

# Commercial Customs Operations Advisory Committee (COAC) Government Issue Paper: Antidumping & Countervailing Duties

September 2018



U.S. Customs and  
Border Protection



OT/Trade Policy & Programs  
Antidumping and Countervailing Duties  
September 18, 2018

**Action Required:** Informational

**Background:**

- Antidumping and countervailing duty (AD/CVD) enforcement is a priority for U.S. Customs and Border Protection (CBP).
- CBP enforces over 462 AD/CVD orders on imported goods. CBP employs significant national assets from across the agency to target AD/CVD evasion, including import trade trend and valuation analysis, the use of targeted reviews and audits to address high-risk cases, lab testing, and special operations.
- The Commercial Customs Operations Advisory Committee (COAC) Trade Enforcement and Revenue Collection (TERC) subcommittee formed the AD/CVD working group to generate advice and develop recommendations specific to AD/CVD. The AD/CVD working group consists of COAC members and nonmembers providing diverse perspectives on AD/CVD issues. Members of the working group include importers, customs brokers, sureties, U.S. manufacturers, lawyers, as well as participants from the Department of Commerce and Immigration and Customs Enforcement, Homeland Security Investigations.
- CBP's partnerships enhance the enforcement of AD/CVD. CBP partners with domestic industries and partner government agencies, including U.S. Immigration and Customs Enforcement, Homeland Security Investigations (ICE HSI) and the U.S. Department of Commerce (Commerce), to enforce AD/CVD laws.
- CBP also strives to be as transparent as possible as disclosure laws allow, and regularly posts AD/CVD information on [CBP.gov](http://CBP.gov).

**Issue:**

- CBP is committed to enforcing AD/CVD laws, identifying and penalizing those who would try to evade those laws, and vigorously pursuing amounts owed to the United States.

**Current Status:**

- Based on a COAC recommendation, CBP reviewed the AD/CVD entry summary rejection policy with the AD/CVD Working Group extending the reject period for AD/CVD entries. After careful analysis, CBP issued CSMS # 18-000301 Modification of Timeframes to Reject Entry Summaries which extended the time period for rejecting AD/CVD entry summaries (with supervisory approval) from 90 days to 300 days.
- As recommended by COAC, the AD/CVD Division published an AD/CVD FAQ document on [CBP.gov](http://CBP.gov).
- CBP initiated discussions with the COAC AD/CVD Working Group on the accurate reporting of manufacturer identification codes (MIDs) on AD/CVD entries.
- CBP engaged the AD/CVD working group in discussions regarding recent Section 232 trade remedy notifications and questions/concerns.
- The AD/CVD Division recently published the 2018 summer edition of the AD/CVD newsletter, which is available on [CBP.gov](http://CBP.gov). This newsletter provides an additional avenue by which CBP can provide information to and engage with the trade community.
- The AD/CVD Division had an exhibit at the 2018 CBP Trade Symposium held on August 14-15, 2018, in Atlanta, Georgia. The exhibit allowed the AD/CVD Division to communicate CBP's role in AD/CVD enforcement, as well as to reinforce CBP's interaction with the trade community.

**Next Steps:**

- CBP will continue to engage with the AD/CVD working group to address any questions/concerns surrounding current and new trade remedies.

- CBP continues to partner with the AD/CVD Working Group to provide increased visibility for the trade on the steel seminars taught by the U.S. steel industry at CBP ports of entry. The last seminar took place on September 11-13 in Portland, Oregon.

Date: September 18, 2018