essential character is the blood-pressure measuring function, not the clock feature. |

Phase 2

TARIFF CLASSIFICATION OPINION

I. Applicable regulatory 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 1). •

“THE HEADING WHICH PROVIDES THE MOST SPECIFIC DESCRIPTION SHALL BE PREFERRED TO HEADINGS PROVIDING A MORE GENERAL DESCRIPTION... in the case of goods put up in sets for retail sale, such headings are to be regarded as equally specific...” (GRI 3(a)). • “WHEN GOODS CANNOT BE CLASSIFIED BY APPLICATION OF RULE 3(a), THEY SHALL BE CLASSIFIED... AS IF THEY CONSISTED OF THE MATERIAL OR COMPONENT WHICH GIVES THEM THEIR ESSENTIAL CHARACTER...” (GRI 3(b)). • “CONTAINERS PRESENTED WITH THE GOODS SHALL BE CLASSIFIED WITH THE GOODS WHEN THEY ARE OF A KIND NORMALLY USED FOR PACKING SUCH GOODS...” (GRI 5(b)). • “THE CLASSIFICATION OF GOODS IN THE SUBHEADINGS OF A HEADING SHALL BE DETERMINED ACCORDING TO THE TERMS OF THOSE SUBHEADINGS... ONLY SUBHEADINGS AT THE SAME LEVEL ARE COMPARABLE” (GRI 6).

- Chapter 90 (legal texts and explanatory notes) • Heading 90.18 text: “Instruments and appliances used in medical... including... other electro-medical apparatus.” • Within 90.18, “Electro-diagnostic apparatus (including functional exploration or monitoring of physiological parameters)” with subheadings 9018.11 to 9018.19; “9018.19 — Other,” with examples such as “Electroencephalographs,” “Patient monitoring systems,” “Audiometers.” • Within 90.18, under the residual line of “Other instruments and appliances” (9018.90) the national tariff specifies: “9018.90.03 — Apparatus for measuring blood pressure.” • Heading 90.26: “Instruments and apparatus for measuring or checking... pressure... (for example:... manometers)...” • Heading 90.31: “Measuring or checking instruments, appliances and machines, not specified or included elsewhere in this Chapter...”
- Chapter 85 (scope/exclusions relevant to alternatives) • Chapter 85: general reminder that its scope does not cover apparatus expressly classified in 90.18; for example, the national note expressly cites certain medical apparatus as covered by 90.18 (illustrative of Chapter 90’s preference for medical devices). • Heading 85.43: “Electrical machines and apparatus, having individual functions, not specified or included elsewhere in this Chapter” (residual in Chapter 85).

II. Legal–technical analysis

- Chapter selection (90) By GRI 1, classification is determined by the legal texts of headings and notes. The good is a medical measuring device intended to measure human blood pressure and pulse at home. Heading 90.18 covers “Instruments and appliances of medicine... including... electro-medical apparatus,” which squarely describes the nature and intended medical use of the article.

- Heading selection (90.18) The article is an electro-medical measuring device (wrist cuff, inflatable pump, pressure sensor, display, electronics) whose essential function is medical measurement. By GRI 3(a), the heading expressly naming medical instruments (90.18) prevails over generic headings in other chapters (see analysis in section III).
- Subheading selection (9018.90, by GRI 6) Within 90.18, there are two relevant families of subheadings at the same one-dash level: • 9018.11 to 9018.19: “Electro-diagnostic apparatus (including... monitoring of physiological parameters),” where 9018.19 covers “Other” and includes examples such as “Electroencephalographs,” “Patient monitoring systems,” “Audiometers.” • 9018.90: “Other” instruments and appliances of 90.18, whose national development expressly includes “Apparatus for measuring blood pressure” (9018.90.03). Applying GRI 6, only subheadings of the same level are compared. The specific national text under 9018.90 expressly names “Apparatus for measuring blood pressure,” which describes the article with greater precision than the residual “other electro-diagnostic apparatus” under 9018.19. Under GRI 3(a), the more specific description governs; therefore, the proper subheading is 9018.90.
- Treatment of the retail set components The product is presented for retail sale as a set (monitor with wrist cuff, batteries, storage box, manual). Under GRI 3(b), goods put up in sets are classified according to the component conferring the essential character, which here is the blood pressure monitor itself; the batteries and the storage box are accessory/packaging elements. In addition, the storage/retail packaging is classified with the goods when of a kind normally used for such goods (GRI 5(b)).

III. Exclusion of alternative headings or subheadings within Chapters 90 and 85

- Exclusion of 9018.19 (“other electro-diagnostic apparatus”) — IMPORTANT NOTE 9018.19 belongs to the electro-diagnostic family and, in the national breakdown, lists equipment such as electroencephalographs, patient-monitoring systems, and audiometers. Conversely, the national tariff text expressly places “Apparatus for measuring blood pressure” under 9018.90.03. By GRI 6 and GRI 3(a), the specific text expressly naming blood pressure measuring apparatus prevails over the generic residual “other electro-diagnostic apparatus.” Therefore, 9018.19 is discarded in favor of 9018.90 for sphygmomanometers/automatic blood pressure monitors.
- Exclusion of 90.26 Heading 90.26 covers instruments for measuring or checking characteristics of liquids or gases (examples include manometers). Although a

blood pressure monitor measures pressure, heading 90.18 specifically covers medical instruments and, moreover, the tariff explicitly locates blood pressure measuring apparatus within 90.18 (9018.90.03). By GRI 1 and GRI 3(a), the specific medical heading—and its explicit text for blood pressure apparatus—prevails over the general measurement heading 90.26.

- Exclusion of 90.31 Heading 90.31 is a residual “not elsewhere specified or included” within Chapter 90. Since 90.18 specifically covers medical instruments and enumerates blood pressure apparatus at the national level, 90.31 does not apply by virtue of GRI 1 and the residual nature of 90.31.
- Exclusion of Chapter 85 alternatives (e.g., 85.43) Heading 85.43 is residual for electrical machines with their own function “not elsewhere specified in Chapter 85.” The article is expressly covered by heading 90.18 as a medical instrument/apparatus. By GRI 1 and GRI 3(a), the specific medical heading prevails over residual electrical machinery headings. Furthermore, the scope notes of Chapter 85 confirm that medical apparatus of 90.18 fall outside Chapter 85 in relevant cases, evidencing the system’s preference to classify medical devices in Chapter 90.

IV. Documentary requirements for substantiation before customs

- Technical datasheet describing the function (automatic blood pressure and pulse measurement), intended medical use, and components (wrist cuff, pump, sensor, display, electronics).
- User manual and retail packaging details to support presentation as a set and the essential character analysis (GRI 3(b)).
- Photographs of the device, cuff, and accessories as presented for retail sale.
- Any product labeling evidencing medical purpose and measurement function consistent with heading 90.18.

V. Conclusion

- Proposed tariff classification at subheading level (as requested): • Chapter: 90 • Heading: 90.18 • Subheading (6 digits): 9018.90 • Fraction and NICO: not determined here, as the requester asked to classify only to subheading level.

Resolution: Based on GRI 1, 3(a), 3(b), 5(b) and 6, and on the legal texts of Chapter 90 heading 90.18 and its national breakdown expressly covering “Apparatus for measuring blood pressure” under the residual subheading line 9018.90, the product “Electronic blood

- 120 pressure monitor with wrist cuff, presented for retail sale with batteries, storage box and
121 manual” is classified at subheading 9018.90.