



## **COAC Public Meeting**

**December 04, 2019 – Washington, DC**

### **SECURE TRADE LANES SUBCOMMITTEE**

#### **Export Modernization Working Group (EMWG)**

##### **010392**

1. COAC Recommends that as the export manifest processing environment moves forward from a paper to a paperless (electronic) environment, CBP collaborate with stakeholders and ensure that all critical control points are functional through testing of the data, assess the impact of the changes to process, as well as work with the Trade on how the regulations can be developed and changed.

##### **010393**

2. COAC Recommends that while developing the electronic export manifest system, the regulatory changes and associated policy guidelines produced are clear and concise for the regulators, trade users, and enforcement bodies to understand prior to going live.

##### **010394**

3. COAC Recommends that the data elements be mapped for Electronic Export Information (EEI) and Manifest filing to define the owners of the data, those who are responsible for the data, and those who may be doing the filing. The mapping should include defining which government agency requires each of the data elements which will demonstrate who is using the data provided as well as significance. By doing so, consider eliminating redundant and/or unnecessary data requirements and soliciting data only from the most accurate source of the data to achieve more accurate filings in accordance with Section 343 of the Trade Act of 2002.

#### **010395**

4. COAC Recommends that CBP work with Census to revise the Foreign Trade Regulations (15 CFR Part 30) and to align CBP's enforcement policy and mitigation guidelines to consider the unintended consequences of the current enforcement environment regarding Electronic Export Information (EEI) and manifest data that often hinders the collection of accurate data. By doing so, promote accurate data reporting, effectively manage risk in the EEI and manifest transaction, and ensure uniformity among US ports of export.

### **NEXT GENERATION FACILITATION SUBCOMMITTEE**

#### **1USG Working Group**

#### **Short term recommendation (Evaluative Proof of Concept)**

#### **010396**

1. COAC Recommends that in order to more fully realize the benefits of the Global Business Identifier (GBI) initiative, CBP work with the agencies within the Border Interagency Executive Council (BIEC) to identify and assess any other entity identifiers currently in use and pursue alignment on the use of the GBI exclusively wherever feasible.

#### **010397**

2. COAC Recommends that to allow for reasonable estimation of cost and requirements to participate, CBP should provide that final Evaluative Proof of Concept (EPoC ) requirements relating to data and electronic transmission for pilot participation are identified and communicated as clearly and early as possible, once funds for the EPoC are secured by CBP.

#### **010398**

3. COAC Recommends that CBP work with the COAC 1USG Working Group in the design of the Pilot program management (including lifespan of pilot, ramp up period, minimum number of participants, rules for participating in the pilot, options and windows to expand the list of products included under the pilot, etc.)

#### **010399**

4. COAC Recommends that Evaluative Proof of Concept (EPoC) participants be able to obtain the needed entity identifier(s) from applicable entity identifier management companies at no or significantly reduced cost.

**010400**

5. COAC Recommends that In designing the EPoC, CBP should push for submission of all three identifiers but permit the use of two of the three to help with participant recruitment efforts.

**010401**

6. COAC Recommends that Data utilized under the GBI program be independent of ownership or contract concerns that could result in the elimination or purging of data from systems within the government or trade.

**010402**

7. COAC Recommends that The currently proposed two-phased launch of EPoC be combined into a single phase with cargo release and entry summary filing under the EPoC to launch concurrently as this would enable transaction processing to occur in one or two steps as needed within the EPoC

**010403**

8. COAC Recommends that CBP broaden the scope of the EPoC to include Mexico as a country of origin in addition to China, Canada, New Zealand, Vietnam and Singapore.

**010404**

9. COAC Recommends that CBP consider expanding the EPoC to include all the data sets required for a transaction from security filing through entry summary.

**010405**

10. COAC Recommends that CBP provide legal entities with access to reporting of their GBI to enable detection of unauthorized use. In addition, importers of record should have visibility to GBI entities associated with their transactions.

**010406**

11. COAC Recommends that EPoC participants not be penalized for lack of timeliness or completeness of data sets submitted for transactions within the pilot.

**010407**

12. COAC Recommends that BIEC develop a policy that the shipments of CTPAT importers who submit all required GBI data for entities in their supply chains receive fewer inspections from CBP and Partnering Government Agencies (PGAs).

#### **010408**

13. COAC Recommends that throughout the pilot, CBP should review the entire operational process to ensure that there is no significant negative impact to trade facilitation resulting from this process and data submission change.

### **Longer term recommendations (Post Evaluative Proof of Concept)**

#### **010409**

14. COAC Recommends that in order to more fully realize the benefits of the GBI initiative in an international context, CBP explore aligning the GBI bi-laterally, regionally and with work underway at the World Customs Organization (WCO) to enable and facilitate broader adoption.

#### **010410**

15. COAC Recommends that CBP, in light of proprietary concerns, evaluate the degree of information access afforded to private-sector parties other than the importer of record.

#### **010411**

16. COAC Recommends that CBP explore the effective use of GBI related to screening entities of concern (e.g. Restricted Party Screening, Import Alerts etc.). The exploration should approach both:

- Pro-active screening by the Government and/or entity identifier management companies as part of the issuance and maintenance process to assist in mitigating the ongoing screening requirements on the trade.
- Agency utilization of the GBI in publication of entities of concern to enable more effective identification of those parties within the applicable supply chain.

#### **010412**

17. COAC Recommends that CBP leverage GBI and the accompanying data to reduce redundant data elements currently required at various points of the importation process. The effort to reduce redundant data elements should apply to both CBP-required and PGA-required elements.