Global Business Identifier (GBI) Initiative
CBP 2021 Virtual Trade Week Briefing

July 22, 2021
The 21st Century Customs Environment

Customs Environment in Fiscal Year 2020

- Processed 32.8 million import entries
- Received more than 28.5 million cargo containers at 328 U.S. ports of entry
- Seized $1.3 billion worth of product with intellectual property rights violations.
- Over 365,000 active Importers of Record and 16,500 Customs Brokers
- 148 million de minimis value shipments via air cargo and 94 million de minimis value shipments via truck environment.

Customs Challenges

- The sheer volume of shipments that are imported into the U.S. leads to risk management challenges.
- CBP requires filers to submit a Manufacturer/Shipper Identification Number (MID) for all imports.
- However, the MID lacks the data quality, data richness, and uniqueness required to provide the U.S. Government with accurate supply chain insights.
- The GBI Initiative was formed as a result of the extensive pain points associated with the MID.
What is the Global Business Identifier (GBI) Initiative?

- The GBI Initiative is an interagency trade transformation project that aims to develop a single identifier solution that will:
  - Improve the U.S. Government’s (USG) ability to effectively identify high-risk shipments and facilitate legitimate trade
  - Create a “common language” between the USG and Trade
  - Improve data quality and efficiency for identification, enforcement, and risk assessments

- Rather than develop an internal identifier, CBP will leverage existing global identifiers for the GBI solution which ideally will uniquely identify:
  - Main Legal Entity and Ownership
  - Specific Business and Global Locations
  - Supply Chain Roles and Functions
What are the current entity identifiers being considered?

The current proposed GBI solution includes **three globally used identifiers** that are each managed by external entities.

<table>
<thead>
<tr>
<th>Entity Identifier Name</th>
<th>Entity Identifier Owner</th>
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<tbody>
<tr>
<td><strong>Legal Entity Identifier (LEI)</strong></td>
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<tr>
<td>20-digit, alphanumeric identifier with underlying reference data elements unique to a legal entity. Over 1.7 million LEIs issued worldwide</td>
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<tr>
<td><strong>Data Universal Numbering System (DUNS)</strong></td>
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<tr>
<td>9-digit numeric and non-indicative identifier that identifies unique business establishments with library of over 200 reference data elements. Over 300 million DUNS issued worldwide</td>
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<tr>
<td><strong>Global Location Number (GLN)</strong></td>
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<tr>
<td>13-digit numeric identifier with varying sets of underlying reference data elements that are customizable to location, function, and operations. Over 2 million companies utilize GS1 Standards</td>
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What are the **core GBI competencies**?

The GBI solution must meet all eight core competencies to meet the **USG data needs**

<table>
<thead>
<tr>
<th>GBI Core Competencies</th>
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<tbody>
<tr>
<td>Globally Unique</td>
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<tr>
<td>Separate Legal Entities</td>
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<tr>
<td>Location &amp; Function Specific</td>
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<tr>
<td>Tracks Supply Chain Roles</td>
</tr>
<tr>
<td>Managed for Accuracy</td>
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<tr>
<td>Oversight &amp; Governance</td>
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<tr>
<td>Data Sharing</td>
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<tr>
<td>Internationally Recognized</td>
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</tbody>
</table>

The three identifiers will be tested on these core competencies
What is the **GBI Evaluative Proof of Concept (EPoC)**?

The interagency GBI Working Group, under the Border Interagency Executive Council (BIEC), has developed an **Evaluative Proof of Concept (EPoC)** that will test the proposed solution and identify the **optimal combination of entity identifiers** to best meet USG needs.

In its current proposed design, the GBI EPoC will:

- Operate within the **USG’s Single Window** platform
- Include **all three entity identifiers** under consideration
- Require volunteer trade participants to submit **all three identifiers (LEI, GLN, DUNS)** for the manufacturer/producer, seller, and shipper via the **CBP Automated Broker Interface (ABI)**
  - Distributer, exporter, and packager will be optional

GBI EPoC implementation will begin at **Cargo Release and Targeting** and is expected to launch in **Spring of 2022**.
What is the **scope of the GBI EPoC?**

To ensure a fully comprehensive GBI EPoC that accurately reflects current trade operations, the EPoC will encompass **ten countries of origin** and **six product categories** – each representing high-risk areas, partner countries, and covering a diversity of USG jurisdictions.

**Border Five Countries**
- Australia
- Canada
- New Zealand
- United Kingdom

**Other Countries of Interest**
- China
- France
- Mexico
- Vietnam
- Italy
- Singapore

**Product Categories**
- Alcohol
- Medical Devices
- Personal Items
- Seafood
- Toys
- U.S. Goods Returned*

**A list of Harmonized Tariff Schedule (HTS) codes have been identified**
What are the anticipated GBI benefits?

- Who is Who clarity
- Improved data quality
- Globally unique and adheres to international standards
- Ownership and affiliation insights
- Stronger targeting and risk assessments
- Better identification of increasingly complex supply chain networks
- More robust than the World Customs Organization (WCO) Trader Identification Number (TIN)

- Provides the opportunity to test and give feedback on the GBI design and scope
- Provides entities with a global and digital identity
- Empowers trade to manage and validate their data
- Globally unique and adheres to international standards
- Further streamline import data collection
- Broad sector coverage
- Utilization of identifiers that trade participants already possess
- Facilitation benefits for participation
- Potential increased protection from counterfeiting
### Which entity identification systems might be impacted by the GBI?

The U.S. Government uses more than 50 distinct entity identification systems*. CBP identified the following **twenty-five (25) entity identification systems** that may be impacted and streamlined by the GBI, based on common data attributes collected:

<table>
<thead>
<tr>
<th>System</th>
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<tbody>
<tr>
<td>499 Filer ID</td>
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<tr>
<td>BEA Foreign Direct Investment Identification Number</td>
</tr>
<tr>
<td>Central Index Key (CIK)</td>
</tr>
<tr>
<td>Commercial and Government Entity (CAGE)</td>
</tr>
<tr>
<td>Company Identifier (CID)</td>
</tr>
<tr>
<td>CUSO Registry Number</td>
</tr>
<tr>
<td>Data Universal Numbering Systems (DUNS) Number</td>
</tr>
<tr>
<td>Employer Identification Number (EIN)</td>
</tr>
<tr>
<td>FCC Registration Number (FRN)</td>
</tr>
<tr>
<td>FDA Establishment Identifier (Facility FEI)</td>
</tr>
<tr>
<td>Federal Deposit Insurance Corporation (FDIC) Certificate Number</td>
</tr>
<tr>
<td>Foreign Entity ID</td>
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<table>
<thead>
<tr>
<th>System</th>
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<tbody>
<tr>
<td>GS1 Company Prefix (GCP)</td>
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<tr>
<td>Home Mortgage Disclosure Act (HMDA) Respondent ID</td>
</tr>
<tr>
<td>International Air Transport Association (IATA) Code</td>
</tr>
<tr>
<td>International Fisheries Trade Permit (IFPT) Number</td>
</tr>
<tr>
<td>Large Trader Identification (LTID) Number</td>
</tr>
<tr>
<td>Legal Entity Identifier (LEI)</td>
</tr>
<tr>
<td>Manufacturer/Shipper Identification Code (MID)</td>
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<tr>
<td>National Drug Code (NDC) Labeler Code</td>
</tr>
<tr>
<td>National Provider Identifier (NPI)</td>
</tr>
<tr>
<td>Registered Identification Number (RN)</td>
</tr>
<tr>
<td>Regulated Persons Index (RPI)</td>
</tr>
<tr>
<td>Replication Server System Database (RSSD ID)</td>
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<tr>
<td>Standard Carrier Alpha Code (SCAC)</td>
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*The full list of entity identification systems can be found in “Envisioning Comprehensive Entity Identification for the U.S. Federal Government” published by Data Foundation and GLEIF in 2018
What are some existing **USG initiatives that synergize with the GBI?**

**Importer of Record (IoR)**

**Blockchain**

**E-commerce**

**21st Century Customs Framework (21CCF)**

**Commercial Customs Operations Advisory Committee (COAC)**
What international engagement has CBP done?

World Customs Organization (WCO)

- CBP continues to engage with the WCO on the GBI initiative
  - On October 1, 2020, in partnership with GLEIF, CBP provided a GBI overview to the WCO SAFE Working Group
  - Members of the WCO Safe Working Group expressed support to further explore the integration of the TIN and LEI, as this has the potential to enhance efficiency

Border Five

- In July 2020, the Border Five Heads stood up the GBI / Trader Identification Number (GBI/TIN) Expert Correspondence Group (ECG) to identify solutions and contemporary innovations to assist in the enhanced identification of trade entities in the global supply chain
  - Members include Australia, Canada, New Zealand, the United Kingdom, and the United States
How can **trade industry** participate in the GBI EPoC?

### How to Participate in the GBI EPoC

**Federal Register Notice**
- Respond to a Federal Register Notice (FRN) that will likely be published in the Winter of 2022

**Obtain the Identifiers**
- Obtain all three identifiers (LEI, DUNS, GLN)

**Cargo Release / Entry Submission Process**
- Through a customs broker or as a self-filer, submit all three identifiers for the supply chain roles at Cargo Release / Entry via the CBP ABI

Participants will be given *ample time to respond to the FRN and obtain the three identifiers* prior to the launch of the GBI EPoC

### Volunteer Criteria

**Who Can Participate**
- Trade members who conduct business in a country of origin and import a product associated with the scope
- Companies of all sizes

**EPoC Support**
- CBP is working with the identifier companies to potentially offer the identifiers at a reduced price to EPoC participants
- The identifier companies will provide a point of contact to answer Trade participants’ inquiries

CBP welcomes suggestions on *speaking / briefing engagements* to provide a GBI overview to interested Trade members
Contact Information For Additional Information

U.S. Customs Border Protection, Office of Trade
Washington, D.C.

globalbusinessidentifierin@cbp.dhs.gov