Importer of Record and Who Controls Your Customs Declaration

SourcingFrom

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The importer of record is the party customs holds responsible for an entry, and it controls the classification, the value, any preference claim, refunds and liability. This guide shows how that control slips to an Indian supplier or its courier, what changes by country, and four habits to take it back.

The Short Version

- Whoever is named on the entry decides your duty and receives your refunds, VAT credits and liability.
- Shipping on an Indian supplier's courier account often makes the courier the importer, with wrong codes and VAT charged at the door.
- A supplier offering to lower duty through the invoice is proposing fraud on your declaration.
- Buy on FOB or FCA once volumes justify a forwarder, and audit your first three entries line by line.

In July 2024 a UK seller of India-made clothing posted a question that sounds like an accounting niggle. Their supplier shipped by express courier, and "DHL then invoices me for VAT and Customs charges when the goods land in the UK" (r/smallbusinessuk, 2024). They were VAT registered. They expected to account for import VAT on their return and pay nothing at the door. One reply put the problem in a sentence - VAT shown on a courier's invoice "can rarely be recovered as import VAT", because the proper evidence is your postponed VAT statement or a C79, not a bill from DHL.



At heart that's a story about who made the customs declaration, not about VAT, and the answer was the courier, on terms the supplier picked, without the buyer's instructions. This page is about that one question, because in our forum research it's the same failure in the US, the UK, the UAE and the EU, with a different symptom in each.

We'll show what the importer of record controls, how control slips to the supplier or the courier, and how to take it back. One caveat up front - the legal labels differ by country, so treat this as the map and check the exact role with your customs broker.

1. What the Importer of Record Actually Controls

The importer of record is the party the customs authority holds responsible for the entry. In the US that's the literal term. In the UK and EU the declarant,

or the person a representative acts for, carries the same weight. Whatever the label, that party owns five things.

- **The classification.** Which tariff line the goods go in under, and so the duty.
- **The value.** What price is declared, and whether it's the true one.
- **The preference.** Whether an FTA rate is claimed, and on what proof.
- **The money back.** Refunds, drawbacks and recoverable VAT go to the party on the entry.
- **The liability.** If the declaration is wrong, the authority comes to that party first, sometimes years later.

So the importer of record is more than a box on a form. It's the party that decides your duty and gets your refunds. If that party isn't you, you've handed both to someone whose incentives aren't yours.

2. How Control Slips Away From Indian Shipments

We read hundreds of buyer and broker posts about shipping from India for our forum research. The single most repeated pattern was this - the buyer loses control wherever the supplier, or the supplier's courier, makes the declaration. Six versions came up.



The courier becomes the importer. A US seller found that on every Indian order "the importer of record is always listed as the courier themselves (Fedex/UPS) instead of my company", and so "THEY will be receiving the refunds instead of us" (r/ecommerce, May 2026). CBP confirms the mechanism. Only "the IOR or the licensed customs broker who filed the entries" can file for IEEPA refunds through CAPE (CBP, read 12 October 2026). That story is told in full in duty refunds.

The courier codes it wrong. The same US seller wrote that "HTS codes and duties are often incorrect", and a US distributor caught enough wrongly assessed tariffs to move off courier entries, a case we follow on HS codes. A courier clearing thousands of parcels a day isn't reading your product spec.

The courier ignores your VAT set-up. Our opening buyer wasn't alone. Another UK importer wrote "I'm registered for PVA and my EORI is listed on the shipments but I am still having to pay import VAT" (r/smallbusinessuk,

2025). The cash comes back eventually, if the evidence is right, but it's tied up meanwhile.

The value gets "helped". UK and US forwarders describe Indian shipments arriving "under declaring the value", so "we will always have to ask for an amended invoice for customs" (r/logistics, 2023), and parcels "massively undervalued, and indicated as being a personal shipment" (r/smallbusinessuk, 2023). Most suppliers who do this think they're doing you a favour. The declaration is still yours, and so is the penalty.

Delivered terms get priced out of reach. A Belgian buyer found the supplier's DAP and DDP prices "super expensive (way above reasonable price)", so the supplier proposed CIF to Antwerp (r/logistics, 2025). DDP from India means the supplier must be able to clear in your country, which most small Indian exporters can't. Either they price in a third party's margin or they push the clearance back to you, unprepared.

The goods stop at the port. One reply to a buyer weighing a delivered quote gave the tell - "the first clue that the other side isn't set up as a non-resident importer is if they can't arrange last mile delivery and can only get it to the port" (r/logistics, 2025).

Why does it keep happening? Because the supplier's courier rate is the bait. A US buyer reported that their own courier quotes were "double or triple the price that our Indian suppliers are getting" (r/ecommerce, May 2026). The cheaper shipping is real. So is what you give up for it.

3. Is the Supplier Being Shady?

Usually not. Indian exporters ship on their own courier accounts because they've negotiated volume rates, and they quote CIF or DDP because buyers ask for one number. A trader or a small workshop that hands goods to a logistics provider isn't hiding anything. It's simply not set up to clear

goods in Leeds or Ohio. The fix is a clear instruction from you, not suspicion of them.

The one real red flag is a supplier who offers to cut your duty through the invoice. A split between cash and invoice, a "gift" or "sample" label on commercial goods, or a lower value "for customs". That's fraud on your declaration, and the right answer is always the true price on the invoice.

4. What It Looks Like Country by Country

The principle travels. The mechanics don't. Here's what changes for our six reader markets. Confirm the details for your business with your customs broker before the first shipment.

United States. The importer of record files the entry, posts the bond and receives refunds. On courier shipments you can usually ask the courier to clear in your name with your own IOR number, or route goods to your own broker. With every Indian origin good paying the base rate plus the Section 301 10% in 2026, and refunds flowing on earlier duties, the party on the entry matters in real money. The rates are on India to the US.



United Kingdom. You need an EORI number, and a representative acting for you must be established in the UK (GOV.UK). The written instruction must say whether they act for you directly or indirectly, which changes who is liable. Give the courier your EORI and a postponed VAT instruction before the goods leave India, in writing. Details on India to the UK.

European Union. The same EORI and representative logic applies, and the 0% or GSP claim depends on the declarant using the right proof. A DDP quote from an Indian supplier into the EU means someone in the EU is clearing for them. Ask who, and what that costs, before you compare it with a FOB or FCA price. See India to the EU.

Australia and New Zealand. Your broker lodges the import declaration in your name, and the ECTA or NZ-India preference only applies if the right certificate is in their hands. A courier clearing in bulk often won't chase a certificate of origin, so the duty you'd have saved goes unclaimed. See India to Australia and India to New Zealand.

UAE. CEPA preference is checked after clearance, so whoever declared must be able to produce the certificate later. Courier parcels rarely carry one. See India to the UAE.

5. Taking Control Back

None of this needs a big operation. It needs four habits.

1. **Buy on FOB or FCA, not CIF or DDP,** once your volumes justify a forwarder. Then your forwarder books the freight and your broker clears it. Choosing a freight forwarder covers whether to use your own or the supplier's.
2. **If you stay on the supplier's courier,** send the courier, through the supplier, your import identifiers (EORI, IOR number or ABN), your VAT instruction and your own broker's details if you have one. Ask for the airway bill before dispatch and check the consignee and importer fields.
3. **Put the true value, the full tariff line and the preference you're claiming on the PO,** so the commercial invoice matches. Import duty explains why each one changes the number.
4. **Audit the first three entries line by line.** Classification, value, preference claimed, and who's named as importer. If any of it is wrong, it'll be wrong on every shipment after.

01 **One failure, four markets.** In our forum research, losing control of the customs entry to the supplier or its courier was the most repeated shipping problem with India, seen in US, UK, UAE and EU threads. Refunds lost, VAT tied up, values under-declared, DDP priced out of reach. *(SourcingFrom forum signals, Pattern 1, FS-SHP-017, 021, 034, 049, 066.)*

02 **The cheap rate is the bait.** US buyers report their own courier quotes at two to three times the rate their Indian supplier gets, which is why they hand over the declaration. *(r/ecommerce, 2026, FS-SHP-018.)*

03 **Refunds follow the entry, not the payer.** US IEEPA refunds through CAPE can be filed only by the importer of record or the broker that filed the entries. *(CBP, read 12 October 2026.)*

What we don't know yet

- ☐ How often courier-cleared Indian shipments carry the wrong tariff line or miss an FTA claim. Forums over-report disasters, and no broker publishes the rate. We're collecting it from SourcingSync shipment records (gap register GAP-031).

05 / Decide here

1. Decide who is importer of record before the first PO, and write it on the PO.
2. Check the importer and consignee fields on the airway bill or bill of lading before dispatch.
3. Audit the first three entries line by line.

Ready to act

Need hands-on help?

Keeping you as importer of record with your own forwarder and broker, briefing a supplier's courier properly, or checking entries line by line is execution. SourcingSync does it, and can act as the Indian side of the arrangement when your supplier can't.

Talk to SourcingSync ↗

Questions Buyers Ask

Can my Indian supplier be the importer of record in my country?

Some can, through a representative established in your country. Most small exporters can't, which is why their DDP prices run high. Ask who will clear the goods, by name, before you accept a delivered price.

The courier is cheaper. Do I have to give it up?

Who is liable if the supplier under-declares the value?

Do I need a customs broker?

6. Back to the DHL Invoice

Our UK clothing seller had done everything right on paper. They were VAT registered and knew what postponed accounting was. What they hadn't done was tell the party making the declaration. The courier was clearing on the supplier's account, so it charged the VAT up front and billed it, and the seller ended up holding an invoice that doesn't count as import VAT evidence.

The fix took one email before the next shipment, not a new supplier. That's the point of this page. Whoever makes the declaration controls your duty,

your refunds and your liability, so make sure it's someone working on your instructions.

Related guides: import duty, duty refunds, low-value imports, why FOB India quotes and invoices differ, DDP, FCA.