

Commercial Customs Operations Advisory Committee (COAC)

Secure Trade Lanes subcommittee Draft In-Bond Recommendations

August 2019



**COAC SECURE TRADE LANES SUBCOMMITTEE IN-BOND
RECOMMENDATIONS - AUGUST 2019**

1. COAC recommends that CBP provide all necessary functionality to allow effective automation functionality across all modes and between import and export cargo movements within the automated manifest systems – especially leveraging the planned truck refactoring and the automation of ocean export manifest processes
2. COAC recommends all automated manifests systems, and associated CBP policy, should be significantly enhanced to allow a carrier to “take possession” of an in-bond shipment, where the initial in-bond was applied in another mode automated system, within the secondary mode system and confirm the appropriate arrival / export within the assuming mode manifest system. This will eliminate the need for multiple subsequent in-bond filing.
3. COAC recommends that CBP develop written guidelines for electronically reporting the diversion of in-bond cargo – including the handling of entry filings in shipments that have been diverted
4. COAC recommends, due to the impacts of non-automated facilities within the in-bond supply chain, that CBP require all facilities that handle in-bond cargo to automate to the extent necessary to allow the seamless passing of cargo and closure of in-bonds at the respective facilities.
5. COAC recommends that CBP provide specific functionality be programmed across ACE modules to facilitate the movement and disposition of cargo that has CBP / PGA refusal / disaster recovery requirements, to allow the extension of the 30 day clock and / or the provision of a status / reason code for the post 30 day status, to facilitate effective handling of cargo that is refused entry or is impacted by an impediment to effective movement to final in-bond location.
6. COAC recommends that CBP provide an automated solution to accommodate the required notations for zone restricted cargo to facilitate CBP enforcement of the FTZ Board or TTB required export or destruction of ZR merchandise.
7. COAC recommends that CBP make available information on in-bond events regardless of mode (in-bound and export) related to FTZ and warehouse operations that provides details of events, transfers of liability, responsible parties and status. Information regarding and the ability to update transaction events to be available both through the ACE portal and an EDI solution.

8. COAC recommends that CBP allow benefits for expedited clearance for in-bond participants using FAST lanes at border facilities to expedite border transit
9. COAC recommends – due to the complexity and supply change process needed for effective implementation of the proposed in-bond regulations, - that CBP allow 2 narrow categories of air shipments be exempted from the current intended IB-FR requirements for electronic arrival / export:
 - i. Cargo originating in the US from either bonded warehouses or FTZ's and are subsequently exported by air, and
 - ii. Cargo arriving in the US on a mode of transport other than air and are subsequently transferred to air for exportation from the US or movement to a US port of entry
10. COAC recommends that CBP provide the bonded carrier (not only the QP Filer) with visibility of any in-bond HOLD, prior to the report of arrival at the destination port. Since carriers are no longer required to physically report to the port office, visibility is required for the real time routing of goods when an exam is requested by the port of destination after normal business hours.