



COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

COAC Public Meeting

October 7, 2020 – Virtual

INTELLIGENT ENFORCEMENT SUBCOMMITTEE

Forced Labor Working Group Recommendations

010502

COAC recommends that CBP implement the core concepts outlined in the Forced Labor Working Group E-Allegations Background Paper related to enhancing system capability and intuitiveness of the e-allegations portal.

Webpage: <https://eallegations.cbp.gov/Home/Index2>

FLWG Background Paper:

<https://www.cbp.gov/sites/default/files/assets/documents/2020-Oct/IE%20Forced%20Labor%20Working%20Group%20E%20Allegations%20Background.pdf>

010503

COAC recommends that CBP increase collaboration with civil society and other U.S. government agencies (e.g. DOL, ICE, etc.) to encourage the use of the e-allegation portal as a primary tool for submitting forced labor allegations and develop an awareness campaign (webinars, trade symposiums, international conferences, fact sheets, etc.) to increase awareness and adoption of the e-allegations portal for suspected forced labor violations.

010504

COAC recommends that CBP increase transparency on the process for receiving, investigating, processing, and closing forced labor allegations, including estimated timelines, notification and engagement of progress to the reporting party. Additionally, COAC recommends that CBP develop and publish how the entire e-allegations process works for handling petitions submitted to CBP regarding forced labor allegation submissions, etc., in line with the mandates for the USMCA Forced Labor Task Force established.

010505

COAC recommends that CBP share up to date and recurring metrics about Forced Labor allegations submitted through the e-portal and other mechanisms. Current metrics published are very general and outdated. Furthermore, they do not provide any meaningful information (e.g. per CBP's Forced Labor webpage 'as of 2019 there have been 8 Forced Labor violation allegations submitted through the e-portal'). COAC recommends that CBP identify the statistics that can be shared to the public while complying with confidentiality laws.

SECURE TRADE LANES SUBCOMMITTEE

Export Modernization Working Group Recommendations

010506

COAC recommends that CBP work with Census and others to define a clerical error versus a material error for both EEI and manifest filing and issue appropriate guidance to CBP Personnel. When unintentional clerical errors are present, CBP should contact the filer for correction in lieu of issuing a penalty.

010507

COAC recommends that CBP in cooperation with Census and others, develop and conduct mandatory training on export enforcement for CBP personnel consistent with recommendation 10098, originally presented July 2016.

In-Bond Working Group – Recommendations

010508

COAC recommends that CBP update the In-bond regulations to eliminate the unnecessary closure of active bonds and filing of subsequent in-bonds. Instead, a single in-bond should be able to be transferred among bonded parties, with liability for the in-bond shipment moving along with the physical transfers.

010509

COAC recommends that CBP reprogram ACE to allow for the posting of CBP hold and release messages related to in-bonds against the house bill level, and the further the ability to query ACE notifications at the house bill level.

Updated: 10/07/2020 - MKS