

**Commercial Customs Operations Advisory
Committee (COAC)
Secure Trade Lanes Subcommittee
Export Modernization Working Group
Proposed Recommendations**

December 2019

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

**COAC Secure Trade Lanes Subcommittee
Export Mod Working Group**

Proposed Recommendations

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 where necessary.
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.
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.
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.